USDA Community Eligibility Provision Characteristics Study

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TABLE OF CONTENTS

Acknowledgments i
List of Tables iv
List of Figures vii
Appendix Tables viii
Appendix Figures xi
List of Acronyms and Abbreviations xii
Executive Summary 1
Impact Study Results 5
1 Introduction 7
1.1 Program Background 8
1.2 Study Objectives 11
1.3 Scope of Report 11
2 Study Design, Sampling, and Data 13
2.1 Characteristics of Eligible, Participating, and Non-Participating LEAs and Schools 13
2.2 Implementation Study 14
2.3 Impact Study 16
2.4 Summary 20
3 Characteristics of Participating and Non-Participating LEAs and Schools 21
3.1 CEP Eligibility and Participation 21
3.2 Characteristics of LEAs 25
3.3 Summary 33
4 Perspectives on CEP Implementation—State-Level Implementation 35
4.1 State Implementation Outcomes 35
4.2 Summary 38
5 Perspectives on CEP Implementation—LEA-Level Implementation 39
5.1 Decision Making and Communications 39
5.2 Benefits and Barriers to Participation in CEP Reported by Participating LEAs 42
5.3 Perceived Barriers and Benefits to Participation in CEP reported by Non-Participating LEAs 45
5.4 Summary 48
6 Impact Study 50
6.1 Expectation about CEP Impacts on Meal Program Participation, Revenues, SBP Service, and Other Outcomes 50
6.2 Outcome Measures 53
6.3 Impact of CEP on Participation in School Meal Programs 54
6.4 Impact of CEP on School Attendance as Perceived by LEA Food Service Directors 64
6.5 Impact of CEP on School Food Service Revenues 65
6.6 Impact of CEP on SBP 73
6.7 Impact of CEP on Meal Costs, Quality, and Variety as Perceived by LEA Food Service Directors 74
6.8 Summary 75

7 Conclusions 77
7.1 Implementation Study Conclusions 77
7.2 Impact Study Conclusions 77
Appendix A. Chapter 3 Additional Tables 1
Appendix B. Chapter 4 Additional Tables 1
Appendix C. Chapter 5 Additional Tables 1
Appendix D. Chapter 6 Additional Tables 1
Appendix E. State Agency Child Nutrition Director Survey 1
Appendix F. Participating LEA Survey 1
Appendix G. Non-Participating LEA Survey 1
Appendix H. Technical Appendix 1

LIST OF TABLES

1. Introduction

Table 1-1 | Reimbursement Rates to SFA for Meals Served in NSLP and SBP, SY 2016–17 8

2. Study Design, Sampling, and Data

Table 2-1 | *AnalysisFile* Data Sources by School Year 14

Table 2-2 | Counts of Participating and Eligible Non-Participating LEAs in Selected States as of SY 2016–17 20

3. Characteristics of Participating and Non-Participating LEAs and Schools

Table 3-1 | National-Level LEA Eligibility and Participation in CEP, by School Year 21

Table 3-2 | National-Level School Eligibility and Participation Rate in CEP, by School Year 23

Table 3-3 | Student Enrollment by School Year 24

Table 3-4 | Percentage of Participating LEAs, by CEP Election Level 24

Table 3-5 | Frequency (Percentage) of LEAs Participating in NSLP/SBP, Eligible for CEP, and Participating in CEP by LEA Characteristic, SY 2016–17 27

Table 3-6 | Participation Rates for LEA-Wide Eligible LEAs by ISP, SY 2016–17 30

Table 3-7 | Participation Rates of LEAs, by LEA Characteristics 31

Table 3-8 | LEA (School) Transitions in CEP Participation 32

Table 3-9 | Frequency (%) of Schools Participating in NSLP/SBP, Eligible for CEP, and Participating in CEP by School Type, SY 2016–17 33

Table 3-10 | Participation Rates for Eligible Schools by School ISP, SY 2016–17 33

4. Perspectives on CEP Implementation—State-Level Implementation

Table 4-1| Difficulty of Allocating Education Benefits Due to Discontinued Collection of F/RP Applications 36

Table 4-2 | Reported Barriers to Meeting Reporting Deadline 37

Table 4-3 | Changes to State Data Systems 37

Table 4-4 | Changes to Financial Payment Systems 38

5. Perspectives on CEP Implementation—LEA-Level Implementation

Table 5-1 | Direct Certification and Other Source Categorical Eligibility Data Used by Participating LEAs to Calculate ISP Values 41

Table 5-2 | Percentage of Participating LEAs that Recalculate their LEA-Wide ISP Prior to the End of the 4-Year Cycle 42

Table 5-3 | Reported Benefits of CEP Participation 43

Table 5-4 | Reported Challenges with CEP Implementation 44

Table 5-5 | Perceived Impact of CEP on Administrative Burden, Among LEAs that Reported Reduced Burden due to CEP 45

Table 5-6 | Perceived Impact of CEP on Food Service Activity Costs 45

Table 5-7 | Factors that Determined Non-Participating LEAs' Decision to Not Participate in CEP 46

Table 5-8 | Non-Participating LEAs' Perceived Barriers to CEP Participation 47

Table 5-9 | Non-Participating LEAs' Expected Benefits of CEP Participation 48

6. Impact Study

Table 6-1 | Impact of CEP on NSLP Participation Rates in the First Year of LEA Implementation 55

Table 6-2 | Impact of CEP on SBP Participation Rates in the First Year of LEA Implementation 55

Table 6-3 | Sustainability of CEP Impacts on the NSLP Participation Rate 57

Table 6-4 | Sustainability of CEP Impacts on the SBP Participation Rate 58

Table 6-5 | Perceived Changes in ADP for NSLP 59

Table 6-6 | Perceived Changes in ADP for SBP 59

Table 6-7 | Primary Factors for the Increase in ADP for NSLP 61

Table 6-8 | Primary Factors for the Increase in ADP for SBP 62

Table 6-9 | Primary Factors for the Perceived Decrease in ADP for NSLP 63

Table 6-10 | Primary Factors for the Decrease in ADP for SBP 64

Table 6-11 | Perceived Changes in ADA 65

Table 6-12 | Perceived Effect of CEP on Changes in ADA 65

Table 6-13 | Impact of CEP on Total Daily NSLP and SBP Federal Reimbursements per Student Enrolled in the First Year of LEA Implementation 66

Table 6-14 | Impact of CEP on Average Federal Reimbursements per NSLP Lunch in the First Year of LEA Implementation 67

Table 6-15 | Impact of CEP on Average Federal Reimbursements per SBP Breakfast in the First Year of LEA Implementation 67

Table 6-16 | Perceived Changes in Total Revenues from Non-Federal Sources 68

Table 6-17 | Primary Factors for the Increase in Total Revenues from Sources Other than Federal Reimbursements..... 69

Table 6-18 | Primary Factors for the Decrease in Total Revenues from Sources Other than Federal Reimbursements..... 70

Table 6-19 | Perceived Changes in the Ability of Food Service Accounts to Break Even..... 71

Table 6-20 | Primary Factors that Made It Easier for LEA Food Service Accounts to Break Even..... 72

Table 6-21 | Primary Factors that Made It Harder for LEA Food Service Accounts to Break Even 73

Table 6-22 | Participation in SBP Prior to CEP Implementation..... 74

Table 6-23 | Perceived Effects of CEP on Food and Labor Costs 75

Table 6-24 | Perceived Effects of CEP on Food Quality and Variety..... 75

LIST OF FIGURES

Executive Summary

Figure ES-1 | Criteria for LEAs/Schools to Implement CEP 2

Figure ES-2 | CEP Participation Rates (Among Eligible LEAs and Schools), SY 2016–17 3

Figure ES-3 | LEA Eligibility and Participation in CEP, SY 2016–17 4

Figure ES-4 | Summary of Findings from the Implementation Study 5

Figure ES-5 | Summary of Findings from the Impact Study 6

2. Study Design, Sampling, and Data

Figure 2-1 | Impact Study Design 17

3. Characteristics of Participating and Non-Participating LEAs and Schools

Figure 3-1 | Percentage of Eligible LEAs Participating in CEP by State, SY 2016–17 22

Figure 3-2 | Percentage of Eligible Schools Participating in CEP by State, SY 2016–17 23

Figure 3-3 | CEP Participation Rates by Characteristic, SY 2016–17 29

APPENDIX TABLES

Appendix A. Chapter 3 Additional Tables

Table A-1 | CEP Eligibility and Participation by State, as of SY 2016–17 ..... A1
Table A-2 | CEP Eligibility and Participation by State, as of SY 2015–16 ..... A3
Table A-3 | CEP Eligibility and Participation by State, as of SY 2014–15 ..... A5
Table A-4 | Distribution of Eligible LEAs by LEA Characteristics (Percentage) A7
Table A-5 | Distribution of Participating LEAs over LEA Characteristics A8
Table A-6 | Marginal Effects of Changes in Characteristics on the LEA Participation Rate, SY 2016–17 A9

Appendix B. Chapter 4 Additional Tables

Table B-1 | SA Challenges Due to CEP Implementation B1
Table B-2 | Questions from LEAs Regarding CEP and Agency Resources Used by SAs to Respond B2
Table B-3 | ISP Verification Methods B3

Appendix C. Chapter 5 Additional Tables

Table C-1 | Participating LEAs' Awareness about the CEP Resource Center C1
Table C-2 | Resources Used Among Participating LEAs that Used the CEP Resource Center C1
Table C-3 | Participating LEAs Reporting the Importance and Usefulness of the CEP Resource Center C2
Table C-4 | Partially Participating LEAs' Reasons Not to Operate CEP in All Schools C2
Table C-5 | Changes Made to Meal Service Due to CEP Participation C3
Table C-6 | Adequacy of Lead Time to Prepare for Implementation of CEP C3
Table C-7 | Participating LEAs that Continue to Collect Household Income Data C4
Table C-8 | Other Uses for Meal Eligibility Data Among Non-Participating LEAs C5
Table C-9 | Non-Participating LEAs Reporting Changes that Would Make CEP More Appealing C6
Table C-10 | Likelihood of LEA to Participate in CEP Next Year C6
Table C-11 | Reasons CEP Was Implemented This Year (SY 2016–17) in Schools Eligible but Non-Participating Last Year (SY 2015–16) C6

Appendix D. Chapter 6 Additional Tables

Table D-1 | Perceived Effects of CEP on NSLP Participation Rate in the First Year of Implementation—Regression Parameter Estimates D1

Table D-2 | Impact of CEP on SBP Participation Rate in the First Year of Implementation—Regression Parameter Estimates D2

Table D-3 | Sustainability of CEP Impacts on the NSLP Participation Rate—Regression Parameter Estimates D3

Table D-4 | Sustainability of CEP Impacts on the SBP Participation Rate—Regression Parameter Estimates D4

Table D-5 | School Type with Greatest Perceived Changes in ADP Rates in NSLP D5

Table D-6 | School Type with Greatest Perceived Changes in ADP Rates in SBP D6

Table D-7 | School Type with Greatest Perceived Changes in ADA D7

Table D-8 | Impact of CEP on Total Daily NSLP and SBP Federal Reimbursements per Student Enrolled in the First Year of Implementation—Regression Parameter Estimates D8

Table D-9 | Impact of CEP on Total Federal Reimbursements per NSLP Lunch in the First Year of Implementation—Regression Parameter Estimates D9

Table D-10 | Impact of CEP on Total Federal Reimbursements per SBP Breakfast in the First Year of Implementation—Regression Parameter Estimates D10

Table D-11 | Perceived Effects of CEP on Labor Costs D11

Table D-12 | Perceived Effects of CEP on Food Costs D11

Table D-13 | Perceived Effects of CEP on Wages D12

Table D-14 | Perceived Effects of CEP on Food Quality D12

Table D-15 | Perceived Effects of CEP on Food Variety D13

Appendix H. Technical Appendix Tables

Table H-1 | Distribution of Participating LEAs into Four Strata H5

Table H-2 | Distribution of Non-Participating LEAs into Strata H5

Table H-3 | Distribution of the CEP Universe vs. Participating Sample, by LEA Size (Number of Students) H6

Table H-4 | Distribution of the CEP Universe vs. Participating Sample, by LEA Size (Number of Schools) H6

Table H-5 | Distribution of the CEP Universe vs. Participating Sample, by School Type H6

Table H-6 | Distribution of the CEP Universe vs. Participating Sample by FNS Region H7

Table H-7 | Distribution of the CEP Universe vs. Non-Participating Sample, by LEA Size (Number of Students) H7

Table H-8 | Distribution of the CEP Universe vs. Non-Participating Sample, by LEA Size (Number of Schools) H7

Table H-9 | Distribution of the CEP Universe vs. Non-Participating Sample, by School Type H8

Table H-10 | Distribution of the CEP Universe vs. Non-Participating Sample, by FNS Region H8

Table H-11 | Key Questions from the LEA Participating Survey Used to Determine the Validity of Responses H10

Table H-12 | Key Questions from the LEA Non-Participating Survey Used to Determine the Validity of Responses H11

Table H-13 | Calculation of Response Rate H12

Table H-14 | Unweighted Sample Distributions for Valid and Invalid Responses H13

Table H-15 | Distribution of Population of Eligible LEAs by Strata H14

Table H-16 | Population[a] and Weighted Sample Distributions for Valid Responses H14

Table H-17 | Number of LEAs in Matched Analytic Sample H18

Table H-18 | Counts of Charter School LEAs H22

Table H-19 | Counts of Eligible LEAs in PSM Sample and Matched Treatment LEAs H25

Table H-20 | Baseline Equivalence Tests Between Matched Treatment and Comparison LEAs H26

Table H-21 | Baseline Equivalence Tests Between Included and Excluded Treatment LEAs H28

Table H-22 | Distribution of the Number of Pre-CEP Years among Treatment LEAs in Final Sample .. H30

Table H-23 | Distribution of the Number of Post-CEP Years among Treatment LEAs in Final Sample. H31

APPENDIX FIGURES

Appendix H. Technical Appendix

Figure H-1 | Baseline NSLP and SBP Participation Rates of Treatment and Comparison LEAs..... H27

LIST OF ACRONYMS AND ABBREVIATIONS

ADA	Average Daily Attendance
ADP	Average Daily Participation
AR	Administrative Review
CBPP	Center on Budget and Policy Priorities
CCD	Common Core of Data
CEP	Community Eligibility Provision
CN	Child Nutrition
DD	Difference-in-differences
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
F/RP	Free and Reduced Price
FSMC	Food Service Management Company
ISP	Identified Student Percentage
LEA	Local Education Agency
NCES	National Center for Education Statistics
NSLA	National School Lunch Act
NSLP	National School Lunch Program
PSM	Propensity Score Matching
PSS	Private School Survey
RCCI	Residential Child Care Institution
SA	State Agency
SBP	School Breakfast Program
SFA	School Food Authority
SNAP	Supplemental Nutrition Assistance Program
SY	School Year
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture
VCR	Verification Collection Report

EXECUTIVE SUMMARY

The Community Eligibility Provision (CEP) is a school meal service option for local education agencies (LEAs) and schools in low-income areas. CEP allows eligible LEAs and schools to offer breakfast and lunch through the School Breakfast Program (SBP) and the National School Lunch Program (NSLP) at no cost to the student without the need for families to submit a household application.[1] CEP has many benefits, including reducing paperwork and administrative errors for LEAs and schools and increasing children's access to nutritious school meals. Families also benefit, as they are no longer required to submit an application. Because all meals are served at no cost to the student, the stigma sometimes associated with the receipt of free meals should also be reduced in LEAs and schools that participate in CEP.[2] Unpaid meal balances are eliminated, and the school learning environment is improved, as students are well-nourished and prepared to learn.[3]

The decision to participate in CEP lies with the school district (i.e., LEA). To participate in CEP, eligible LEAs must have an Identified Student Percentage (ISP) that is 40 percent or greater—that is, the number of students who are automatically eligible for free meals (e.g., through direct certification based on participation in another assistance program) must be at least 40 percent of total student enrollment.

Federal reimbursements are typically based on meal counts, information from household applications, and direct certification data. LEAs that adopt CEP are reimbursed based on a formula using their ISP. An LEA's ISP is multiplied by 1.6 to establish their claiming percentage, which is the percentage of meals served that are reimbursed by the Federal Government at the "free" rate. This claiming percentage serves as a proxy for the percentage of students who would be eligible for free and reduced price meal benefits if the LEA certified students through the traditional application and direct certification processes. The remaining meals served are reimbursed at the Federal "paid" rate.[4] LEAs are responsible for all program costs not covered by the Federal reimbursements they receive, which must be paid with non-Federal funds. Eligible LEAs may choose to participate in CEP as an entire school district (i.e., LEA-wide participation), or as groups of schools or individual schools (i.e., partial participation). The criteria that LEAs/schools must meet in order to implement CEP are noted in Figure ES-1.

[1] Section 104(a) of the reauthorization of the Richard B. Russell National School Lunch Act

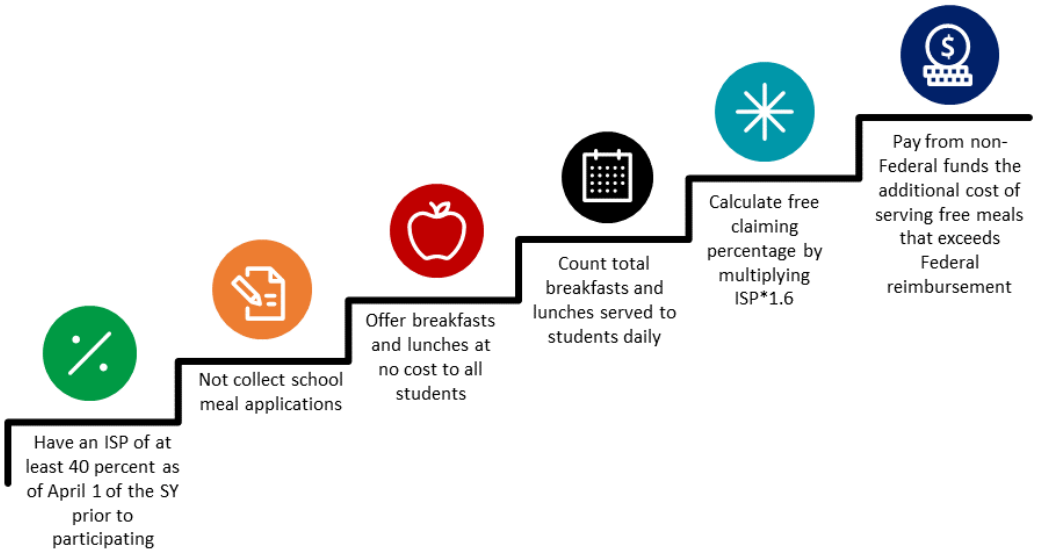
[2] U.S. Department of Agriculture, Food and Nutrition Service. (2017, July). *Eligibility manual for school meals*. Retrieved from https://www.fns.usda.gov/eligibility-manual-school-meals

[3] U.S. Department of Agriculture, Food and Nutrition Service. (2016, October). *Community Eligibility Provision: Planning and implementation guidance*. Retrieved from https://www.fns.usda.gov/fall-2016-edition-community-eligibility-provision-planning-and-implementation-guidance

[4] There are no reduced price reimbursements at CEP schools.

Figure ES-1 | Criteria for LEAs/Schools to Implement CEP

While operating under CEP, LEAs/schools must:



CEP was phased in over several years, beginning with school year (SY) 2011–12 with three States (Illinois, Kentucky, and Michigan). Four more States were added in each of the following two school years (the District of Columbia, New York, Ohio, and West Virginia in SY 2012–13; and Florida, Georgia, Maryland, and Massachusetts in SY 2013–14).[5] Beginning July 1, 2014, CEP became available nationwide to all eligible schools at the discretion of their LEAs. CEP is currently operating in all 50 States, the District of Columbia, and the Territory of Guam.[6]

This study updates the initial CEP evaluation of the early adopting States[7] by using data from SY 2016–17, which was the third year that CEP was available nationwide.

The following were the research objectives of this project:

(1) Describe the characteristics of eligible, participating, and non-participating LEAs and schools
(2) Describe operational issues including perceived barriers and benefits to participation, and identify changes to CEP that would make non-participating eligible LEAs and schools more likely to participate

[5] U.S. Department of Agriculture, Food and Nutrition Service. (2012, May 4). *USDA announces next states chosen to phase in streamlined free school meal option.* Retrieved from https://www.fns.usda.gov/pressrelease/2012/fns-212

[6] U.S. Department of Agriculture, Food and Nutrition Service. (2018, October 2). *School meals: Community Eligibility Provision status of school districts and schools by State*. Retrieved from https://www.fns.usda.gov/school-meals/community-eligibility-provision-status-school-districts-and-schools-state

[7] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

(3) Estimate the impacts of electing CEP on student participation, per meal revenues, attendance, and the availability of school breakfast.

Study Design and Data

The study design included Implementation Study and Impact Study components. The Implementation Study component examined the characteristics of eligible and participating LEAs and schools from SY 2014–15 to SY 2016–17 using administrative data. In addition, the Implementation Study component included web-based surveys, which were completed by Child Nutrition State Agencies (SAs) and a nationally representative sample of participating and non-participating LEAs. Administrative data from a sample of 12 SAs were used to examine the impact of CEP on participation and revenue outcomes.

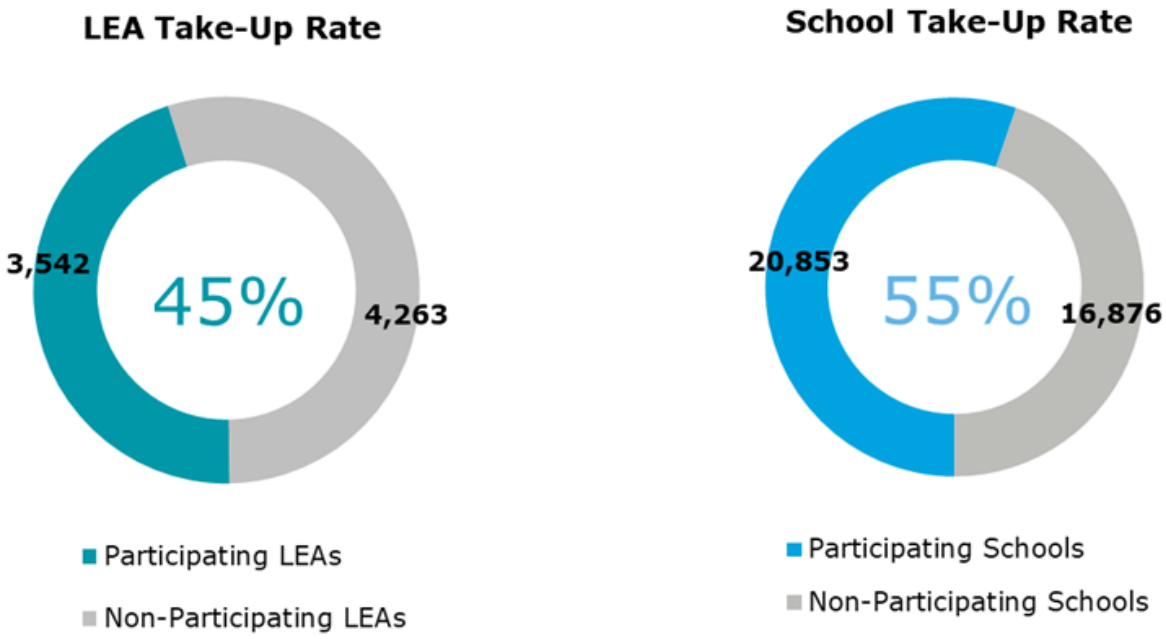
Implementation Study Results

CEP ELIGIBILITY AND PARTICIPATION

Overview of CEP Eligibility and Participation Rates

In SY 2016–17, the LEA participation rate (i.e., take-up rate, the number of participating LEAs divided by the number of eligible LEAs) was 45 percent, which is a 10 percentage point increase in LEA take-up from the first year of national CEP implementation (SY 2014–15). The school participation rate in CEP was 55 percent in SY 2016–17, representing a nine percentage point increase from SY 2014–15.

Figure ES-2 | CEP Participation Rates (Among Eligible LEAs and Schools), SY 2016–17



Eligibility for and Participation in CEP LEAs, by LEA Characteristics

Eligible LEAs were those with at least one eligible school plus any LEAs that implemented CEP during the previous school year, which is a subset of LEAs that participated in NSLP/SBP. Participating LEAs included

those with at least one school implementing CEP in the respective school year, which is a subset of the universe of eligible LEAs.

Distribution of LEAs Eligible for CEP

Of the 19,240 LEAs that participated in NSLP and SBP in SY 2016–17, 7,805 were eligible for CEP. Of these eligible LEAs,

- 69 percent of eligible LEAs had five or fewer schools;
- 35 percent of eligible LEAs were located in rural areas; and
- most eligible LEAs were public (87 percent).

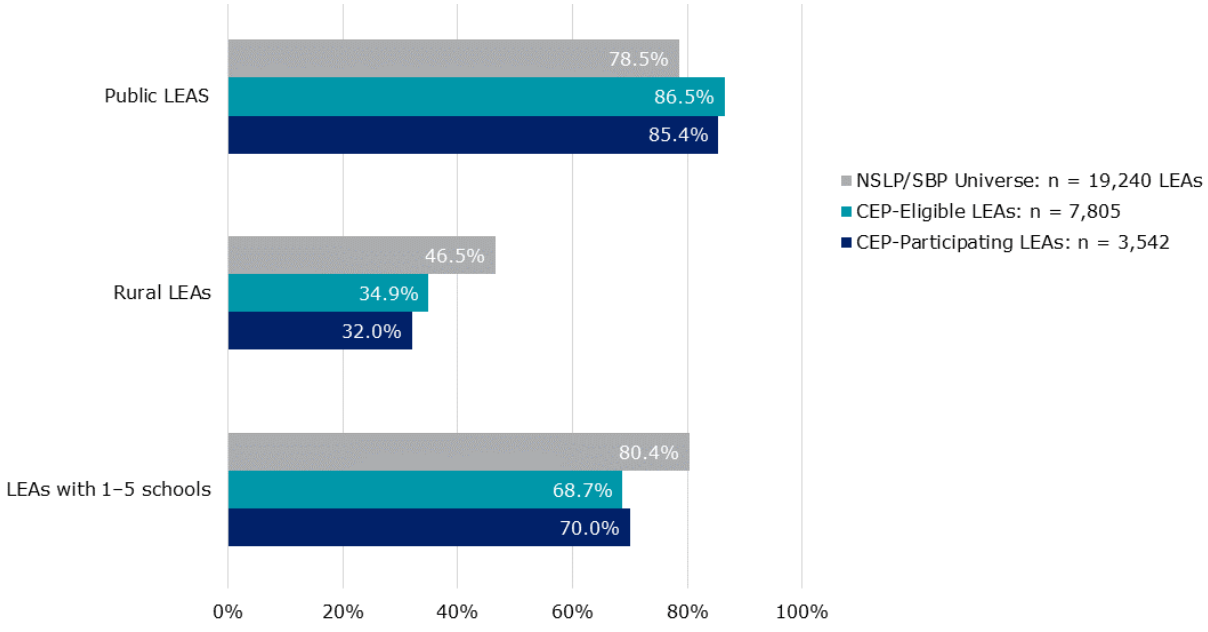
Distribution of LEAs that Elected to Participate in CEP

Of the 7,805 LEAs that were eligible for CEP in SY 2016–17, 3,542 elected to participate in CEP. Of the 3,542 participating LEAs,

- 70 percent of participating LEAs had five or fewer schools;
- 32 percent of participating LEAs were located in rural areas; and
- most participating LEAs were public (85 percent).

Figure ES-3 demonstrates the similarities among the universe of LEAs that participated in NSLP and SBP, LEAs that were eligible for CEP, and LEAs that participated in CEP in SY 2016–17.

Figure ES-3 | LEA Eligibility and Participation in CEP, SY 2016–17



STATE AND LEA IMPLEMENTATION

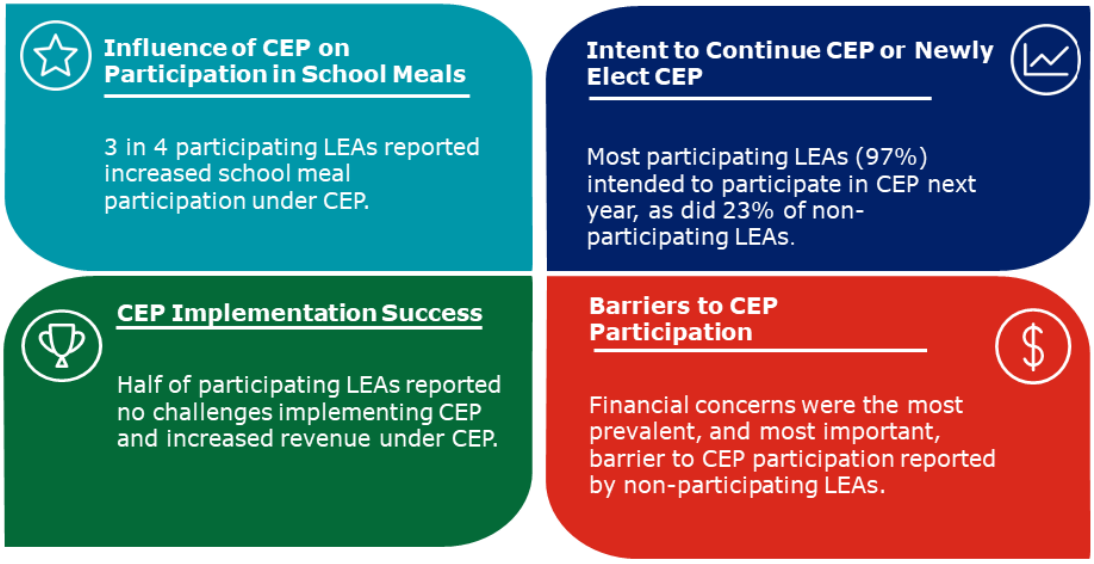
SAs provided support and technical assistance to LEAs regarding their CEP participation decisions. SAs mostly provided support to address LEA concerns about the financial viability of CEP, uncertainty about

Federal reimbursement under CEP, and concerns about the potential loss of other educational funds due to CEP participation.

Participating LEAs were asked about the benefits of CEP participation. Participating LEAs reported perceived increased school meal participation (76 percent), decreased burden on families (74 percent), eliminated unpaid meal charges (70 percent), and decreased administrative burden (65 percent). More than 50 percent of participating LEAs reported recalculating their ISPs before the end of a 4-year cycle (52.7 percent). Ninety-seven percent of participating LEAs reported being likely to participate in CEP the next school year (i.e., SY 2017–18). More than half of participating LEAs reported no challenges implementing CEP.

Concerns about financial viability, uncertainty about reimbursements, and uncertainty about the impact on other educational funding were the barriers to participation most reported by eligible, non-participating LEAs. Despite these concerns, eligible, non-participating LEAs understood the benefits CEP would have, including eliminating unpaid meal charges, increasing school meal participation, and decreasing financial burden on families and administrative burden on schools and LEAs. Half (50.9 percent) of eligible, non-participating LEAs reported that CEP would be more appealing if the multiplier were increased. Important findings from the Implementation Study are shown in Figure ES-4.

Figure ES-4 | Summary of Findings from the Implementation Study

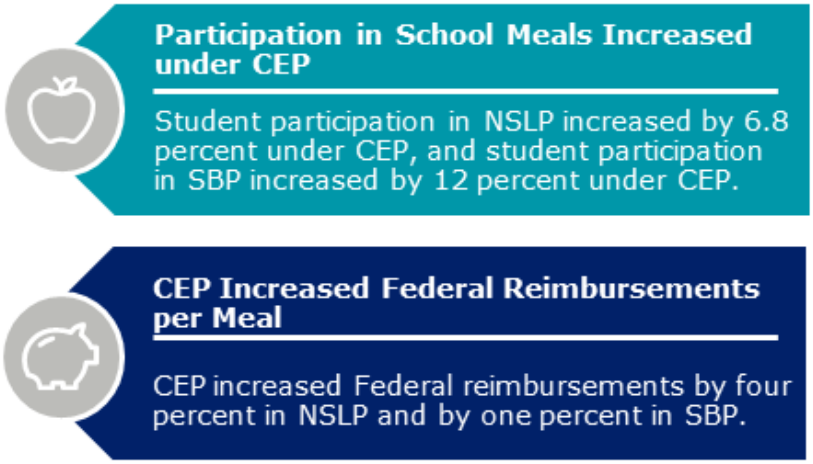


Impact Study Results

The Impact Study was designed to examine the impact of CEP on important outcomes, including participation in school meal programs and reimbursements for NSLP and SBP. Results showed that CEP increased the student participation rate by 6.8 percentage points in NSLP and by 12 percentage points in SBP. In addition, revenues due to NSLP and SBP reimbursements increased by four percent and one percent, respectively. These results are similar, both in magnitude and significance, to the NSLP and the

SBP participation rates that were found in the evaluation that was conducted before CEP was implemented nationwide.[8] Important findings from the Impact Study are displayed in Figure ES-5.

Figure ES-5 | Summary of Findings from the Impact Study



Summary

The findings from this report show that participation in CEP has grown since becoming available nationwide to all eligible schools. The eligible LEAs that participated in CEP had similar characteristics as the overall population of NSLP/SBP LEAs: they tended to be publicly run (rather than private), had fewer than five schools, and were located in rural areas.

CEP was most appealing to high-poverty LEAs and schools—as ISPs increased, so did the percentage of eligible LEAs that participated in CEP. Seventy-six percent of LEAs participated in CEP LEA-wide, while 24 percent chose to participate in CEP in some schools.

In terms of implementation, more than half of participating LEAs reported no problems implementing CEP. Financial considerations were the most important factors that influenced decisions to participate in CEP. Similarly, most participating LEAs reported recalculating their ISPs before the end of a 4-year cycle.

Not only did LEAs *perceive* that school meal participation (76 percent) and revenue (51 percent) increased under CEP, the Impact Study found similar effects—CEP increased NSLP and SBP participation by 6.8 percent and 12 percent, respectively. In addition, CEP led to an increase of four percent and one percent for NSLP and SBP revenues due to Federal reimbursements, respectively.

[8] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation. This report found that CEP increased participation in NSLP and SBP by five and nine percent, respectively. The study also found an increase in federal reimbursements of six percent for NSLP and two percent for SBP as a result of CEP.

1 INTRODUCTION

The Community Eligibility Provision (CEP) is a school meal service option for local education agencies (LEAs) in low-income areas.[9] CEP allows eligible LEAs and schools to provide breakfast and lunch through the School Breakfast Program (SBP) and the National School Lunch Program (NSLP) at no cost to all students and without the need for families to submit a household application. Instead, LEAs and schools that adopt CEP are reimbursed based on a formula that accounts for the percentage of enrolled students who participate in other need-based programs.[10]

CEP has many benefits, including reduced administrative burden for LEAs and schools. In particular, schools that adopt CEP are no longer permitted to accept and process school meal applications to make individual eligibility determinations. Administrative burden is also reduced for LEAs, as the annual process of verifying household income applications is not required in CEP schools. Families also benefit from CEP, as they are no longer required to submit an application, and eligible students who may have been missed through the application process receive a meal at no cost when schools adopt CEP. Participation in the school meal programs may be increased in CEP LEAs and schools by reducing the stigma sometimes associated with receiving free meals.

CEP was phased in over three school years. Eligible LEAs and schools in three States (Illinois, Kentucky, and Michigan) participated in CEP during school year (SY) 2011–12. Over the next two school years, eight States were added: the District of Columbia, New York, Ohio, and West Virginia in SY 2012–13; and Florida, Georgia, Maryland, and Massachusetts in SY 2013–14. CEP was made available nationwide in SY 2014–15.

An earlier, congressionally required CEP evaluation of the early-implementing States examined CEP implementation and the impacts of providing free meals to all students in high-poverty schools. The earlier evaluation described the characteristics of participating and non-participating LEAs and schools and described CEP's preliminary impacts on program participation, revenues, LEA administrative costs, and meal quality.[11] The evaluation provided valuable insight, best practices, and useful resources for the nationwide implementation of CEP.

With CEP's nationwide expansion, the purpose of this study was to obtain a better understanding of the

(a) characteristics of eligible, participating, and non-participating LEAs and schools;
(b) operational issues related to CEP faced by Child Nutrition State Agencies (SAs);
(c) incentives and barriers for LEAs affecting CEP adoption; and
(d) the impact of CEP on participation and Federal revenues.

This report presents the results of this nationwide CEP evaluation. The next sections discuss the background of and authorization for CEP and conclude with the scope and organization of this report.

[9] Section 104(a) of the reauthorization of the Richard B. Russell National School Lunch Act

[10] U.S. Department of Agriculture, Food and Nutrition Service. (2016, October 7). *Community Eligibility Provision: Planning and implementation guidance*. Retrieved from https://www.fns.usda.gov/fall-2016-edition-community-eligibility-provision-planning-and-implementation-guidance

[11] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation final report*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

1.1 Program Background

NSLP and SBP are vital to the U.S. Department of Agriculture's (USDA) Food and Nutrition Service's (FNS) ability to combat childhood hunger. Child Nutrition State Agencies administer the programs and have agreements with school food authorities (SFAs) that operate the programs. School districts (i.e., LEAs)[12] that participate in NSLP and/or SBP receive Federal subsidies in the form of reimbursements for meals served to students. The Federal Government subsidizes all reimbursable school meals but provides a larger subsidy for meals served to children certified for free or reduced price (F/RP) meals. The reimbursement rates for free, reduced price, and paid lunches and breakfasts are displayed below in Table 1-1.[13]

Table 1-1 | Reimbursement Rates to SFA for Meals Served in NSLP and SBP, SY 2016–17

	Free	Reduced Price	Paid
NSLP	$3.16	$2.76	$0.30
SBP	$1.71	$1.41	$0.29

Children from families with incomes less than or equal to 130 percent of the Federal poverty level[14] are eligible for free meals, whereas children from families with incomes above 130 percent, but less than or equal to 185 percent of the poverty level, are eligible for reduced price meals. Schools may charge up to 40 cents for reduced price lunches and up to 30 cents for reduced price breakfasts. Children from families with incomes above 185 percent of the poverty level pay full price for meals at rates established by SFAs.

As of fiscal year 2018, NSLP operates in about 100,000 public schools, nonprofit private schools, and residential child care institutions (RCCIs).[15] About 29.6 million children participate in NSLP each day, and nearly 75 percent of lunches are served to low-income children certified to receive F/RP meals.[16] SBP operates in about 90,000 public schools and RCCIs,[17] and about 14.7 million children participate each

[12] The term "SFA" refers to the governing body responsible for school food service operations, and the term "LEA" refers to the governing body responsible for activities related to but not directly under the school food service. In most cases, the LEA and SFA are the same entity (i.e., the school district).

[13] U.S. Department of Agriculture, Food and Nutrition Service. (2016, August 10). *National School Lunch, Special Milk, and School Breakfast Programs, national average payments/maximum reimbursement rates (July 1, 2016–June 30, 2017)*. Retrieved from https://www.fns.usda.gov/school-meals/fr-080516. The rates cited here vary in SFAs that served more than 40 percent F/RP lunches in SY 2014–15, more than 60 percent F/RP lunches in SY 2014–15, when the SFA is in compliance with updated meal pattern requirements, and in Alaska, Hawaii, and Puerto Rico. These rates are adjusted annually based on the Food Away From Home series of the Consumer Price Index for All Urban Consumers.

[14] For 2016, the Federal poverty level was $24,300 for a family of four; see https://www.gpo.gov/fdsys/pkg/FR-2016-03-23/pdf/2016-06463.pdf

[15] U.S. Department of Agriculture, Economic Research Service. (2019, August). *National School Lunch Program*. Retrieved from https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program.aspx

[16] U.S. Department of Agriculture, Food and Nutrition Service. (2019, October). *Child nutrition tables: National level annual summary tables: FY 1969–2018. National School Lunch Program: Participation and meals served*. Retrieved from https://www.fns.usda.gov/pd/child-nutrition-tables

[17] U.S. Department of Agriculture, Economic Research Service. (2019, August). *School Breakfast Program*. Retrieved from https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/school-breakfast-program/

day.[18] More than 85 percent of SBP breakfasts are served to low-income children certified to receive F/RP meals.[19]

Student eligibility for F/RP meals is determined annually through household applications or direct certification. To establish eligibility for F/RP meals based on income, households must report household size and total household gross income, which is compared to applicable income eligibility guidelines. Households that are directly certified do not need to complete an application. With direct certification, children's eligibility for free meals is determined by matching student enrollment records with administrative records from the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), the Food Distribution Program on Indian Reservations (FDPIR), and Medicaid (in pilot States).[20,21] In addition, children can be certified as eligible for free meals without submitting an application based on their status as homeless, runaway, migrant, foster child, or based on their enrollment in Head Start.[22]

1.1.1 SPECIAL ASSISTANCE ALTERNATIVES

In an effort to reduce administrative burden at the local level, Congress established Provisions 1, 2, and 3 as options in the school meal programs. These provisions provide local program operators with alternatives to the traditional requirements for annual determination of eligibility for F/RP school meals and/or daily meal counts by type. LEAs can choose to participate in these special provisions described below:[23]

Provision 1: Provision 1 reduces administrative burden by allowing free certifications to last for two years in schools where 80 percent or more of the students are eligible for F/RP meals. Schools continue to take daily meal counts by type for Federal reimbursement.

Provision 2: Provision 2 requires schools to offer meals at no cost to all students. It also reduces the application burden to once every four years and simplifies meal counting, as schools receive Federal reimbursement based on claiming percentages established in a base year (i.e., the last year in which the F/RP eligibility determinations were made). Provision 2 can be extended in 4-year increments if the socioeconomic status of the student population is stable.

[18] U.S. Department of Agriculture, Food and Nutrition Service. (2019, October). *Child nutrition tables: National level annual summary tables: FY 1969–2018. School Breakfast Program: Total participation.* Retrieved from https://fns-prod.azureedge.net/sites/default/files/resource-files/08sbfypart-8.pdf

[19] U.S. Department of Agriculture, Food and Nutrition Service. (2019, October). *Child nutrition tables: National level annual summary tables: FY 1969–2018. School Breakfast Program: Participation and meals served.* Retrieved from https://www.fns.usda.gov/pd/child-nutrition-tables

[20] Direct certification is the process by which students are automatically eligible for free meals when their school and/or LEA enrollment is matched with SNAP, TANF, FDPIR, and Medicaid (in pilot States) data. Direct certification is completed using State or local-level data exchange and/or data-matching. (For additional information, see the Eligibility Manual for School Meals, https://www.fns.usda.gov/eligibility-manual-school-meals).

[21] On an application, households may also note participation in a means-tested program by submitting a case number or other identifier. When any individual child becomes eligible for free meals based a case number from an application, approval is extended to all children in the household.

[22] LEAs coordinate with local service agencies to produce lists of categorically eligible students.

[23] U.S. Department of Agriculture, Food and Nutrition Service. (2017, May 5). *School meals: Provisions 1, 2, and 3*. Retrieved from https://www.fns.usda.gov/school-meals/provisions-1-2-and-3

Provision 3: Provision 3 is similar to Provision 2, except that the Federal reimbursement is the same dollar amount as the school received in the base year and adjusted for enrollment, operating days, and inflation. Like Provision 2, Provision 3 can further be extended in 4-year increments if the socioeconomic status of the student population is stable.

As of SY 2017–18, fewer than 5,000 schools (five percent of schools enrolled in NSLP) participated in FNS's school meal programs under these provisions.[24]

1.1.2 AUTHORIZATION AND PURPOSE FOR CEP

Congress established CEP in Section 104(a) of the reauthorization of the National School Lunch Act (NSLA) in 2010. Like Provisions 1, 2, and 3, CEP is an alternative to annual household applications and conventional reimbursement methods. CEP allows all students at participating schools to have access to school meals at no cost to the student. CEP reduces administrative burden by eliminating the application process entirely.

1.1.3 FUNCTION OF CEP

Entire school districts (i.e., LEAs), groups of schools within a school district, and individual schools may participate in CEP. To be eligible, the LEA, group, or school must have an Identified Student Percentage (ISP) that is 40 percent or greater. The ISP is a ratio of the number of students who are automatically eligible for free meals (e.g., through direct certification) to total student enrollment.

$$ISP = \frac{\text{Identified students (directly certified for free meals without the use of a household application)}}{\text{Enrolled Students}}$$

The ISP is used to establish a free claiming percentage (i.e., the percentage of meals reimbursed with Federal funds at the free rate) for the LEA, group of schools within an LEA, or individual school. The claiming percentage is equal to the ISP multiplied by a factor of 1.6. (Using this calculation, the percentage of meals reimbursed cannot exceed 100 percent.)

$$\text{Percentage of Meals Claimed at the Federal "free" rate} = ISP \times 1.6$$

For example, a school with an ISP of 40 percent would receive the Federal "free" reimbursement for 64 percent of the meals served (40 x 1.6 = 64), and the remaining 36 percent of meals served would be reimbursed at the Federal "paid" rate.[25] The percentages are applied to the number of breakfasts and lunches separately. Program costs associated with reimbursable meals that exceed the Federal reimbursement must be paid for by the SFA with non-Federal funds.

The claiming percentage for CEP is established in the base year (i.e., the school year prior to CEP participation) and is used for a 4-year cycle. If the number of students who are automatically eligible increases during that 4-year cycle, then a new base year claiming percentage can be established and a new 4-year cycle initiated. The year prior to renewing another CEP 4-year cycle, participating schools must review their claiming percentages to ensure they meet the minimum ISP of 40 percent. Participating schools that fall below the 40 percent ISP threshold in the fourth year of their 4-year cycle

[24] This includes schools that participate in SBP and/or NSLP as reported on FNS Form 742 VCR for SY 2017–18.
[25] There are no reduced price reimbursements at CEP schools.

may continue to participate for a "grace year" if their ISP is at least 30 percent. If participating schools achieve the required minimum ISP of 40 percent as of April 1[26,27] of the grace year, then they may begin a new 4-year cycle the following year. Schools that do not meet the 40 percent threshold must return to normal counting and claiming procedures. Any participating LEA or school may stop participating in CEP during the 4-year cycle if standard counting and claiming better suits the program's needs.

To ensure that LEAs and schools are aware of their eligibility for CEP, the law establishes SA notification and public reporting requirements. By May 1 of each year, all SAs are required to notify LEAs of LEA-wide eligibility and provide information and guidance about CEP. LEAs must submit school-level eligibility to SAs by April 15 (if the school-level data are not available at the State level). By May 1 of each year, SAs must post the LEA-wide and school-level eligibility lists on their website. Interested and eligible LEAs and schools must notify their SAs of their intent to participate in CEP and provide the number of identified students and total enrollment to the SA by June 30 prior to the applicable school year.

1.2 Study Objectives

The CEP Characteristics Study was designed to achieve general research objectives and provide insight on specific research questions deemed of interest. The Implementation Study component addressed the first two objectives, and the Impact Study component addressed the third objective. The study objectives were to

(1) describe the characteristics of eligible, participating, and non-participating LEAs and schools;
(2) describe barriers to participation and identify changes to CEP that would make non-participating eligible LEAs and schools more likely to participate; and
(3) estimate the impacts of electing CEP on student participation, per student revenues, attendance, and the availability of SBP.

1.3 Scope of Report

In order to meet the objectives of this study, implementation and impacts were assessed using both administrative data and primary data collected from SAs and from LEAs with schools that were eligible for CEP during SY 2016–17.

The study included several components, which are presented in this report as follows. First, the report examines the characteristics of eligible participating and non-participating LEAs and schools for SY 2014–15 through SY 2016–17 using administrative data from all eligible LEAs and schools. Second, perspectives on CEP implementation are described based on survey data from SAs with eligible LEAs and two samples of eligible LEAs—one with participating schools (i.e., participating LEAs) and one without

[26] When calculating an ISP, LEAs and schools must use enrollment data as of April 1. This requirement (i.e., "as of April 1") ensures that all reported data is reflective of April 1 to accurately capture the LEAs' and schools' student populations. However, if certain States conduct direct certification on a different date (e.g., April 5), the term "as of" allows data from a date reflective of April 5 to generate the ISP. FNS strongly recommends timing data matching to coincide with April 1.

[27] U.S. Department of Agriculture, Food and Nutrition Service. (2016, October 7). *Community Eligibility Provision: Planning and implementation guidance*. Retrieved from https://www.fns.usda.gov/fall-2016-edition-community-eligibility-provision-planning-and-implementation-guidance

any participating schools (non-participating LEAs). Third, the Impact Study analyses use more detailed administrative data for eligible LEAs from a sample of 12 SAs to examine real and perceived impacts of CEP on student participation, per student revenues, and attendance.

2 STUDY DESIGN, SAMPLING, AND DATA

To achieve the objectives of the CEP Characteristics Study, the research team followed a design that required activities in several general areas. Initial activities involved processing lists of administrative data on SAs, LEAs, and schools to identify the universe of eligible and participating LEAs in SYs 2014–15 through SY 2016–17. The *eligible* universe of LEAs was defined to include LEAs with at least one eligible school plus any LEAs implementing CEP during the previous school year.[28] The *participating* universe of LEAs included all LEAs with at least one school implementing CEP in the respective school year, which is a subset of the universe of eligible LEAs.

Extant administrative data from various sources including the National Center for Educational Statistics (NCES) and FNS were acquired and merged with the annual public school and LEA universe files. These data provided descriptive characteristics of LEAs and schools. The research team also acquired LEA-level administrative data on school meal programs via formal data requests to SAs.

For the Implementation Study, primary data were collected from SAs and the sample of LEAs using web surveys. The survey questions focused on the SAs' and LEAs' perspectives concerning the administration and implementation of CEP.

For the Impact Study, administrative data were collected from a sample of the 12 SAs with the greatest number of CEP-eligible LEAs (participating and non-participating).

2.1 Characteristics of Eligible, Participating, and Non-Participating LEAs and Schools

The primary purpose of the analysis of LEA and school characteristics was to provide annual snapshots of the universe of participating and non-participating CEP-eligible LEAs and schools. These snapshots were created by merging data from various sources and provided the best estimates of the number of eligible LEAs and schools, participating LEAs and schools, and their readily observable characteristics (e.g., the number of students in LEAs and schools, the number of schools in LEAs, the types of schools in LEAs, and the location of LEAs and schools in terms of FNS Region and NCES's definition of urbanicity). Links to other administrative data were created, facilitating additional analyses; for example, whether a participating LEA participated under another special provision prior to adopting CEP and when the LEA was initially eligible for CEP. Chapter 3 presents these snapshots in terms of numerous LEA characteristics. Here, we summarize how the merged dataset was compiled. Throughout this report this dataset is referred to as the *AnalysisFile*.[29]

2.1.1 ADMINISTRATIVE DATA FOR THE UNIVERSE OF LEAS

We created a merged administrative dataset to describe characteristics of CEP-eligible LEAs and schools and participating LEAs and schools for SYs 2014–2015, 2015–2016, and 2016–2017. The following variables were included:

- Identifiers for LEAs and schools

[28] By the time of this data collection in SY 2016–17, CEP was implemented in all 50 States, Guam, and the District of Columbia.
[29] The *AnalysisFile* is several files related by common identifiers.

- Indicators of eligibility for and participation in CEP for LEAs and schools
- Classifications of LEAs and schools in terms of size, location, and grade level (elementary, middle, high school, and other)
- Demographic characteristics of students in LEAs and schools
- Indicators to denote Title I services, existence of charter schools, and whether the LEA was considered private or public

The initial lists of eligible and participating LEAs and schools, provided by FNS, were augmented using data from other sources. Those data sources and the year(s) they were available are listed in Table 2-1.[30] Once the final lists of eligible and participating LEAs and schools were created, additional characteristics were added to augment the data to facilitate sampling and to characterize the difference in the eligible and participating universes. These LEA characteristics are explained below and in Chapter 3.

Table 2-1 | *AnalysisFile* Data Sources by School Year

Data Source	Year in *AnalysisFile* SY 2014–15	SY 2015–16	SY 2016–17
CEP School and LEA Notification Report[a]		✓	✓
CEP National Election Data[a]	✓	✓	✓
Verification Collection Report[a]	✓	✓	✓
CEP Take-Up Database[b]	✓	✓	
Public Schools Universe File[c]	✓	✓	✓
Public LEAs Universe File[c]	✓	✓	✓
Private School Universe Survey Data[d]		✓	

[a] Provided by FNS.
[b] https://www.cbpp.org/research/food-assistance/community-eligibility-database-take-up-of-community-eligibility-for-2015
[c] https://nces.ed.gov/ccd/ccddata.asp
[d] https://nces.ed.gov/surveys/pss/

2.2 Implementation Study

The objective of the Implementation Study was to better understand the mechanics of implementing CEP and identify the perceived benefits of and barriers to operating under CEP. This objective was accomplished by using web-based surveys to collect primary data directly from SAs and LEAs.

2.2.1 IMPLEMENTATION STUDY DESIGN

To collect data on CEP implementation, web-based surveys were administered to samples of participating and non-participating LEAs and to a census of SAs with CEP-eligible LEAs. The LEA sample was designed to be nationally representative of the eligible LEAs (participating and non-participating) in SY 2016–17 and to produce accurate estimates for these LEAs.[31] The resulting sample included 484 participating LEAs. A total of 533 LEAs were sampled to represent the universe of non-participating LEAs,

[30] RCCIs are not permitted to participate in CEP.
[31] Appendix H provides more detail on the sampling methodology and weighting of the data.

which included 50 reserve sample LEAs that were identified due to the expectation that some LEAs might be ineligible. The SA Survey units included the 50 States and the District of Columbia.[32]

2.2.2 PARTICIPATING LEA SURVEY

The sample of participating LEAs was invited to complete the web-based Participating LEA Survey (Appendix F). This survey contained the following seven sections:

- Section 1: CEP eligibility, participation, and implementation
- Section 2: ISP calculation
- Section 3: Impact of CEP on other programs
- Section 4: CEP Resource Center and communication about CEP to stakeholders
- Section 5: Perceived benefits and challenges of participating in CEP
- Section 6: Plans for continuation and expansion of CEP
- Section 7: Perceived impacts of CEP on attendance, school meal participation, and revenues

Of the 484 participating LEAs sampled for the web survey, nine were found to be ineligible, and 29 did not complete or otherwise provide a valid survey response, resulting in 446 surveys available for analysis (an overall response rate of 92.1 percent). The Participating LEA Survey was considered complete if at least 80 percent of the key questions were answered.[33]

2.2.3 NON-PARTICIPATING LEA SURVEY

The sample of non-participating LEAs was asked to complete the Non-Participating LEA Survey (Appendix G). This survey contained five sections that were modeled after Sections 1, 2, 3, 5, and 7 (noted above) in the Participating LEA Survey. Therefore, the design of the surveys facilitated direct comparisons of responses to some common questions between participating and non-participating LEAs. During the administration of the survey, 181 of the 483 LEAs in the non-participating LEA sample were found to be ineligible for CEP, so 50 reserve sample units were added, which brought the total non-participating LEA sample to 352. Of these, 307 provided valid responses, which resulted in an overall response rate of 87.2 percent.[34] The Non-Participating LEA Survey was considered valid if at least 80 percent of the key questions were answered.[35]

2.2.4 SURVEY WEIGHTS

Each sampled LEA received a sampling weight that was based on its probability of being selected for the study. The weights were adjusted for nonresponse and to ensure the collected data represented the universe of eligible LEAs and the universe of participating LEAs. The details of these adjustments are

[32] In Guam, the State Department of Education is both the SA and LEA. Given the data of interest from SAs, and after some discussion with Guam, the research team decided that it would be better to categorize the Guam State Department of Education as an LEA. Hence, the Guam State Department of Education was included in the LEA universe but not the SA census.

[33] This percentage included at least 14 of 17 key questions on the Participating LEA Survey. See Appendix H for list of key questions.

[34] The original sample plan required 386 valid responses (i.e., an 80 percent response rate for the universe of 483 non-participating LEAs). Appendix H includes an analysis of the implication for the statistical properties of the estimates, owing to the lower than expected responding sample size of 307.

[35] This percentage included at least 11 of 13 key questions on the Non-Participating LEA Survey. See Appendix H for list of key questions.

presented in Appendix H.[36] It is important to note that all population-level summary measures derived from the LEA surveys use the adjusted weights and represent the universe summary measure with a precision of ±5 percentage points at the 95 percent level of confidence.

2.2.5 STATE AGENCY CHILD NUTRITION DIRECTORS SURVEY

The SA Child Nutrition (CN) Director survey was administered to SAs in the 50 States and the District of Columbia that represented all CN Agencies that had at least one LEA eligible for CEP. Two of the 51 SAs did not complete the survey. These 49 responses were analyzed as a census, meaning that the responses were not weighted to account for the missing SAs. The SA CN Director Survey (Appendix E) collected information regarding the implementation of CEP, the interaction between SAs and LEAs, and ways that CEP influenced CN program operations at the State level, including the administrative review process.

2.3 Impact Study

The objective of the Impact Study was to assess CEP's impact on student participation in NSLP and SBP and CEP's impact on Federal reimbursements per enrolled student and per meal. The impacts were estimated by comparing what happened in LEAs operating under CEP to what likely would have happened had they not elected CEP. The project team used non-experimental methods to assess CEP's impact on these outcomes of interest because a randomized controlled experiment would have been neither practical nor ethical.

2.3.1 IMPACT STUDY DESIGN

The Impact Study considered how various outcomes were different under CEP compared to what those outcomes would have been without CEP. Outcomes were constructed from 1) State administrative data on meal claims records collected from the 12 selected SAs (including information on meal counts claimed, enrollment, and Federal reimbursements) and 2) data from the LEA survey responses.

A **matched difference-in-differences (DD) design**[37] was used to analyze the State administrative data and assessed the following outcomes:

- Average daily participation (ADP) in NSLP in the first year of CEP
- ADP in SBP in the first year of CEP
- ADP in the second year of CEP as a measure of the sustainability of impacts
- Federal reimbursements per student enrolled
- Federal reimbursements per meal

A **post-test-only comparison group design** used responses from the Participating and Non-Participating LEA Surveys to estimate how outcomes were perceived to have changed after CEP implementation. The LEA survey responses captured perceived explanations for the changes in NSLP and SBP participation

[36] After the data collection period, some refinements to the *AnalysisFile* reduced the size of the universe of eligible LEAs. This reduction was also addressed by adjusting the weights.

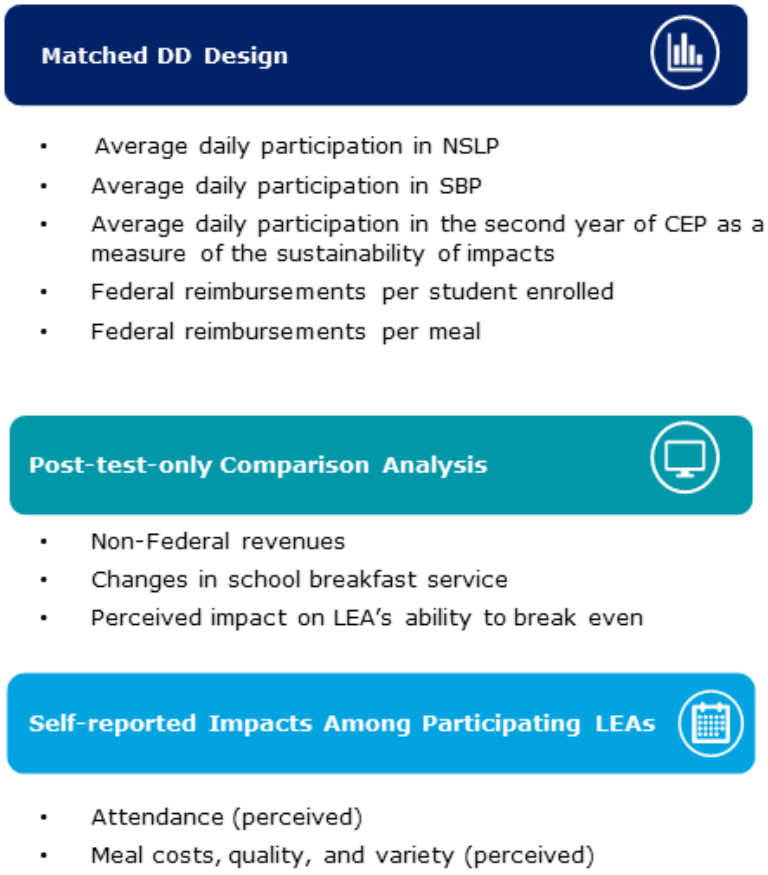
[37] An explanation of this design is provided in Gertler, P. J., Martinez, S., Premand, P., Rawlings, L. B., & Vermeersch, C. M. J. (2011). *Impact evaluation in practice.* The World Bank Group Book Series. Washington, DC: The International Bank for Reconstruction and Development/The World Bank. Retrieved from https://siteresources.worldbank.org/EXTHDOFFICE/Resources/5485726-1295455628620/Impact_Evaluation_in_Practice.pdf

and Federal reimbursements, including changes in non-Federal revenues, changes in school breakfast service after the adoption of CEP, the perceived impact on the LEA's ability to break even, and changes in perceived attendance from SY 2013–14 compared to SY 2016–17.

Finally, the Impact Study included an **analysis of self-reported (i.e., perceived) impacts** of CEP on attendance, meal costs, quality, and variety among participating LEAs.

The components of the Impact Study design are shown in Figure 2-1.

Figure 2-1 | Impact Study Design



Matched DD Design

The DD design estimates the difference in an outcome's pre-post changes by comparing a treatment group to a comparison group. The project team used an LEA sample of matched treatment and comparison LEAs within a sample of 12 States that were selected for the Impact Study, which included the SAs with the greatest number of eligible LEAs (participating and non-participating) (See Table 2-2). Treatment LEAs were those that adopted CEP in at least one school during or before SY 2016–17, and comparison LEAs, representing the counterfactual, were those LEAs that did not adopt CEP in any eligible school during that period. The project team used one-to-one propensity score matching (PSM)

to match comparison LEAs to treatment LEAs within each selected State. The matching variables were measures of LEA size, eligibility for F/RP meals, and student demographics. These variables are described in Appendix H.

Post-Test-Only Comparison Group Analysis

The post-test-only comparison group design used responses from the Participating and Non-Participating LEA Surveys to estimate how outcomes were perceived to have changed after CEP implementation. This design used perceptions of Food Service Directors in participating and non-participating LEAs about changes in outcomes between SY 2013–14, the school year before CEP was made available nationwide, and SY 2016–17, the current survey year. Non-participating LEA responses provided counterfactual perceptions.[38] The difference in the prevalence of perceptions between these two groups is a measure of how these outcomes changed after CEP implementation from what they would have been in the absence of CEP. In evaluating such comparisons, two questions arise:

(1) Do outcomes differ between the two groups because of differences that led LEAs to choose to participate in CEP (i.e., is there selection bias)?
(2) Do outcomes differ because other factors in the economic or policy context differ between participating and non-participating LEAs?

The difference in the perception of change in the outcomes between participating and non-participating LEAs may control for unobserved factors that are associated with an LEA's decision to adopt CEP or other policy factors. However, because the post-test-only comparison group design relies on perceptions of change, which may vary from actual changes in the outcomes, comparisons of perceptions of change between the two groups may not represent the true effect of CEP. Participating LEAs may be more likely to overstate benefits due to favorable attitudes toward CEP, which may in turn bias the estimated effect of CEP.

Self-Reported Impacts Among Participating LEAs

To evaluate additional outcomes, Participating LEA Survey responses about the perceived impacts of CEP on attendance and meal costs, quality, and variety were used in lieu of observed impacts. The Food Service Director was the primary respondent of the LEA surveys but could ask other personnel to provide input if they were more knowledgeable about specific topics. Food Service Directors are responsible for all aspects of food service operations, which include managing the preparation and service of school meals, menu planning, hiring food service personnel, and maintaining program records as required by the school and State.

[38] Unlike the DD design, non-participating LEAs were not matched to participating LEAs for this analysis. The estimates for participating and non-participating LEAs were weighted to reflect the probability of the LEA's selection into the sample and adjusted to minimize nonresponse bias, as described in Appendix H. To determine whether differences in outcomes between participating and non-participating LEAs were significantly different from zero, linear regressions were performed on the outcome using CEP participation as the single predictor. For this report, baseline control variables were not included in the regression model. The regressions accommodated the complex survey design and estimated the variance of the differences in outcomes using the jackknife replication method. This report includes estimates from regression models that control for baseline covariates (i.e., a sensitivity check). The baseline covariates will be the same as those used in the propensity score model for matching the LEAs in the DD study. The model may not be able to capture all confounding factors that influence LEAs to self-select into treatment, or control for unobserved systematic factors that influence outcomes. See Appendix H for details on how the jackknife replicate weights were developed.

The prevalence of LEA perceptions about the impact of CEP on attendance and meal costs, quality, and variety were weighted to reflect the probability of the participating LEA's selection into the sample and adjusted to minimize nonresponse bias.

2.3.2 IMPACT STUDY SAMPLING

The sample for the matched DD Impact Study was determined through two steps.

(1) The first step was choosing States from which to collect a time series of LEA-level State meal claims data. Claims data were used to construct longitudinal outcomes on student participation in meal programs and Federal reimbursements. The purpose of the sampling approach for the DD design was to attain an LEA sample that included States from all FNS Regions and included substantial variation in the timing of CEP implementation.

(2) The second step was constructing a matched treatment and comparison LEA sample from eligible LEAs within the selected States using PSM (see Appendix H). The matching procedure restricted matching comparison LEAs to treatment LEAs within the same States. The considerations in selecting States and LEAs, and the construction of the final analytic sample, are described in the following sections.

A purposive sample of 12 States was selected. This sample fulfilled three criteria: (1) the total number of eligible but non-participating LEAs was sufficient to attain the LEA sample size required to achieve acceptable statistical power; (2) the pool of States was geographically diverse, representing all FNS Regions; and (3) the pool included several of the six "early-implementing" States, defined as States that started CEP in SY 2011–12 and SY 2012–13, as well as "late-implementing" States that started CEP after national rollout in SY 2014–15.[39,40] The selected sample of 12 States, presented in Table 2-2, fulfill all these criteria. After sampling, the counts from the FNS lists of eligible LEAs in SY 2016–17 were updated. Table 2-2 shows the counts of participating and non-participating LEAs from the updated SY 2016–17 CEP participation data.[41]

[39] The States that were involved in the earlier evaluation of CEP are called "early-implementing" States. See Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

[40] Massachusetts implemented CEP in SY 2013–14, but only the Boston school district participated in the provision. In addition, the earlier report did not collect data from Massachusetts for the Impact Study. As a result, we consider it a "late-implementing" State.

[41] The PSM procedure was based on the updated counts.

Table 2-2 | Counts of Participating and Eligible Non-Participating LEAs in Selected States as of SY 2016–17

State	FNS Region	Number of CEP-Eligible LEAs	
		Participating as of SY 2016–17	Non-Participating as of SY 2016–17
Early-Implementing States			
Illinois	Midwest	204	169
Michigan	Midwest	178	217
New York	Northeast	245	200
Late-Implementing States			
Alabama	Southeast	38	82
California	Western	78	448
Massachusetts	Northeast	65	111
Minnesota	Midwest	65	97
Missouri	Mountain Plains	90	163
New Jersey	Mid-Atlantic	71	106
Texas	Southwest	190	416
Virginia	Mid-Atlantic	38	52
Washington	Western	57	108

2.4 Summary

The CEP Characteristics Study included two components, an Implementation Study and an Impact Study.

For the Implementation Study, the universe of CEP-eligible LEAs and schools was created using several linked data files that provided characteristics on CEP-eligible LEAs, LEAs participating in CEP, CEP-eligible schools, and schools participating in CEP for SYs 2014–15, 2015–16, and 2016–17. The Implementation Study sought to better understand the mechanics of implementing CEP and identify the perceived benefits of and barriers to operating under CEP. Data were collected through a web-based survey from a sample of 446 participating and 307 non-participating LEAs and 49 SAs. Responses to survey items were weighted to appropriately represent the known universe of CEP-eligible LEAs.

The Impact Study considered how various outcomes were different under CEP compared to what those outcomes would have been in the absence of CEP. The outcomes, derived from LEA-level meal claims data and survey responses, consisted of participation in NSLP and SBP, Federal reimbursements per NSLP lunch and per SBP breakfast, presence of SBP prior to CEP, and student attendance.

Twelve States were sampled for the Impact Study. Outcomes were assessed using a matched DD analysis from a matched sample of 481 participating LEAs and 481 non-participating LEAs or using a post-test-only comparison group design, depending on the data source.

3 CHARACTERISTICS OF PARTICIPATING AND NON-PARTICIPATING LEAS AND SCHOOLS

This chapter presents the numbers of eligible and participating LEAs and schools since the national implementation of CEP in SY 2014–15. For added context, the numbers of eligible and participating LEAs in terms of LEA characteristics (e.g., size, urbanicity, FNS Region) in SY 2016–17 are presented. Next, the participation rates for LEAs are described in terms of these LEA characteristics. A final set of tables displays how LEA and school participation have changed since SY 2014–15. The analyses presented in Chapter 3 answers the research questions below.

- How many LEAs elect CEP LEA-wide, for one school, or for groups of schools?
- What are the characteristics of participating LEAs/schools and non-participating LEAs/schools?
- How appealing is CEP to high-poverty LEAs? To high-poverty schools?
- Are LEAs/schools operating under Provision 2 or 3 more likely to switch to CEP or remain on Provision 2 or 3?[42]

3.1 CEP Eligibility and Participation

3.1.1 OVERVIEW OF CEP ELIGIBILITY AND PARTICIPATION RATES

LEAs

LEAs are eligible to participate in CEP if the ISP for the entire LEA, any group of schools in the LEA, or any single school in the LEA is 40 percent or greater. Participating LEAs were defined as those with at least one school participating in CEP. In SY 2016–17, the number of eligible LEAs increased by 1,635 (Table 3-1) or 26 percent since SY 2014–15. Over the same period, the number of participating LEAs increased by 1,352 (Table 3-1). This corresponds to an increase of 62 percent in participating LEAs relative to SY 2014–15.

These changes resulted in LEA participation rates (i.e., the ratio of the total number of participating LEAs to the total number of eligible LEAs) that increased by 10 percentage points (Table 3-1) from SY 2014–15 to SY 2016–17. In SY 2016–17, the State-level LEA participation rates ranged from approximately 13 percent to 88 percent (Figure 3-1 and Table A-1).

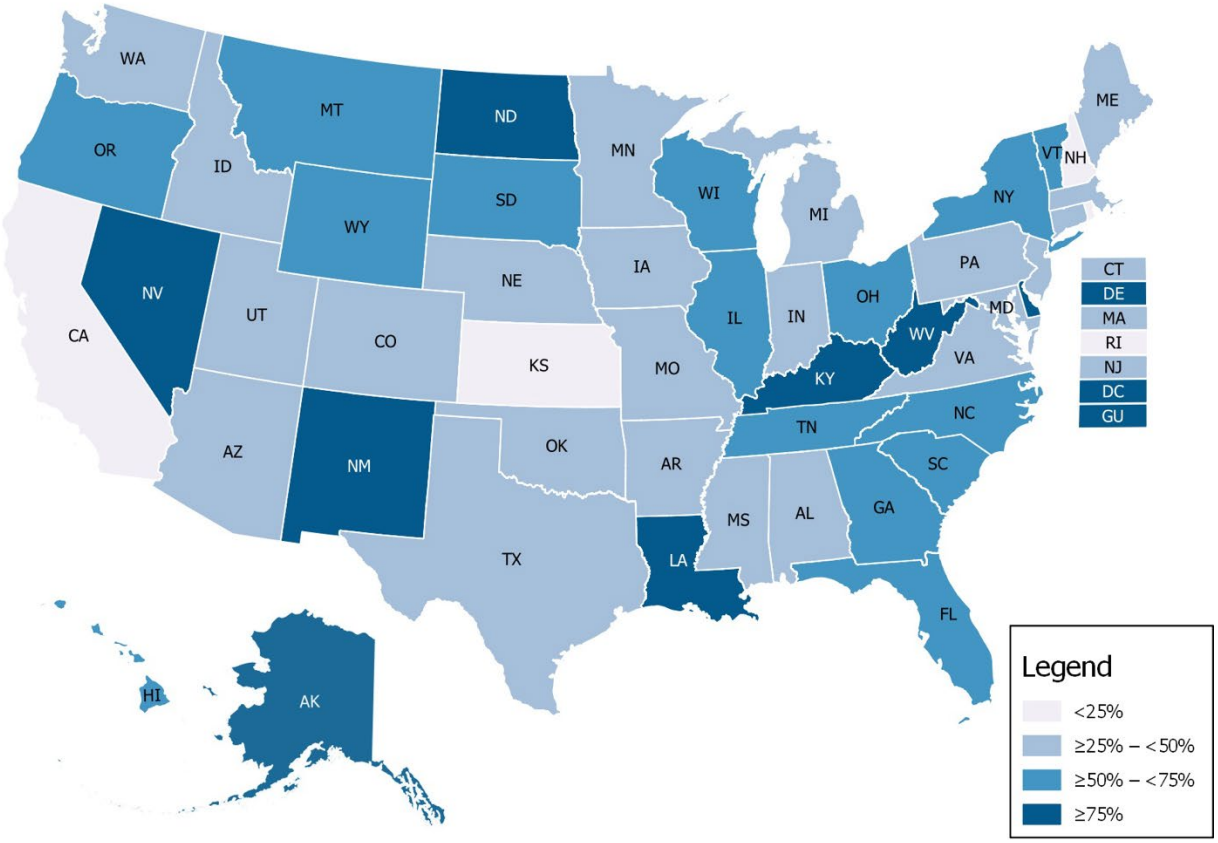
Table 3-1 | National-Level LEA Eligibility and Participation in CEP, by School Year

	SY 2014–15	SY 2015–16	SY 2016–17
Eligible LEAs	6,170	7,465	7,805
Participating LEAs	2,190	2,951	3,542
LEA Participation Rate	35.5	39.5	45.4

Source: *AnalysisFile.*

[42] The Special Assistance Alternatives for NSLP/SBP (Provision 2 and Provision 3) were elected by 3,235 schools in SY 2016-17. Because no LEAs participated in Provision 1, no data were collected regarding Provision 1.

Figure 3-1 | Percentage of Eligible LEAs Participating in CEP by State, SY 2016–17



Schools

Schools are eligible to participate in CEP if

a. they are in an LEA that has an LEA-wide ISP of 40 percent or greater,
b. they are included in a group of schools within their LEA that has an ISP of 40 percent or greater, or
c. the school's ISP is 40 percent or greater.

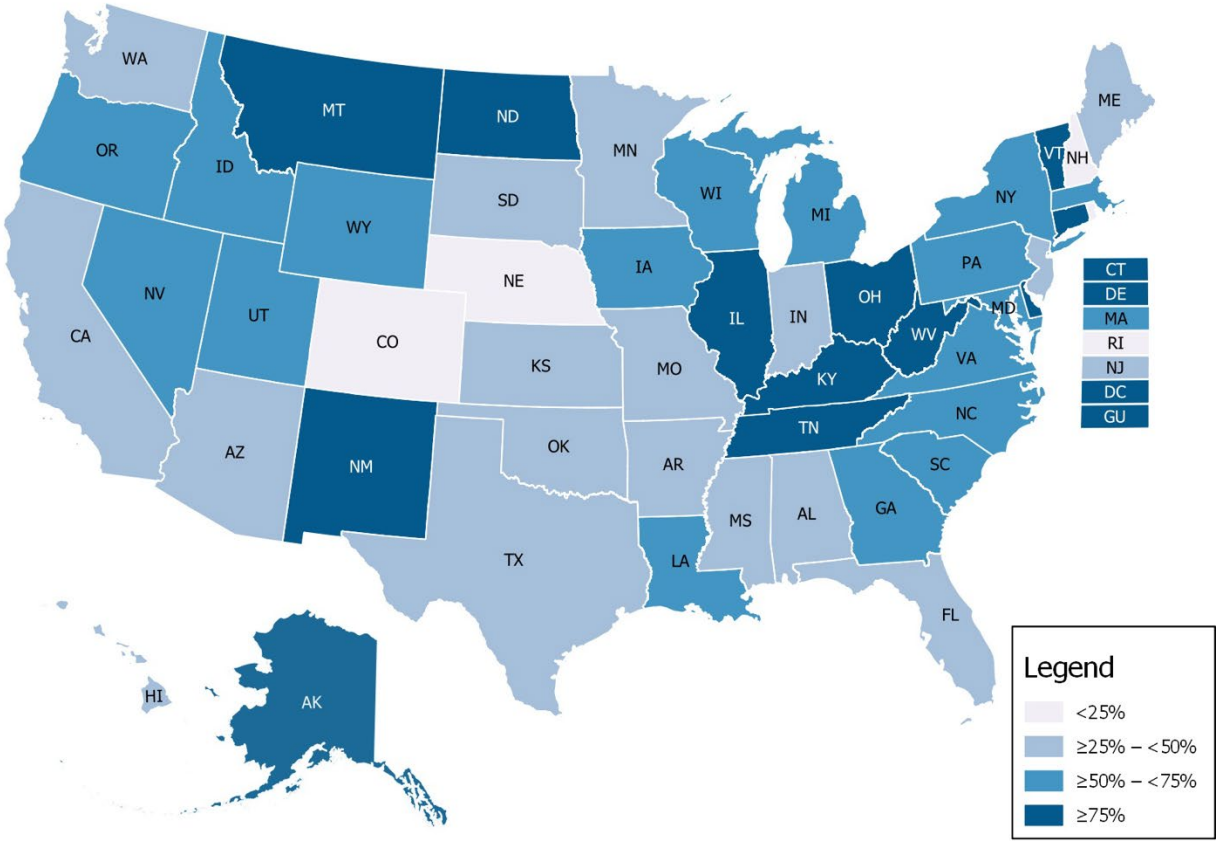
From SY 2014–15 to SY 2016–17, the number of schools eligible for CEP increased by 7,406 (Table 3-2) or 24 percent. Correspondingly, the number of schools participating in CEP increased by 6,911 (Table 3-2) or 50 percent. Defining the school participation rate as the ratio of the total number of schools participating in CEP to the total number of schools eligible for CEP, in SY 2016–17, the national-level school participation rate was 55 percent (Table 3-2). This was an increase of 9.3 percentage points compared to SY 2014–15 (Table 3-2). The State-level school participation rates in SY 2016–17 varied from approximately 10 percent to 94 percent (Figure 3-2 and Table A-2).

Table 3-2 | National-Level School Eligibility and Participation Rate in CEP, by School Year

	SY 2014–15	SY 2015–16	SY 2016–17
Eligible Schools	30,323	35,332	37,729
Participating Schools	13,942	17,700	20,853
School Participation Rate	46.0	50.1	55.3

Source: *AnalysisFile.*

Figure 3-2 | Percentage of Eligible Schools Participating in CEP by State, SY 2016–17



Students

Even though the number of students enrolled in schools participating in NSLP/SBP has remained stable since SY 2014–15, the number of students enrolled in CEP-eligible and participating schools has grown (Table 3-3). Nationally, more than one in three students who attended a school that participated in NSLP/SBP were enrolled in a CEP-eligible school in SY 2016–17. About one in five students were enrolled in a school that participated in CEP (Table 3-3).

Table 3-3 | Student Enrollment by School Year

	SY 2014–15	SY 2015–16	SY 2016–17
Student Enrollment in Schools Participating in NSLP/SBP*	52,089,703	50,790,966	51,442,114
Student Enrollment in CEP-Eligible Schools	14,731,101	16,907,581	18,025,186
Student Enrollment in CEP-Participating Schools	6,498,988	8,161,104	9,451,087

Source: *AnalysisFile* and FNS 742 Data.
*Excluding enrollment in RCCIs.

3.1.2 CEP ELECTION LEVEL

Among all participating LEAs, 76 percent participated LEA-wide (i.e., for all schools) (Table 3-4), and this proportion steadily increased since SY 2014–15 to SY 2016–17.

LEAs that are not eligible to participate in CEP LEA-wide, but have some eligible schools, may choose to participate in all eligible schools, choose to participate in a subset of eligible schools, or choose not to participate at all. In SY 2016–17, among the 866 partially participating LEAs, 537 SFAs (62 percent) used grouping, while the remaining 329 LEAs (38 percent) consisted of single participating schools.[43] Forty-four percent of partially participating LEAs were eligible to participate in CEP LEA-wide but did not. As explored later in this chapter, partial participation among LEAs with LEA-wide ISPs of 40 percent or greater decreased as LEA-wide ISPs increased (Table 3-6). This suggests that although these LEAs met the criteria to elect CEP in all schools, they chose to participate in CEP in some schools until their ISPs were high enough for CEP to be financially viable for their entire LEA.

Table 3-4 | Percentage of Participating LEAs, by CEP Election Level

CEP Election Level	SY 2014–15	SY 2015–16	SY 2016–17
Participating LEA-Wide	72.7	74.7	75.6
Partially Participating	27.3	25.3	24.4

Source: *AnalysisFile.*

[43] Data not displayed. Source: *AnalysisFile*. Note that in SY 2016–17, 284 LEAs indicated using grouping *and* participating LEA-wide. These are not included in the 537. Use of grouping was determined by the school claiming ISPs. If more than one school within an LEA reported identical claiming ISPs, then the partially participating LEA was assumed to have grouped those schools. Of the 329 LEAs with participating individual schools, the median number of participating schools was four.

3.2 Characteristics of LEAs

In the remainder of this report, differences in LEAs are described by various characteristics of the LEAs. The characteristics facilitate analyses of how findings from the Implementation and Impact Studies vary by subgroups of LEAs. In addition, comparisons can be made along these characteristics between participating and non-participating LEAs. The following are the LEA characteristics:

- LEA Size (Number of students in the LEA; Number of schools in the LEA)
- Location (City/Urban, Suburb, Town, and Rural)[44]
- FNS Administrative Regions (Western, Mountain Plains, Southwest, Midwest, Southeast, Northeast, and Mid-Atlantic)[45]
- Private School[46,47]
- Charter School[48]
- Title I School[49]
- School Levels (Elementary, Middle, High, and Other schools)[50]

In this section, we used these characteristics to describe differences in LEAs that participated in NSLP/SBP, in LEAs that were eligible for CEP, and in LEAs that participated in CEP for SY 2016–17.[51]

[44] LEAs were categorized by NCES according to four locale types that are based on proximity to an urban area: city/urban, suburb, town, and rural. City/urban areas include territories of various sizes that are inside urbanized areas and inside a principal city; suburbs are territories outside a principal city and inside an urbanized area; towns are inside an urban cluster; rural areas are territories defined by their proximity to an urbanized area and proximity to an urban cluster. *See* Institute of Education Sciences, National Center for Education Statistics. (n.d.). *Rural education in America*. Retrieved from https://nces.ed.gov/surveys/ruraled/definitions.asp

[45] FNS reorganized the assignment of some States and U.S. territories to Regions, effective October 1, 2019. The Regional assignments noted in this report reflect the States and territories assigned to Regions prior to this date. U.S. Department of Agriculture, Food and Nutrition Service. (2020, March). *FNS Regional offices*. Retrieved from https://www.fns.usda.gov/fns-regional-offices

[46] A private school is not supported primarily by public funds, provides classroom instruction for one or more of grades K–12 or comparable ungraded levels, and has one or more teachers. Organizations or institutions that provide support for home schooling without offering classroom instruction for students are not included. Institute of Education Sciences, National Center for Education Statistics. (n.d.). *Private school universe survey*. Retrieved from https://nces.ed.gov/surveys/pss/

[47] This report presents findings based on the public/private school distinction, but analyses by LEA are also presented. Even though "LEA" is a designation given only to public schools, we report findings for public LEAs throughout this chapter, which notes that the private school(s) were analyzed as LEAs rather than as schools.

[48] Charter schools are publicly funded and typically governed by a group or organization under a legislative contract (a charter) with the State, district, or other entity. The charter exempts the school from certain State or local rules and regulations. In return for flexibility and autonomy, the charter school must meet the accountability standards outlined in its charter. Institute of Education Sciences, National Center for Education Statistics. (n.d.). *NCES fast facts: Charter schools*. Retrieved from https://nces.ed.gov/fastFacts/display.asp?id=30

[49] These schools are designated under appropriate State and Federal regulations as being high-poverty and eligible for funding and participation in programs to ensure that all children meet rigorous academic standards. Institute of Education Sciences, National Center for Education Statistics. (n.d.). *NCES fast facts: Title I*. Retrieved from https://nces.ed.gov/fastfacts/display.asp?id=158

[50] The Common Core of Data (CCD) defines school levels as follows: Elementary Schools, with lowest grade level pre-kindergarten through 3rd grade and highest grade level pre-kindergarten through 8th grade; Middle Schools, with lowest grade level 4th grade through 7th grade and highest grade level 4th grade through 9th grade; High Schools, with lowest grade level 7th grade through 12th grade and highest grade level 12th grade; and Other schools, with all other combinations of grade levels. Institute of Education Sciences, National Center for Education Statistics. (n.d.). *Common Core of Data: Reference library*. Retrieved from https://nces.ed.gov/ccd/reference_library.asp

[51] Comparable information for SY 2014–15 and SY 2016–17 is presented in Appendix Tables A-4 and A-5.

3.2.1 DISTRIBUTIONS OF LEAS IN SY 2016–17

This section presents the distributions of LEAs in terms of the universe of LEAs that participated in NSLP/SBP in SY 2016–17, the distributions of LEAs that were eligible for CEP in SY 2016–17, and the distributions of LEAs that participated in CEP in SY 2016–17.[52, 53]

Within the distribution of the universe of LEAs that **participated in NSLP/SBP in SY 2016–17**,

- 90 percent had fewer than 5,000 students,
- 80 percent had five or fewer schools,
- 38 percent were single-school LEAs,
- The largest number of these LEAs were in rural areas (46.5 percent),
- 79 percent were public LEAs, and
- 27 percent were in the Midwest Region.

Within the distribution of LEAs that were **eligible for CEP in SY 2016–17**,

- 82 percent had fewer than 5,000 students,
- 69 percent of CEP-eligible LEAs had five or fewer schools,
- 29 percent were single-school LEAs,
- The largest number of these LEAs were in rural areas (35 percent),
- 87 percent were public LEAs, and
- 22 percent were in the Midwest Region.

Within the distribution of LEAs that **participated in CEP in SY 2016–17**,

- 83 percent had fewer than 5,000 students,
- 70 percent of LEAs had five or fewer schools,
- 36 percent were single-school LEAs,
- Approximately, the same number of these LEAs were in urban and rural areas (32 percent),
- 85 percent were public LEAs, and
- 25 percent were in the Midwest Region.[54]

Taken together, the distributions of CEP-eligible and participating LEAs in terms of size, their public/private designation, urbanicity, and FNS Region were similar to those of NSLP/SBP LEAs in general—the largest percentages of them were small, public, rural, and located in the Midwest Region.

[52] Each of these groups is a subset of the former. That is, LEAs eligible for CEP are a subset of LEAs that participated in NSLP/SBP, and LEAs that participated in CEP are a subset of LEAs that were eligible for CEP.

[53] These values should be interpreted in terms of percentages or numbers that sum to 100 within an SFA characteristic (e.g., fewer than 5,000 students). This is in contrast to the discussion of participation rates, which can vary from 0 to 100 percent for each subgroup characteristic. Participation rates are discussed in Section 3.2.2.

[54] Of the six States in the Midwest Region, three participated in CEP prior to the national rollout in SY 2016–17.

Table 3-5 | Frequency (Percentage) of LEAs Participating in NSLP/SBP, Eligible for CEP, and Participating in CEP by LEA Characteristic, SY 2016–17

Characteristic[a]	Participating in NSLP/SBP	Eligible for CEP	Participating in CEP
Students in LEA			
1–999 Students	61.5	49.6	54.6
1,000–4,999 Students	28.2	32.8	28.3
5,000–24,999 Students	8.8	14.2	13.4
More than 24,999 Students	1.5	3.4	3.8
Schools in LEA			
1 School	37.9	29.0	35.7
2–5 Schools	42.5	39.7	34.3
6–14 Schools	13.9	19.8	17.9
More than 14 Schools	5.8	11.5	12.1
Urbanicity			
City/Urban	17.7	25.2	32.7
Suburban	22.8	20.8	19.1
Town	12.4	18.2	15.9
Rural	46.5	34.9	32.0
Unknown	0.7	0.9	0.3
FNS Region			
Mid-Atlantic	10.5	9.8	11.0
Midwest	26.6	22.3	25.2
Mountain Plains	15.9	8.1	7.1
Northeast	11.4	10.5	10.7
Southeast	8.5	15.5	20.4
Southwest	13.2	17.9	15.0
Western	14.0	15.8	10.6
LEA Is Private			
Yes	21.5	10.1	13.5
No	78.5	86.5	85.4
Unknown		3.3	1.1
LEA Has Charter Schools			
Yes	14.2	21.3	25.2
No	85.8	65.3	58.2
Unknown or Not Applicable		13.4	16.6
LEA Has Title I Schools			
Yes	57.0	70.9	70.7
No	43.0	18.4	17.1
Unknown or Not Applicable	.	10.7	12.1
Number of LEAs	[a]	**7,805**	**3,542**

[a] Students, schools, urbanicity, FNS Region, and private status information based on 19,240 LEAs in the FNS Verification Collection Report, SY 2016–2017. Title I services and school types based on 15,308 public LEAs and 4,450 private LEAs from NCES.

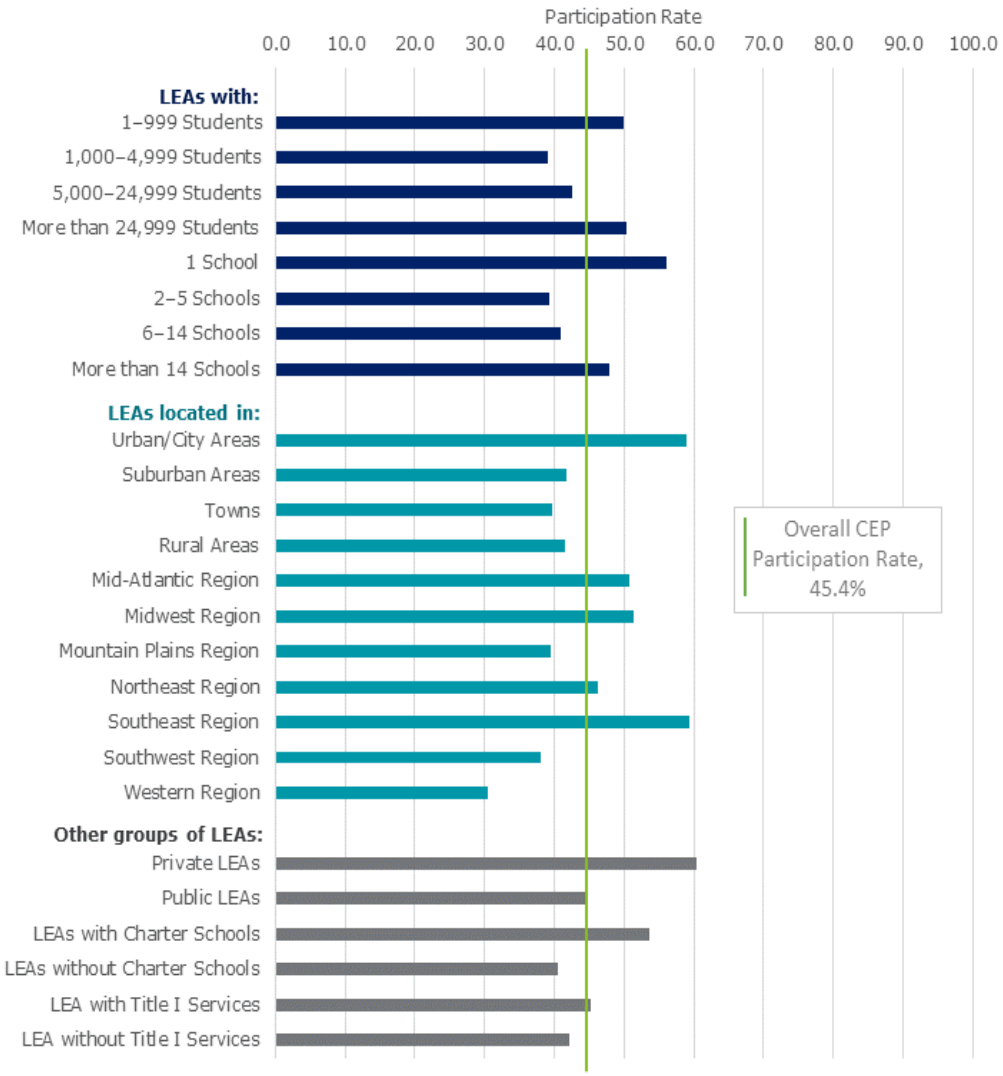
Sources: *AnalysisFile*; FNS Verification Collection Report, SY 2016–2017; NCES CCD data files.

3.2.2 CEP PARTICIPATION RATES, BY LEA CHARACTERISTICS IN SY 2016–17

This section presents the participation rates for LEAs based on their LEA characteristics. As a ratio of the number of LEAs that participated in CEP to the number of LEAs that were eligible for CEP, participation rates provide an indication of the appeal of CEP to LEAs based on their characteristics (i.e., size, urbanicity, FNS Region). It is important to note that the tables and figures in Section 3.2.2 show participation rates by LEA characteristics (which cluster around the overall LEA participation rate of 45.4), which differs from the distribution of participating LEAs by characteristic (which sum to 100 percent for every LEA characteristic) as presented in Table 3-5.

When considered based on their characteristics, participation rates of LEAs differed from the overall LEA participation rate, as shown in Figure 3-3. To more precisely describe differences in participation rates, we estimated a model of participation rates that facilitated an examination of the impact of changing an LEA characteristic (e.g., an LEA changing from private to public) on the participation rate, statistically holding all other characteristics constant (Table A-6). This model shows that, by far, the most important factor in explaining differences in LEA participation rates was the LEA-wide ISP. A 10-percentage point increase in the ISP (e.g., increasing from 45 percent to 55 percent) was associated with an increase in participation rate of 17 percentage points, when all other LEA characteristics were held constant.

Figure 3-3 | CEP Participation Rates by Characteristic, SY 2016–17



LEAs that were eligible for CEP LEA-wide were more likely to elect to participate in CEP in all schools as their LEA-wide ISP increased (Table 3-6). Similarly, the percentage of LEAs partially participating in CEP decreased as the LEA-wide ISP decreased. Eligible LEAs with lower ISPs may have had some schools with relatively high school-level ISPs, making it more financially viable for those schools to form groups and partially participate in CEP. Because the LEA must use non-Federal funds to cover any additional operating costs of CEP above Federal reimbursements, implementing CEP LEA-wide may not have been the best decision for these LEA-wide eligible LEAs. This pattern is consistent with the reported considerations noted by partially participating LEAs that are discussed further in Chapter 5.

Table 3-6 | Participation Rates for LEA-Wide Eligible LEAs by ISP, SY 2016–17

LEA-Wide ISP (%) at Time of Notification	LEAs (*N*)	LEA-Wide Participation (%)	Partial Participation (%)	Overall Participation (%)
ISP ≥ 40 and ISP < 45	951	18.8	14.6	33.4
ISP ≥ 45 and ISP < 50	746	31.1	16.6	47.7
ISP ≥ 50 and ISP < 55	637	48.0	8.2	56.2
ISP ≥ 55 and ISP < 62.5	732	67.5	6.3	73.8
ISP ≥ 62.5	1,279	76.2	1.9	78.0
Total	**4,345**	**2,185**	**385**	**2,570**

Source: *AnalysisFile.*

3.2.3 CHANGES IN LEA PARTICIPATION OVER TIME

Since SY 2014–15, participation rates in larger LEAs (more than 4,999 students and/or more than five schools) increased by approximately 10 percentage points (Table 3-7). Participation rates in city/urban areas have been above 50 percent since the national implementation of CEP (and have steadily increased since then). Additionally, the CEP participation rate increased by 24 percentage points in the Northeast Region since SY 2014–15, driven primarily by a large increase in the participation rate for New York (25 percent to 55 percent; Table A-1 and Table A-3).

Table 3-7 | Participation Rates of LEAs, by LEA Characteristics

Characteristic	SY 2014–15	SY 2015–16	SY 2016–17
Students in LEA			
1–999 Students	42.6	43.7	50.0
1,000–4,999 Students	29.0	33.7	39.1
5,000–24,999 Students	30.3	37.4	42.6
More than 24,999 Students	37.4	46.2	50.4
Schools in LEA			
1 School	50.2	50.6	56.0
2–5 Schools	29.6	32.9	39.2
6–14 Schools	30.0	36.0	40.9
More than 14 Schools	36.2	43.8	47.8
Urbanicity			
City/Urban	52.0	52.3	58.8
Suburban	29.9	38.4	41.8
Town	26.9	32.0	39.6
Rural	32.6	37.0	41.5
FNS Region			
Mid-Atlantic	36.2	46.2	50.8
Midwest	45.4	44.4	51.4
Mountain Plains	33.2	35.5	39.4
Northeast	22.8	28.6	46.3
Southeast	46.0	54.9	59.4
Southwest	26.7	31.0	38.1
Western	25.9	31.6	30.4
LEA Is Private			
Yes	47.2	55.7	60.4
No	34.6	39.1	44.8
LEA Has Charter Schools			
Yes	49.4	44.8	53.7
No	29.0	31.6	40.5
LEA Has Title I Schools			
Yes	36.0	38.0	45.3
No	22.0	20.2	42.2

Source: *AnalysisFile.*

In addition to financial considerations, LEAs must weigh administrative changes when deciding to elect CEP. Experience gained through Provision 2, Provision 3, or partial participation in CEP may facilitate the expansion of CEP to additional schools in the LEA.

From SY 2014–15 to SY 2016–17, 182 LEAs (resulting in an additional 634 CEP schools) transitioned from partial participation in CEP to participating LEA-wide (Table 3-8).

From SY 2014–15 to SY 2016–17, 153 LEAs (resulting in an additional 1,279 CEP schools) transitioned from Provisions 2 or 3 to CEP.

By SY 2016–17, there is evidence that Provision 2 and 3 schools were converting to CEP. For example, approximately 11 percent of the *newly* participating CEP schools in SY 2015–16 came from the Provision 2 or 3 LEAs that did not participate in CEP in the previous school year. This percentage more than doubled to approximately 27 percent of the *newly* participating CEP schools in SY 2016–17.[55]

In addition, by SY 2016–17, the CEP-eligible but not participating LEAs operating under Provisions 2 or 3 in SY 2014–15 were more likely to have schools transitioning to CEP than CEP-eligible but not participating LEAs that did not have schools operating under Provisions 2 or 3 in SY 2014–15 (39 percent vs. 20 percent).[56]

Table 3-8 | LEA (School) Transitions in CEP Participation

LEA (School) Transitions	School Year	
	From SY 2014–15 to SY 2015–16	From SY 2015–16 to SY 2016–17
LEAs (schools) changing from partial to LEA-wide participation	87 (479)	95 (155)
LEAs (schools) switching from Provision 2 or 3 to CEP	55 (422)[a]	98 (857)[b]

[a] The reduction in Provision 2/3 schools was 278.
[b] The reduction in Provision 2/3 schools was 863.

3.2.4 SCHOOL CHARACTERISTICS AND PARTICIPATION IN CEP

Schools vary in terms of the highest and lowest grade levels offered (i.e., school type). This section presents the distributions of schools that were eligible for and participated in CEP in SY 2016–17 by school type (i.e., elementary, middle, high, other). The distribution of school type was similar in the eligible and participating LEAs—more than 58 percent of eligible and participating schools were elementary schools (Table 3-9), and this distribution also reflects the universe of schools participating in NSLP/SBP.[57]

Similarly, 61 percent of schools in partially-participating LEAs were elementary schools in SY 2016–17 (data not shown). The distributions of partially participating schools by school type (i.e., primary, middle, high, other) have remained stable since SY 2014–15, with elementary schools representing approximately 60 percent of all schools partially participating LEAs in each school year (data not shown).

[55] Data on the LEAs operating Provisions 2 or 3 schools comes from the annual FNS 742 data and included LEAs with schools in non-base and/or base years. The percentages were calculated by first using Table 3-2 to determine the additional CEP schools each school year. For example, in SY 2016–17, there was a total of 3,153 (20,853 – 17,700) additional CEP schools. Therefore, the percentage from Provisions 2 or 3 is (857/3,153) × 100 = 27.0.

[56] In SY 2014–15, of the 3,980 eligible LEAs not operating under CEP, 214 were operating some schools under Provision 2 or Provision 3 which provides the base for the comparison in the text.

[57] In terms of school type, participation rates were highest for elementary schools (low grade PK–3; high grade PK–8), which represented between 62 and 66 percent of participating schools in CEP each school year since SY 2014–15.

Table 3-9 | Frequency (%) of Schools Participating in NSLP/SBP, Eligible for CEP, and Participating in CEP by School Type, SY 2016–17

School Level[a]	Participating in NSLP/SBP	Eligible for CEP	Participating in CEP
Elementary (Low grade PK–3; High grade PK–8)	53.6	58.2	59.4
Middle (Low grade 4–7; High grade 4–9)	14.7	15.0	14.5
High (Low grade 7–12; High grade 12 only)	18.5	17.0	16.5
Other Configurations (Combinations not included above)	10.3	7.0	6.9
Not Applicable or Unknown	2.9	2.9	2.7

[a] Students, schools, urbanicity, FNS Region, and private status information based on 19,240 LEAs in the FNS Verification Collection Report, SY 2016–2017. Title I services and school types based on 15,308 public LEAs and 4,450 private LEAs from NCES.

Sources: *AnalysisFile*; FNS Verification Collection Report, SY 2016–2017; NCES CCD data files.

School-level participation rates and school-level ISPs are presented in Table 3-10. Individual schools were less likely to participate at lower ISPs and more likely to participate at higher ISPs. Even though schools with ISPs above 62.5 percent would have 100 percent of meals served reimbursed at the "free" rate under CEP, less than 80 percent of these schools participated in CEP (Table 3-10). Eighty-eight percent of the non-participating schools with ISPs greater than 62.5 were in LEAs that did not participate in CEP (923 out of 1,043 LEAs, not displayed).

Table 3-10 | Participation Rates for Eligible Schools by School ISP, SY 2016–17

School ISP (%) at Time of Notification	Eligible Schools (*N*)	School Participation Rate (%)
ISP ≥ 40 and ISP < 45	5,872	21.8
ISP ≥ 45 and ISP < 50	5,104	32.4
ISP ≥ 50 and ISP < 55	4,740	44.7
ISP ≥ 55 and ISP < 62.5	5,877	58.1
ISP ≥ 62.5	12,269	71.9
Total	**33,862[a]**	**17,281[b]**

[a] Only eligible schools with an ISP value in the notification reports are included in the tabulation.

[b] Only participating schools that were listed as eligible at the time of notification are included in calculation of participation rates.

Source: *AnalysisFile.*

3.3 Summary

In SY 2016–17, the distributions of LEAs that were eligible for and that participated in CEP mirrored the distributions of LEAs in the NSLP/SBP universe—most LEAs contained elementary schools and were rural, small (in terms of numbers of schools), and public.

Overall, more LEAs and schools were eligible for and participated in CEP in SY 2016–17 relative to SY 2014–15. The participation rate increased by 10 percentage points (to 45.4 percent) among eligible LEAs

and increased by nine percentage points (to 55.3 percent) among eligible schools since CEP became available nationwide to all eligible schools in SY 2014–15.

Among participating LEAs, 76 percent participated LEA-wide. Twenty-four percent of participating LEAs chose to participate in CEP in some but not all schools, and 62 percent of these partially participating LEAs used grouping as opposed to using individual school ISPs to calculate the claiming percentages. The percentage of LEA-wide and partially participating LEAs has remained stable since SY 2014–15.

The rate of LEA participation varied by LEA characteristics. The largest and smallest LEAs (in terms of numbers of students) were more likely to participate in CEP when compared to mid-sized LEAs. Single-school LEAs were most likely to participate when compared to LEAs with more schools. The rate of participation was greatest in LEAs in urban and rural areas, when compared to LEAs in areas classified as suburban or as a town.

An increase of ten percentage points in the ISP (e.g., increasing from 45 percent to 55 percent) was associated with an increase in participation rate of 17 percentage points, when all other LEA characteristics were held constant. The most important factor in explaining CEP participation rates was the LEA-wide ISP.

In SY 2016–17, LEAs transitioning to CEP from Provision 2 or Provision 3 was 39 percent, while the transition rate of eligible non-participating LEAs was approximately 20 percent.

4 PERSPECTIVES ON CEP IMPLEMENTATION—STATE-LEVEL IMPLEMENTATION

This chapter outlines the experiences reported by SAs as they provided support and guidance to LEAs as they implemented CEP. Topics included SA communication with LEAs, methods to confirm ISPs, SA implementation challenges and adjustments to SA systems, and SA implementation benefits. The specific project questions included the following:

- How difficult is it to implement CEP?
- How difficult is the loss of F/RP application data for allocating educational benefits to economically disadvantaged students?
- Do SAs receive timely information (e.g., lists of eligible and near-eligible schools, notification of desire to participate) from LEAs with one or more eligible schools?
- How do SAs confirm that the enrollment and number of identified students in individual schools an LEA has identified as eligible are correct?
- How are the notification and public reporting requirements for SAs implemented? Are these requirements difficult to meet?
- Have SAs had to alter their financial payment system to accommodate the meal reimbursement payments for schools/LEAs participating in CEP?

SAs support CEP implementation in many ways, including by conducting direct certification (although some occurs at the local level). SAs are required to provide information about CEP eligibility to LEAs. This includes providing direct certification data used to calculate ISPs, answering questions from LEAs regarding CEP implementation, providing tools and resources to LEAs as they implement CEP, verifying ISPs, and updating systems to accurately track meal counting and claiming data.[58] The tables in Sections 4.1 and 4.2 address CEP implementation from the perspective of the SA. Results are presented from SA Surveys.

4.1 State Implementation Outcomes

When asked about the level of challenge involved in assisting LEAs to implement CEP, 14 of the 48 responding SAs ranked CEP implementation as “a little challenging” to implement, and 23 SAs rated CEP as “moderately challenging” to implement. Nine SAs ranked CEP as “very challenging” to implement, and one SA rated CEP as “extremely challenging” to implement (Table B-1).[59]

Because SAs serve as a resource for LEAs as they implement and participate in CEP, SAs were asked to report the questions most asked by LEAs regarding CEP. Almost all (*n* = 47/49) responding SAs reported questions from LEAs about the effect of CEP on other Federal funding sources (i.e., Title I, E-Rate). Questions about financial viability and calculating ISPs were asked by LEAs from 45 and 41 States,

[58] These activities may be more or less common in States depending on their level of involvement with the direct certification process.

[59] Of the SAs that implemented CEP prior to SY 2014–15, three rated CEP as “a little challenging,” four rated CEP as “moderately challenging,” and two rated CEP as “very challenging.” Two SAs did not respond to this question.

respectively (Table B-2). It is also notable that resources provided by FNS were most often used by SAs to answer LEAs' questions about CEP (Table B-2).

Twenty-three SAs reported that their LEAs experienced difficulty allocating education benefits due to the discontinued collection of household income information from school meal applications (Table 4-1). Similarly, 33 SAs reported fielding questions from LEAs about the effect of CEP on other State or local funding, and 23 SAs were asked questions about the impact of CEP on other benefits for low-income students (Table B-2).[60] A closer analysis found that the SAs that reported that their LEAs expressed difficulty allocating education benefits without school meal applications were the same SAs that reported fielding questions from LEAs about this issue.

Table 4-1| Difficulty of Allocating Education Benefits Due to Discontinued Collection of F/RP Applications

Difficulty	Number of SAs	Percentage of SAs
It is more difficult to allocate benefits under CEP.	23	47.9
The level of difficulty is about the same.	14	29.2
It is less difficult to allocate benefits under CEP.	4	8.3
Don't know.	7	14.6

Notes: Data were provided by 48 State CN directors; 1 State CN director did not respond.
Source: State CN Director Survey.

While the decision to elect CEP rests with the LEA, the SA provides technical assistance and ensures program integrity. In all cases, the SA must review an LEA's submitted documentation to ensure the LEA meets all eligibility requirements to participate in CEP (e.g., evaluating the accuracy of the ISP). ISPs may be evaluated through a review of ISP documentation submitted by the LEA at the time CEP is elected and when an LEA updates its ISP(s) (e.g., adds schools, updates the configuration of groups of schools). To evaluate the accuracy of the ISP, SAs examine documentation submitted by the LEA to substantiate the number of identified students and the number of enrolled students. Forty-two SAs reported verifying documentation used to support ISPs before LEAs began implementing CEP (whether that election was new or updated). Five SAs reported verifying ISP documentation by drawing statistically valid samples or samples of certain sizes (e.g., 10 percent) to verify the direct certification status or categorical eligibility of those students (Table B-3).

By May 1 of each year, SAs must notify each LEA of its LEA-wide CEP eligibility and near-eligibility. To complement this list, LEAs must submit school-level eligibility lists to their SA by the same date. SAs with access to school-level data may exempt LEAs from school-level notification requirements. Table 4-2 shows SAs' ability to meet this reporting deadline and whether they were able to produce CEP eligibility lists without input from LEAs. All 49 SAs reported being able to meet the deadline to inform LEAs about LEA-wide eligibility. More than half of SAs (n = 27/49) reported the ability to produce school-level eligibility lists without LEA input, while 22 SAs reported needing LEAs to submit school-level eligibility lists to them. Even though all SAs reported being able to meet the reporting deadline, some SAs

[60] Of the SAs that implemented CEP prior to SY 2014–15, two reported that they experienced less difficulty allocating benefits under CEP, three reported that they experienced more difficulty allocating benefits under CEP, and two reported that the level of difficulty was about the same. Two SAs did not respond to this question.

reported barriers to meeting the deadline. The most common barrier, reported by nine States, was lack of time to get information from LEAs and meet the deadline.

Table 4-2 | Reported Barriers to Meeting Reporting Deadline

SA Ability and Reported Barriers to Meeting Deadline	Number of SAs	Percentage of SAs	SA Able to Produce List Without LEA Input			
			Yes	Percentage	No	Percentage
SAs able to meet deadline to inform LEAs about CEP eligibility[a]	49	100	27	55.1	22	44.9
Noted barrier						
Not enough time to get information from LEAs[a]	9	18.4	3	11.1	6	27.3
Issues with notification lists and reporting	6	12.2	4	14.8	2	9.1
Insufficient staffing	1	2.0	1	3.7	0	0.0
Process is confusing to LEAs	1	2.0	1	3.7	0	0.0
No barriers	16	32.7	12	44.4	4	18.2
No response	16	32.7	6	22.2	10	45.5

[a] Both SAs and LEAs face reporting deadlines on April 15. SAs are required to inform LEAs about district-wide CEP eligibility; LEAs must submit school-level CEP eligibility lists to SAs. In some cases, SAs have access to school-level lists and do not require LEAs to submit those lists. States are required to publish district-wide and school-level eligibility data on their websites by May 1.

Note: Data were provided by 49 CN directors. Response options were updated as a result of recoding other and/or open-ended responses.

Source: State CN Director Survey.

Thirty-one SAs reported that CEP resulted in changes to SA data systems (Table 4-3), and for most SAs, those changes were to their electronic claims systems. Nine SAs without sufficient financial payment systems made changes to those systems as a result of CEP, and one SA developed/purchased a separate system to accommodate CEP (Table 4-4). Forty SAs had systems that were sufficient to accommodate CEP.

Table 4-3 | Changes to State Data Systems

Changes Made		Number of SAs	Percentage of SAs
CEP resulted in changes to the State data tracking systems used for the school meals programs	Yes	31	63.3
	No	18	36.7
Among those States that reported changes to data tracking systems:			
Made changes to their electronic claims system		28	90.3
Made changes to paper tracking procedure		7	22.6
Implemented first electronic claims system		2	6.5

Notes: Data were provided by 49 State CN directors. Thirty-one State CN directors were directed to report the changes made to their system. State CN directors could select multiple changes to programs and procedures.

Source: State CN Director Survey.

Table 4-4 | Changes to Financial Payment Systems

Changes Made		Number of SAs	Percentage of SAs
Financial payment system was sufficient to accommodate CEP	Yes	40	81.6
	No	9	18.4
Among those States that did not have a sufficient financial system:			
Added new capacity to existing system		8	88.9
Developed/purchased a separate system		1	11.1

Notes: Data were provided by 49 State CN directors. Nine State CN directors with insufficient financial systems were directed to report changes made. State CN directors could select multiple changes to their financial payment system.
Source: State CN Director Survey.

4.2 Summary

Most SAs provided technical assistance, support, and materials for LEAs to estimate the financial impacts of CEP prior to implementation. This support provided by SAs addressed the concerns that CEP-eligible LEAs cited most often: financial viability, uncertainty about reimbursement, and concern about the potential loss of other educational funds. All SAs reported an ability to meet the deadline to notify LEAs about LEA-wide CEP eligibility for the upcoming school year, including the 22 SAs that needed input from their LEAs to produce school-level eligibility lists. About half of SAs reported that their LEAs had difficulty allocating education benefits under CEP, due to the loss of household income information. SAs also reported answering questions from and providing support to LEAs about the effects of CEP on other benefits and funding sources for their low-income students. These results show that SAs successfully managed and guided the CEP election process by providing notifications about LEA and school eligibility, verifying enrollment and ISP data prior to implementation, and providing guidance about the financial implications of CEP.

5 PERSPECTIVES ON CEP IMPLEMENTATION—LEA-LEVEL IMPLEMENTATION

This chapter presents the experiences and perceptions of LEAs with CEP-eligible and participating schools as of SY 2016–17. In particular, the chapter reports CEP participation decisions, perceived benefits and barriers to participation, challenges with CEP implementation, and the perceived impact of CEP on administrative burden and food costs. The specific research questions included the following:

- How are LEAs educating and informing the public about CEP?
- How often do LEAs use the first year ISP (established in the year prior to the start of the current 4-year cycle) rather than an ISP that was updated before the end of the 4-year cycle?
- What is the perceived impact of CEP on LEA administrative burden?
- Have LEAs been able to reallocate staff as a result of not having to process school meal applications?
- What are the barriers to participation for non-participating LEAs?
- What changes could be made to make CEP more appealing to non-participating LEAs?

This chapter summarizes the decision-making processes and perceived implementation benefits and barriers for LEAs with CEP-eligible and participating schools. The tables in Sections 5.1–5.3 examine perceptions about CEP implementation at the LEA level. Specifically, results are presented from Participating and Non-Participating LEA Surveys.

5.1 Decision Making and Communications

This section outlines factors involved in the LEAs' decision-making processes as LEAs determined whether to participate in CEP. The following tables present LEAs as participating LEA-wide (i.e., all schools in the LEA participate in CEP); partially participating (i.e., one or some, but not all, eligible schools in the LEA participate in CEP);[61] and non-participating (i.e., no eligible schools in the LEA participate in CEP).

5.1.1 COMMUNICATION ABOUT CEP

FNS provides online materials through the CEP Resource Center, which provides resources for families and school officials to better understand CEP and to support the successful implementation of CEP at the local level.[62] Much of the guidance is in the form of webinars, but the website also includes information on eligibility, CEP's impact on other funding sources, and implementation strategies. Forty-four SAs reported being aware of the CEP Resource Center, and of those, 40 SAs directed LEAs to the

[61] Some of these tables display the data by ISP level at important thresholds. As of the publication of this report, in order to be eligible to participate in CEP, a minimum ISP of at least 40 percent of the total student enrollment at the school, group, or district level was required. The ISP is multiplied by a factor of 1.6 to generate the free claiming percentage, which is the percentage of meals that USDA will reimburse at the Federal "free" rate. The remaining percentage of meals, up to 100 percent, are reimbursed at the Federal "paid" rate. Schools or LEAs with ISPs above 62.5 percent qualify for 100 percent reimbursement at the "free" rate. When presenting data by ISP category in tables in this section, we use ISPs below 40, between 40 and 62.5, and above 62.5 as key thresholds.

[62] The CEP Resource Center is available at https://www.fns.usda.gov/school-meals/community-eligibility-provision-resource-center.

CEP Resource Center. Thirty-two of those SAs viewed the CEP Resource Center as useful (data not shown).

Food Service Directors were most often the LEA personnel that had awareness of the CEP Resource Center (Table C-1). The CEP Resource Center materials that were most used by LEAs were the CEP Fact Sheet, CEP Estimator Tool, ISP worksheet, and CEP policy memos and guidance (Table C-2). Ninety-eight percent of LEAs viewed the CEP Resource Center resources as important, and 99 percent of LEAs rated its resources as useful (Table C-3).

Federal law requires direct certification of children from households that receive SNAP benefits. Most SA direct certification systems also extend to children in households that receive TANF benefits. Among the CEP-eligible LEAs that were responsible for their own direct certification, all reported using data from SNAP to conduct direct certification and establish their ISP, and 70 percent of eligible LEAs reported using data from TANF to conduct direct certification and bolster their ISP (Table 5-1). The most frequently used categorical eligibility data among participating LEAs were lists of foster children and homeless children (Table 5-1). These results suggest that participating LEAs could readily access these sources and that these sources were worth the administrative effort to pursue additional direct certification matches.

Table 5-1 | Direct Certification and Other Source Categorical Eligibility Data Used by Participating LEAs to Calculate ISP Values

Source of ISP Data	Percentage of Participating LEAs
Direct Certification	
SNAP	100.0
TANF	69.6
FDPIR	24.1
Medicaid (in pilot States)	16.3
Weighted number of LEAs	1880
Unweighted number of LEAs	254
Other Source Categorical Eligibility	
Homeless	82.5
Foster children	82.0
Migrant	48.0
Runaway	39.8
Head Start	34.0
Approved by local authorities	19.8
Weighted number of LEAs	721
Unweighted number of LEAs	90

Notes: At the time of this study, direct certification Medicaid demonstration States included California, Florida, Illinois, Kentucky, Massachusetts, New York, and Pennsylvania.
Data presented are among LEAs that indicated they used direct certification or other source categorical eligibility data to establish their ISP. Ninety-five LEAs reported that the State calculated their both their LEA-wide and school level ISPs; 38 LEAs did not know who calculated their ISPs; 5 LEAs did not respond. None of these LEAs were included in this table.
Three percent of LEAs participating LEA-wide reported doing direct certification but did not specifically choose a direct certification source.
LEAs could select multiple responses.
SNAP = Supplemental Nutrition Assistance Program
TANF = Temporary Assistance for Needy Families
FDPIR = Food Distribution Program on Indian Reservations
Sources: *AnalysisFile*, Participating LEA Survey.

Participating LEAs can recalculate their ISP at any point during the 4-year cycle. Presumably, participating LEAs elected CEP using an ISP that was sufficient for school meal program operations; however, some LEAs may have opted to recalculate their ISP to determine the financial viability of adding more CEP schools[63] prior to actually adding more CEP schools. Almost 53 percent of participating LEAs reported recalculating their ISP at some point prior to the end of the 4-year cycle, and among partially participating LEAs, this number increased to 64 percent (Table 5-2). These results show that participating LEAs regularly reexamine their ISP to determine when and whether to add more CEP schools as doing so becomes financially viable.

[63] Recalculating their ISP allows partially participating LEAs to know when CEP would become financially feasible in more schools, which was the most cited reason not to operate CEP in all schools (Table C-4).

Table 5-2 | Percentage of Participating LEAs that Recalculate their LEA-Wide ISP Prior to the End of the 4-Year Cycle

LEAs Recalculate ISP	Participating LEAs	Partially Participating LEAs	LEAs Participating LEA-wide
No	24.0	21.3	24.8
Yes	52.7	64.2	49.0
Don't know	5.1	5.7	4.9
No response	18.2	8.9	21.2
Weighted number of LEAs	3,542	866	2,676
Unweighted number of LEAs	446	96	350

Source: Participating LEA Survey.

5.2 Benefits and Barriers to Participation in CEP Reported by Participating LEAs

The following set of tables displays findings related to benefits and barriers to CEP participation, as reported by participating LEAs. Table 5-3 lists the perceived benefits of CEP participation, as reported by participating LEAs. Participating LEAs noted increased meal participation;[64] relief for families under financial burden; and reduced/eliminated unpaid meal charges more frequently than other benefits of CEP. When examined by ISP category, the rank order of reported benefits of CEP does not substantially change (data not shown).

[64] Thirteen percent of participating LEAs made changes to meal service as a result of CEP; of those, more than 60 percent implemented or expanded SBP (Table C-5). These results contextualize the increased meal participation experienced by LEAs participating in CEP.

Table 5-3 | Reported Benefits of CEP Participation

Reported Benefits	Percentage of Participating LEAs Indicating Benefit
Increased meal participation	75.5
Decreased financial burden on families	74.3
Eliminated unpaid meal charges	70.3
Decreased administrative burden	65.0
Decreased stigma for students in need	59.0
Increased revenue	50.8
Reduced wait in lunch and/or breakfast lines	32.7
Improved academic performance	26.7
Improve nutritional quality of meals	23.1
Increased attendance	21.6
Improved student behavior	17.8
Decreased costs	16.9
Improved student health	16.5
Reduced tardiness	12.7
Greater opportunity to receive grants	0.4
Don't know	3.3
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Notes: LEAs could select multiple benefits; categories were combined; new benefit categories were added as a result of recoding "Other" responses.
Source: Participating LEA Survey.

One-third of participating LEAs reported having at least three months to prepare for the implementation of CEP, and almost all of those LEAs (99 percent) reported that three months was enough time to prepare for the implementation of CEP (Table C-6). As participating LEAs reported less lead time to prepare for CEP, the lead time was rated as less adequate. These findings suggest that the established reporting and decision deadlines for SAs and LEAs allow adequate time for LEAs and schools to prepare for CEP implementation.

Participating LEAs were asked about challenges with CEP implementation (Table 5-4). Approximately half of LEAs reported no challenges implementing CEP (52 percent). Among LEAs that reported challenges with CEP, these included no decrease in administrative burden (9 percent) and increased meal participation that strains serving capacity (8 percent).

Approximately 40 percent of participating LEAs continued to collect household income information while participating in CEP (Table C-7). It is also notable that, overall, only 3 percent of participating LEAs rated CEP as cost ineffective. When examined by LEA ISP, these ratings increased to 12 percent for LEAs with ISPs between 40 and 50 (data not shown).

Table 5-4 | Reported Challenges with CEP Implementation

Reported Challenges	Percent of Participating LEAs Indicating Challenge
No challenge encountered	52.0
No decrease in administrative burden	8.8
Increased meal participation strains the capacity to serve meals	7.9
Negative impact of CEP on funding for educational programs	7.2
Less total revenue from food service	5.6
LEAs/schools participating in CEP are viewed as low income	3.8
CEP is not cost-effective	3.1
Confusion over how to submit claims	3.0
More time than expected needed to implement CEP and train staff	2.5
LEAs/schools participating in CEP are treated differently than other LEAs/schools	2.2
Other	2.2
Don't know	8.3
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Notes: LEAs could select multiple challenges; similar categories were combined; new benefit categories were added as a result of recoding "Other" responses.
Source: Participating LEA Survey.

Almost two-thirds (65 percent) of participating LEAs noted decreased administrative burden as a benefit of CEP (Table 5-3). Among participating LEAs that experienced decreased administration burden due to CEP (Table 5-5), food service staff spent more time conducting other administrative tasks (73 percent), overseeing food program operations (69 percent), and planning meal services (56 percent).

Seventeen percent of participating LEAs reported decreased costs due to CEP (Table 5-3). Among participating LEAs that reported decreased costs, 27 percent saw economies of scale that resulted in a reduction in the cost per meal (Table 5-6).

Together, these results suggest that LEAs were provided with adequate resources from FNS and their respective SAs in the form of resources to address financial concerns about CEP implementation. Once implemented, CEP was more beneficial than challenging.

Table 5-5 | Perceived Impact of CEP on Administrative Burden, Among LEAs that Reported Reduced Burden due to CEP

	Percentage
Personnel with reduced administrative burden	
LEA food service administrative staff (e.g., director, bookkeeper, clerical staff)	85.6
School food service workers (e.g., cashiers, cooks)	48.9
Cafeteria managers	48.2
School administrators (e.g., principal, administrative assistants)	38.9
Other LEA administrative staff	22.1
Activities on which food service staff spent more time	
Conducting other administrative tasks	72.7
Overseeing food service operations	68.6
Planning nutrition/meal services	55.6
Conducting professional development or training	38.4
Researching purchasing options for food and supplies	29.9
Implementing new SBP	11.9
None—not able to spend more time on any activities	2.2
Weighted number of LEAs	2,302
Unweighted number of LEAs	297

Notes: Data are presented among the 65 percent of participating LEAs that reported a decrease in administrative burden due to CEP. Approximately 5 percent of LEAs that reported experiencing a decrease in administrative burden did not respond to these questions related to personnel and activities. LEAs could select multiple responses.
Source: Participating LEA Survey.

Table 5-6 | Perceived Impact of CEP on Food Service Activity Costs

How costs have been reduced	Percentage
Reduced technology costs associated with meal counting	39.8
Reduction in cost per meal	27.0
Reduced food service staff	25.0
Decreased administrative burden	9.0
Don't know	12.9

Notes: Data are presented among the 446 participating LEAs (16.9 percent) that reported a decrease in food service activity costs due to CEP. Approximately 4 percent of LEAs that reported a decrease in costs did not respond to this question. New categories were added as a result of recoding "Other" responses. LEAs could select multiple responses.
Source: Participating LEA Survey.

5.3 Perceived Barriers and Benefits to Participation in CEP reported by Non-Participating LEAs

The financial impact on school meals was the factor most noted by non-participating LEAs in their decision not to participate in CEP (Table 5-7). Sixty percent of non-participating LEAs reported that they used individual meal eligibility data (which they would no longer receive under CEP) for other purposes (Table C-8). Half of non-participating LEAs reported that CEP would be more appealing if the multiplier

was increased, underscoring the prevalent financial concerns about CEP implementation among non-participating LEAs (Table C-9). Among the non-participating LEAs that reported that CEP would be more appealing if the multiplier were increased, non-participating LEAs with lower ISPs (i.e., ISP between 40 and 50) endorsed this statement most (59 percent), followed by non-participating LEAs with ISPs between 50.1 and 62.4 (54 percent), and by non-participating LEAs with ISPs greater than 62.5 (18 percent) (data not shown).

Sixty-one percent of non-participating LEAs reported that financial viability was a barrier to CEP participation (Table 5-8). Other barriers included concern or uncertainty about the amount of reimbursement under CEP (40 percent) and concern about how CEP would affect the funding for other educational programs that relied on the availability of F/RP data (37 percent). Non-participating LEAs' concern about losing access to this household income information seemed driven by the prevalent use of this information for other important purposes, but these concerns were not as prevalent among participating LEAs, as they found alternative ways to capture household income data or used guidance from the U.S. Department of Education to allocate funds.

Despite their choice not to elect CEP, most non-participating LEAs expected numerous benefits from CEP, including eliminated unpaid meal charges, increased meal participation, decreased financial burden on families, and decreased administrative burden (Table 5-9).

Table 5-7 | Factors that Determined Non-Participating LEAs' Decision to Not Participate in CEP

Factors	Percentage
Financial impact on school meals	67.0
Financial impact on other education funding	31.5
Eligibility of individual schools and/or entire district to participate	29.3
Availability of CEP for the long term	23.9
Need to continue to collect student-level data for other funding sources	20.3
Impact on loss of other benefits/services for economically disadvantaged students	14.7
Staffing needs	11.0
Considerations about schools being labeled low income	10.6
Rate of participation in school meal programs	9.4
Logistics or difficulty implementing	8.7
Consideration around students being labeled low income	8.1
Other	11.5
Don't know	9.8
Weighted number of LEAs	4,263
Unweighted number of LEAs	307

Notes: LEAs could select multiple responses; approximately 2 percent of LEAs did not respond to this question.
Source: Non-Participating LEA Survey.

Table 5-8 | Non-Participating LEAs' Perceived Barriers to CEP Participation

Perceived Barriers	Percentage
CEP not financially viable	60.6
Uncertainty or concern about reimbursement	40.2
Uncertainty or concern about how CEP affects funding for educational programs	37.0
Increased cost in overall school programs	23.6
Increased administrative burden	15.8
LEAs/schools participating in CEP are treated differently	12.4
Not enough time to implement CEP and train staff	10.8
LEAs/schools participating in CEP viewed as low income	9.6
Key LEA/school officials not supportive	5.3
Difficulty establishing an SBP	3.7
Community not supportive	3.1
Uncertainty about long-term eligibility	1.6
Not viable unless LEA can participate district-wide	1.2
Don't know	10.1
Weighted number of LEAs	4,263
Unweighted number of LEAs	307

Notes: LEAs could select multiple responses. Barriers were added as new categories from recode of "Other" responses. Approximately 2 percent of non-participating LEAs did not respond to this question.
Source: Non-Participating LEA Survey.

Table 5-9 | Non-Participating LEAs' Expected Benefits of CEP Participation

Expected Benefits	Percentage
Eliminate unpaid meal charges	80.9
Increase meal participation	80.6
Decrease financial burden on families	79.4
Decrease administrative burden	66.1
Decrease stigma for students in need	57.6
Improve academic performance	45.2
Improve student health	42.9
Improve student behavior	37.3
Increase attendance	36.0
Increase revenue	33.4
Reduce the wait in lunch and/or breakfast lines	24.2
Reduce tardiness	22.1
Improve nutritional quality of meals	20.6
Decrease costs	17.5
Don't know	0.6
Weighted number of LEAs	4,263
Unweighted number of LEAs	307

Notes: LEAs could select multiple benefits; row estimates for importance responses may not add to 100 percent because LEAs could also select "Don't know," not shown in table; benefits were added as new categories from recode of "Other" responses.
Source: Non-Participating LEA Survey.

Almost all participating LEAs (97 percent) reported that they were likely to participate in CEP in the next school year (i.e., SY 2017–18), and 38 percent of non-participating LEAs reported being likely to participate in CEP in the next school year (among the LEAs that responded; Table C-10).

5.4 Summary

More than half of participating LEAs reported no problems implementing CEP. Participating LEAs reported experiencing more benefits than barriers as a result of CEP implementation. For example, three-fourths of participating LEAs reported *perceived* increased meal participation, decreased financial burden on families, and eliminated unpaid meal charges as a result of CEP implementation. Most participating LEAs reported recalculating their ISPs before the end of a 4-year cycle, presumably as a precursor to deciding on the financial viability of electing CEP in more schools.[65]

Partially participating[66] and non-participating (Table 5-7 and Table 5-8) LEAs reported financial concerns as barriers to CEP implementation, despite non-participating LEAs' recognition that CEP implementation could eliminate unpaid meal charges, increase school meal program participation, and relieve financial

[65] Among LEAs that had eligible, non-participating schools in SY 2015–16 but added those schools in SY 2016–17, 63 percent reported that their decision to participate in SY 2016–17 was based on their reconsideration of the costs and benefits of CEP (Table C-11), suggesting that even though financial concerns are prevalent among non-participating LEAs/schools, these concerns are assuaged enough for eligible LEAs/schools to choose to participate in CEP.

[66] This refers to barriers to implementing CEP LEA-wide for partially participating LEAs (Table C-4).

concerns for families. Non-participating LEAs also expressed concerns about the impact on funding for other education programs as a barrier to CEP participation; however, only seven percent of participating LEAs actually experienced this challenge.

Ninety-seven percent of participating LEAs and 38 percent of non-participating LEAs reported they were likely to participate in CEP during the next school year. These findings suggest that CEP offers benefits for participating LEAs and that many non-participating LEAs even had intentions to participate in CEP in an upcoming school year, presuming that participation would be financially feasible.

6 IMPACT STUDY

The Impact Study considered how various outcomes were different under CEP compared to what those outcomes would have been in the absence of CEP. The following research questions were addressed:

- What is the impact of CEP on attendance and program participation?
- What is the impact of CEP on revenues generated for reimbursable meals?
- What is the impact of CEP on the School Breakfast Program?
- What are the School Foodservice Director's *perceived* impacts of CEP on attendance and meal costs, quality, and variety?

The project team employed a matched DD design[67] to assess the *confirmatory outcomes* (i.e., participation in NSLP and Federal reimbursements per enrolled student) using State administrative meal claims data. The *exploratory outcomes* were assessed with post-test-only comparison group methods using LEA-reported impacts from the LEA survey (i.e., participation in SBP, Federal reimbursements per NSLP lunch and per SBP breakfast, presence of SBP prior to CEP, and other student-level outcomes). The project team decided to consider CEP to be impactful if it increased at least one of the two confirmatory outcomes.

This chapter presents results from the matched DD design and the post-test-only comparison group analysis of LEA survey responses. Finally, the chapter presents participating LEAs' perceptions of CEP's effects on outcomes related to meal costs, quality, and variety. The LEA surveys assessed perceived changes from SY 2013–14 to SY 2016–17.

6.1 Expectation about CEP Impacts on Meal Program Participation, Revenues, SBP Service, and Other Outcomes

Findings from the earlier impact evaluation of CEP in the first six States that implemented CEP before nationwide rollout showed that CEP increased student participation in NSLP and SBP.[68,69] On the revenue side, that evaluation showed that CEP led to an increase in Federal reimbursement per student and per meal but did not find any evidence of impacts on non-Federal revenues.

6.1.1 IMPACTS TO PARTICIPATION

The earlier impact evaluation demonstrated that CEP increased student participation and Federal reimbursements in the first three years of availability. If those results are valid and generalizable, then

[67] See Chapter 2 and Appendix H for additional detail.

[68] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

[69] The earlier evaluation included District of Columbia in the implementation study, but it was deemed infeasible to include in the Impact Study as it had only one regular school district. For a detailed explanation, please see Appendix 2A of Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

CEP would be expected to similarly improve outcomes in other States when it was made available nationwide.

CEP election could lead to an increase in NSLP and SBP participation for several reasons. First, any schools that did not have a breakfast program were required to add one under CEP. Increasing the availability of SBP would increase participation. Second, CEP eliminated the application process for certification, making it easier for students to participate. Third, universal availability may have reduced the stigma sometimes associated with receiving free meals. Finally, schools may have promoted universally available meals or improved meal delivery, resulting in increased participation.

One goal of CEP is to increase access and participation in NSLP and SBP among students in high-poverty schools. Therefore, the first confirmatory question was whether CEP increased student participation in NSLP. To measure participation impacts, NSLP was selected for two reasons. NSLP is the larger program compared to SBP, and our estimates of the effect of CEP on NSLP participation are less likely to be biased. Because the presence of SBP at a school is potentially related to a school's choice to take up CEP, disentangling the selection effect from the causal effect is more difficult for SBP. Given this difficulty, the examination of CEP effects on SBP participation was an exploratory analysis. The previous evaluation similarly examined participation in NSLP (and not SBP) as a confirmatory outcome.[70]

CEP would be unappealing to LEAs if the costs of implementing the program exceeded revenues; therefore, this study designated increased Federal reimbursements per enrolled student (rather than per meal reimbursements) as the second confirmatory outcome and the best proxy available for the financial impact of CEP. The assessment of per meal reimbursements was a confirmatory outcome in the earlier impact evaluation, but was treated as an exploratory outcome in the current study. The designation of per meal reimbursements as exploratory in this study was due to the fact that the administrative data collected did not include all of the variables necessary to control for changes in reimbursements that were unrelated to CEP

The question of sustainability of impacts on NSLP and SBP participation was also addressed in an exploratory analysis. This analysis required multiple years of post-implementation data to assess whether any CEP impacts lasted beyond the first year of implementation. While CEP has been operational nationwide since SY 2014–15, many eligible LEAs started participating in CEP after SY 2014–15. Therefore, fewer LEAs in our sample had participation data for school years after the first year of CEP election. This analysis may have lower power for two reasons. First, the smaller sample size reduces the precision of the impact estimates. Second, this analysis requires three or more measurement points per LEA, each of which is subject to random error.

6.1.2 IMPACTS TO FEDERAL REIMBURSEMENT

Federal reimbursements per student were the best available proxy for the financial impact of CEP. The best available data were the State records of Federal reimbursements for NSLP and SBP. The project team used these data to test whether LEAs that elected CEP received more Federal funds for school meals. While Federal reimbursements do not necessarily fill the entire gap, this outcome indicates that

[70] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

the LEAs' Federal reimbursements have moved in a positive direction. The earlier CEP impact evaluation found that Federal reimbursements per enrolled student increased by 13.5 percent and increased by 6 percent for NSLP lunches and 2 percent for SBP breakfasts. CEP was not found to impact non-Federal revenues.

CEP may impact Federal reimbursements in three ways. First, providing free meals to all students may result in more students participating in both NSLP and SBP, in which case the LEA receives reimbursements based on a greater number of meals served. Second, Federal reimbursements may be higher or lower under CEP depending on the percentage of meals served free, reduced price, or paid under the traditional reimbursement system. Third, in schools and LEAs that did not participate in SBP prior to CEP, the election of CEP spurs a new channel of Federal revenues from SBP reimbursements. The cumulative effect of CEP on Federal reimbursements from each of these channels is captured by the impact on daily NSLP and SBP reimbursements per enrolled student.[71]

6.1.3 IMPACTS TO OTHER OUTCOMES

CEP did not appear to affect LEA food service revenues from local non-Federal sources in the earlier impact evaluation. In the current evaluation, we assessed the change in local non-Federal revenues due to CEP through the perceptions of LEA Food Service Directors reported in the Participating LEA and Non-Participating LEA surveys.

The effect of CEP on State reimbursements may be similar to the impact on Federal reimbursements if the State provides reimbursements tied to counts of free, reduced price, and paid meals. However, we did not collect data on revenue amounts from State subsidies to avoid undue burden on respondents. Instead, these impacts are also evaluated with the responses from the LEA survey instruments.[72]

When the level of Federal reimbursement received under CEP is less than the cost of providing meals at no cost to all students, LEAs must use non-Federal funds to cover the difference. Sometimes participation increases, and other cost-saving impacts of CEP can help make up this difference. For example, an increase in the number of meals produced and served may lead to economies of scale that reduce the average cost per meal.[73] Alternatively, an increase in participation may require schools to hire additional food service staff to accommodate the demand, which may increase the average cost per meal. Cost considerations may also affect the variety and quality of foods offered at lunch and breakfast.

Participating in CEP may have additional benefits, including relieving financial burden on low-income families and improving academic outcomes for students. By providing an incentive for school attendance and increasing access to healthy food, CEP may improve participating students' academic

[71] Using reimbursements per enrolled student simplifies the analysis by capturing changes in the number of enrolled students that participate in school meals in a parsimonious way. For example, if the number of enrolled students stays constant but more students participate in school meals, then the reimbursement per enrolled student increases. Correspondingly, if the number of enrolled students increases but the number of students participating in school meals stays the same, then the reimbursement per enrolled student would decrease.

[72] The earlier evaluation used State administrative data and revenue data collected from surveys to evaluate the impact on non-Federal revenues.

[73] As noted in Chapter 5, among the participating LEAs that reported decreased costs due to CEP, 27 percent reported economies of scale, which resulted in a reduction in the cost per meal (Table 5-6).

performance and attendance. Respondents to the LEA Participating Survey provided their perceptions on the extent that CEP influenced these outcomes.

6.2 Outcome Measures

This section describes the construction of the outcome variables used in the DD analysis. As described in Chapter 2, the matched DD analysis used data from State administrative meals claims records to answer the Impact Study's confirmatory research questions on NSLP participation and Federal reimbursements per student enrolled, as well as exploratory questions on SBP participation and Federal reimbursements per meal.

6.2.1 OUTCOME MEASURES

Participation in NSLP and SBP

Participation in NSLP and SBP was measured as the average daily ratio of students enrolled who receive meals. For each school year, these outcomes were constructed as the 3-month average from October to December of the ADP rate. The ADP rate for each month was constructed as follows:

ADP rate for NSLP:

$$ADP_{NSLP} = \frac{\text{\# of NSLP monthly meals}}{\text{\# of operating days in the month}} \times \frac{1}{\text{enrollment}} \quad \text{(Eq. 6.1)}$$

ADP for SBP:

$$ADP_{SBP} = \frac{\text{\# of SBP monthly meals}}{\text{\# of operating days in the month}} \times \frac{1}{\text{enrollment}} \quad \text{(Eq. 6.2)}$$

Federal Reimbursements

Daily Federal reimbursements per student were measured as the 3-month average of the sum of daily reimbursements per student from NSLP and SBP meals. This measure does not include Federal reimbursements from other CN programs,[74] as these data were not provided by all States. This outcome was constructed as follows:

Sum of Daily NSLP and SBP Reimbursements per Student:

$$Daily\ NSLP\ and\ SBP\ Federal\ Reimbursements\ per\ student\ =$$

$$\frac{\text{\$ NSLP monthly Federal reimbursement+\$ SBP monthly Federal reimbursement}}{\text{\# of operating days in the month}} * \frac{1}{\text{enrollment}} \quad \text{(Eq. 6.3)}$$

Federal reimbursements per NSLP lunch and per SBP breakfast, respectively, were constructed as the 3-month averages of the following measures:

[74] These include NSLP Afterschool Snacks, Child and Adult Care Food Program (CACFP), Fresh Fruit and Vegetable Program (FFVP), and USDA Foods.

$$Federal\ reimbursement\ per\ NSLP\ lunch\ = \frac{\$\ \text{NSLP monthly Federal reimbursements}}{\#\ \text{NSLP monthly lunches served}} \quad \text{(Eq. 6.4)}$$

$$Federal\ reimbursement\ per\ SBP\ breakfast = \frac{\$\ \text{SBP monthly Federal reimbursement}}{\#\ \text{SBP monthly breakfasts served}} \quad \text{(Eq. 6.5)}$$

6.3 Impact of CEP on Participation in School Meal Programs

Tables 6-1 through 6-4 present CEP's impacts on NSLP and SBP participation outcomes using State meal claims data. As described above, impacts are measured using DD regression models on a sample consisting of equal numbers of matched participating and non-participating LEAs. In addition to presenting these estimated impacts, the tables also present regression-adjusted outcome levels in the pre- and post-implementation periods for the treatment and comparison LEAs, the differences in the regression-adjusted pre- and post-implementation outcomes, and the impact estimate.

6.3.1 IMPACT ON PARTICIPATION IN NSLP

CEP's impact on NSLP participation rates was examined by comparing the participation rates in NSLP before and after the implementation of CEP to the participation rates in NSLP for a matched group of non-participating LEAs during the same time periods. Table 6-1 presents the regression-adjusted means for the treatment and comparison LEAs.[75]

The ADP rates for the treatment LEAs increased 3.7 percentage points, from 66.8 percent to 70.5 percent, while the ADP rates for the comparison LEAs decreased 0.6 percentage points, from 64.8 percent to 64.2 percent, over the same time period. The change in the outcome of the comparison LEAs represents the expected change that would have occurred in the treatment LEAs if they had not implemented CEP. CEP's impact on NSLP participation rates is calculated by subtracting the percentage change experienced by the comparison LEAs from the percentage change experienced by the treatment LEAs. Thus, CEP increased NSLP participation rates by 4.4 percentage points (3.7–[-0.7]). This represents an NSLP participation rate that was 6.8 percent higher in participating LEAs relative to similar eligible LEAs that did not adopt CEP.

In the absence of CEP, as measured by the comparison group estimates, the participation rates in NSLP slightly declined over time, while the NSLP participation rates increased over time among treatment LEAs. The significant difference in the changes among the two groups suggests that providing free meals to all students encourages students who would not have otherwise participated on an average day to take an NSLP lunch.

[75] The adjusted outcomes are slightly different from the average pre- and post-CEP outcomes for referenced groups of LEAs. The adjustment ensures that differences between the cell entries agree exactly with the estimated impact of CEP. Because the regression approach corrects for residual covariate imbalances between the treatment and comparison groups, the estimated impacts are different from the simple DD between the two groups.

Table 6-1 | Impact of CEP on NSLP Participation Rates in the First Year of LEA Implementation

	Comparison (%)	Treatment (%)	Impact (percentage points)	Percent Impact (%)
Pre-implementation NSLP ADP rate	64.8***	66.8***		
Post-implementation NSLP ADP rate	64.1***	70.5***		
Difference (post-implementation NSLP ADP rate minus pre-implementation NSLP ADP rate)	-0.7***	3.7***	4.4***	6.8
Number of LEAs	481	481		

*** = $p < .01$, ** = $p < .05$, * = $p < .10$.

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924. See Appendix Table D-1 for parameter estimates of the full model.
The last column, Percent Impact, is the impact estimate divided by the mean pre-implementation outcome estimate among comparison LEAs, multiplied by 100.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–11 to SY 2016–17.

6.3.2 IMPACT ON PARTICIPATION IN SBP

Similar in magnitude to the impact on the NSLP participation rates, CEP increased the SBP participation rates by 4.4 percentage points on average (Table 6-2). This change represents a 12 percent increase over the SBP participation rates among comparison LEAs.

CEP's overall impact on SBP participation rates might reflect a boost in demand for breakfast due to several reasons: serving meals at no cost to students, increased access to breakfast under an alternative breakfast service model, or the effect of initiating SBP in schools that did not serve breakfast prior to CEP implementation. The analysis is unable to determine which of these program changes is responsible for the observed effect.

Table 6-2 | Impact of CEP on SBP Participation Rates in the First Year of LEA Implementation

	Comparison (%)	Treatment (%)	Impact (percentage points)	Percent Impact (%)
Pre-implementation SBP ADP rate	36.2***	39.4***		
Post-implementation SBP ADP rate	36.0***	43.5***		
Difference (post-implementation SBP ADP rate minus pre-implementation SBP ADP rate)	-0.2	4.1***	4.4***	12.1
Number of LEAs	481	481		

*** = $p < .01$, ** = $p < .05$, * = $p < .10$.

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924. See Appendix Table D-2 for parameter estimates of the full model.
The last column, Percent Impact, is the impact estimate divided by the pre-implementation outcome estimate among comparison LEAs, multiplied by 100.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–11 to SY 2016–17.

6.3.3 SUSTAINABILITY OF IMPACTS ON PARTICIPATION IN NSLP AND SBP

Table 6-3 shows whether the increase in the NSLP participation rates under CEP lasted beyond the first year of implementation. As of SY 2016–17, fewer LEAs had been participating in CEP for two or more years (compared to those that had been participating for at least a year). This subset of LEAs (which we call the Year 2 sample) may differ from LEAs that had only one year of CEP participation in ways that are not controlled for in the regression model. The analysis of sustainability of impacts was therefore restricted to the Year 2 sample to provide internally valid estimates of Year 2 impacts, and valid estimates of the difference between the Year 2 and Year 1 impacts. Therefore, the Year 2 results do not represent the sustained effect that CEP may have in all LEAs in the full analytic sample. They do, however, suggest that the impact of CEP is likely to extend beyond the first year of implementation.

Year 1 impact estimates are presented for the full analytic sample of 481 treatment and comparison LEAs (first row, third cell), and for the subset of LEAs that participated in CEP for at least two years as of SY 2016–17 (second row, third cell). Year 2 impact estimates are derived from the Year 2 sample and presented in the third row. A significant Year 2 impact implies that the change in participation rate attributed to CEP was sustained after the first year of implementation. The fourth row shows whether the impact in the second year was different from the impact in the first year among the Year 2 sample.

Among the Year 2 sample, the impact on the NSLP participation rates was statistically significant at five percentage points in the first year of CEP and 6 percentage points in the second year of CEP. This suggests that the impact of CEP lasted beyond the first year of implementation and actually grew by one percentage point from the first to second year of implementation.

Table 6-3 | Sustainability of CEP Impacts on the NSLP Participation Rate

	Comparison (percentage points)	Treatment (percentage points)	Impact (percentage points)	Difference in Yearly Impacts (percentage points)
Difference between pre-implementation and post-implementation NSLP ADP rate in Year 1 of CEP among full sample[a]	-0.7***	3.7***	4.4***	
Difference between pre-implementation and post-implementation NSLP ADP rate in Year 1 of CEP among Year 2 sample[a]	<-0.1	5.0***	5.0***	
Difference between pre-implementation and post-implementation NSLP ADP rate in Year 2 of CEP among Year 2 sample[a]	-0.9**	5.3***	6.1***	
Year 2 difference minus Year 1 difference among Year 2 sample[a]	-0.8***	0.3		1.2***
Number of LEAs	481	481		

*** = $p < .01$, ** = $p < .05$, * = $p < .10$.

[a] The full sample is composed of 481 treatment and 481 matched comparison LEAs. Of the 481 treatment LEAs, 276 LEAs participated in CEP for at least 2 years as of SY 2016–17. The Year 2 sample is composed of these 276 treatment LEAs and their matched comparison LEAs.

Notes: The first two rows report differences between the mean pre-implementation and first-year outcomes for the comparison and treatment groups, respectively, and the corresponding impact. The first row presents the Year 1 impacts estimated from the full analytic sample of 481 treatment and 481 matched comparison LEAs, respectively. With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924.

The second row presents the Year 1 impact estimates among the Year 2 sample that is composed of 276 treatment and 276 matched comparison LEAs that have at least 2 years of post-CEP outcome data. With 3 observations per LEA and 552 LEAs, the total number of observations used in the regression model is 1,656.

The third row reports the differences between the mean pre-implementation and second-year outcomes for the comparison and treatment groups in the Year 2 sample, and the corresponding impact.

The fourth row reports the differences between the Year 1 change and Year 2 change for the comparison and treatment groups and the corresponding difference between the Year 1 impact and Year 2 impact in the Year 2 sample. The pre- and post-implementation outcomes for the comparison LEAs are for the same year as the matched treatment LEA.

See Appendix Table D-3 for parameter estimates of the full model.

Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–11 to SY 2016–17.

Table 6-4 presents the results from the similar analysis of CEP impact on the SBP participation rates in the second year of CEP implementation. As noted above, the impact during the first year of CEP on both the SBP and NSLP participation rates among the full analytic sample was the same, at 4.4 percentage points. Among the Year 2 sample, the first- and second-year impacts on the participation rate are similar across the two programs. The resulting increase in the impact on SBP participation rates from the first to second year of CEP is also one percentage point, but this change is only significant at the 0.1 level. The evidence of an increase in impacts is weaker for SBP than for NSLP, but the impact was clearly sustained for both programs.

Table 6-4 | Sustainability of CEP Impacts on the SBP Participation Rate

	Comparison (percentage points)	Treatment (percentage points)	Impact (percentage points)	Difference in Yearly Impacts (percentage points)
Difference between pre-implementation and post-implementation SBP ADP rate in Year 1 of CEP among full sample[a]	-0.2	4.1***	4.4***	
Difference between pre-implementation and post-implementation SBP ADP rate in Year 1 of CEP among Year 2 sample[a]	-0.4	4.9***	4.9***	
Difference between pre-implementation and post-implementation SBP ADP rate in Year 2 of CEP among Year 2 sample[a]	0.9	7.0***	6.1***	
Year 2 difference minus Year 1 difference among Year 2 sample[a,b]	0.9**	2.2***		1.2*
Number of LEAs[b]	481	481		

*** = $p < .01$, ** = $p < .05$, * = $p < .10$.

[a] The full sample comprises 481 treatment and 481 matched comparison LEAs. Of the 481 treatment LEAs, 276 LEAs participated in CEP for at least 2 years as of SY 2016–17. The Year 2 sample is composed of these 276 treatment LEAs and their matched comparison LEAs.

[b] The difference in the differences may not exactly match the reported estimate due to rounding.

Notes: The first two rows report differences between the mean pre-implementation and first-year outcomes for the comparison and treatment groups, respectively, and the corresponding impact. The first row presents estimates from the full analytic sample of 481 treatment and 481 matched comparison LEAs, respectively. With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924.

The second row presents the Year 1 impact estimates among the Year 2 sample that is composed of 276 treatment and 276 matched comparison LEAs that have at least 2 years of post-CEP outcome data. With 3 observations per LEA and 552 LEAs, the total number of observations used in the regression model is 1,656.

The third row reports the differences between the mean pre-implementation and second-year outcomes for the comparison and treatment groups in the Year 2 sample, and the corresponding impact.

The fourth row reports the differences between the Year 1 change and Year 2 change for the comparison and treatment groups and the corresponding difference between the Year 1 impact and Year 2 impact in the Year 2 sample. The pre- and post-implementation outcomes for the comparison LEAs are for the same year as the matched treatment LEA.

See Appendix Table D-4 for parameter estimates of the full model.

Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–11 to SY 2016–17.

6.3.4 IMPACT OF CEP ON PARTICIPATION IN NSLP AND SBP AS PERCEIVED BY LEA FOOD SERVICE DIRECTORS

This section presents LEA Food Service Directors' perceptions on how CEP affected NSLP and SBP ADP rates in their LEAs.[76] As described in Chapter 2, this analysis compares participating LEAs' perceptions of the change in outcomes between SY 2013–14 (prior to national implementation) and SY 2016–17 (the time the survey was fielded) to those of eligible, but non-participating, LEAs. The counterfactual of what changes Food Service Directors would have perceived in the absence of CEP suffers from two shortcomings, relative to the impacts reported with the matched DD design: As noted in Chapter 2, the

[76] The impacts reported in Sections 5.3.4 on participation in NSLP and SBP describe the effects of CEP on the ADP rate (ADP rate (the average daily ratio of enrolled students who receive meals). However, LEA Food Service Directors' perceptions on changes in participation for NSLP and SBP refer to changes in ADP (the average daily number of students participating), not changes in the ADP rate.

eligible non-participating LEAs were not matched to participating LEAs on observable characteristics, and the perceived changes reported do not control for pre-CEP characteristics that may confound CEP's true effect on outcomes. However, the results of Food Service Directors' perceptions do confirm the findings from the matched DD analysis on NSLP and SBP participation presented in the previous section and provide some evidence about how the changes were distributed.

As shown in Table 6-5, Food Service Directors in participating LEAs more commonly perceived an increase in ADP for NSLP from SY 2013–14 to SY 2016–17 (56 percent) than their counterparts in non-participating LEAs received (23 percent). Perceptions about the change in SBP ADP followed a similar pattern, as shown in Table 6-6, with participating LEAs more commonly reporting an increase in ADP compared to ADP reported by non-participating LEAs (58 percent and 35 percent, respectively). Both of these results align with the empirical evidence presented earlier in the matched DD analysis that showed CEP's positive effect on student participation in NSLP and SBP.

Table 6-5 | Perceived Changes in ADP for NSLP

Perceived Change in NSLP ADP from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Increased ADP	56.4	23.4	33.0***
Decreased ADP	5.6	27.4	-21.8***
Stayed the same	24.1	34.5	-10.4**
Don't know	13.4	14.7	-1.2
No response	0.5	0.0	0.5
Weighted number of LEAs	3,542	4,263	
Unweighted number of LEAs	446	307	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size. See Appendix Table D-5 for perceived changes in ADP for NSLP by school type.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table 6-6 | Perceived Changes in ADP for SBP

Perceived Change in SBP ADP from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Increased ADP	58.2	34.9	23.3***
Decreased ADP	6.3	22.1	-15.8***
Stayed the same	22.6	28.6	-6.0
Don't know	12.4	14.4	-2.0
No response	0.5	0.0	0.5
Weighted number of LEAs	3,542	4,189	
Unweighted number of LEAs	446	303	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size. See Appendix Table D-6 for perceived changes in ADP for SBP by school type.

The table excludes non-participating LEAs whose schools do not serve breakfast.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table 6-7 and Table 6-8 explore the primary reasons for the increase in ADP in NSLP and SBP as identified by the Food Service Director. For NSLP, LEAs stated the primary reason as either due to an increase in the percentage of students participating, increase in the *frequency* of participation, or increase in student enrollment.[77] Non-participating LEAs were more likely than participating LEAs to cite an increase in student enrollment as the primary reason for the increases in NSLP ADP. Given that it is unlikely that CEP impacts overall enrollment, an increase in the percentage of students participating in school lunch was participating LEAs' most frequently cited primary factor for the increase in ADP for NSLP.

For SBP, LEAs specifically mentioned increases in the number of schools offering breakfast and the number of meals taken per week by participating students as the primary reasons for the increase in ADP in SBP. The results were not statistically significant on any of the factors cited as primary reasons for the perceived increase in SBP ADP.

Food Service Directors at participating LEAs were also asked separately whether CEP was a factor in the increases in NSLP and SBP ADP (regardless of what was cited as the primary factor). More than 86 percent of participating LEAs reported that CEP was a factor in the increases in both NSLP and SBP ADP.

Because schools participating in CEP were required to initiate SBP if they did not already operate it, a greater percentage of participating LEAs might be expected to report an increase in the number of schools operating SBP. However, there was no significant difference between the percentages of participating and non-participating LEAs citing more schools offering breakfast as the primary reason ADP increased for SBP. These results support the finding (Table 6-22) that 81 percent of all schools participating in CEP participated in SBP prior to CEP implementation. With such a high percentage of LEAs already fully participating in SBP, there were few LEAs with the opportunity to expand SBP to more schools.

[77] "Enrollment" here means enrollment in the LEA without reference to meal consumption. Since Food Service Directors reported on changes in ADP (the average daily number of students participating), not the ADP rate (which is expressed as a percentage of enrolled students), this measure is susceptible to changes in enrollment. Even if the percentage of students taking meals remained constant over time, an increase in student enrollment may cause an increase in ADP.

Table 6-7 | Primary Factors for the Increase in ADP for NSLP

Factors in the Perceived Increase in NSLP ADP from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor in the perceived increase			
Increase in student enrollment	20.8	34.2	-13.4*
Increase in the percentage of students participating	42.6	26.6	16.0**
Increase in the number of meals taken per week	33.4	36.1	-2.7
Don't know	3.2	3.2	0.1
Weighted number of LEAs	1,999	998	
Unweighted number of LEAs	264	76	
CEP was a factor in the increase			
Yes	89.0		
No	9.1		
Don't know	1.9		
No response	0.0		
Weighted number of LEAs	1,999		
Unweighted number of LEAs	264		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results were robust to covariate controls, including urbanicity and LEA size in terms of number of students.

The table excludes participating and non-participating LEAs that did not report an increase in NSLP ADP from SY 2013–14 to SY 2016–17. All LEAs that reported an increase in NSLP ADP responded to the question about primary factors for the increase in NSLP ADP.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table 6-8 | Primary Factors for the Increase in ADP for SBP

Factors in the Perceived Increase in SBP ADP from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor in the perceived increase			
Increase in the number of schools offering breakfast	7.1	4.5	2.6
Increase in student enrollment	17.4	22.5	-5.1
Increase in the percentage of students participating at least once per year	40.3	42.3	-2.0
Increase in the number of meals taken per week by participating students	30.9	23.9	7.1
Don't know	4.2	6.8	-2.6
Weighted number of LEAs	2,061	1,461	
Unweighted number of LEAs	274	113	
CEP was a factor in the increase			
Yes	86.7		
No	9.5		
Don't know	3.7		
No response	0.0		
Weighted number of LEAs	2,061		
Unweighted number of LEAs	274		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results were robust to covariate controls, including urbanicity and LEA size in terms of number of students.

The table includes participating and non-participating LEAs that reported an increase in SBP ADP from SY 2013–14 to SY 2016–17. All LEAs that reported an increase in SBP ADP responded to the question about primary factors for the increase in SBP ADP.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

There appear to be some large differences between participating and non-participating LEAs with respect to the primary reasons for the perceived declines in NSLP and SBP ADP (Table 6-9 and Table 6-10). However, these results should be approached with caution because only a small sample of participating LEAs reported a decrease in NSLP or SBP ADP (22 and 20 unweighted LEAs, respectively). For a decline in NSLP ADP, participating LEAs were more likely to report a decrease in student enrollment, whereas the non-participating LEAs were more likely to report a decrease in the number of meals taken per week as the primary reason. A similar pattern was observed for the primary reason for the decline in SBP ADP. Participating LEAs also overwhelmingly reported that CEP was not a factor in the perceived decrease in NSLP ADP or SBP ADP.

Table 6-9 | Primary Factors for the Perceived Decrease in ADP for NSLP

Factors in the Perceived Decrease in NSLP ADP from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor in the perceived decrease			
Decrease in student enrollment	62.9	30.3	32.7**
Decrease in the percentage of students participating at least once per year	16.8	24.3	-7.6
Decrease in the number of meals taken per week by participating students	12.1	42.0	-29.9***
Don't know	8.2	3.4	4.8
Weighted number of LEAs	198	1,168	
Unweighted number of LEAs	22	92	
CEP was a factor in the decrease			
Yes	0.0		
No	92.3		
Don't know	7.7		
No response	0.0		
Weighted number of LEAs	198		
Unweighted number of LEAs	22		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size.

The table includes participating and non-participating LEAs that reported a decrease in NSLP ADP from SY 2013–14 to SY 2016–17. All LEAs that reported a decrease in NSLP ADP responded to the question about primary factors for the decrease in NSLP ADP.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table 6-10 | Primary Factors for the Decrease in ADP for SBP

Factors in the Perceived Decrease in SBP ADP from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor in the perceived decrease			
Decrease in the number of schools offering breakfast	0.0	0.0	0.0
Decrease in student enrollment	58.1	33.0	25.1
Decrease in the percentage of students participating at least once per year	34.6	28.0	6.6
Decrease in the number of meals taken per week by participating students	0.0	26.9	-26.9***
Don't know	7.3	12.1	-4.8
Weighted number of LEAs	224	926	
Unweighted number of LEAs	20	70	
CEP was a factor in the decrease			
Yes	0.0		
No	93.2		
Don't know	6.8		
No response	0.0		
Weighted number of LEAs	224		
Unweighted number of LEAs	20		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size.
The table includes participating and non-participating LEAs that reported a decrease in SBP ADP from SY 2013–14 to SY 2016–17. All LEAs that reported a decrease in SBP ADP responded to the question about primary factors for the decrease in SBP ADP.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

6.4 Impact of CEP on School Attendance as Perceived by LEA Food Service Directors

The universal provision of free meals may encourage students to attend school more regularly. Evidence from the LEA survey suggests that CEP may have been associated with increased average daily attendance. A greater percentage of Food Service Directors at participating LEAs perceived that average daily attendance increased over the study period compared to non-participating LEAs (Table 6-11). Among participating LEAs that reported an increase in average daily attendance, 58 percent said that CEP was a factor for the increase. Only five percent of participating LEAs that reported a decrease in average daily attendance said that CEP was a factor (Table 6-12).

Table 6-11 | Perceived Changes in ADA

Perceived Change in ADA from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Increased ADA	36.2	20.0	16.2***
Stayed the same	36.4	36.1	0.4
Decreased ADA	8.6	17.8	-9.2***
Don't know	18.7	26.1	-7.5*
No response	0.1	0.0	0.1
Weighted number of LEAs	3,542	4,263	
Unweighted number of LEAs	446	307	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size. See Appendix Table D-7 for perceived changes in ADA by school type.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table 6-12 | Perceived Effect of CEP on Changes in ADA

CEP Was a Factor in the Increase or Decrease in ADA from SY 2013–14 to SY 2016–17	Increase (%)	Decrease (%)
Yes	57.8	5.4
No	17.4	88.7
Don't know	24.7	5.9
No response	0.0	0.0
Weighted number of LEAs	1,282	305
Unweighted number of LEAs	158	36

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. This table includes participating LEAs that reported an increase or decrease in ADA from SY 2013–14 to SY 2016–17.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

6.5 Impact of CEP on School Food Service Revenues

This section presents results of analyses of CEP's impact on LEAs' school food service revenues from Federal and non-Federal sources. The section first presents findings of CEP's impact on LEAs' Federal reimbursements per student and per meal and then presents results from the survey analysis of revenues from non-Federal sources.

6.5.1 IMPACT ON LEA REVENUES FROM FEDERAL REIMBURSEMENTS

Recall from Section 6.1 that increases in the revenues generated by Federal reimbursements were an important part of the logic model for defining CEP success. The impact of CEP on Federal reimbursement per enrolled student was examined by comparing the differences in this ratio before (pre) and after (post) the implementation of CEP for participating LEAs to the differences in this ratio for a matched (comparison) group of non-participating LEAs during the same time periods. The results show a statistically significant increase in Federal reimbursements of 27 cents per day per enrolled student from

NSLP and SBP (Table 6-13).[78] This impact is 12 percent greater than daily NSLP and SBP reimbursements per enrolled student among the comparison group during the pre-implementation school year. Table 6-14 and Table 6-15 use the same methodology to analyze CEP's impacts on Federal reimbursements per NSLP lunch and SBP breakfast, respectively.

The results suggest that the switch to CEP, on average, resulted in a greater increase in Federal reimbursement revenue per meal. The resulting impact of CEP on Federal reimbursements per NSLP lunch and SBP breakfast was an increase of nine cents and two cents (4 percent and 1 percent), respectively.[79] The breakfast impact was smaller, likely due to the higher percentage of free breakfasts claimed prior to implementation. While small in absolute and relative terms, the increase in per meal reimbursement for both meals was statistically significant.[80]

Table 6-13 | Impact of CEP on Total Daily NSLP and SBP Federal Reimbursements per Student Enrolled in the First Year of LEA Implementation

	Comparison ($)	Treatment ($)	Impact ($)	Percent Impact (%)
Pre-intervention Federal reimbursements per student	2.16***	2.27***		
Post-intervention Federal reimbursements per student	2.19***	2.58***		
Difference (post-intervention minus pre-intervention Federal reimbursements per student)[a]	0.04***	0.30***	0.27***	12.3
Number of LEAs	481	481		

*** = $p < .01$, ** = $p < .05$, * = $p < .10$.

[a] Differences in point estimates may not exactly match the impact estimate due to rounding.

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924. See Appendix Table D-8 for parameter estimates of the full model.

The last column, Percent Impact, is the impact estimate divided by the pre-implementation outcome estimate among comparison LEAs, multiplied by 100.

Not all States provided data on Federal reimbursements from reimbursable snacks. To provide a consistent measure of Federal reimbursements per student across States, we included only NSLP and SBP Federal reimbursements in the calculation of total reimbursements.

Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

[78] The prior evaluation found that Federal reimbursements under CEP increased by 13.5 percent per enrolled student. Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

[79] The prior evaluation found that Federal reimbursements under CEP increased by 6 percent for NSLP and by 2 percent for SBP. Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

[80] The model used to estimate these impacts controls for baseline differences in factors that may affect the change in the reimbursement rate and confound the true effect of CEP, namely the ISP and the percentage of students eligible for F/RP meals.

Table 6-14 | Impact of CEP on Average Federal Reimbursements per NSLP Lunch in the First Year of LEA Implementation

	Comparison ($)	Treatment ($)	Impact ($)	Percent Impact (%)
Pre-implementation Federal reimbursements per NSLP lunch	2.39***	2.42***		
Post-implementation Federal reimbursements per NSLP lunch	2.46***	2.57***		
Difference (post-implementation minus pre-implementation Federal reimbursements per NSLP lunch)[a]	0.07***	0.15***	0.09***	3.6
Number of LEAs	481	481		

*** = $p < .01$, ** = $p < .05$, * = $p < .10$.

[a] Differences in point estimates may not exactly match the impact estimate due to rounding.

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924. See Appendix Table D-9 for parameter estimates of the full model.

The last column, Percent Impact, is the impact estimate divided by the pre-implementation outcome estimate among comparison LEAs, multiplied by 100.

Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

Table 6-15 | Impact of CEP on Average Federal Reimbursements per SBP Breakfast in the First Year of LEA Implementation

	Comparison ($)	Treatment ($)	Impact ($)	Percent Impact (%)
Pre-implementation Federal reimbursements per SBP breakfast	1.63***	1.63***		
Post-implementation Federal reimbursements per SBP breakfast	1.67***	1.69***		
Difference (post-implementation minus pre-implementation Federal reimbursements per SBP breakfast)	0.04***	0.06***	0.02***	1.3
Number of LEAs	481	481		

*** = $p < .01$, ** = $p < .05$, * = $p < .10$.

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924. See Appendix Table D-10 for parameter estimates of the full model.

The last column, Percent Impact, is the impact estimate divided by the pre-implementation outcome estimate among comparison LEAs, multiplied by 100.

Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

6.5.2 IMPACT OF CEP ON REVENUES AS PERCEIVED BY LEA FOOD SERVICE DIRECTORS

The mix of Federal and non-Federal food service revenues may be expected to change due to the switch to CEP. Non-Federal revenues include State and local revenues, student payments for reimbursable meals, and food sales outside of school meals. Under CEP, schools forgo revenues from student

payments for reimbursable meals. The data analyses demonstrated that revenues generated from Federal reimbursements generally increased, but were the increases adequate to offset the loss of student payments? As discussed in Section 6.1, when the level of Federal reimbursement received under CEP is less than the cost of providing meals at no cost to all students, LEAs must use non-Federal funds to cover the difference. This section explores changes in non-Federal revenue and its sources, as perceived by LEA Food Service Directors. It also explores how CEP was perceived to affect LEAs' ability to balance costs and revenues and related factors.[81]

Non-participating LEAs were more likely than participating LEAs to report that revenues from non-Federal sources decreased between SY 2013–14 and SY 2016–17, as shown in Table 6-16.[82] Of the LEAs that reported an increase in non-Federal revenues, non-participating LEAs were three times more likely to attribute the increase primarily to an uptick in student payments for reimbursable meals (Table 6-17). Participating LEAs were substantially more likely to report that the increase in non-Federal revenues was primarily due to an increase in State funding. This result may be explained by the way that States determine funding for NSLP and SBP. If States provide reimbursements tied to Federal reimbursements and counts of free, reduced price, and paid meals, then the increase in Federal reimbursements resulting from CEP will lead to corresponding increases in State reimbursements. Almost two-thirds of participating LEAs said that CEP was a factor in the increase in non-Federal revenues.

Table 6-16 | Perceived Changes in Total Revenues from Non-Federal Sources

Perceived Change in Non-Federal Revenues from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Increased revenues	18.0	20.9	-2.9
Decreased revenues	24.8	29.5	-4.7
Stayed the same	27.4	26.1	1.3
Don't know	29.1	23.5	5.6
No response	0.7	0.0	0.7
Weighted number of LEAs	3,542	4,263	
Unweighted number of LEAs	446	307	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs.

Revenues from non-Federal sources may include student payments for reimbursable meals, other food sales, and local funds.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

[81] Note that some of the tables in Section 6.5.2 and 6.5.3 include partially participating LEAs in the participating LEA sample because the response options about perceived impact of increased student payments in CEP LEAs is relevant for those schools that did not participate in CEP. If the participating LEA sample only included LEAs that participated in CEP LEA-wide, then the response option would be irrelevant for participating LEAs.

[82] Participating LEAs were more likely to report that they did not know whether non-Federal revenues changed during the same period. However, these differences were not statistically significant.

Table 6-17 | Primary Factors for the Increase in Total Revenues from Sources Other than Federal Reimbursements

Factors in the Perceived Revenue Increase from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor in the perceived increase			
Increase in student payments for reimbursable meals[a]	9.3	34.4	-25.1***
Increase in revenues from food sales outside of school meals[b]	26.0	37.3	-11.3
Increase in State funding	36.1	6.4	29.7***
Increase in local funding	0.9	5.5	-4.6
Don't know	19.4	13.0	6.4
No response	8.2	3.4	4.8
Weighted number of LEAs	638	890	
Unweighted number of LEAs	80	77	
CEP was a factor in the increase			
Yes	62.0		
No	21.0		
Don't know	17.0		
No response	0.0		
Weighted number of LEAs	638		
Unweighted number of LEAs	80		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

[a] "Increase in student payments for reimbursable meals" was not a response option in the survey for participating LEAs that elected to implement CEP LEA-wide. In LEAs that implemented CEP in some but not all schools, some students continued to pay for meals in non-participating schools.

[b] Food sales outside of reimbursable school meals include food sold à la carte, vending machines, snack bars, school store sales, and catering for school-related events.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size.

This table excludes participating and non-participating LEAs that did not report an increase in total revenues from non-Federal sources from SY 2013–14 to SY 2016–17.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Among LEAs that reported a decrease in revenues from sources other than Federal reimbursements, a significantly greater percentage of participating LEAs cited a decrease in student payments as the primary reason for the decline; two out of three LEAs said that CEP contributed to this decline (Table 6-18).[83] Conversely, non-participating LEAs were more than twice as likely to attribute the decline primarily to a decrease in revenues from food sales outside of school meals, such as à la carte sales; food sold from vending machines, snack bars, and school store sales; and catering for school-related events. Requirements to implement new nutritional standards for competitive foods[84] may have

[83] The decrease in payments is due to fewer paid and reduced price meals. For LEA-wide participating LEAs, this payment will be zero.

[84] National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy Hunger-Free Kids Act of 2011, 81 Fed. Reg. 50131 (July 29, 2016). Retrieved from https://www.federalregister.gov/documents/2016/07/29/2016-17227/national-school-lunch-program-and-school-breakfast-program-nutrition-standards-for-all-foods-sold-in

contributed to the decline in non-reimbursable food sales, if new foods offered were less popular than former options.

Table 6-18 | Primary Factors for the Decrease in Total Revenues from Sources Other than Federal Reimbursements

Factors in the Perceived Revenue Decrease from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor in the perceived decrease			
Decrease in student payments for reimbursable meals	64.3	36.9	27.4***
Decrease in revenues from food sales outside of school meals[a]	20.3	45.4	-25.1***
Decrease in State funding	5.4	5.9	-0.5
Decrease in local funding	5.9	1.2	4.7
Don't know	4.1	10.5	-6.4
No response	0.0	0.0	0.0
Weighted number of LEAs	878	1,258	
Unweighted number of LEAs	128	87	
CEP was a factor in the decrease			
Yes	68.8		
No	23.7		
Don't know	7.5		
No response	0.0		
Weighted number of LEAs	878		
Unweighted number of LEAs	128		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

[a] Food sales outside of school meals include food sold à la carte, vending machines, snack bars, school store sales, and catering for school-related events.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size.

This table excludes participating and non-participating LEAs that did not report a decrease in total revenues from non-Federal sources from SY 2013–14 to SY 2016–17.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

6.5.3 IMPACT OF CEP ON ABILITY OF LEA FOOD SERVICE ACCOUNTS TO BREAK EVEN AS PERCEIVED BY FOOD SERVICE DIRECTORS

The changes in non-Federal and Federal revenues after CEP implementation may affect whether and how LEAs are able to "break even" or cover the costs of producing and serving meals. On the cost side, there may be economies of scale resulting from CEP, both in administrative costs[85] and in meal production, driving down the cost per meal. This section first presents LEAs' perceptions of their ability to balance food service revenues and costs, and then presents the contributing factors.

[85] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

Compared to non-participating LEAs, Table 6-19 shows that a significantly greater percentage of participating LEAs (43 percent vs. 12 percent) perceived that it became easier for food service operations to break even between SY 2013–14 and SY 2016–17. In direct contrast, a non-participating LEA was six times as likely to report that it became harder to balance food service funds during the same period.

Table 6-19 | Perceived Changes in the Ability of Food Service Accounts to Break Even

Perceived Change in Ability to Break Even from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Easier to break even	42.5	12.3	30.2***
Harder to break even	6.2	37.3	-31.1***
No change	26.4	26.6	-0.3
Don't know	24.3	23.6	0.8
No response	0.7	0.2	0.5
Weighted number of LEAs	3,542	4,263	
Unweighted number of LEAs	446	307	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional controls like urbanicity and school size.
Breaking even implies that revenues, from all sources, are at least equal to costs.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

More participating than non-participating LEAs reported that it was easier to break even due to an increase in revenues from Federal reimbursements (Table 6-20). Participating LEAs were also more likely to cite an increase in State funding as the primary reason for being better able to balance revenues and costs. On the other hand, non-participating LEAs were more likely to cite that an increase in revenues outside of school meals was the main factor that made it easier to break even. Among participating LEAs, more than 90 percent said that CEP was a factor that made it easier to break even. Non-participating LEAs were more likely than participating LEAs to report that a decrease in food and labor costs was a factor contributing to the food service accounts breaking even. Under CEP, total food and labor costs may need to increase to produce additional meals. There was no difference between the percentages of participating and non-participating LEAs that reported that a decrease in administrative costs contributed to balancing revenues and costs, even though CEP is expected to make food service operations more efficient.

Among LEAs that reported it was harder to break even, participating LEAs (n = 35) were more likely than non-participating LEAs to report a decrease in Federal revenues as the primary contributing factor to difficulty breaking even, whereas an increase in administrative costs was cited as the primary factor more often by non-participating LEAs (Table 6-21).[86] Other reasons for difficulty in breaking even were similarly reported among participating and non-participating LEAs. Among participating LEAs reporting that it was harder to break even, fewer than half said that CEP was a factor. These findings should be

[86] The group of participating LEAs that indicated they experienced a decrease in Federal revenues had a lower average ISP (not shown) than the other participating LEAs.

evaluated carefully because only 35 participating LEAs indicated difficulty with breaking even and were, therefore, given a chance to respond to these questions.

Table 6-20 | Primary Factors that Made It Easier for LEA Food Service Accounts to Break Even

Factors that Made It Easier to Break Even from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor that made it easier			
Increase in revenues from Federal reimbursements	78.7	47.4	31.3**
Increase in student payments from reimbursable meals[a]	4.1	12.5	-8.4
Increase in revenues from food sales outside of school meals[b]	1.9	12.8	-10.8**
Increase in State funding	6.0	0.0	6.0***
Increase in local funding	0.0	0.0	0.0
Decrease in food and labor costs	1.8	23.2	-21.4*
Decrease in administrative costs	5.4	3.5	1.9
Don't know	2.1	0.7	1.4
No response	0.0	0.0	0.0
Weighted number of LEAs	1,504	524	
Unweighted number of LEAs	201	34	
CEP was a factor making it easier			
Yes	92.2		
No	4.9		
Don't know	2.9		
No response	0.0		
Weighted number of LEAs	1,504		
Unweighted number of LEAs	201		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

[a] "Increase in student payments for reimbursable meals" was not a response option in the survey for participating LEAs that elected to implement CEP LEA-wide. In LEAs that implemented CEP in some but not all schools, some students continued to pay for meals in non-participating schools.

[b] Food sales outside of school meals include food sold à la carte, vending machines, snack bars, school store sales, and catering for school-related events.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size

Breaking even implies that revenues, from all sources, are at least equal to costs.

This table excludes participating and non-participating LEAs that did not report that it was easier to break even from SY 2013–14 to SY 2016–17.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table 6-21 | Primary Factors that Made It Harder for LEA Food Service Accounts to Break Even

Factors that Made It Harder to Break Even from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Primary factor that made it harder			
Decrease in revenues from Federal reimbursements	26.6	7.8	18.8*
Decrease in student payments from reimbursable meals	17.9	14.1	3.9
Decrease in revenues from food sales outside of school meals[a]	8.6	14.9	-6.3
Decrease in State funding	0.0	2.7	-2.7
Decrease in local funding	0.0	1.0	-1.0
Increase in food and labor costs	46.9	51.3	-4.4
Increase in administrative costs	0.0	5.7	-5.7**
Don't know	0.0	2.6	-2.6
No response	0.0	0.0	0.0
Weighted number of LEAs	220	1,591	
Unweighted number of LEAs	35	126	
CEP was a factor making it harder			
Yes	37.9		
No	35.5		
Don't know	26.6		
No response	0.0		
Weighted number of LEAs	220		
Unweighted number of LEAs	35		

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

[a] Food sales outside of school meals include food sold à la carte, vending machines, snack bars, school store sales, and catering for school-related events.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs. Results are robust to additional covariates like urbanicity and school size.

Breaking even implies that revenues, from all sources, are at least equal to costs.

This table excludes participating and non-participating LEAs that did not report that it was harder to break even from SY 2013–14 to SY 2016–17.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

6.6 Impact of CEP on SBP

6.6.1 PRESENCE OF SBP PRIOR TO CEP

All schools that participate in CEP must participate in SBP. Therefore, in some cases, CEP is an opportunity to initiate a new SBP. However, local Food Service Directors reported that 81 percent of participating LEAs were operating SBP prior to implementing CEP (Table 6-22). In 13 percent of participating LEAs, at least some schools had to initiate SBP to participate in CEP (including nine percent of participating LEAs where no schools participating in CEP were already operating SBP) .

Table 6-22 | Participation in SBP Prior to CEP Implementation

Participation in SBP Prior to CEP	Participating LEAs (%)
All schools participating in CEP participated in SBP prior to CEP implementation	80.9
Some, but not all, schools participating in CEP participated in SBP prior to CEP implementation	4.2
No schools participating in CEP participated in SBP prior to CEP implementation	8.9
No response	6.0
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Source: Participating LEA Survey.

6.7 Impact of CEP on Meal Costs, Quality, and Variety as Perceived by LEA Food Service Directors

This section presents findings from the analysis of participating LEAs' perceptions of CEP's impacts on costs per meal, cafeteria workers' wages, and the quality and variety of food in meals served. As stated in Chapter 2, objective data on the outcomes selected for evaluation using the perceptions of participating LEAs were either inaccessible to the project team or too costly to collect. The survey of Food Service Directors, however, provided a feasible alternative to collect information on these outcomes from an informed source.

The increased demand for meals under CEP may affect food costs. Increased production to meet demand may lead to economies of scale and reduce marginal costs. A larger service population may lead schools to simplify or diversify menus, and greater demand may cause schools to hire additional staff. Either could increase costs. Table 6-23 shows that a majority of participating LEAs believed that CEP did not affect the labor or food cost per meal (58 and 66 percent, respectively). Of all participating LEAs, 79 percent reported that CEP did not affect pay per cafeteria worker.[87] As shown in Appendix Table D-12, two-thirds of participating LEAs reported that CEP did not affect food costs, and about one in six did not know whether CEP affected food costs. Among those who thought that there was a change, about the same numbers of LEAs reported that CEP increased or decreased food costs, and these results held true for both breakfast and lunch.[88]

[87] See Appendix Table D-11, Table D-12, and Table D-13 for perceived increase or decrease in the labor cost per meal, food cost per meal, and cafeteria worker wage.

[88] For both lunch and breakfast, the percentage of participating LEAs reporting a perceived decrease in meal production labor costs due to CEP was significantly greater than the percentage reporting a perceived increase in labor costs. On the other hand, there were no statistically significant differences between the percentage of LEAs reporting a decrease in food costs and LEAs reporting an increase in food costs.

Table 6-23 | Perceived Effects of CEP on Food and Labor Costs

Type of Cost	Percentage of LEAs Reporting Whether CEP Affected Costs				Weighted Number of LEAs (Unweighted Number of LEAs)
	CEP affected costs	CEP did not affect costs	Don't know	No response	
Labor costs per meal	23.4	58.0	18.1	0.6	3,542 (446)
Food costs per meal	17.2	65.6	16.6	0.6	
Pay per hour of cafeteria workers	6.9	79.3	13.8	0.0	

Source: Participating LEA Survey.

Almost two-thirds of all participating LEAs reported that CEP did not affect food quality or variety offered in school meals (Table 6-24). Of the LEAs that perceived that CEP affected food quality, most LEAs perceived that food quality increased (rather than decreased) under CEP. This was the case for both breakfast and lunch (Table D-14). These findings are similar for food quality: most LEAs perceived that food variety increased (rather than decreased) under CEP for both breakfast and lunch (Table D-15).

Table 6-24 | Perceived Effects of CEP on Food Quality and Variety

Food Quality and Variety	Percentage of LEAs Reporting Whether CEP Affected Food Quality and Variety				Weighted Number of LEAs (Unweighted Number of LEAs)
	CEP affected outcome	CEP did not affect outcome	Don't know	No response	
Food quality	21.8	66.1	11.6	0.4	3,542 (446)
Food variety	23.7	65.3	11.0	0.0	

Source: Participating LEA Survey.

6.8 Summary

The objective of the Impact Study was to assess the effects of CEP on student participation in NSLP and SBP, Federal per student and per meal reimbursements, and student attendance. The impacts were estimated by comparing what happened in LEAs operating under CEP to what likely would have happened had they not elected to participate in CEP. In addition, the Impact Study examined some reasons for the changes in participation, revenues, and attendance, including perceptions about the impact of CEP on meal cost and quality and food service operations. Other outcomes included perceived changes in non-Federal sources of funding, perceived ability to balance the LEA food service account, and the presence of an SBP prior to CEP.

CEP was clearly successful: It increased the student participation rate in NSLP and SBP— NSLP ADP increased by 6.8 percent, and SBP ADP increased by 12 percent. In addition, the impact of CEP on

participation lasted beyond the first year of implementation and significantly increased from the first to second year of national implementation.

Under CEP, Federal reimbursements increased by about 12 percent per day per enrolled student from NSLP and SBP, and Federal reimbursements per NSLP lunch and SBP breakfast increased by four percent and one percent, respectively.

Participating LEAs that reported an increase in ADP between SY 2013–14 and SY 2016–17 were most likely to attribute that growth primarily to an increase in the proportion of students taking school lunches at least once per year (NSLP) and to an increase in the frequency of school breakfasts taken per year (SBP). More than 80 percent of these LEAs reported that CEP contributed to the increase.

Significantly more participating LEAs perceived increased attendance relative to non-participating LEAs, and the increased attendance was attributed to CEP. Eighty-one percent of participating LEAs reported participating in SBP prior to electing CEP. About two thirds of participating LEAs perceived that CEP did not impact meal costs or quality.

Among LEAs that reported an increase in non-Federal revenues between SY 2013–14 and SY 2016–17, participating LEAs were more likely to cite increased State funding as the primary reason for the increase. A majority of participating LEAs cited that CEP was a factor in the increase in non-Federal revenues. There was no significant difference in the percentage of participating and non-participating LEAs that reported a decrease in non-Federal funding.

Participating LEAs more often reported that balancing the food service account was easier in SY 2016–17 than in SY 2013–14, while non-participating LEAs were more likely to report that it was harder to break even. Among participating LEAs that reported it was easier to balance the food service account, an increase in revenues from Federal reimbursements was often cited as the primary reason for the ease. Taken together, these findings suggest that CEP may have produced a net gain for participating LEAs and did not have an adverse overall effect on LEA food service revenues.

7 CONCLUSIONS

7.1 Implementation Study Conclusions

In SY 2016–17, more LEAs and schools participated in CEP than ever before—45 percent of eligible LEAs and 55 percent of eligible schools were enrolled in CEP in SY 2016–17, which was an increase of 19.8 percent and 19.5 percent, respectively, since SY 2014–15. More than 3.1 million additional students were enrolled in schools that participated in CEP compared to SY 2014–15.

LEAs that were eligible for and participated in CEP tended to be small (i.e., fewer than five schools), rural, and public. LEAs that participated in NSLP/SBP had similar characteristics.

The LEA participation rate in CEP (i.e., take-up; the number of participating LEAs divided by the number of eligible LEAs) varied among LEAs based on their characteristics in SY 2016–17. CEP was appealing to high-poverty LEAs and schools—as ISPs increased, so did the percentage of eligible LEAs that participated in CEP (i.e., participation rate). LEA participation rates were high in single-school LEAs (56 percent) and in city/urban LEAs (60 percent).

Three in four participating LEAs implemented CEP LEA-wide, and one in four participating LEAs had some, but not all, eligible schools participating in CEP.

SAs supported LEAs as they implemented CEP by providing technical assistance, support, and materials to estimate the financial impacts of CEP prior to implementation. This support provided by SAs addressed the topics about which CEP-eligible LEAs asked most often: financial viability, uncertainty about reimbursement, and concern about the potential loss of other educational funds. SAs also reported answering questions from and providing support to LEAs about the effect of CEP on other benefits and funding sources for their low-income students.

Participating LEAs reported experiencing more benefits than barriers as a result of CEP implementation, including *perceived* increased school meal participation, decreased financial burden on families, and eliminated unpaid meal charges. Financial concerns were the most reported barrier to CEP noted by non-participating LEAs. Almost all participating LEAs and about 40 percent of non-participating LEAs reported being likely to participate in CEP during the next school year. More than half of participating LEAs reported no problems implementing CEP. SAs seemed to effectively equip LEAs with the tools and support to determine the financial viability of CEP, and once CEP was elected, LEAs were able to implement CEP with minimal challenges.

7.2 Impact Study Conclusions

According to the Impact Study findings, CEP had positive impacts on student participation in NSLP and SBP. LEAs with schools that adopted CEP realized gains in NSLP participation rates that were 6.8 percent higher relative to similar eligible schools that did not adopt CEP. The relative impact on SBP participation rates was almost double the impact on NSLP participation (12 percent). Among LEAs that had participated in CEP for at least two years, the impact of CEP on participation rates in the second year relative to participation rates before CEP was also positive and significant. Thus, the impact was sustained after the first year of CEP participation.

Participating LEAs were significantly more likely than non-participating LEAs to report that ADP rates in NSLP and SBP increased from SY 2013–14 to SY 2016–17. Among LEAs that reported an increase in NSLP participation over this period, participating LEAs were more likely to attribute that growth primarily to an increase in the proportion of students taking school meals at least once per year. More than 80 percent of these LEAs reported that CEP contributed to the increase in NSLP and SBP participation. Taken together, the Impact Study and Implementation Study findings clearly demonstrate that, under CEP, student participation in school meal programs increased.

While CEP's continued success in improving student participation rates is promising, CEP must also be financially viable for LEAs. Under conventional reimbursement systems with traditional meal counting and claiming, LEAs balance their food service accounts through a mix of Federal reimbursements, USDA Foods, á la carte sales, State and local funds, and student payments for reimbursable meals. According to a recent nationally representative study on school meal costs and revenues, the largest source of LEA revenues in SY 2014–15 was Federal reimbursements, accounting for 57 percent of total reported LEA revenues, with an additional 6 percent accounted for from USDA Foods.[89] Under CEP, Federal reimbursements are not based on meal counts by student eligibility for F/RP meals. Instead, a preset percentage of total meals are claimed (and reimbursed) at the Federal free meal reimbursement rate, while the remainder are claimed at the paid meal rate. This research estimated the impact of CEP on total NSLP and SBP Federal reimbursements per enrolled student and on Federal reimbursement per lunch and per breakfast among LEAs in the 12 Impact Study States. CEP had a positive impact on all measures of Federal reimbursements, similar to the findings in the pilot evaluation.[90] CEP increased daily Federal NSLP and SBP reimbursements per enrolled student by about 12 percent. The relative impacts on Federal reimbursements per NSLP lunch and SBP breakfast were four and one percent, respectively.

The gains in Federal reimbursements make a positive contribution to LEAs' overall finances, given that Federal reimbursements generally comprise the bulk of total LEA revenues. However, for LEAs to cover school food service costs, these gains must be enough to cover the cost of providing meals at no cost to all students without student payments for reduced price or paid meals. To understand how total revenues from both Federal and non-Federal sources changed before CEP implementation, the analysis considered LEA survey responses on changes in non-Federal revenues and the ability to break even between SY 2013–14 and SY 2016–17. This analysis showed that there were no significant differences between participating and non-participating LEAs in the percentage that reported an increase or a decrease in non-Federal funding. Considering these findings and the impacts of CEP on Federal reimbursements and student participation rates, participating LEAs were more than three times as likely as non-participating LEAs to report that it was easier to "break even" (i.e., equalize revenues and costs) in SY 2016–17 than in SY 2013–14.

[89] Logan, C., Tran, V., Boyle, M., Enver, A., Zeidenberg, M., & Mendelson, M. (2019). *School nutrition and meal cost study, Final report volume 3: School meal costs and revenues.* U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/school-nutrition-and-meal-cost-study

[90] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation final report*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from https://www.fns.usda.gov/community-eligibility-provision-evaluation

Appendices

APPENDIX A. CHAPTER 3 ADDITIONAL TABLES

Table A-1 | CEP Eligibility and Participation by State, as of SY 2016–17

State	LEAs			Schools			Student Enrollment		
	Eligible	Participating	Rate	Eligible	Participating	Rate	Eligible*	Participating*	Rate
Alabama	120	38	31.7	787	391	49.7	3.88	1.96	50.5
Alaska	33	26	78.8	194	174	89.7	0.37	0.34	92.5
Arizona	307	99	32.2	847	227	26.8	4.04	0.94	23.3
Arkansas	179	45	25.1	491	139	28.3	2.06	0.56	26.9
California	527	78	14.8	3,068	1,069	34.8	16.02	4.56	28.5
Colorado	63	18	28.6	371	91	24.5	1.49	0.36	24.2
Connecticut	47	21	44.7	288	228	79.2	1.41	1.1	78.2
DC	46	39	84.8	168	160	95.2	0.62	0.57	91.4
Delaware	33	26	78.8	132	115	87.1	0.67	0.56	83.8
Florida	226	142	62.8	2,572	1,001	38.9	16.79	5.79	34.5
Georgia	157	100	63.7	1,091	767	70.3	7.25	4.68	64.5
Guam	1	1	100	33	27	81.8	0.24	0.2	81.1
Hawaii	17	12	70.6	107	43	40.2	0.48	0.2	41.7
Idaho	52	22	42.3	158	92	58.2	0.52	0.33	63.5
Illinois	379	204	53.8	1,740	1,366	78.5	8.32	6.86	82.4
Indiana	197	54	27.4	673	283	42.1	3.17	1.27	40.1
Iowa	57	16	28.1	236	119	50.4	0.94	0.51	53.8
Kansas	63	8	12.7	246	69	28	0.84	0.23	26.8
Kentucky	172	151	87.8	1,021	888	87	5	4.36	87.4
Louisiana	117	91	77.8	1,004	739	73.6	4.67	3.41	73
Maine	81	22	27.2	176	72	40.9	0.41	0.21	50.3
Maryland	31	14	45.2	381	228	59.8	1.68	0.99	59.3
Massachusetts	178	65	36.5	824	525	63.7	3.9	2.39	61.2
Michigan	395	178	45.1	1,081	653	60.4	3.93	2.73	69.5
Minnesota	162	65	40.1	348	153	44	1.34	0.57	42.4
Mississippi	142	56	39.4	668	333	49.9	3.2	1.52	47.4

State	LEAs			Schools			Student Enrollment		
	Eligible	Participating	Rate	Eligible	Participating	Rate	Eligible*	Participating*	Rate
Missouri	253	90	35.6	749	367	49	2.54	1.22	48
Montana	69	50	72.5	175	138	78.9	0.32	0.23	73.9
Nebraska	31	8	25.8	101	15	14.9	0.41	0.04	10.5
Nevada	13	10	76.9	229	122	53.3	1.62	0.71	44.1
New Hampshire	15	3	20	30	3	10	0.1	0.01	10.9
New Jersey	177	71	40.1	634	270	42.6	2.91	1.27	43.7
New Mexico	148	112	75.7	627	487	77.7	2.12	1.65	77.6
New York	445	245	55.1	3,020	1,671	55.3	14.28	6.46	45.2
North Carolina	148	93	62.8	1,317	787	59.8	6.31	3.68	58.2
North Dakota	22	18	81.8	31	25	80.6	0.07	0.06	78
Ohio	405	296	73.1	1,277	919	72	5.17	3.64	70.4
Oklahoma	348	94	27	886	301	34	3.1	1.04	33.6
Oregon	120	71	59.2	470	346	73.6	1.68	1.3	77.4
Pennsylvania	333	153	45.9	1,196	861	72	5.75	4.27	74.3
Rhode Island	22	3	13.6	94	21	22.3	0.47	0.1	22.2
South Carolina	91	47	51.6	678	412	60.8	3.51	1.8	51.3
South Dakota	52	30	57.7	274	124	45.3	0.26	0.16	61.7
Tennessee	157	94	59.9	1,163	909	78.2	5.6	4.28	76.6
Texas	606	190	31.4	3,709	1,678	45.2	21.47	9.85	45.9
Utah	17	7	41.2	51	29	56.9	0.17	0.09	52.3
Vermont	32	21	65.6	80	60	75	0.16	0.14	83.4
Virginia	90	38	42.2	464	255	55	2.17	1.2	55.4
Washington	165	57	34.5	579	193	33.3	2.6	0.75	28.9
West Virginia	55	48	87.3	551	492	89.3	2.03	1.78	87.6
Wisconsin	202	97	48	625	415	66.4	2.17	1.56	72
Wyoming	7	5	71.4	14	7	50	0.03	0.01	53.5
U.S. Total	**7805**	**3542**	**45.4**	**37,729**	**20,859**	**55.3**	**180.25**	**94.51**	**52.4**

*Expressed in 100,000s of students.

Source: *AnalysisFile*.

Table A-2 | CEP Eligibility and Participation by State, as of SY 2015–16

State	LEAs			Schools			Student Enrollment		
	Eligible	Participating	Rate	Eligible	Participating	Rate	Eligible*	Participating*	Rate
Alabama	122	37	30.3	827	379	45.8	4.03	1.87	46.4
Alaska	31	21	67.7	178	137	77	0.34	0.3	89.7
Arizona	260	60	23.1	719	142	19.7	3.45	0.59	17
Arkansas	179	22	12.3	488	71	14.5	1.98	0.27	13.4
California	246	45	18.3	872	374	42.9	3.95	2.08	52.5
Colorado	72	12	16.7	415	79	19	1.76	0.34	19.5
Connecticut	41	13	31.7	263	208	79.1	1.23	1.04	85.1
DC	44	38	86.4	161	151	93.8	0.58	0.55	93.6
Delaware	31	24	77.4	129	107	82.9	0.73	0.49	66.6
Florida	210	107	51	2,545	876	34.4	16.58	4.79	28.9
Georgia	160	93	58.1	1,029	685	66.6	7.17	4.27	59.6
Guam	1	1	100	27	27	100	0.2	0.2	100
Hawaii	14	11	78.6	109	25	22.9	0.49	0.05	9.4
Idaho	49	19	38.8	156	88	56.4	0.61	0.33	53.3
Illinois	570	186	32.6	2,324	1,298	55.9	11.03	6.74	61.1
Indiana	157	41	26.1	587	260	44.3	2.64	1.17	44.3
Iowa	103	16	15.5	342	105	30.7	1.45	0.44	30.7
Kansas	60	9	15	258	63	24.4	0.9	0.2	22.3
Kentucky	172	136	79.1	1,000	804	80.4	4.84	3.85	79.5
Louisiana	114	67	58.8	935	463	49.5	4.92	2.12	43.2
Maine	77	15	19.5	168	59	35.1	0.43	0.18	41
Maryland	31	11	35.5	375	224	59.7	1.68	0.97	57.9
Massachusetts	134	38	28.4	732	263	35.9	3.44	1.09	31.7
Michigan	429	186	43.4	1,132	652	57.6	4.18	2.77	66.2
Minnesota	207	57	27.5	395	127	32.2	1.31	0.52	39.5
Mississippi	140	52	37.1	572	306	53.5	2.68	1.41	52.6
Missouri	230	83	36.1	691	329	47.6	2.35	1.09	46.6
Montana	64	47	73.4	152	130	85.5	0.26	0.23	85.4
Nebraska	24	5	20.8	106	10	9.4	0.44	0.03	6.8

State	LEAs			Schools			Student Enrollment		
	Eligible	Participating	Rate	Eligible	Participating	Rate	Eligible*	Participating*	Rate
Nevada	9	4	44.4	194	33	17	1.28	0.17	13.3
New Hampshire	25	1	4	51	1	2	0.17	0	1.4
New Jersey	178	50	28.1	652	227	34.8	2.93	1.07	36.4
New Mexico	133	99	74.4	571	435	76.2	1.9	1.49	78.6
New York	656	196	29.9	3,871	1,439	37.2	17.8	5.52	31
North Carolina	128	82	64.1	1,304	751	57.6	7.33	3.59	48.9
North Dakota	17	17	100	24	24	100	0.06	0.06	100
Ohio	228	228	100	788	788	100	2.78	2.78	100
Oklahoma	345	55	15.9	858	182	21.2	3.06	0.66	21.6
Oregon	116	66	56.9	457	317	69.4	1.82	1.24	68
Pennsylvania	274	127	46.4	1,074	740	68.9	5.15	3.76	73
Rhode Island	13	1	7.7	95	9	9.5	0.47	0.06	11.9
South Carolina	89	42	47.2	696	356	51.1	3.69	1.74	47
South Dakota	40	27	67.5	177	116	65.5	0.2	0.16	80
Tennessee	155	97	62.6	1,190	919	77.2	5.7	4.47	78.4
Texas	546	165	30.2	3,316	1,641	49.5	19.31	10.06	52.1
Utah	14	6	42.9	54	28	51.9	0.27	0.09	32.1
Vermont	32	16	50	86	51	59.3	0.21	0.12	59.1
Virginia	92	29	31.5	464	209	45	2.61	0.99	37.7
Washington	158	52	32.9	590	177	30	2.81	0.77	27.2
West Virginia	54	46	85.2	485	425	87.6	1.67	1.42	85.3
Wisconsin	182	90	49.5	616	384	62.3	2.19	1.46	66.5
Wyoming	9	3	33.3	16	6	37.5	0.03	0.01	45.4
U.S. Total	**7465**	**2951**	**39.5**	**35,316**	**17,700**	**50.1**	**169.08**	**81.61**	**48.3**

***Expressed in 100,000s of students.

Source: *AnalysisFile*.

Table A-3 | CEP Eligibility and Participation by State, as of SY 2014–15

State	LEAs			Schools			Student Enrollment		
	Eligible	Participating	Rate	Eligible	Participating	Rate	Eligible*	Participating*	Rate
Alabama	121	31	25.6	818	347	42.4	3.95	1.88	47.7
Alaska	32	18	56.3	168	123	73.2	0.31	0.28	90.2
Arizona	88	28	31.8	233	73	31.3	1.38	0.3	22
Arkansas	156	2	1.3	397	4	1	1.65	0.01	0.5
California	267	27	10.1	1,085	205	18.9	5.2	1.12	21.5
Colorado	57	8	14	234	37	15.8	0.89	0.13	14.5
Connecticut	27	7	25.9	208	131	63	1.05	0.65	62.2
DC	40	32	80	158	121	76.6	0.55	0.46	84.5
Delaware	31	21	67.7	127	92	72.4	0.65	0.46	70.5
Florida	162	61	37.7	2,066	547	26.5	13.25	2.67	20.1
Georgia	135	72	53.3	1,076	578	53.7	7.44	3.56	47.8
Guam	1	1	100		21			0.15	
Hawaii	12	6	50	81	14	17.3	0.39	0.02	6.2
Idaho	60	13	21.7	179	52	29.1	0.65	0.19	29.8
Illinois	436	134	30.7	1,857	1,047	56.4	8.94	5.77	64.5
Indiana	100	27	27	444	206	46.4	2.13	0.94	44.1
Iowa	64	11	17.2	232	74	31.9	0.91	0.34	37.1
Kansas	64	5	7.8	258	18	7	1.05	0.06	5.7
Kentucky	166	103	62	889	607	68.3	4.12	2.79	67.7
Louisiana	100	45	45	882	345	39.1	3.92	1.51	38.5
Maine	8	7	87.5	25	20	80	0.08	0.05	67.4
Maryland	30	5	16.7	379	25	6.6	1.66	0.08	4.6
Massachusetts	132	22	16.7	720	300	41.7	3.62	1.35	37.3
Michigan	332	176	53	999	605	60.6	4.03	2.66	66
Minnesota	176	35	19.9	371	56	15.1	1.36	0.21	15.4
Mississippi	116	37	31.9	535	259	48.4	2.74	1.19	43.4
Missouri	227	75	33	694	297	42.8	2.54	1.07	42.1
Montana	48	39	81.3	119	93	78.2	0.22	0.16	71.3
Nebraska	25	1	4	95	1	1.1	0.37	0	0.5

State	LEAs			Schools			Student Enrollment		
	Eligible	Participating	Rate	Eligible	Participating	Rate	Eligible*	Participating*	Rate
Nevada	10	3	30	158	13	8.2	1.02	0.08	8.2
New Jersey	154	31	20.1	565	204	36.1	2.93	1.06	36.4
New Mexico	103	54	52.4	547	341	62.3	1.94	1.19	61.4
New York	557	132	23.7	2,179	1,221	56	9.35	4.73	50.6
North Carolina	130	65	50	1,267	625	49.3	6.19	3.02	48.8
North Dakota	25	16	64	36	23	63.9	0.07	0.05	71.5
Ohio	230	226	98.3	744	738	99.2	2.96	2.93	99.1
Oklahoma	21	16	76.2	103	92	89.3	0.43	0.41	93.7
Oregon	139	50	36	673	259	38.5	2.89	1.01	35.1
Pennsylvania	240	94	39.2	983	646	65.7	4.95	3.22	65
Rhode Island	14	1	7.1	86	6	7	0.45	0.01	1.9
South Carolina	80	33	41.3	588	224	38.1	3	1.14	37.8
South Dakota	23	23	100	142	141	99.3	0.15	0.14	91.7
Tennessee	150	86	57.3	1,198	862	72	5.72	4.35	76
Texas	566	136	24	3,538	1,288	36.4	21.39	7.93	37.1
Utah	22	5	22.7	68	22	32.4	0.27	0.07	26.6
Vermont	29	11	37.9	64	32	50	0.16	0.07	46.3
Virginia	89	11	12.4	444	85	19.1	2.18	0.43	19.8
Washington	81	33	40.7	393	118	30	1.88	0.52	27.6
West Virginia	54	37	68.5	475	353	74.3	1.67	1.19	71.3
Wisconsin	210	75	35.7	681	346	50.8	2.45	1.34	54.9
Wyoming	6	3	50	9	5	55.6	0.02	0.01	55.3
U.S. Total	**6170**	**2190**	**35.5**	**30,323**	**13,942**	**46**	**147.31**	**64.99**	**44.1**

*Expressed in 100,000s of students.

Note: Urbanicity was unknown for 0.8 percent of eligible LEAs and 0.5 percent of participating LEAs.

Source: *AnalysisFile*.

Table A-4 | Distribution of Eligible LEAs by LEA Characteristics (Percentage)

Characteristic	SY 2014–15	SY 2015–16	SY 2016–17
Students in LEA			
1–999 Students	43.5	48.6	49.6
1,000–4,999 Students	36.0	33.7	32.8
5,000–24,999 Students	16.2	14.1	14.2
More than 24,999 Students	4.2	3.5	3.4
Schools in LEA			
1 School	24.0	27.2	29.0
2–5 Schools	39.7	41.4	39.7
6–14 Schools	23.0	20.2	19.8
More than 14 Schools	13.2	11.3	11.5
Urbanicity			
City/Urban	24.1	20.8	25.2
Suburban	22.0	21.2	20.8
Town	20.5	18.8	18.2
Rural	33.4	38.3	34.9
Unknown	0	1.0	0.9
FNS Region			
Mid-Atlantic	10.3	9.4	9.8
Midwest	24.1	23.8	22.3
Mountain Plains	9.1	8.5	8.1
Northeast	12.8	13.1	10.5
Southeast	17.2	15.7	15.5
Southwest	15.3	17.6	17.9
Western	11.2	11.8	15.8
LEA Is Private			
Yes	9.0	9.0	10.1
No	90.3	88.4	86.5
Unknown	0.7	2.6	3.3
LEA Has Charter Schools			
Yes	20.0	17.3	21.3
No	68.0	66.6	65.3
Unknown or Not Applicable	11.9	16.1	13.4
LEA Has Title I Schools			
Yes	77.1	69.6	70.9
No	13.0	16.0	18.4
Unknown	9.9	14.4	10.7
Total Eligible LEAs	**6,170**	**7,465**	**7,805**

Source: *AnalysisFile*.

Table A-5 | Distribution of Participating LEAs over LEA Characteristics

Characteristic	SY 2014–15	SY 2015–16	SY 2016–17
Students in LEA			
1–999 Students	52.3	53.8	54.6
1,000–4,999 Students	29.5	28.7	28.3
5,000–24,999 Students	13.8	13.4	13.4
More than 24,999 Students	4.4	4.1	3.7
Schools in LEA			
1 School	33.9	34.7	35.7
2–5 Schools	33.1	34.4	34.3
6–14 Schools	19.5	18.3	17.9
More than 14 Schools	13.5	12.5	12.1
Urbanicity			
City/Urban	35.3	27.5	32.7
Suburban	18.4	20.6	19.1
Town	15.5	15.2	15.9
Rural	30.7	35.8	32.0
Unknown	.	0.8	0.3
FNS Region			
Mid-Atlantic	10.5	11.0	11.0
Midwest	30.7	26.7	25.2
Mountain Plains	8.5	7.6	7.1
Northeast	8.2	9.5	10.7
Southeast	22.3	21.9	20.4
Southwest	11.6	13.8	15.0
Western	8.2	9.5	10.6
LEA Is Private			
Yes	12.0	12.6	13.5
No	88.0	87.4	85.4
Unknown	0	0	1.1
LEA Has Charter Schools			
Yes	27.9	19.6	25.2
No	55.7	53.2	58.2
Unknown or Not Applicable	16.5	27.2	16.5
LEA Has Title I Schools			
Yes	78.1	66.9	70.8
No	8.1	8.1	17.1
Unknown	13.8	24.9	12.1
Total Participating LEAs	**2,190**	**2,951**	**3,542**

Source: *AnalysisFile*.

Table A-6 | Marginal Effects of Changes in Characteristics on the LEA Participation Rate, SY 2016–17

Characteristic	Marginal Effect	*t*-Statistic
Students in LEA		
1–999 Students	0.043	1.09
1,000–4,999 Students	0.015	0.40
5,000–24,999 Students	-0.006	-0.18
More than 24,999	RC	-
Schools in LEA		
1 School	-0.155	-5.18***
2–5 Schools	-0.132	-4.74***
6–14 Schools	-0.068	-2.80***
More than 14 Schools	RC	-
Urbanicity		
City/Urban	-0.015	-0.88
Suburban	-0.057	-3.92***
Town	0.003	0.25
Rural	RC	-
FNS Region		
Mid-Atlantic	0.149	8.06***
Midwest	0.140	8.53***
Mountain Plains	0.027	1.38***
Northeast	0.121	6.07***
Southeast	0.114	6.71***
Southwest	0.041	2.69***
Western	RC	-
LEA Is Private		
Yes	-0.074	-2.52**
No	RC	-
LEA Has Charter Schools		
Yes	0.013	0.90
No	RC	-
Some Students Get Title I Services		
Yes	0.011	0.89
No	RC	-
ISP	0.170	86.89***
Number of LEAs	**6,195**[a]	

[a] RC denotes the reference category. The marginal effect is calculated by assuming the change in the characteristic comes from the RC.

[b] LEAs with unknown values for any of the characteristics are excluded.

*Statistically significant at the 0.1 level.

***Statistically significant at the 0.001 level.

Notes: Number of eligible LEAs is noted in parentheses. Table values do not include LEAs with missing or unknown characteristics.

There were 0.8 percent of eligible LEAs with unknown urbanicity and 0.4 percent of eligible LEAs with unknown public/private characteristics.

Source: *AnalysisFile*

APPENDIX B. CHAPTER 4 ADDITIONAL TABLES

Table B-1 | SA Challenges Due to CEP Implementation

	Number of SAs	Level of Challenge Implementing CEP				
		Extremely challenging	Very challenging	Moderately challenging	A little challenging	Not challenging
SA reported that CEP was challenging to implement	48	1	9	23	14	1

Note: Data were provided by 48 State CN directors.
Source: State CN Director Survey.

Table B-2 | Questions from LEAs Regarding CEP and Agency Resources Used by SAs to Respond

Questions Asked by LEAs	Number of SAs	Percentage of SAs	Agency Resources Used in Response					
			FNS resources		Other Federal agency resources		Did not use agency resources	
			Number of SAs	Percentage of SAs	Number of SAs	Percentage of SAs	Number of SAs	Percentage of SAs
Effect on Federal (Title I and E-Rate) funding[a]	47	95.9	39	83.0	21	44.7	1	2.1
Financial viability	45	91.8	43	95.6	5	11.1	1	2.2
Calculation of ISPs for individual schools, groups of schools, and district	41	83.7	40	97.6	2	4.9	0	0.0
State or local requirement to collect household income data in the absence of F/RP meals applications	38	77.6	31	81.6	7	18.4	4	10.5
Effect on partially participating LEAs (i.e., not all schools participate in CEP)	36	73.5	29	80.6	0	0.0	5	13.9
Effect on other State or local funding	33	67.3	18	54.5	6	18.2	9	27.3
Effect on other benefits to low-income students	23	46.9	19	82.6	5	21.7	3	13.0
Effect on compensatory education funding provided by the State to LEAs	19	38.8	7	36.8	6	31.6	7	36.8
Effect on food quality	1	2.0	1	100	1	100.0	0	0.0
Effect on staffing	1	2.0	0	0.0	0	0.0	1	100.0

[a] The Title I program allocates grant funding to low-income schools for supplementary education-related services. The E-Rate program provides discounted telecommunications services and internet access to schools and libraries. In non-CEP schools, F/RP data are typically used to determine Title I and E-Rate funding.

Notes: Data were provided by 49 SA directors; multiple response options were allowed. Response options were added as new categories from recode of other and/or open-ended responses.

Source: State CN Director Survey.

Table B-3 | ISP Verification Methods

Method for Verification	Number of SAs	Percentage of SAs
[1] SA verifies all enrollment and ISP data before LEA begins implementation	42	89.4
[2] SA verifies documentation for ISPs according to certain criteria	5	10.6

[1] Responses include SA validation when a new 4-year CEP cycle begins and when LEAs add schools or rearrange the schools that comprise a CEP group.
[2] SAs reported drawing random samples or samples of certain sizes (e.g., 10 percent) for validation of ISP.
Notes: Data were provided by 46 State CN directors; 2 State CN directors did not respond. Response options were updated as a result of recoding open-ended responses.
Source: State CN Director Survey.

APPENDIX C. CHAPTER 5 ADDITIONAL TABLES

Table C-1 | Participating LEAs' Awareness about the CEP Resource Center

Personnel	Percentage
Food Service Director	49.9
Other	28.4
Other LEA administrator	12.0
Don't know	7.6
Superintendent	6.2
FSMC	5.6
Weighted number of LEAs	1,487
Unweighted number of LEAs	191

Notes: LEAs could select multiple responses. Percentages are among participating LEAs that were aware of the CEP Resource Center.
FSMC = Food Service Management Company.
Source: Participating LEA Survey.

Table C-2 | Resources Used Among Participating LEAs that Used the CEP Resource Center

Resource	Percentage
CEP Fact Sheet	78.2
CEP Estimator Tool	61.8
ISP Worksheet	61.1
CEP Policy Memos and Guidance	51.0
USDA State List of Eligible Schools/LEAs	34.1
CEP Perceived Barriers to Implementation Info Sheet	26.2
CEP Webinar Series	20.1
Partner Websites and Resources	17.2
CBPP Eligibility Status Searchable Database	11.0
USDA Blog	7.3
Other	6.0
Don't know	2.2
Weighted number of LEAs	898
Unweighted number of LEAs	124

Notes: LEAs could select multiple responses. Percentages are among participating LEAs that used the CEP Resource Center.
Source: Participating LEA Survey.

Table C-3 | Participating LEAs Reporting the Importance and Usefulness of the CEP Resource Center

	Percentage
LEAs that Found the CEP Resource Center Important	
Very important	79.6
Moderately important	18.4
Not very important	0.3
Not at all important	0.2
Don't know	1.5
No response	0.3
Weighted number of LEAs	898
Unweighted number of LEAs	124
LEAs that Found the CEP Resource Center Useful	
Very useful	74.8
Moderately useful	24.1
Don't know	0.8
Not very useful	0.3
Weighted number of LEAs	898
Unweighted number of LEAs	124

Source: Participating LEA Survey.

Table C-4 |Partially Participating LEAs' Reasons Not to Operate CEP in All Schools

Reported Reasons	Percentage
Not financially viable at all schools	92.3
Reluctance by district-level administration	13.7
Reluctance by school-level administration	4.4
Difficulty in providing school breakfast in all schools	4.5
Uncertainty or concern about how CEP will affect funding for educational programs	2.4
Low participation in school meal programs	1.9
Availability of CEP for the long term	1.4
Weighted number of LEAs	385
Unweighted number of LEAs	44

Notes: Respondents include only those partially participating LEAs eligible to operate CEP in all schools. LEAs could select multiple options; reasons were added as new categories from recode of "Other" responses; row estimates for importance responses may not add to 100 percent because LEAs could also select "Don't know," not shown in table. No LEAs selected the category "Lack the capacity to feed all students."
Source: Participating LEA Survey.

Table C-5 | Changes Made to Meal Service Due to CEP Participation

	Percentage
LEA Changed Meal Service	
Yes	12.7
No	78.3
Don't know	7.8
No response	1.3
Among Those that Reported Changes to Meal Service	
Implemented or expanded SBP	61.4
Increased the variety of foods served at school breakfast and lunch	51.1
Increased the use of pre-prepared foods	32.3
Increased nutrition education activities throughout the food service department	22.4
Decreased the use of pre-prepared foods	14.7
Decreased the variety of foods served at school breakfast and lunch	10.6
Increased participation	4.2
More professional development for food service workers	3.4
Don't know	2.4
Purchased new kitchen equipment	1.0
Increased staff	0.9
Increased taste testing	0.7
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Note: LEAs could select multiple responses; table does not include nonresponse; one participating LEA, representing an estimated eight LEAs in the population, did not respond to this question.
Source: Participating LEA Survey.

Table C-6 | Adequacy of Lead Time to Prepare for Implementation of CEP

Lead Time for CEP Implementation	Percentage	Lead Time Was Adequate	
		Yes	No
Less than 2 weeks	4.1	48	34.8
2 weeks to less than 1 month	10.7	75.2	19.5
1 month to less than 2 months	15.6	85.3	10.2
2 months to less than 3 months	20.6	93	5.4
3 months or more	29.6	98.8	1.2
Weighted number of LEAs	3,542		
Unweighted number of LEAs	446		

Note: Lead time information was missing for approximately 19 percent of participating LEAs; percentage for "Lead time was adequate" may not add to 100 percent due to missing (1.2 percent) and "Don't know" (18.2 percent) responses.
Source: Participating LEA Survey.

Table C-7 | Participating LEAs that Continue to Collect Household Income Data

	Percentage
Collect Household Income Data	
Yes	38.6
No	50.1
Don't know	9.6
No response	1.7
Among LEAs that Continue to Collect Household Income Data, Reported Uses of Data	
Title 1 funds	68.5
E-Rate initiatives	45.4
State or local education funding	33.0
Reduced fees/free programs (e.g., for summer school, tutoring programs, textbooks)	21.7
NCLB (measurement of adequate yearly progress)	23.3
Waivers (e.g., Advance Placement or other test fees, sports fee, transportation)	17.4
Other food service programs (e.g., Summer Feeding Program, Afterschool Snack Program)	18.4
Literacy and reading programs	13.8
Student loan forgiveness programs (for teachers)	12.9
Early childhood education programs	11.9
NAEP	10.1
Vocational and technical education	7.1
Funding for average daily attendance	2.7
State reporting	1.0
LEA reporting	0.6
Don't know	11.3
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Notes: LEAs could select multiple responses; table does not include nonresponse.
NCLB = No Child Left Behind; NAEP = National Assessment of Education Progress.
Source: Participating LEA Survey.

Table C-8 | Other Uses for Meal Eligibility Data Among Non-Participating LEAs

	Percentage
LEA Uses Meal Eligibility Data for Other Purposes	
Yes	59.7
No	19.2
Don't know	21.0
No response	0.1
F/RP Meals Eligibility Data Uses	
Title 1 funds	80.2
E-Rate initiatives	68.4
Other food service programs (e.g., Summer Feeding Program, Afterschool Snack Program)	53.8
Waivers (e.g., Advance Placement or other test fees, sports fee, transportation)	48.2
State or local education funding	47.0
Reduced fees/free programs (e.g., for summer school, tutoring programs, textbooks)	37.3
NCLB (measurement of adequate yearly progress)	36.5
Student loan forgiveness programs (for teachers)	26.3
Early childhood education programs	26.1
Literacy and reading programs	24.2
Vocational and technical education	23.1
NAEP	21.5
Food service programs	0.7
Special education	0.4
Don't know	7.6
Weighted number of LEAs	4,263
Unweighted number of LEAs	307

Notes: LEAs could select multiple responses; table does not include nonresponse; one participating LEA, representing an estimated nine LEAs in the population, did not respond to this question.
NCLB = No Child Left Behind; NAEP = National Assessment of Education Progress.
Source: Non-Participating LEA Survey.

Table C-9 | Non-Participating LEAs Reporting Changes that Would Make CEP More Appealing

Changes to CEP	Percentage
Increase the multiplier	50.9
Allow ISP data in qualifying for other State and Federal funds	46.4
Available to all schools in LEA and not just schools that are eligible	40.7
Provide more training	24.1
Do not require implementation of SBP to operate under CEP	5.6
Don't know	10.6
Other	7.8
Weighted number of LEAs	4,180
Unweighted number of LEAs	303

Note: LEAs could select multiple responses; LEAs reported on changes that would influence an increase in the number of schools operating under CEP.
Source: Non-Participating LEA Survey.

Table C-10 | Likelihood of LEA to Participate in CEP Next Year

Likelihood	Participating LEAs to Continue in CEP	Non-Participating LEAs to Elect CEP
	Percent	Percent
Likely (very/somewhat)	96.5	23.2
Unlikely (very/somewhat)	2.1	20.7
Don't know	1.0	17.3
No response	0.4	38.8
Weighted number of LEAs	3,527	2,608
Unweighted number of LEAs	444	173

Source: Participating LEA Survey, Non-Participating LEA Survey.

Table C-11 | Reasons CEP Was Implemented This Year (SY 2016–17) in Schools Eligible but Non-Participating Last Year (SY 2015–16)

	Percentage
Considered the costs and benefits in more detail	62.8
Recognized the success in other schools	48.7
Encouraged by the SA	35.3
Wanted to phase in CEP gradually	23.2
Parents and community urged school to do so	14.2
Newly opened schools with high need	11.2
ISP more favorable	4.8
Concerns about program sustainability ("grandfathered" in)	0.7
Weighted number of LEAs	77
Unweighted number of LEAs	10

Note: LEAs could select multiple responses; table does not include nonresponse; one participating LEA, representing an estimated eight LEAs in the population, did not respond to this question.
Source: Participating LEA Survey.

APPENDIX D. CHAPTER 6 ADDITIONAL TABLES

Table D-1 | Perceived Effects of CEP on NSLP Participation Rate in the First Year of Implementation—Regression Parameter Estimates

Outcome = ADP Rate in NSLP				
Variable	Estimate	SE	*t* Value	*p*-value
Intercept	0.651	0.095	6.84	<.001
Year 1 post-implementation	-0.007	0.002	-2.8	0.005
Treatment status indicator	0.020	0.007	3.04	0.002
Year 1 post-implementation x treatment status	0.044	0.004	9.82	<.001
Average number of students per school—baseline	3.8E-05	2.8E-05	1.38	0.167
Percentage of students in Grades K–5 in LEA—baseline	0.135	0.030	4.51	<.001
Percentage of students in Grades 6–8 in LEA—baseline	0.083	0.051	1.63	0.104
Percentage of Hispanic students in LEA—baseline	0.108	0.047	2.27	0.023
Percentage of black students in LEA—baseline	0.060	0.049	1.22	0.223
Percentage of white students in LEA—baseline	0.049	0.050	0.98	0.327
Percentage of English language learners in LEA—baseline	0.060	0.036	1.68	0.093
Percentage of students in Title 1 schools in LEA—baseline	0.051	0.018	2.81	0.005
Urbanicity (1 = City/Urban, 0 = Other)—baseline	-0.038	0.040	-0.95	0.340
Difference between F/RP percentage and ISP—baseline	0.299	0.056	5.35	<.001
Percentage of students eligible for F/RP meals—baseline	0.022	0.012	1.9	0.058
Natural log of number of schools in LEA—baseline	-0.039	0.010	-3.91	<.001
Natural log of number of students in LEA—baseline	0.060	0.036	1.68	0.093
Percentage of free NSLP lunches claimed—baseline	-0.050	0.076	-0.66	0.512
Percentage of reduced price NSLP claimed—baseline	-0.020	0.135	-0.15	0.883
State indicator—California	-0.196	0.027	-7.19	<.001
State indicator—Massachusetts	-0.144	0.026	-5.45	<.001
State indicator—Minnesota	-0.048	0.035	-1.38	0.167
State indicator—Missouri	-0.060	0.024	-2.53	0.012
State indicator—New Jersey	-0.130	0.031	-4.26	<.001
State indicator—Texas	-0.115	0.023	-4.9	<.001
State indicator—Virginia	-0.109	0.028	-3.97	<.001
State indicator—Washington	-0.143	0.028	-5.12	<.001
State indicator—Illinois late-implementing LEAs	-0.137	0.027	-5.17	<.001
State indicator—Illinois early-implementing LEAs	-0.092	0.024	-3.78	<.001
State indicator—Michigan early-implementing LEAs	-0.105	0.023	-4.63	<.001
State indicator—New York late-implementing LEAs	-0.111	0.025	-4.44	<.001
State indicator—New York early-implementing LEAs	-0.084	0.031	-2.71	0.007

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924.
Alabama is the reference State and omitted from the model.
Early-implementing LEAs are LEAs that implemented CEP before SY 2014–15 and their matched comparison LEAs. Late-implementing LEAs are LEAs that implemented CEP after SY 2014–15 and their matched comparison LEAs.
SE = Standard Error.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

Table D-2 | Impact of CEP on SBP Participation Rate in the First Year of Implementation—Regression Parameter Estimates

Outcome = ADP Rate in SBP				
Variable	Estimate	SE	*t* Value	*p*-value
Intercept	0.536	0.116	4.630	<.001
Year 1 post-implementation	-0.002	0.003	-0.820	0.414
Treatment status indicator	0.032	0.010	3.300	0.001
Year 1 post-implementation x treatment status	0.044	0.006	7.510	<.001
Average number of students per school baseline	5.3E-05	4.5E-05	1.190	0.236
Percentage of students in Grades K–5 in LEA—baseline	0.154	0.036	4.240	<.001
Percentage of students in Grades 6–8 in LEA—baseline	0.043	0.061	0.700	0.481
Percentage of Hispanic students in LEA—baseline	0.048	0.073	0.660	0.508
Percentage of black students in LEA—baseline	0.023	0.074	0.310	0.757
Percentage of white students in LEA—baseline	0.005	0.070	0.070	0.943
Percentage of English language learners in LEA—baseline	-0.012	0.066	-0.190	0.851
Percentage of students in Title 1 schools in LEA—baseline	-0.024	0.026	-0.920	0.359
Urbanicity (1 = City/Urban, 0 = Other)—baseline	-0.028	0.014	-1.950	0.052
Difference between F/RP percentage and ISP—baseline	-0.092	0.056	-1.660	0.097
Percentage of students eligible for F/RP meals—baseline	0.205	0.058	3.530	<.001
Natural log of number of schools in LEA—baseline	0.079	0.018	4.400	<.001
Natural log of number of students in LEA—baseline	-0.091	0.015	-6.100	<.001
Percentage of free NSLP lunches claimed—baseline	0.298	0.075	3.970	<.001
Percentage of reduced price NSLP lunches claimed—baseline	0.217	0.211	1.030	0.305
State indicator—California	-0.116	0.043	-2.690	0.007
State indicator—Massachusetts	-0.110	0.043	-2.560	0.011
State indicator—Minnesota	-0.018	0.053	-0.330	0.738
State indicator—Missouri	-0.024	0.040	-0.610	0.545
State indicator—New Jersey	0.015	0.051	0.310	0.759
State indicator—Texas	-0.018	0.039	-0.460	0.648
State indicator—Virginia	-0.063	0.039	-1.600	0.111
State indicator—Washington	-0.135	0.042	-3.230	0.001
State indicator—Illinois late-implementing LEAs	-0.144	0.041	-3.470	0.001
State indicator—Illinois early-implementing LEAs	-0.062	0.042	-1.460	0.144
State indicator—Michigan early-implementing LEAs	-0.088	0.040	-2.220	0.027
State indicator—New York late-implementing LEAs	-0.027	0.041	-0.660	0.507
State indicator—New York early-implementing LEAs	-0.050	0.066	-0.750	0.451

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924.
Alabama is the reference State and omitted from the model.
Early-implementing LEAs are LEAs that implemented CEP before SY 2014–15 and their matched comparison LEAs. Late-implementing LEAs are LEAs that implemented CEP after SY 2014–15 and their matched comparison LEAs.
SE = Standard Error.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

Table D-3 | Sustainability of CEP Impacts on the NSLP Participation Rate—Regression Parameter Estimates

Outcome = ADP Rate in NSLP				
Variable	Estimate	SE	*t* Value	*p*-value
Intercept	0.548	0.122	4.49	<.001
Year 1 post-implementation	0.000	0.004	-0.08	0.936
Treatment status indicator	0.010	0.009	1.13	0.257
Year 1 post-implementation x treatment status	0.050	0.007	7.43	<.001
Year 2 post-implementation	-0.009	0.004	-2.09	0.037
Year 2 post-implementation x treatment status	0.062	0.008	8.06	<.001
Average number of students per school—baseline	4.2E-05	3.7E-05	1.14	0.256
Percentage of students in Grades K–5 in LEA—baseline	0.173	0.044	3.91	<.001
Percentage of students in Grades 6–8 in LEA—baseline	0.183	0.061	2.97	0.003
Percentage of Hispanic students in LEA—baseline	0.059	0.054	1.09	0.277
Percentage of black students in LEA—baseline	0.002	0.057	0.03	0.974
Percentage of white students in LEA—baseline	0.004	0.059	0.07	0.945
Percentage of English language learners in LEA—baseline	0.019	0.044	0.44	0.658
Percentage of students in Title 1 schools in LEA—baseline	0.071	0.026	2.76	0.006
Urbanicity (1 = City/Urban, 0 = Other)—baseline	-0.034	0.012	-2.85	0.005
Difference between F/RP percentage and ISP—baseline	-0.057	0.050	-1.12	0.261
Percentage of students eligible for F/RP meals—baseline	0.320	0.087	3.66	0.000
Natural log of number of schools in LEA—baseline	0.024	0.015	1.61	0.108
Natural log of number of students in LEA—baseline	-0.033	0.013	-2.55	0.011
Percentage of free NSLP lunches claimed—baseline	0.002	0.110	0.02	0.987
Percentage of reduced price NSLP lunches claimed—baseline	-0.049	0.175	-0.28	0.779
State indicator—California	-0.213	0.037	-5.79	<.001
State indicator—Massachusetts	-0.134	0.037	-3.62	<.001
State indicator—Minnesota	-0.046	0.047	-0.97	<.001
State indicator—Missouri	-0.054	0.031	-1.74	0.082
State indicator—New Jersey	-0.110	0.033	-3.29	0.001
State indicator—Texas	-0.102	0.030	-3.38	0.001
State indicator—Virginia	-0.067	0.040	-1.68	0.094
State indicator—Washington	-0.166	0.035	-4.79	<.001
State indicator—Illinois late-implementing LEAs	-0.145	0.036	-4.06	<.001
State indicator—Illinois early-implementing LEAs	-0.091	0.031	-2.91	0.004
State indicator—Michigan early-implementing LEAs	-0.099	0.029	-3.38	0.001
State indicator—New York late-implementing LEAs	-0.123	0.039	-3.15	0.002
State indicator—New York early-implementing LEAs	-0.045	0.038	-1.18	0.238

Notes: With 3 observations per LEA and 552 LEAs, the total number of observations used in the regression model is 1,656. Alabama is the reference State and omitted from the model.
Early-implementing LEAs are LEAs that implemented CEP before SY 2014–15 and their matched comparison LEAs. Late-implementing LEAs are LEAs that implemented CEP after SY 2014–15 and their matched comparison LEAs.
SE = Standard Error.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2014 to SY 2016–2017.

Table D-4 | Sustainability of CEP Impacts on the SBP Participation Rate—Regression Parameter Estimates

Outcome = ADP Rate in SBP				
Variable	Estimate	SE	*t* Value	*p*-value
Intercept	0.435	0.154	2.82	0.005
Year 1 post-implementation	-0.001	0.004	-0.17	0.863
Treatment status indicator	0.022	0.014	1.55	0.122
Year 1 post-implementation x treatment status	0.049	0.009	5.71	<.001
Year 2 post-implementation	0.009	0.005	1.61	0.107
Year 2 post-implementation x treatment status	0.061	0.010	6.28	<.001
Average number of students per school—baseline	6.3E-07	5.1E-05	0.01	0.990
Percentage of students in Grades K–5 in LEA—baseline	0.159	0.052	3.04	0.003
Percentage of students in Grades 6–8 in LEA—baseline	0.214	0.087	2.46	0.014
Percentage of Hispanic students in LEA—baseline	0.011	0.121	0.09	0.928
Percentage of black students in LEA—baseline	0.022	0.127	0.17	0.865
Percentage of white students in LEA—baseline	-0.003	0.122	-0.03	0.979
Percentage of English language learners in LEA—baseline	-0.007	0.090	-0.08	0.940
Percentage of students in Title 1 schools in LEA—baseline	-0.025	0.037	-0.67	0.500
Urbanicity (1 = City/Urban, 0 = Other)—baseline	-0.036	0.021	-1.72	0.086
Difference between F/RP percentage and ISP—baseline	-0.033	0.074	-0.44	0.661
Percentage of students eligible for F/RP meals—baseline	0.173	0.089	1.94	0.053
Natural log of number of schools in LEA—baseline	0.079	0.024	3.33	0.001
Natural log of number of students in LEA—baseline	-0.081	0.019	-4.21	<.001
Percentage of free NSLP lunches claimed—baseline	0.285	0.104	2.73	0.006
Percentage of reduced price NSLP lunches claimed—baseline	0.016	0.282	0.06	0.956
State indicator—California	-0.093	0.047	-1.97	0.049
State indicator—Massachusetts	-0.008	0.056	-0.15	0.880
State indicator—Minnesota	-0.005	0.051	-0.1	0.919
State indicator—Missouri	0.011	0.035	0.33	0.744
State indicator—New Jersey	0.137	0.073	1.89	0.060
State indicator—Texas	0.034	0.035	0.96	0.336
State indicator—Virginia	-0.008	0.034	-0.25	0.806
State indicator—Washington	-0.085	0.043	-1.98	0.048
State indicator—Illinois late-implementing LEAs	-0.099	0.040	-2.47	0.014
State indicator—Illinois early-implementing LEAs	-0.014	0.038	-0.37	0.710
State indicator—Michigan early-implementing LEAs	-0.027	0.034	-0.79	0.430
State indicator—New York late-implementing LEAs	-0.013	0.040	-0.33	0.745
State indicator—New York early-implementing LEAs	0.012	0.093	0.13	0.896

Notes: With 3 observations per LEA and 552 LEAs, the total number of observations used in the regression model is 1,656.
Alabama is the reference State and omitted from the model.
Early-implementing LEAs are LEAs that implemented CEP before SY 2014–15 and their matched comparison LEAs. Late-implementing LEAs are LEAs that implemented CEP after SY 2014–15 and their matched comparison LEAs.
SE = Standard Error.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2014 to SY 2016–2017.

Table D-5 | School Type with Greatest Perceived Changes in ADP Rates in NSLP

Type of School with Greatest Perceived Change in ADP Rates from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Increase in ADP			
Elementary school	49.0	37.5	11.5
Middle school	5.8	3.9	1.9
High school	23.5	43.7	-20.3*
Other school	1.2	0.0	1.2
No difference by type	19.0	12.3	6.6
Don't know	1.6	2.6	-1.0
No response	0.0	0.0	0.0
Weighted number of LEAs	770	384	
Unweighted number of LEAs	128	40	
Decrease in ADP			
Elementary school	0.0	18.9	-18.9***
Middle school	6.5	6.7	-0.1
High school	62.9	40.0	22.9
Other school	0.0	0.0	0.0
No difference by type	6.9	26.0	-19.1**
Don't know	23.6	5.5	18.1
No response	0.0	2.9	-2.9
Weighted number of LEAs	51	673	
Unweighted number of LEAs	9	61	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs.

This table is restricted to LEAs that reported having at least one elementary school, at least one middle school, and at least one high school.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table D-6 | School Type with Greatest Perceived Changes in ADP Rates in SBP

Type of School with Greatest Perceived Change in ADP Rates from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Increase in ADP			
Elementary school	55.4	48.2	7.2
Middle school	11.5	8.7	2.8
High school	15.1	26.3	-11.2
Other school	2.2	0.0	2.2
No difference by type	15.2	12.5	2.7
Don't know	0.6	4.3	-3.7
No response	0.0	0.0	0.0
Weighted number of LEAs	825	711	
Unweighted number of LEAs	138	69	
Decrease in ADP			
Elementary school	32.8	11.9	20.9
Middle school	13.3	19.7	-6.4
High school	39.9	31.6	8.3
Other school	0.0	1.3	-1.3
No difference by type	14.0	31.9	-17.8
Don't know	0.0	3.7	-3.7
No response	0.0	0.0	0.0
Weighted number of LEAs	61	493	
Unweighted number of LEAs	9	46	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs.

This table is restricted to LEAs that reported having at least one elementary school, at least one middle school, and at least one high school. Other schools include any school that does not meet the elementary, middle or junior high, or high school definition (6–12, K–8, K–12).

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table D-7 | School Type with Greatest Perceived Changes in ADA

Type of School with Greatest Perceived Change in ADA from SY 2013–14 to SY 2016–17	Participating LEAs (%)	Non-Participating LEAs (%)	Difference (percentage points)
Increase in ADA			
Elementary school	47.2	40.9	6.3
Middle school	5.3	7.4	-2.1
High school	18.1	21.3	-3.2
Other school	0.0	0.0	0.0
No difference by type	22.8	18.1	4.7
Don't know	6.6	12.3	-5.6
No response	0.0	0.0	0.0
Weighted number of LEAs	408	421	
Unweighted number of LEAs	66	42	
Decrease in ADA			
Elementary school	4.8	25.0	-20.1*
Middle school	0.0	9.4	-9.4
High school	23.2	29.4	-6.2
Other school	6.6	0.0	6.6
No difference by type	57.6	27.9	29.7
Don't know	7.8	8.3	-0.6
No response	0.0	0.0	0.0
Weighted number of LEAs	54	339	
Unweighted number of LEAs	13	32	

*** = $p < 0.01$, ** = $p < 0.05$, * = $p < 0.10$.

Notes: *T*-tests were performed to calculate the statistical significance of the difference between estimates for participating and non-participating LEAs.

This table is restricted to LEAs that reported having at least one elementary school, at least one middle school, and at least one high school.

Sources: Participating LEA Survey, Non-Participating LEA Survey.

Table D-8 | Impact of CEP on Total Daily NSLP and SBP Federal Reimbursements per Student Enrolled in the First Year of Implementation—Regression Parameter Estimates

Outcome = Daily Average of Total NSLP and SBP Federal Revenues per Student Enrolled ($)				
Variable	**Estimate**	**SE**	***t* Value**	***p*-value**
Intercept	1.285	0.389	3.3	0.001
Year 1 post-implementation	0.038	0.011	3.52	<.001
Treatment status indicator	0.117	0.029	4	<.001
Year 1 post-implementation x treatment status	0.266	0.023	11.82	<.001
Average number of students per school—baseline	1.2E-04	1.3E-04	0.89	0.376
Percentage of students in Grades K–5 in LEA—baseline	0.639	0.127	5.05	<.001
Percentage of students in Grades 6–8 in LEA—baseline	0.363	0.213	1.7	0.089
Percentage of Hispanic students in LEA—baseline	0.336	0.221	1.52	0.128
Percentage of black students in LEA—baseline	0.251	0.220	1.14	0.254
Percentage of white students in LEA—baseline	0.166	0.215	0.77	0.441
Percentage of English language learners in LEA—baseline	0.291	0.176	1.65	0.099
Percentage of students in Title 1 schools in LEA—baseline	0.064	0.083	0.77	0.442
Urbanicity (1=City/Urban, 0=Other)—baseline	-0.072	0.044	-1.65	0.100
Difference between F/RP percentage and ISP—baseline	-0.274	0.182	-1.51	0.132
Percentage of students eligible for F/RP meals—baseline	1.142	0.222	5.16	<.001
Natural log of number of schools in LEA—baseline	0.191	0.055	3.49	0.001
Natural log of number of students in LEA—baseline	-0.256	0.046	-5.51	<.001
Percentage of free NSLP lunches claimed—baseline	2.058	0.292	7.05	<.001
Percentage of reduced price NSLP lunches claimed—baseline	1.205	0.644	1.87	0.062
State indicator—California	-0.688	0.171	-4.02	<.001
State indicator—Massachusetts	-0.537	0.163	-3.29	0.001
State indicator—Minnesota	-0.368	0.195	-1.89	0.060
State indicator—Missouri	-0.338	0.158	-2.13	0.033
State indicator—New Jersey	-0.414	0.183	-2.26	0.024
State indicator—Texas	-0.429	0.156	-2.75	0.006
State indicator—Virginia	-0.428	0.156	-2.73	0.006
State indicator—Washington	-0.617	0.167	-3.7	<.001
State indicator—Illinois late-implementing LEAs	-0.601	0.167	-3.6	<.001
State indicator—Illinois early-implementing LEAs	-0.603	0.157	-3.85	<.001
State indicator—Michigan early-implementing LEAs	-0.744	0.152	-4.9	<.001
State indicator—New York late-implementing LEAs	-0.253	0.160	-1.59	0.113
State indicator—New York early-implementing LEAs	-0.477	0.196	-2.44	0.015

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924.
Alabama is the reference State and omitted from the model.
Early-implementing LEAs are LEAs that implemented CEP before SY 2014–15 and their matched comparison LEAs. Late-implementing LEAs are LEAs that implemented CEP after SY 2014–15 and their matched comparison LEAs.
SE = Standard Error.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

Table D-9 | Impact of CEP on Total Federal Reimbursements per NSLP Lunch in the First Year of Implementation—Regression Parameter Estimates

Outcome = Federal Revenues per NSLP Lunch ($)				
Variable	Estimate	SE	*t* Value	*p*-value
Intercept	0.593	0.147	4.04	<.001
Year 1 post-implementation	0.068	0.005	13.79	<.001
Treatment status indicator	0.032	0.010	3.19	0.001
Year 1 post-implementation x treatment status	0.086	0.011	7.54	<.001
Average number of students per school—baseline	-8.0E-05	4.8E-05	-1.56	0.119
Percentage of students in Grades K–5 in LEA—baseline	0.009	0.039	0.22	0.827
Percentage of students in Grades 6–8 in LEA—baseline	0.055	0.070	0.78	0.436
Percentage of Hispanic students in LEA—baseline	0.111	0.087	1.27	0.203
Percentage of black students in LEA—baseline	0.133	0.091	1.46	0.144
Percentage of white students in LEA—baseline	0.121	0.089	1.37	0.172
Percentage of English language learners in LEA—baseline	0.013	0.057	0.23	0.821
Percentage of students in Title 1 schools in LEA—baseline	0.020	0.024	0.81	0.418
Urbanicity (1 = City/Urban, 0 = Other)—baseline	0.025	0.012	1.97	0.049
Difference between F/RP percent and ISP—baseline	-0.005	0.056	-0.08	0.934
Percentage of students eligible for F/RP meals—baseline	0.095	0.061	1.57	0.117
Natural log of number of schools in LEA—baseline	0.010	0.019	0.54	0.590
Natural log of number of students in LEA—baseline	-0.015	0.017	-0.86	0.392
Percentage of free NSLP lunches claimed—baseline	2.301	0.080	28.87	<.001
Percentage of reduced price NSLP lunches claimed—baseline	1.755	0.201	8.74	<.001
State indicator—California	0.013	0.028	0.48	0.632
State indicator—Massachusetts	0.080	0.031	2.57	0.010
State indicator—Minnesota	-0.128	0.036	-3.59	<.001
State indicator—Missouri	-0.068	0.021	-3.16	0.002
State indicator—New Jersey	-0.074	0.057	-1.3	0.193
State indicator—Texas	-0.051	0.021	-2.39	0.017
State indicator—Virginia	0.019	0.025	0.76	0.445
State indicator—Washington	0.037	0.030	1.22	0.223
State indicator—Illinois late-implementing LEAs	0.059	0.033	1.78	0.076
State indicator—Illinois early-implementing LEAs	-0.225	0.025	-8.89	<.001
State indicator—Michigan early-implementing LEAs	-0.313	0.020	-15.63	<.001
State indicator—New York late-implementing LEAs	0.150	0.025	5.96	<.001
State indicator—New York early-implementing LEAs	-0.164	0.029	-5.58	<.001

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924.
Alabama is the reference State and omitted from the model.
Early-implementing LEAs are LEAs that implemented CEP before SY 2014–15 and their matched comparison LEAs. Late-implementing LEAs are LEAs that implemented CEP after SY 2014–15 and their matched comparison LEAs.
SE = Standard Error.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

Table D-10 | Impact of CEP on Total Federal Reimbursements per SBP Breakfast in the First Year of Implementation—Regression Parameter Estimates

Outcome = Federal Revenues per SBP Breakfast ($)				
Variable	Estimate	SE	*t* Value	*p*-value
Intercept	1.030	0.121	8.51	<.001
Year 1 post-implementation	0.037	0.003	10.82	<.001
Treatment status indicator	-0.002	0.009	-0.22	0.827
Year 1 post-implementation x treatment status	0.022	0.008	2.67	0.008
Average number of students per school—baseline	-5.0E-05	4.0E-05	-1.17	0.244
Percentage of students in Grades K–5 in LEA—baseline	0.009	0.034	0.27	0.785
Percentage of students in Grades 6–8 in LEA—baseline	0.064	0.058	1.1	0.272
Percentage of Hispanic students in LEA—baseline	-0.063	0.055	-1.15	0.252
Percentage of black students in LEA—baseline	-0.032	0.059	-0.54	0.591
Percentage of white students in LEA—baseline	0.010	0.059	0.17	0.869
Percentage of English language learners in LEA—baseline	0.069	0.045	1.52	0.129
Percentage of students in Title 1 schools in LEA—baseline	-0.015	0.020	-0.75	0.454
Urbanicity (1 = City/Urban, 0 = Other)—baseline	0.018	0.011	1.62	0.106
Difference between F/RP percentage and ISP—baseline	-0.044	0.047	-0.93	0.351
Percentage of students eligible for F/RP meals—baseline	-0.005	0.064	-0.08	0.937
Natural log of number of schools in LEA—baseline	-0.019	0.015	-1.29	0.197
Natural log of number of students in LEA—baseline	0.020	0.013	1.49	0.137
Percentage of free NSLP lunches claimed—baseline	0.824	0.095	8.7	<.001
Percentage of reduced price NSLP lunches claimed—baseline	0.231	0.183	1.26	0.208
State indicator—California	-0.038	0.029	-1.31	0.191
State indicator—Massachusetts	0.025	0.032	0.79	0.431
State indicator—Minnesota	-0.130	0.036	-3.57	<.001
State indicator—Missouri	-0.095	0.023	-4.04	<.001
State indicator—New Jersey	-0.088	0.050	-1.74	0.082
State indicator—Texas	-0.089	0.023	-3.81	<.001
State indicator—Virginia	-0.025	0.028	-0.88	0.377
State indicator—Washington	-0.009	0.030	-0.3	0.763
State indicator—Illinois late-implementing LEAs	0.011	0.026	0.41	0.682
State indicator—Illinois early-implementing LEAs	-0.139	0.025	-5.67	<.001
State indicator—Michigan early-implementing LEAs	-0.214	0.024	-8.98	<.001
State indicator—New York late-implementing LEAs	0.046	0.026	1.74	0.083
State indicator—New York early-implementing LEAs	-0.080	0.029	-2.72	0.007

Notes: With 2 observations per LEA and 962 LEAs, the total number of observations used in the regression model is 1,924.
Alabama is the reference State and omitted from the model.
Early-implementing LEAs are LEAs that implemented CEP before SY 2014–15 and their matched comparison LEAs. Late-implementing LEAs are LEAs that implemented CEP after SY 2014–15 and their matched comparison LEAs.
SE = Standard Error.
Sources: State Administrative Data, Common Core of Data, Verification Summary Reports, SY 2010–2011 to SY 2016–2017.

Table D-11 | Perceived Effects of CEP on Labor Costs

Effect of CEP on Average Labor Costs per Meal for Meal Production and Service	Percentage of Participating LEAs
Effect of CEP on Breakfast Labor Costs	
CEP increased breakfast labor costs	5.7
CEP decreased breakfast labor costs	14.6
CEP did not affect labor costs	58.0
Don't know	21.1
No response	0.6
Effect of CEP on Lunch Labor Costs	
CEP increased lunch labor costs	5.7
CEP decreased lunch labor costs	14.7
CEP did not affect labor costs	58.0
Don't know	21.1
No response	0.6
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Source: Participating LEA Survey.

Table D-12 | Perceived Effects of CEP on Food Costs

Effect of CEP on Average Food Costs per Meal	Percentage of Participating LEAs
Effect of CEP on Breakfast Food Costs	
CEP increased breakfast food costs	7.8
CEP decreased breakfast food costs	8.2
CEP did not affect breakfast food costs	65.6
Don't know	17.8
No response	0.6
Effect of CEP on Lunch Food Costs	
CEP increased lunch food costs	6.4
CEP decreased lunch food costs	9.4
CEP did not affect lunch food costs	65.6
Don't know	18.0
No response	0.6
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Source: Participating LEA Survey.

Table D-13 | Perceived Effects of CEP on Wages

Effect of CEP on Average Pay per Hour for Cafeteria Workers	Percentage of Participating LEAs
CEP increased pay per hour	4.7
CEP decreased pay per hour	2.3
CEP did not affect pay per hour	79.3
Don't know	13.8
No response	0.0
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Source: Participating LEA Survey.

Table D-14 | Perceived Effects of CEP on Food Quality

Effect of CEP on Average Quality of Foods[1] Offered for Reimbursable School Meals	Percentage of Participating LEAs
Effect of CEP on Breakfast Food Quality	
CEP increased breakfast food quality	18.1
CEP decreased breakfast food quality	2.3
CEP did not affect breakfast food quality	66.1
Don't know	13.1
No response	0.4
Effect of CEP on Lunch Food Quality	
CEP increased lunch food quality	18.8
CEP decreased lunch food quality	1.2
CEP did not affect lunch food quality	66.1
Don't know	13.4
No response	0.4
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

[1] Quality of foods is defined in terms of freshness and nutrition.

Source: Participating LEA Survey.

Table D-15 | Perceived Effects of CEP on Food Variety

Effect of CEP on Average Variety of Foods Offered for Reimbursable School Meals	Percentage of Participating LEAs
Effect of CEP on Breakfast Food Variety	
CEP increased breakfast food variety	20.4
CEP decreased breakfast food variety	2.2
CEP did not affect breakfast food variety	65.3
Don't know	12.1
No response	0.0
Effect of CEP on Lunch Food Variety	
CEP increased lunch food variety	20.0
CEP decreased lunch food variety	2.2
CEP did not affect lunch food variety	65.3
Don't know	12.5
No response	0.0
Weighted number of LEAs	3,542
Unweighted number of LEAs	446

Source: Participating LEA Survey.

APPENDIX E. STATE AGENCY CHILD NUTRITION DIRECTOR SURVEY

Community Eligibility Provision Characteristics Study (CEP)

State Agency Child Nutrition Director Web Survey

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0612, expires 9/30/2019. The time required to complete this information collection is estimated to average 60 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of time estimates or suggestions for improving this form, please contact:

U.S. Department of Agriculture
Food and Nutrition Service
Office of Policy Support
Alexandria, VA 22302
Attention: Dr. John Endahl.

Prepared for:
US Department of Agriculture
Food and Nutrition Service
Office of Policy Support

Prepared by:
2M Research Services

This survey is being conducted for the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), as part of a study called Community Eligibility Provision (CEP) Characteristics Study. 2M Research Services has been hired by the USDA FNS to conduct this survey. Information provided in this survey will be kept private, to the extent provided by law. No data will be attributed to specific survey respondents. De-identified data from this study will be provided to the USDA FNS. Responses to the study will in no way affect your agency's receipt of funds from USDA's school meals program.

The study is authorized by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), and participation by selected states, local education agencies, and schools is required under Section 305 of HHFKA. Section 305 of HHFKA states that "States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts."

Please note, if you cannot complete the survey in one sitting, you can save it and complete it at a later date. You may also share the survey link with appropriate personnel as you deem necessary in order to report accurate information. This survey will take about 60 minutes to complete.

We thank you for your cooperation and participation in this very important study.

If you have any questions about the study or about completing this survey, please email CEP@2mresearch.com or call 1-844-503-7045 (toll-free).

Date: _____
MM/DD/YYYY

State: _____

Contact information for the State Child Nutrition Director:

Name: _____

Address: _____

Suite, Bldg.: _____

_____
City *State* *Zip Code*

Phone Number: _____
(XXX) XXX-XXXX Ext. XXXX

Email Address: _____

Name and address of person filling out this survey (if other than the Child Nutrition Director):

Name: _____

Address: _____

Suite, Bldg.: _____

_____
City *State* *Zip Code*

Phone Number: _____
(XXX) XXX-XXXX Ext. XXXX

Email Address: _____

1 Implementation of CEP

1.1 Overall how was your experience implementing the Community Eligibility Provision (CEP)? (Select the best response)

- ☐ Not challenging
- ☐ A little challenging
- ☐ Moderately challenging
- ☐ Very challenging
- ☐ Extremely challenging
- ☐ Not applicable (*Explain*):

1.2 Has the implementation of CEP resulted in any changes to your meal programs data tracking procedures (e.g. electronic, paper, etc.)??

- ☐ Yes
- ☐ No (go to1.4)
- ☐ Don't know (go to 1.4)

1.3 How have your meal programs data tracking procedures changed? (Select all that apply)

- ☐ Implemented our first electronic claims system
- ☐ Made major changes to our electronic claims system
- ☐ Made minor changes to our electronic claims system
- ☐ Made changes to our paper tracking procedures
- ☐ Other (*Specify*):

1.4 Has the implementation of CEP resulted in any changes to your procedures and processes for direct certification and/or for identifying eligible students without an application?

- ☐ Yes
- ☐ No (go to1.6)
- ☐ Don't know (go to 1.6)

1.5 How have your procedures and processes for direct certification and/or for identifying eligible students without an application changed? (Select all that apply)

- ☐ Data linking/sharing among State data systems
- ☐ Data linking/sharing between State and local data systems
- ☐ Data linking/sharing at the local level
- ☐ Other (*Specify*:)

1.6 Was your financial payment system sufficient to accommodate CEP?

- ☐ Yes (go to 1.8)
- ☐ No

1.7 If no, which of the following adjustments did you make to your financial payment system? (Select all that apply)

- ☐ Add a new capability to the existing financial payment system
- ☐ Develop/purchase a separate system specifically for CEP
- ☐ Other (*Specify*:)
- ☐ Other (2) - (*Specify*:)

1.8 Please indicate which of the following resources were available to your LEA during initial implementation of CEP.

Select all that apply

- ☐ Effective communication between LEA and SA
- ☐ Effective communication between FNS and SAs
- ☐ Training and support provided by FNS to SA
- ☐ Training and support provided by SAs to LEAs
- ☐ Technology
- ☐ Sufficient staff
- ☐ Sufficient monetary resources
- ☐ Education support (e.g., State superintendent, State School Business Officials Association)
- ☐ Political support (e.g., governor's office)
- ☐ Other (*Specify*):

  _____
- ☐ Other (2) - (*Specify*):

  _____

1.9 Shown below are the resources available to your SA and LEAs during the initial implementation of CEP indicated in question 1.8. Please rate the following resources in terms of their usefulness during the initial implementation of CEP. (Only respond to resources selected in Q1.8)

Resources Available	1-Very Useful	2-Useful	3-Not Useful	5-Don't Know
Effective communication between LEA and SA	☐	☐	☐	☐
Effective communication between FNS and SAs	☐	☐	☐	☐
Training and support provided by FNS to SA	☐	☐	☐	☐
Training and support provided by SAs to LEAs	☐	☐	☐	☐
Technology	☐	☐	☐	☐
Infrastructure for eligibility verification	☐	☐	☐	☐
Sufficient staff	☐	☐	☐	☐
Sufficient monetary resources	☐	☐	☐	☐
Education support (e.g., State superintendent, State School Business Officials Association)	☐	☐	☐	☐
Political support (e.g., governor's office)	☐	☐	☐	☐
Other (*Specify)*:	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐

The questions in this section seek to understand your State's methods of communicating with LEAs and schools, as well as the success of CEP-related changes to the communication process.

1.10 Please indicate which strategies your agency used to inform LEAs and schools within your State about the availability of CEP.

Select all that apply

- ☐ Email marketing campaign
- ☐ Providing basic information via mail
- ☐ Providing basic information via email
- ☐ Providing basic information via website
- ☐ USDA provided webinar for LEAs and schools
- ☐ Teleconference for LEAs and schools
- ☐ Press releases
- ☐ Media events
- ☐ One-on-one phone calls
- ☐ Meetings with LEAs
- ☐ Meetings with schools
- ☐ Share required notification lists
- ☐ Contact from state/political officials (e.g., governor's office, superintendent)
- ☐ Other (*Specify*):

  _____
- ☐ Other (2) - (*Specify*):

  _____
- ☐ Other (3) - (*Specify*):

  _____

1.11 Indicate the level of effectiveness of each strategy your agency used to inform LEAs and schools within your State about the availability of CEP. (Only respond to strategies selected in Q1.10)

Strategies Used to Inform LEAs and Schools	1-Very Effective	2- Effective	3- Not Effective
Email marketing campaign	☐	☐	☐
Providing basic information via mail	☐	☐	☐
Providing basic information via email	☐	☐	☐
Providing basic information via website	☐	☐	☐
Webinar for LEAs and schools	☐	☐	☐
Teleconference for LEAs and schools	☐	☐	☐
Press releases	☐	☐	☐
Media events	☐	☐	☐
One-on-one phone calls	☐	☐	☐
Meetings with LEAs	☐	☐	☐
Meetings with schools	☐	☐	☐
Share required notification lists	☐	☐	☐
Contact from state/political officials (e.g., governor's office, superintendent)	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐

1.12 By April 15th, SAs must notify LEAs of districtwide eligibility status and provide additionally guidance information.

Did your State Agency notify eligible and potentially eligible LEAs of their districtwide eligibility for CEP by the April 15 deadline?

☐ Yes
☐ No
☐ Don't know

1.13 Please indicate any barriers to meeting the April 15th deadline to notify LEAs of districtwide eligibility for CEP:

1.14 LEAs are required to submit to their State Agency lists of schools with an identified student percentage (ISP) of at least 40 percent, schools with an ISP greater than or equal to 30 but less than 40 percent, schools currently participating in CEP, and schools in the fourth year of CEP participation with an ISP greater than 30 but less than 40 percent.

Does your State have school-level information so that your LEAs do not have to submit the lists discussed above?

- ☐ Yes (go to 1.14.3)
- ☐ No
- ☐ Don't know

1.14.1 Please indicate if you received these by the April 15 deadline for all LEAs in the table below. (Only respond to lists selected in Q1.14.1)

Required List	**Received by April 15?**			
	Yes	**No**	**Don't Know**	**Produced list without input from LEAs**
Schools with an identified student percentage (ISP) of at least 40 percent	☐	☐	☐	☐
Schools with an ISP greater than or equal to 30 but less than 40 percent	☐	☐	☐	☐
Schools currently participating in CEP	☐	☐	☐	☐
Schools in the fourth year of CEP participation with an ISP greater than 30 but less than 40 percent	☐	☐	☐	☐

1.14.2 Please indicate your perception of the difficulty faced by LEAs in producing these lists.

Required List	Level of Difficulty		
	Not Difficult	**Moderately Difficult**	**Very Difficult**
Schools with an identified student percentage (ISP) of at least 40 percent	☐	☐	☐
Schools with an ISP greater than or equal to 30 but less than 40 percent	☐	☐	☐
Schools currently participating in CEP	☐	☐	☐
Schools in the fourth year of CEP participation with an ISP greater than 30 but less than 40 percent	☐	☐	☐

1.14.3 (Only respond to lists you indicated were produced without input from LEAs in Q1.14.1) Please indicate the sources of information that your SA used to produce the lists:

Required List	Sources of Information
Schools with an identified student percentage (ISP) of at least 40 percent	Source1: ☐ Source2: ☐ Source3: ☐
Schools with an ISP greater than or equal to 30 but less than 40 percent	Source1: ☐ Source2: ☐ Source3: ☐
Schools currently participating in CEP	Source1: ☐ Source2: ☐ Source3: ☐

Schools in the fourth year of CEP participation with an ISP greater than 30 but less than 40 percent	Source1: Source2: Source3:

1.14.4 (Only respond to lists you indicated were not received by the deadline in Q1.14.1) What percent of LEAs were timely in responding to your agency with the information needed by April 15th? (Select the best response)

Required List	**Percent of LEAs meeting the April 15th deadline**				
	0-24 percent	**25-49 percent**	**50-74 percent**	**75-99 percent**	**Don't Know**
Schools with an identified student percentage (ISP) of at least 40 percent	☐	☐	☐	☐	☐
Schools with an ISP greater than or equal to 30 but less than 40 percent	☐	☐	☐	☐	☐
Schools currently participating in CEP	☐	☐	☐	☐	☐
Schools in the fourth year of CEP participation with an ISP greater than 30 but less than 40 percent	☐	☐	☐	☐	☐

1.14.5 (Only respond to lists you indicated was very difficult to produce in Q1.14.2) Please indicate what you believe are the major barriers that LEAs encountered in their efforts to meet the April 15th deadline for identifying schools' ISPs as required by USDA regulations for CEP.

Required List	Perceived Barriers
Schools with an identified student percentage (ISP) of at least 40 percent	Barrier 1: Barrier 2: Barrier 3:
Schools with an ISP greater than or equal to 30 but less than 40 percent	Barrier 1: Barrier 2: Barrier 3:
Schools currently participating in CEP	Barrier 1: Barrier 2: Barrier 3:
Schools in the fourth year of CEP participation with an ISP greater than 30 but less than 40 percent	Barrier 1: Barrier 2: Barrier 3:

2 State and LEA Interaction

2.1 Please indicate which of the following concerns kept LEAs and schools from participating in CEP?

Select all that apply.

- ☐ Not financially viable
- ☐ Uncertainty or concern about meal reimbursements
- ☐ Uncertainty or concern about the effect on funding for educational programs
- ☐ Perceived need to collect alternate income data if FRP meal applications are eliminated
- ☐ Too few eligible schools
- ☐ Lack of time for implementation and training
- ☐ Difficulty establishing a School Breakfast Program
- ☐ Lack of community support
- ☐ Key LEA and/or school officials not supportive
- ☐ Insufficient time for LEAs to understand CEP and ascertain financial viability
- ☐ Insufficient time to obtain local approval for participation
- ☐ Other (*Specify*):

- ☐ Other (2) - (*Specify*):

- ☐ Other (3) - (*Specify*):

- ☐ Other (4) - (*Specify*):

- ☐ Other (5) - (*Specify*):

2.2 To what extent did the concerns indicated in 2.1 keep LEAs and schools from participating in CEP?

(Indicate importance of the concerns in the table below.) (Only respond to concerns selected in Q2.1)

Concern	1-Very Important	2-Moderately Important	3-Not Important	4-Don't Know
Not financially viable	☐	☐	☐	☐
Uncertainty or concern about meal reimbursements	☐	☐	☐	☐
Uncertainty or concern about the effect on funding for educational programs	☐	☐	☐	☐
Perceived need to collect alternate income data if F/RP meal applications are eliminated	☐	☐	☐	☐
Too few eligible schools	☐	☐	☐	☐
Lack of time for implementation and training	☐	☐	☐	☐
Difficulty establishing a School Breakfast Program	☐	☐	☐	☐
Lack of community support	☐	☐	☐	☐
Key LEA and/or school officials not supportive	☐	☐	☐	☐
Insufficient time for LEAs to understand CEP and ascertain financial viability	☐	☐	☐	☐
Insufficient time to obtain local approval for participation	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐
Other (4) - (*Specify*):	☐	☐	☐	☐
Other (5) - (*Specify*):	☐	☐	☐	☐

2.3 What were some questions that LEAs and schools asked your SA about CEP?

Select all that apply

- ☐ Financial Viability
- ☐ Calculation of ISPs for individual schools, groups of schools, and district
- ☐ Effect on Federal (Title I and E-rate) funding
- ☐ Effect on other State or local funding
- ☐ Effect on compensatory education funding provided by the State to LEAs
- ☐ Effect on mixed LEAs (i.e. not all schools participate in CEP)
- ☐ Effect on other benefits to low income students
- ☐ Requirement to collect household income data in the absence of FRP meals applications
- ☐ Other (*Specify*):

- ☐ Other (2) - (*Specify*):

- ☐ Other (3) - (*Specify*):

2.4 How important were your responses in helping LEAs and schools in assessing CEP? (Indicate importance in the table below.) (Only respond to strategies selected in Q2.3)

Questions	1-Very Important	2-Moderately Important	3-Not Very Important	5-Don't Know
Financial Viability	☐	☐	☐	☐
Calculation of ISPs for individual schools, groups of schools, and district	☐	☐	☐	☐
Effect on Federal (Title I and E-rate) funding	☐	☐	☐	☐
Effect on other State or local funding	☐	☐	☐	☐
Effect on compensatory education funding provided by the State to LEAs	☐	☐	☐	☐
Effect on mixed LEAs (i.e. not all schools participate in CEP)	☐	☐	☐	☐
Requirement to collect household income data in the absence of FRP meals applications	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐

2.5 Which FNS and other Federal agency resources did you use for more information or help in answering these questions? (Please select all that apply per question) (Only respond to questions selected in Q2.3)

Questions	1 - Referred to CEP Guidance Manual and Q&As	2 – Other FNS Web Resources (E.g. CEP Estimator)	3 - Approached FNS for Information	4 - Approached Other Federal Agencies for Information	5 - Did not Approach FNS or Federal Agencies for Information
Financial Viability	☐	☐	☐	☐	☐
Calculation of ISPs for individual schools, groups of schools, and district	☐	☐	☐	☐	☐
Effect on Federal (Title I and E-rate) funding	☐	☐	☐	☐	☐
Effect on other State or local funding	☐	☐	☐	☐	☐
Effect on compensatory education funding provided by the State to LEAs	☐	☐	☐	☐	☐
Effect on mixed LEAs (i.e. not all schools participate in CEP)	☐	☐	☐	☐	☐
Requirement to collect household income data in the absence of FRP meals applications	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐	☐

2.6 Does your agency provide LEAs with any of the following tools to help them determine whether participation in CEP is financially feasible? (Select all that apply)

☐ On-line calculators]
☐ Worksheets (developed by USDA or the State)
☐ Other tools (*Specify*):

☐ No tools provided

2.7 Does your agency provide LEAs with technical assistance in *conducting* direct certification beyond what is conducted at the State-level (for example, in using additional data sources beyond SNAP or processes for identifying extended eligibility in SNAP households)?

☐ Yes
☐ No (go to2.9)
☐ Don't know (go to 2.9)

2.8 Please explain the type of technical assistance provided:

2.9 The USDA FNS CEP Resource Center website provides resources for parents, teachers, and school officials at the local, state, and Federal level to better understand CEP, along with tools to help facilitate implementation of the Provision. Examples of the available resources include a CEP webinar series which provide guidance on topics such as outreach, administrative reviews, and direct certification and reporting, among others. Were you aware of the CEP Resource Center?

☐ Yes
☐ No (go to 2.14)

2.10 Did you direct LEAs and school officials (State and local level) to FNS' CEP Resource Center to provide additional Technical Assistance (e.g. webinars, guidance material, policy memos, partner website information, etc.) on CEP?

☐ Yes
☐ No (go to 2.14)
☐ Don't know (go to 2.14)

2.11 How useful is the USDA FNS CEP Resource Center perceived by LEAs and other school officials?

- ☐ Very useful
- ☐ Moderately useful
- ☐ Slightly useful
- ☐ Not at all useful
- ☐ Don't know

2.12 Does your State require all LEAs, including those participating in CEP, to conduct annual direct certification?

- ☐ Yes
- ☐ No
- ☐ Don't know

2.13 To what extent did your state use any of the following direct certification processes in the past year?

Process	1-Fully Used	2-Beginning to Use	3-Not Used
Matching students in SNAP	☐	☐	☐
Matching children in TANF	☐	☐	☐
Matching foster children	☐	☐	☐
Matching other agency lists of students categorically eligible for free meals (for example, homeless, runaway, migrant youth, and Head Start)	☐	☐	☐
Including student ID numbers with direct certification lists	☐	☐	☐
All students from the same household identified through one student's record	☐	☐	☐
Frequent review of data throughout the school year	☐	☐	☐
Medicaid in pilot States only	☐	☐	☐

2.14 How would you characterize the participation in CEP in your State in comparison to other provisions (e.g., Provision 1, Provision 2, and Provision 3)?

- ☐ More than I expected
- ☐ About as I expected
- ☐ Less than I expected

2.15 What are your expectations for school participation in CEP in your State over the next two years (SY 2017-18 and 2018-19)?

- ☐ I expect participation to increase
- ☐ I expect participation to remain about the same
- ☐ I expect participation to decrease

3 Functionality of CEP

3.1 How has the discontinued use of FRP application data affected the allocation of educational benefits to economically disadvantaged students?

- ☐ It is more difficult to allocate benefits
- ☐ The level of difficulty is about the same
- ☐ It is less difficult to allocate benefits
- ☐ Other *(Specify):*

3.2 Has time been saved on administrative reviews as a result of participation in CEP compared to operating in other provisions (e.g., Provision 1, Provision 2, and Provision 3)?

- ☐ Yes
- ☐ No (go to 3.4)
- ☐ Don't know (go to 3.4)

3.3 Approximately how much time has been saved as a result of participation in CEP in comparison to other provisions (e.g. Provision 1, Provision 2, and Provision 3)?

☐ Hours

3.4 Please describe how your agency verifies the accuracy of student enrollment and ISP data of individual schools (provided by LEAs)?

APPENDIX F. PARTICIPATING LEA SURVEY

Community Eligibility Provision Characteristics Study (CEP)

LEA Foodservice Director Web Survey

Eligible Participating LEAs

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0612, and it expires 09/30/2019. The time required to complete this information collection is estimated to take 120 minutes, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any questions or comments concerning the accuracy of time estimates or suggestions for improving this form, please contact:

U.S. Department of Agriculture
Food and Nutrition Service
Office of Policy Support
Alexandria, VA 22302
Attention: Dr. John Endahl

Prepared for:
US Department of Agriculture
Food and Nutrition Service
Office of Policy Support

Prepared by:
2M Research Services

This survey is being conducted for the Food and Nutrition Service, U.S. Department of Agriculture as part of a study called Community Eligibility Provision (CEP) Characteristics Study. 2M Research Services has been hired by the Food and Nutrition Service of the U.S. Department of Agriculture to conduct this survey. Information provided in this survey will be kept private, to the extent provided by law. No data will be attributed to specific survey respondents. De-identified data from this study will be provided to the Food and Nutrition Service of the U.S. Department of Agriculture. Responses to the study will in no way affect your agency's receipt of funds from USDA's school meals program.

The study is authorized by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) and participation by selected states, local education agencies, and schools is required under Section 305 of the HHFKA. Section 305 of the Healthy, Hunger-Free Kids Act of 2010 States that "States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts."

Please note, if you cannot complete the survey in one sitting, you can save it and complete it at a later date. You may also share the login credentials with appropriate personnel as you deem necessary in order to report accurate information. This survey will take about 120 minutes to complete.

We thank you for your cooperation and participation in this very important study.

If you have any questions about the study or about completing this survey, please email CEP@2mresearch.com or call 1-844-503-7045 (toll-free).

Date: _____
MM/DD/YYYY

LEA Name: _____

Contact information for the LEA Foodservice Director:

Name: _____

Address: _____

Suite, Bldg.: _____

_____
City *State* *Zip Code*

Phone Number: _____
(XXX) XXX-XXXX Ext. XXXX

Email Address: _____

Name and address of person filling out this survey (if other than the LEA Foodservice Director):

Name: _____

Address: _____

Suite, Bldg.: _____

_____
City *State* *Zip Code*

Phone Number: _____
(XXX) XXX-XXXX Ext. XXXX

Email Address: _____

1 Community Eligibility Provision Schools

First we would like to collect some information about the schools in your LEA that are eligible to participate in the Community Eligibility Provision (CEP).

1.1 During SY 2016-17, please provide in the table below, (1) the total number of schools in your LEA, (2) the number of schools eligible for CEP (either individually or as part of a group), and (3) the total number of schools participating in CEP.

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

School Type	1-Number of Schools in your LEA	2-Number of Schools CEP-Eligible but not Participating	3-Number of Schools Participating in CEP
Elementary Schools			
Middle or Junior High Schools			
High Schools			
Other Schools			
Total:			

☐ Please confirm that the total number of schools in your LEA is correct. (Select to continue)

(If the total number of schools in your LEA equals total eligible but not all are participating, complete 1.1.1-1.1.4; otherwise, go to 1.2)

1.1.1 You are eligible for district-wide eligibility in CEP but not all schools are participating. Please indicate the reasons for this decision. (Check all that apply)

☐ Reluctance by district-level administration
☐ Reluctance by school-level administration
☐ Lack the capacity to feed all students
☐ Financially not viable at all schools (ask 1.1.3)
☐ Difficulty in providing school breakfast in all schools (ask 1.1.4)
☐ Other (*Specify*):

☐ Other (2) - (*Specify*):

☐ Other (3) - (*Specify*):

☐ Other (4) - (*Specify*):

1.1.2 Shown below are the reasons that you indicated for all schools not participating in CEP. Rate the importance of each of these reasons in not using grouping.

Reason	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
Reluctance by district-level administration	☐	☐	☐	☐	☐
Reluctance by school-level administration	☐	☐	☐	☐	☐
Financially not viable at all schools	☐	☐	☐	☐	☐
Difficulty in providing school breakfast in all schools	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐	☐
Other (4) - (*Specify*):	☐	☐	☐	☐	☐

1.1.3 In the table below, please indicate the number of schools by school type (e.g., elementary, middle, high, and other school) that did not participate in CEP during SY 2016-17 because it is not financially viable.

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

School Type	1-Number of Schools where CEP is not Financially Viable
Elementary Schools	
Middle or Junior High Schools	
High Schools	
Other Schools	
Total:	

1.1.4 In the table below, please indicate the number of schools by school type (e.g., elementary, middle, high, and other school) that did not participate in CEP during SY 2016-17 because it is too difficult to establish an SBP.

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

School Type	1-Number of Schools where it is too Difficult to Establish an SBP
Elementary Schools	
Middle or Junior High Schools	
High Schools	
Other Schools	
Total:	

(If total number participating is less than eligible go to 1.2. If the total eligible is equal to participating, go to 1.18)

CEP can be implemented district-wide, for just some schools on an individual basis, where each school is eligible for the Provision and is reimbursed based on only that school's identified student percentage (ISP), or for groups of schools where eligibility for the Provision and reimbursement rate may be determined using pooled data from the group of schools.

1.2 How did your LEA elect to participate in CEP (grouped, districtwide, or individual)? (Select one)

- ☐ District-wide (go to 1.3)
- ☐ One or more schools on an individual basis (go to 1.4)
- ☐ Groups of schools (go to 1.5)
- ☐ Both individual and groups of schools (go to 1.5)

1.3 Did your LEA use the district-wide ISP, ISPs for various groupings of schools, or the ISPs of the individual schools? (Select one)

- ☐ District-wide ISP
- ☐ ISPs for two or more groupings
- ☐ ISPs for one or more groupings and ISPs for one or more schools
- ☐ Just the ISPs for one or more individual schools (go to 1.20)

1.4 Did your LEA consider grouping schools to increase the number of schools and students that would be eligible for benefits under CEP?

- ☐ Yes
- ☐ No (go to 1.7)
- ☐ Don't know (go to 1.7)

1.5 Who was responsible at the LEA-level for initially communicating with individual schools regarding grouping to qualify for CEP? (Select one)

- ☐ Superintendent
- ☐ Food Service Director
- ☐ Food Service Contract Management Company
- ☐ Other LEA administrator
- ☐ Other (*Specify*):

- ☐ Don't know

1.6 What procedures/strategies did you use to determine which schools should be grouped together to qualify for CEP? (Select all that apply)

- ☐ Examine the ISP of individual schools before creating groups
- ☐ Create groups to ensure that the most students receive free meals
- ☐ Used school types; for example, looked at all elementary schools as a group
- ☐ Other (*Specify*):

- ☐ Don't know

Do not answer 1.7 if indicated that "Groups of schools" or "Both individual and groups of schools" in question 1.2; Instead go to 1.8.

1.7 Why was grouping not utilized? (Select all that apply)

- ☐ No groups were found to be eligible
- ☐ Difficult to determine optimal groupings
- ☐ Key LEA and/or school officials not supportive
- ☐ Eligible groups were not as financially viable as individual schools
- ☐ Other (*Specify*):

- ☐ Other (2) - (*Specify*):

- ☐ Other (3) - (*Specify*):

- ☐ Other (4) - (*Specify*):

- ☐ Other (5) - (*Specify*):

- ☐ Don't know

Go to 1.10 if "No groups were found to be eligible" or "Don't Know"

1.8 Compared to determining eligibility for individual schools, how difficult was it to determine eligibility for groups of schools?

☐ Approximately the same level of difficulty (go to 1.10)
☐ More difficult
☐ Less difficult

1.9 Please indicate the number of schools by school type (e.g., elementary, middle, high, and other school) for (1) participating schools through school eligibility, and (2) participating schools through group eligibility during SY 2016-17 in the table below.

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

School Type	1-Number of Schools Participating in CEP through Individual School Eligibility	2-Number of Schools Participating in CEP through Grouping of Schools
Elementary Schools		
Middle or Junior High Schools		
High Schools		
Other Schools		
Total:		

1.10 Which of the following possible barriers either made CEP difficult to implement in your LEA or caused your LEA to decide against adopting the Provision in your non-participating eligible schools? (Select all that apply) Possible Barriers to Adopting CEP

- ☐ CEP not financially viable
- ☐ Increased administrative burden
- ☐ Uncertainty or concern about how much reimbursement the LEA would receive
- ☐ Uncertainty or concern about how the Provision will affect State/local education funding
- ☐ Not enough time to implement the Provision and train staff
- ☐ Concern about schools participating in the Provision being treated differently than other schools
- ☐ LEAs participating in CEP may be viewed as low-income
- ☐ Difficulty establishing an SBP
- ☐ Community not supportive
- ☐ Key LEA and/or school officials not supportive
- ☐ Increased cost in overall school programs
- ☐ Need to collect alternative income forms for State and local funding
- ☐ Other (*Specify*):

  [ ]
- ☐ Other (2) - (*Specify*):

  [ ]
- ☐ Other (3) - (*Specify*):

  [ ]
- ☐ Other (4) - (*Specify*):

  [ ]
- ☐ Other (5) - (*Specify*):

  [ ]
- ☐ Don't Know (go to 1.15)

1.11 Shown below are the possible barriers that either made CEP difficult to implement in your LEA or caused your LEA to decide against adopting the Provision in your non-participating eligible schools. Rate the importance of each of these possible barriers. (Only respond to barriers you selected in Q1.10)

Possible barriers to adopting CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
CEP not financially viable	☐	☐	☐	☐	☐
Increased administrative burden	☐	☐	☐	☐	☐
Uncertainty or concern about how much reimbursement the LEA would receive	☐	☐	☐	☐	☐

Possible barriers to adopting CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
Uncertainty or concern about how the Provision will affect State/local education funding	☐	☐	☐	☐	☐
Not enough time to implement the Provision and train staff	☐	☐	☐	☐	☐
Concern about schools participating in the Provision being treated differently than other schools	☐	☐	☐	☐	☐
LEAs participating in CEP may be viewed as low income	☐	☐	☐	☐	☐
Difficulty establishing an SBP	☐	☐	☐	☐	☐
Community not supportive	☐	☐	☐	☐	☐
Key LEA and/or school officials not supportive	☐	☐	☐	☐	☐
Increased cost in overall school programs	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐	☐
Other (4) - (*Specify*):	☐	☐	☐	☐	☐
Other (5) - (*Specify*):	☐	☐	☐	☐	☐

1.12 What were the most important determining factors that were considered in deciding not to participate in CEP in all of your eligible schools? (Select all that apply)

- ☐ ISP or rate of reimbursement for school meals
- ☐ Staffing needs
- ☐ Financial impact on school meals revenue
- ☐ Financial impact on other education funding
- ☐ Impact on loss of other benefits/services for economically disadvantaged students
- ☐ Need to continue to collect student-level data for other funding sources
- ☐ Rate of participation in school meals programs
- ☐ Logistics or difficulty implementing
- ☐ Considerations around schools being labeled as low income
- ☐ Consideration around students being labeled as low income
- ☐ Availability of CEP for the long term
- ☐ Eligibility of individual schools and/or entire district to participate
- ☐ Other (*Specify*):

- ☐ Don't know

1.13 How likely is your LEA to increase the number of schools that participate in CEP in the next year? (Select one)

- ☐ Very likely
- ☐ Somewhat likely
- ☐ Somewhat unlikely
- ☐ Very unlikely
- ☐ Don't know

1.14 What changes could be made to CEP that would make it appealing for your LEA to increase the number of schools that participate in the future? (Select all that apply. Add additional changes if not listed)

☐ Increase the multiplier
☐ Elimination of SBP requirement
☐ More training provided
☐ Available to all schools in an LEA and not just schools that are eligible
☐ Allow ISP data in qualifying for other State and Federal funds (for example, Title 1 funds, other Child Nutrition programs, assistance programs, education funding and/or benefits to low-income students, etc.)
☐ Other (*Specify*):

☐ Other (2) - (*Specify*):

☐ Other (3) - (*Specify*):

☐ Other (4) - (*Specify*):

☐ Other (5) - (*Specify*):

☐ Don't Know (go to 1.17)

1.15 Below are the changes that you indicated would make CEP more appealing to your LEA. Please indicate whether your LEA would elect to increase the number of schools in CEP if each change were made. (Select all that apply)

LEA would elect to increase the number of schools in CEP next year if change were made…	**Yes**	**Maybe**	**No**
Increase the multiplier	☐	☐	☐
Elimination of SBP requirement	☐	☐	☐
More training provided	☐	☐	☐
Available to all schools in an LEA and not just schools that are eligible	☐	☐	☐
Using ISP data to qualify for other assistance programs	☐	☐	☐
Other (*Specify*)	☐	☐	☐
Other (2) - (*Specify*)	☐	☐	☐

Other (3) - (*Specify*)	☐	☐	☐
Other (4) - (*Specify*)	☐	☐	☐
Other (5) - (*Specify*)	☐	☐	☐
Two or more of these changes must be made	☐	☐	☐
Three or more of these changes must be made	☐	☐	☐
All changes must be made	☐	☐	☐
I would not elect CEP (Specify):			

1.16 Of the eligible schools in your LEA that participate in CEP, how many used the following reimbursement systems before CEP?

Reimbursement Systems	Number of Schools
Traditional	
Provision 1	
Provision 2	
Provision 3	
Other systems where free meals are provided to all students (*Specify):*	
Total:	

1.17 Of the eligible schools in your LEA that do not participate in CEP (as reported in question 1.1), how many currently use the following reimbursement systems? (enter NA if all schools in CEP and skip to 1.19.)

Reimbursement Systems	Number of Schools
Traditional	
Provision 1	
Provision 2	
Provision 3	
Other systems where free meals are provided to all students (*Specify):*	
Total:	

1.18 Does your LEA have schools that once participated in CEP and then decided to discontinue the program?

☐ Yes

☐ No (go to 1.19)

1.18.1 Of the schools in your LEA that once participated in CEP and then decided to discontinue the program, how many currently use the following reimbursement systems?

Reimbursement Systems	Number of Schools
Traditional	
Provision 1	
Provision 2	
Provision 3	
Other systems where free meals are provided to all students (*Specify):*	
Total:	

1.19 You have [number from 1.1] schools participating in CEP. How many of these schools were participating in the School Breakfast Program (SBP) before CEP was implemented?

(type in number of schools)

If the number of schools in 1.19 is less than the number of schools participating in CEP, answer 1.19.1 – 1.19.11 otherwise go to 1.20.

1.19.1 In the table below, please indicate the number of schools by school type (e.g., elementary, middle, high, and other school) that did not participate in SBP before CEP.

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

School Type	Number of Schools that did not participate in SBP before CEP

Elementary Schools	
Middle or Junior High Schools	
High Schools	
Other Schools	
Total:	

1.19.2 In the table below, please indicate the locations where breakfast is served in the schools ***that did not have breakfast before CEP***. (Check all that apply)

Breakfast Location	Elementary Schools	Middle Schools	High Schools	Other Schools
Cafeteria or other indoor/outdoor food service area	☐	☐	☐	☐
School buses	☐	☐	☐	☐
Classrooms	☐	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐	☐
Grab-and-go	☐	☐	☐	☐
Other (*Specify*): ☐	☐	☐	☐	☐
Don't Know	☐	☐	☐	☐

1.19.3 In the table below, please indicate the times when breakfast is served in the schools ***that did not have breakfast before CEP***. (Check all that apply)

Breakfast Time	Elementary Schools	Middle Schools	High Schools	Other Schools
Before school doors open	☐	☐	☐	☐
After school doors open but before the first class	☐	☐	☐	☐

During the first class	☐	☐	☐	☐
After the first class	☐	☐	☐	☐
All day	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐
Don't Know	☐	☐	☐	☐

1.19.4 Is this your LEA's first year participating in CEP?

☐ Yes

☐ No

1.19.5 Prior to CEP, did your LEA serve breakfast in any elementary schools?

☐ Yes

☐ No

1.19.5a In the elementary schools now participating in CEP ***that did serve breakfast before CEP***, which locations did elementary schools serve breakfast? (Check all that apply)

In the table below, please indicate the locations where elementary schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.5 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐

Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.19.6 Prior to CEP, did your LEA serve breakfast in any middle schools?

☐ Yes

☐ No

1.19.6a In the middle schools now participating in CEP ***that did serve breakfast before CEP***, which locations did middle schools serve breakfast?

In the table below, please indicate the locations where middle schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.6 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐
Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐

Other (*Specify*): ☐	☐	☐	☐
Don't Know	☐	☐	☐

1.19.7 Prior to CEP, did your LEA serve breakfast in any high schools?

☐ Yes

☐ No

1.19.7a In the high schools now participating in CEP ***that did serve breakfast before CEP***, which locations did high schools serve breakfast?

In the table below, please indicate the locations where high schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.7 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐
Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐
Other (*Specify*): ☐	☐	☐	☐
Don't Know	☐	☐	☐

1.19.8 Prior to CEP, did your LEA serve breakfast in any of the other schools?

☐ Yes

☐ No

1.19.8a In the other schools now participating in CEP ***that did serve breakfast before CEP***, which locations did other schools serve breakfast?

In the table below, please indicate the locations where other schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.8 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐
Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.19.9 In the elementary schools now participating in CEP ***that did serve breakfast before CEP***, during which time periods did elementary schools serve breakfast?

In the table below, please indicate the times that elementary schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.4 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Time	**1-Before Implementation of CEP**	**2-First Year of CEP Implementation**	**3-After First Year of CEP Implementation**
Before school doors open	☐	☐	☐
After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐
After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.19.10 In the middle schools now participating in CEP ***that did serve breakfast before CEP***, during which time periods did middle schools serve breakfast?

In the table below, please indicate the times that middle schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.6 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Time	**1-Before Implementation of CEP**	**2-First Year of CEP Implementation**	**3-After First Year of CEP Implementation**
Before school doors open	☐	☐	☐

After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐
After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.19.11 In the high schools now participating in CEP ***that did serve breakfast before CEP***, during which time periods did high schools serve breakfast?

In the table below, please indicate the times that high schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.7 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Time	**1-Before Implementation of CEP**	**2-First Year of CEP Implementation**	**3-After First Year of CEP Implementation**
Before school doors open	☐	☐	☐
After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐
After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐

Don't Know	☐	☐	☐

1.19.12 In the other schools now participating in CEP ***that did serve breakfast before CEP***, during which time periods did other schools serve breakfast?

In the table below, please indicate the times that other schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.19.4 is checked "Yes" for LEA's first year of participation, ignore third column)

(if 1.19.8 is checked "No" for LEA's first year of participation, ignore first column)

Breakfast Time	**1-Before Implementation of CEP**	**2-First Year of CEP Implementation**	**3-After First Year of CEP Implementation**
Before school doors open	☐	☐	☐
After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐
After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

(go to section 2)

1.20 Is this your LEA's first year participating in CEP?

☐ Yes

☐ No

1.20a In the elementary schools now participating in CEP, which locations did elementary schools serve breakfast?

In the table below, please indicate the locations where elementary schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐
Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.21 In the middle schools now participating in CEP, which locations did middle schools serve breakfast?

In the table below, please indicate the locations where middle schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation

Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐
Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.22 In the high schools now participating in CEP, which locations did high schools serve breakfast?

In the table below, please indicate the locations where high schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐
Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐
Other (*Specify*):	☐	☐	☐

Don't Know	☐	☐	☐

1.23 In the other schools now participating in CEP, which locations did other schools serve breakfast?

In the table below, please indicate the locations where other schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Location	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Cafeteria or other indoor/outdoor food service area	☐	☐	☐
School buses	☐	☐	☐
Classrooms	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐
Grab-and-go	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.24 In the elementary schools now participating in CEP, during which time periods did elementary schools serve breakfast?

In the table below, please indicate the times that elementary schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Time	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Before school doors open	☐	☐	☐

After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐
After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.25 In the middle schools now participating in CEP, during which time periods did middle schools serve breakfast?

In the table below, please indicate the times that middle schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Time	**1-Before Implementation of CEP**	**2-First Year of CEP Implementation**	**3-After First Year of CEP Implementation**
Before school doors open	☐	☐	☐
After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐
After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.26 In the high schools now participating in CEP, during which time periods did high schools serve breakfast?

In the table below, please indicate the times that high schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Time	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Before school doors open	☐	☐	☐
After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐
After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

1.27 In the other schools now participating in CEP, during which time periods did other schools serve breakfast?

In the table below, please indicate the times that other schools served breakfast (1) before implementing CEP, (2) during the first year of CEP, and (3) after the first year of CEP.

(if 1.20 is checked "Yes" for LEA's first year of participation, ignore third column)

Breakfast Time	1-Before Implementation of CEP	2-First Year of CEP Implementation	3-After First Year of CEP Implementation
Before school doors open	☐	☐	☐
After school doors open but before the first class	☐	☐	☐
During the first class	☐	☐	☐

After the first class	☐	☐	☐
All day	☐	☐	☐
Other (*Specify*):	☐	☐	☐
Don't Know	☐	☐	☐

2 Calculation of the Identified Student Percentage (ISP)

The Identified Student Percentage (ISP) is the number of students directly certified plus the number of students identified as eligible for free meals through other agency lists (such as, runaway, homeless, migrant, foster children) divided by the number of students enrolled, multiplied by 100. To be eligible for CEP, a LEA or school or group of schools must have an ISP of 40% or more.

2.1 What is the district-wide ISP that was most recently calculated for your LEA?

☐ Select here to enter district-wide ISP

☐ LEA only has ISPs for individual schools or groups of schools

☐ Don't know

2.2 Do you know when the most recent district-wide ISP was calculated for your LEA?

☐ Yes

☐ No (go to 2.3)

2.2.1 When was the most recent district-wide ISP calculated for your LEA?

Month/Year: _____

2.3 Who calculated the most recent district-wide ISP for your LEA? (Select one)

☐ The State calculated the ISP without input from the LEA (go to 2.7)

☐ The LEA provided information to the State to calculate the ISP

☐ The LEA calculated the ISP using its own data

☐ Both the LEA and State calculated the ISP

☐ Other (*Specify*):

☐ Don't know (go to 2.7)

2.4 What data were used to calculate the most recent district-wide ISP for your LEA? (Select all that apply)

☐ Directly Certified (go to 2.4.1)

☐ Identified from other agency lists (go to 2.4.2)

2.4.1 Direct certification was based on data from? (Select all that apply)

- ☐ SNAP
- ☐ TANF
- ☐ FDPIR
- ☐ Extended eligibility benefits for other children in the household
- ☐ Medicaid in pilot States only

2.4.2 Select all the other agency lists used to calculate the most recent district-wide ISP:

- ☐ Homeless
- ☐ Runaway
- ☐ Migrant
- ☐ Head Start
- ☐ Foster children
- ☐ Approved by local authorities

2.5 Approximately, what percentage of identified students came from direct certification with:

☐	SNAP	%
☐	TANF	%
☐	FDPIR	%
☐	Medicaid in pilot States only	%
☐	Extended eligibility benefits for other children in the household (go to 2.5.1)	%
☐	Don't know	%

2.5.1 Which extended eligibility benefits for other children in the household did you use? (Select all that apply)

- ☐ SNAP
- ☐ TANF
- ☐ FDPIR
- ☐ Medicaid in pilot States only

2.6 As of the date in 2.2, where did you obtain data used to calculate the ISP? (Select all that apply):

- ☐ POS or other electronic system
- ☐ Match conducted by LEA
- ☐ Direct Certification list provided by State
- ☐ Other agency list
- ☐ School enrollment file
- ☐ Other (*Specify*):

2.7 Who calculated the most recent ISP for individual schools or groups of schools in your LEA? (Select one)

- ☐ The State calculated the ISPs without input from the LEA (go to 2.15)
- ☐ The LEA provided information to the State to calculate the ISPs
- ☐ The LEA calculated the ISPs using its own data
- ☐ Both the LEA and State calculated the ISP
- ☐ Other (*Specify*):

- ☐ Don't know (go to 2.15)

2.8 What data were used to calculate the most recent ISP for your individual schools or groups of schools? (Select all that apply)

- ☐ Directly Certified (go to 2.8.1)
- ☐ Identified from other agency lists (go to 2.8.2)

2.8.1 Direct certification was based on data from? (Select all that apply)

- ☐ SNAP
- ☐ TANF
- ☐ FDPIR
- ☐ Extended eligibility benefits for other children in the household
- ☐ Medicaid in pilot States only

2.8.2 Select all the other agency lists used to calculate the most recent ISP for your individual schools or groups of schools:

- ☐ Homeless
- ☐ Runaway
- ☐ Migrant
- ☐ Head Start
- ☐ Foster children
- ☐ Approved by local authorities

2.9 Approximately, what percentage of identified students for your individual schools or groups of schools came from direct certification with:

☐	SNAP	%
☐	TANF	%
☐	FDPIR	%
☐	Medicaid in pilot States only	%

☐ Extended eligibility benefits for other children in the household (go to 2.10.1)	%
☐ Don't know	%

2.9.1 Which extended eligibility benefits for other children in the household did you use? (Select all that apply)

☐ SNAP
☐ TANF
☐ FDPIR
☐ Medicaid in pilot States only

2.10 Were the most recent ISPs for individual schools or groups of schools in your LEA calculated at once or at various times depending on when CEP was implemented in school or group of schools?

☐ At once (go to 2.10.1)
☐ Various times, depending on when CEP was implemented in school or group of schools. Please indicate the time period for the majority of your schools (go to 2.10.2)
☐ Don't know (go to 2.16)

2.10.1 When were the most recent ISPs calculated for individual schools or groups of schools in your LEA?

Month/Year: _____

2.10.2 When were the most recent ISPs calculated for individual schools or groups of schools in your LEA?

Month/Year: _____

2.11 Does your LEA use the most recently calculated ISPs (as indicated in 2.10) for all participating schools for its claims for NSLP and SBP reimbursement in the current School Year (2016-17)?

☐ Yes (go to 2.15)
☐ No
☐ Don't know (go to 2.15)

2.12 For how many schools does your LEA use the most recently calculated ISP (as indicated in 2.10)?:

2.13 For how many schools does your LEA use a previously calculated ISP?

2.14 For schools that use a previously calculated ISP, when was this ISP calculated?

☐ At once (go to 2.14.1)

☐ Multiple dates, depending on when CEP was implemented in schools or group of schools. Please indicate the time period for the majority of your schools (go to 2.14.2)

☐ Don't know (go to 2.15)

2.14.1 When was the most recent ISP calculated?

Month/Year: _____

2.14.2 When was this ISP calculated? (Please indicate the time period for the majority of your schools)

Month /Year: _____

2.15 [Answer if you indicated using recently calculated ISPs (as indicated in 2.10) in at least one participating school] Please indicate which of the following considerations your LEA took into account in deciding to use a recently calculated ISP for participating schools. (Select all that apply):

☐ Changed grouping arrangements due to school consolidations, requiring a recalculated ISP

☐ Changed grouping arrangements due to school closings, requiring a recalculated ISP

☐ ISP increased in participating schools

☐ Needed recently calculated ISP to qualify for State or local education funding

☐ Other (*Specify*):

☐ None of the above

2.16 Household applications and direct certification with SNAP were required to determine eligibility for FRP meals in your LEA prior to implementing CEP. For your CEP schools, what additional sources did your LEA use prior to electing CEP for determining eligibility for FRP meals? If you have non-participating schools now, please also select the additional sources being used for determining eligibility for FRP meals in those schools. (Select all that apply)

- ☐ Direct certification using TANF
- ☐ Direct certification using FDPIR
- ☐ Direct certification using Medicaid in pilot States only
- ☐ Extended eligibility benefits for other children in household of directly certified child
- ☐ Identified as homeless
- ☐ Identified as runaway
- ☐ Identified as migrant youth
- ☐ Identified as foster child
- ☐ Identified as Head Start
- ☐ Identified as Even Start
- ☐ Identified in state-funded pre-kindergarten programs
- ☐ Other (*Specify*):

- ☐ Don't Know

3 Other Programs Affected by the Community Eligibility Provision

3.1 Prior to implementing CEP, did your LEA use FRP meals eligibility data for any purpose other than for school meals eligibility (such as, for other funding eligibility, allocating funds among schools, or identifying economically disadvantaged students)? (Select one)

- ☐ Yes
- ☐ No (go to 3.3)
- ☐ Don't know (go to 3.3)

3.2 Aside from school meals eligibility, for what other purpose did your LEA use FRP meals eligibility data for prior to implementing CEP? (Select all that apply)

- ☐ Title 1 Funds
- ☐ National Assessment of Education Progress (NAEP)
- ☐ No Child Left Behind (NCLB) (measurement of adequate yearly progress)
- ☐ Other Food Service programs (Summer Feeding Program, Afterschool Snack Program, etc.)
- ☐ E-rate initiatives
- ☐ Early childhood education programs
- ☐ Vocational and technical education
- ☐ Literacy and reading programs
- ☐ State or local education funding
- ☐ Student loan forgiveness programs (for teachers)
- ☐ Waivers (Advance Placement or other test fees, sports fee, transportation, etc.)
- ☐ Reduced fees/free programs (such as, for summer school, tutoring programs, textbooks)
- ☐ Other (*Specify*):

- ☐ Don’t Know

3.3 After implementing CEP, does your LEA still collect student-level household income data (for example with alternative income forms) similar to what was previously collected using the Household Application for FRP meals?

- ☐ Yes
- ☐ No (go to 3.6)
- ☐ Don't know (go to 3.6)

3.4 For what programs does your LEA collect household income data using alternate income forms? (Select all that apply)

☐ Title 1 Funds
☐ National Assessment of Education Progress (NAEP)
☐ No Child Left Behind (NCLB) (measurement of adequate yearly progress)
☐ Other Food Service programs (Summer Feeding Program, Afterschool Snack Program, etc.)
☐ E-rate initiatives
☐ Early childhood education programs
☐ Vocational and technical education
☐ Literacy and reading programs
☐ State education funding
☐ Student loan forgiveness programs (for teachers)
☐ Waivers (AP or other test fees, sports fee, transportation, etc.)
☐ Reduced fees/free programs (such as, for summer school, tutoring programs, textbooks)
☐ Other (*Specify*):

☐ Don't Know

3.5 What parts of your LEA are involved with collecting and processing this household income data? (Select all that apply)

☐ Schools
☐ Food Service department
☐ Other LEA department
☐ Other (*Specify*):

☐ Don't Know

3.6 Aside from the SBP and NSLP, in what other food assistance or USDA Food and Nutrition Service programs or initiatives does your LEA participate? (Select all that apply)

- ☐ Fresh Fruit and Vegetable Program
- ☐ Child and Adult Care Food Program
- ☐ Special Milk Program
- ☐ Summer Feeding Program
- ☐ After School Snack Program
- ☐ Farm to School
- ☐ Healthier US School Challenge
- ☐ Team Nutrition
- ☐ Other (*Specify*):

- ☐ Don't Know

4 Communication and Implementation of Community Eligibility Provision

4.1 Thinking back to before CEP implementation, how did your LEA initially inform your LEA's school officials (e.g. principals) about the process of implementing CEP? (Select all that apply)

- ☐ In-person meeting/presentation
- ☐ In-person training
- ☐ Letter/mail
- ☐ Email
- ☐ School website
- ☐ Phone call to principal or other senior manager
- ☐ Webinar
- ☐ Press release
- ☐ Other
- ☐ Does not apply – did not inform schools (go to 5.1)
- ☐ Don't know

4.2 Who was responsible at the LEA-level for initially communicating with individual schools regarding CEP? (Select one)

- ☐ Superintendent
- ☐ Food Service Director
- ☐ Food Service Contract Management Company
- ☐ Other LEA administrator
- ☐ Other (*Specify*):

- ☐ Don't know

4.3 The CEP Resource Center website provides resources for parents, teachers, and school officials at the local, State, and Federal level to better understand CEP, along with tools to help facilitate implementation of the Provision. Examples of the available resources include a CEP webinar series which provide guidance on topics such as outreach, administrative reviews, and direct certification and reporting, among others. Were you aware of the CEP Resource Center?

- ☐ Yes
- ☐ No (go to 5.1)

4.4 How did your LEA become aware of the CEP Resource Center website?

- ☐ Superintendent
- ☐ Food Service Director
- ☐ Food Service Contract Management Company
- ☐ Other LEA administrator
- ☐ Other (*Specify*):

  [ ]
- ☐ Don't know

4.5 Did your LEA use the CEP Resource Center website?

- ☐ Yes
- ☐ No (go to 5.1)
- ☐ Don't Know (go to 5.1)

4.6 Which of the following resources did your LEA use? (Select all that apply)

- ☐ CEP Fact Sheet
- ☐ CEP Perceived Barriers to Implementation Info Sheet
- ☐ CEP Webinar Series - Please specify: _____
- ☐ CBPP Eligibility Status Searchable Database
- ☐ USDA State List of Eligible Schools/LEAs
- ☐ CEP Estimator
- ☐ ISP Worksheet
- ☐ CEP Memos and Policy Guidance
- ☐ USDA Blog
- ☐ Partner Websites and Resources
- ☐ Other – Please specify: _____
- ☐ Don't know

4.7 How useful was the CEP Resource Center when considering whether to implement CEP in your eligible schools?

- ☐ Very useful
- ☐ Moderately useful
- ☐ Not very useful
- ☐ Not at all useful
- ☐ Don't know

4.8 Overall, how important was the information that your LEA gained from CEP Resource Center to your LEA's decision to implement CEP in eligible schools?

- ☐ Very important
- ☐ Moderately important
- ☐ Not very important
- ☐ Not at all important
- ☐ Don’t know

5 Benefits and Challenges of Community Eligibility Provision

Now, we'd like to understand your LEA's experience in operating CEP.

5.1 Thinking back to the time that your LEA decided to participate in CEP, how much lead time did you have to prepare for the implementation? (Select one)

- ☐ Less than 2 weeks
- ☐ 2 weeks to less than 1 month
- ☐ 1 to less than 2 months
- ☐ 2 to less than 3 months
- ☐ 3 months or more
- ☐ Don't know

5.2 Do you feel that this was enough time? (Select one)

- ☐ Yes (go to 5.4)
- ☐ No
- ☐ Don't know (go to 5.4)

5.3 How much lead time do you feel would be enough to prepare for the implementation of CEP? (Enter number of weeks)

(Indicate Number of Weeks)	Weeks

5.4 As result of operating under CEP in your LEA, in your opinion, what benefits has your LEA experienced? (Select all that apply)

Benefits of Implementing CEP

- ☐ Increased revenue
- ☐ Decreased administrative burden
- ☐ Decreased costs
- ☐ Decreased stigma for students in need
- ☐ Improved academic performance
- ☐ Reduced the wait in lunch and/or breakfast lines
- ☐ More schools offering breakfast
- ☐ More students participating in breakfast
- ☐ Increase in number of breakfasts served per week
- ☐ Increased school meal participation
- ☐ Improved nutritional quality of meals
- ☐ Relief for families under financial burden
- ☐ Improved student behavior (such as fewer disciplinary incidents)
- ☐ Improved student health (such as fewer sick days or visits to school nurse)
- ☐ Increased attendance
- ☐ Reduced tardiness
- ☐ No unpaid meal charges
- ☐ Shorter wait time to get breakfast
- ☐ Shorter wait time to get lunch
- ☐ Other (*Specify*):

- ☐ Other (2)- (*Specify*):

- ☐ Other (3) - (*Specify*):

- ☐ Other (4) - (*Specify*):

- ☐ Other (5) - (*Specify*):

- ☐ Don’t know (go to 5.6) (exclusive choice)

5.5 Rate the importance of each of these benefits. (Only respond to the benefits selected in Q5.4)

Benefits of Implementing the Community Eligibility Provision	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
Increased revenue	☐	☐	☐	☐	☐
Decreased administrative burden	☐	☐	☐	☐	☐
Decreased costs	☐	☐	☐	☐	☐

Decreased stigma for students in need	☐	☐	☐	☐	☐
Improved academic performance (such as improved test scores)	☐	☐	☐	☐	☐
Reduced the wait in lunch and/or breakfast lines	☐	☐	☐	☐	☐
More schools offering breakfast	☐	☐	☐	☐	☐
More students participating in breakfast	☐	☐	☐	☐	☐
Increase in number of breakfasts served per week	☐	☐	☐	☐	☐
Increased school meal participation	☐	☐	☐	☐	☐
Improved nutritional quality of meals	☐	☐	☐	☐	☐
Relief for families under financial burden	☐	☐	☐	☐	☐
Improved student behavior (such as fewer disciplinary incidents)	☐	☐	☐	☐	☐
Improved student health (such as fewer sick days or visits to school nurse)	☐	☐	☐	☐	☐
Increased attendance	☐	☐	☐	☐	☐
Reduced tardiness	☐	☐	☐	☐	☐
No unpaid meal charges	☐	☐	☐	☐	☐
Shorter wait time to get breakfast					
Shorter wait time to get lunch					
Other (*Specify*):	☐	☐	☐	☐	☐
Other 2 - (*Specify*):	☐	☐	☐	☐	☐
Other 3 - (*Specify*):	☐	☐	☐	☐	☐
Other 4 - (*Specify*):	☐	☐	☐	☐	☐
Other 5 - (*Specify*):	☐	☐	☐	☐	☐

Answer 5.5.1 – 5.5.3 if indicated Very or Moderate importance for “decreased administrative burden”; if missing for “decreased administrative burden” continue to 5.6.

5.5.1 Specifically, whose administrative burden has been reduced by implementing the Community Eligibility Provision? (Select all that apply)

☐ School Administrators (such as, Principal, administrative assistants, etc.)
☐ LEA Food Service administrative staff (such as, Director, bookkeeper, clerical, etc.).
☐ Other LEA administrative staff
☐ Cafeteria Managers
☐ School Food Service workers (such as, cashiers, cooks, etc.)
☐ Other (*Specify*):

☐ Don't know

5.5.2 What activities are you or your Food Service staff able to spend more time on now that your LEA is operating under CEP? (Select all that apply) (If select "None – not able to spend more time on any activities" go to 5.5.3; otherwise go to 5.6)

☐ Conducting professional development or training
☐ Conducting other administrative tasks
☐ Implementing new School Breakfast Program
☐ Planning nutrition/meal services
☐ Overseeing Food Service operations
☐ Developing recipes
☐ Researching purchasing options for food and supplies
☐ Developing nutrition education materials/activities
☐ Assessing student nutritional needs and/or food preferences
☐ Other (*Specify*):

☐ None – not able to spend more time on any activities (go to 5.5.3)(exclusive choice)
☐ Don't know (exclusive choice)

Answer 5.5.3 if respondent selected "None" in 5.5.2

5.5.3 Why have you and your staff been unable to spend more time on other activities?

Answer 5.5.4 – 5.5.5. if indicate Very or Moderate importance for "decreased cost"; if missing for "decreased cost" continue to 5.6.

5.5.4 In what ways have your costs been reduced? (Select all that apply)

☐ In meeting meal pattern requirements
☐ In meeting nutrition requirements
☐ Reduced foodservice staff
☐ Reduced technology costs associated with meal counting
☐ Other (*Specify*):

☐ Other (*Specify*):

☐ Don't know

5.5.5 Have you been able to employ these cost savings?

☐ Yes (*Specify*):

☐ No
☐ Don't Know

5.6 Now that CEP has been operating in your LEA, what (if any) problems has your LEA experienced? (Select all that apply)

Problems Implementing CEP:

- ☐ CEP is not cost effective
- ☐ Less total revenue from foodservice
- ☐ No decrease in administrative burden
- ☐ Negative impact of CEP on funding for educational programs
- ☐ More time than expected to implement the Provision and train staff
- ☐ LEAs/schools participating in the Provision are treated differently than other LEAs/schools
- ☐ LEAs/schools participating in CEP are viewed as low-income
- ☐ Difficulty establishing the School Breakfast Program
- ☐ Confusion over how to submit claims
- ☐ Increased meal participation strains the capacity to serve meals
- ☐ Community not supportive
- ☐ Other – (Specify)

- ☐ Other (2) – (Specify):

- ☐ Other (3) - (Specify):

- ☐ Other (4) - (Specify):

- ☐ Other (5) - (Specify):

- ☐ No problems encountered (go to 5.8) (exclusive choice)
- ☐ Don’t know (go to 5.8) (exclusive choice)

5.7 Rate the importance of each of these problems in operating under CEP. (Only respond to the problems selected in Q5.6)

Problems Implementing CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
CEP is not cost effective	☐	☐	☐	☐	☐
Less total revenue from foodservice	☐	☐	☐	☐	☐
No decrease in administrative burden	☐	☐	☐	☐	☐
Negative impact of CEP on funding for educational programs	☐	☐	☐	☐	☐

More time than expected to implement the Provision and train staff	☐	☐	☐	☐	☐
LEAs/schools participating in the Provision are treated differently than other LEAs/schools	☐	☐	☐	☐	☐
LEAs/schools participating in CEP are viewed as low-income	☐	☐	☐	☐	☐
Difficulty establishing an SBP	☐	☐	☐	☐	☐
Confusion over how to submit claims	☐	☐	☐	☐	☐
Increased meal participation strains the capacity to serve meals	☐	☐	☐	☐	☐
Community not supportive	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐	☐
Other (4) - (*Specify*):	☐	☐	☐	☐	☐
Other (5) - (*Specify*):	☐	☐	☐	☐	☐

5.8 Has your LEA changed its meal service in any of the participating schools due to CEP? NOTE: This question refers to changes from CEP, and not changes from other new school meal regulations and rules.

☐ Yes
☐ No (go to 5.10)
☐ Don't know (go to 5.10)

5.9 In general, due to CEP, our LEA has: (Select all that apply)

- ☐ Implemented or expanded the school breakfast program
- ☐ Increased the variety of foods served at school breakfast and lunch
- ☐ Decreased the variety of foods served at school breakfast and lunch
- ☐ Increased the use of pre-prepared foods
- ☐ Decreased the use of pre-prepared foods
- ☐ Increased nutrition education activities throughout the food service department
- ☐ Decreased nutrition education activities throughout the food service department
- ☐ Other (*Specify*):

- ☐ Don't know

5.10 Thinking about the schools that implemented CEP, how does the total meal reimbursement under CEP compare with the total meal reimbursement in prior years?

CEP provides (Select one)

- ☐ Much more reimbursement
- ☐ Moderately more reimbursement
- ☐ The same amount of reimbursement
- ☐ Moderately less reimbursement
- ☐ Much less reimbursement

Now we like to ask about your LEA's experience transitioning schools from Provision 1, 2 or 3 to CEP. (If no Provision 1, 2, and 3 schools detailed in question 1.17; go to 6.1)

5.11 On a scale of 1 to 5, with 1 being very easy and 5 being very difficult, how easy or difficult was it for schools that used Provision 1, 2 or 3 to implement CEP? (Select one)

- ☐ 1 (Very easy)
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5 (Very difficult)

5.12 Why did your LEA choose to adopt CEP for schools that previously used Provision 1, 2 or 3? (Select all that apply)

- ☐ Eliminate household application
- ☐ Eliminate the need to count meals by free, reduced price, or paid category in base year
- ☐ Possibility of changing claiming percentage every year rather than every 4 years
- ☐ Other (*Specify*):

- ☐ Don't know

5.13 What difficulties were encountered when switching from Provision 1, 2 or 3 to CEP? (Select all that apply).

- ☐ Calculating the ISP
- ☐ Communicating changes to school Food Service staff
- ☐ Losing application data
- ☐ Other (*Specify*):

  [ ]
- ☐ No problems were encountered
- ☐ Don't know

6 Continuing Participation in Community Eligibility Provision

6.1 Have any schools that implemented CEP gone back to the previous reimbursement method? (Select one)

- ☐ Yes
- ☐ No (go to 6.5)
- ☐ Don't Know (go to 6.5)

6.2 How many schools have gone back to the previous reimbursement method?

Number of schools:

- ☐ Don't know

6.3 For what reasons did the schools counted in question 6.2 end participation in CEP?

- ☐ CEP is not cost effective
- ☐ No decrease in administrative burden
- ☐ Negative impact of the Provision on funding for educational programs
- ☐ LEAs/schools participating in CEP are treated differently than other LEAs/schools
- ☐ Difficulty establishing the School Breakfast Program
- ☐ Too difficult to meet demands of increased meal participation
- ☐ Community not supportive
- ☐ Key LEA and/or school officials not supportive
- ☐ School closed or consolidated with another school (answer 6.4.1)
- ☐ Increased meal participation strains the capacity to serve meals
- ☐ Other (1)- (Specify):

- ☐ Other (2) – (Specify):

- ☐ Other (3) – (Specify):

- ☐ Other (4) –– (Specify):

- ☐ Other (5) – (Specify):

- ☐ Don't know (go to 6.5)

6.4 Shown below are the Reasons for Ending Participation in CEP indicated in question 6.3. Rate the importance of each of these reasons for discontinuing participation in your LEA. (Select all that apply). (Only respond to the reasons selected in Q6.3)

Reasons for Ending CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
CEP is not cost effective	☐	☐	☐	☐	☐
No decrease in administrative burden	☐	☐	☐	☐	☐
Negative impact of the Provision on funding for educational programs	☐	☐	☐	☐	☐
LEAs/schools participating in CEP are treated differently than other LEAs/schools	☐	☐	☐	☐	☐
Difficulty establishing the School Breakfast Program	☐	☐	☐	☐	☐
Too difficult to meet demands of increased meal participation	☐	☐	☐	☐	☐
Community not supportive	☐	☐	☐	☐	☐
Key LEA and/or school officials not supportive	☐	☐	☐	☐	☐
School closed or consolidated with another school	☐	☐	☐	☐	☐
Increased meal participation strains the capacity to serve meals	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐	☐
Other (4) - (*Specify*):	☐	☐	☐	☐	☐
Other (5) - (*Specify*):	☐	☐	☐	☐	☐

Answer 6.4.1 if LEA indicates any level of importance in 6.4 for "School closed or consolidated with another school". Otherwise go to 6.5

6.4.1 How many schools closed or consolidated?

NUMBER OF SCHOOLS:

6.5 In SY 2016-17, has CEP been implemented in any schools that were eligible in SY 2015-16 but did not participate then? (Select one)

- ☐ Yes
- ☐ No (go to 6.9)
- ☐ Don't know (go to 6.9)

6.6 How many eligible schools did not participate in CEP during School Year 2015-16, but are now participating in School Year 2016-17?

NUMBER OF SCHOOLS:

6.7 Why did these schools implement CEP? (Select all that apply)

Reason for Now Implementing CEP:

- ☐ Wanted to phase in CEP gradually
- ☐ Recognized the success in other schools
- ☐ Considered the costs and benefits in more detail
- ☐ Parents and community urged school to do so
- ☐ Encouraged by the State Agency
- ☐ Other (*Specify*):
- ☐ Don't know (go to 6.9)

6.8 Shown below are the reasons you indicated that some schools first implemented CEP beginning in SY 2016-17, although they were eligible in SY 2015-16. Rate the importance of each of these reasons for now implementing CEP. (Only respond to the reasons selected in Q6.7)

Reasons for now Implementing in CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
Wanted to phase in CEP gradually	☐	☐	☐	☐	☐
Recognized the success in other schools	☐	☐	☐	☐	☐
Considered the costs and benefits in more detail	☐	☐	☐	☐	☐
Parents and community urged school to do so	☐	☐	☐	☐	☐
Encouraged by the State Agency	☐	☐	☐	☐	☐

Other (*Specify*): Base your answer on the other listed in 6.7	☐	☐	☐	☐	☐

6.9 How likely is your LEA to continue participating in CEP in the next year? (Select one)

☐ Very likely
☐ Somewhat likely
☐ Somewhat unlikely
☐ Very unlikely
☐ Don't know

6.10 How likely is your LEA to expand participation in CEP in the next year? (Select one) [Skip if districtwide]

☐ Very likely
☐ Somewhat likely
☐ Somewhat unlikely
☐ Very unlikely
☐ Don't know

7 Impacts of the Community Eligibility Provision

7.1 In your opinion, did CEP affect average labor costs per meal for meal production and service?

- ☐ Yes
- ☐ No (go to 7.3)
- ☐ Don't know (go to 7.3)

7.2 How did CEP affect average labor costs per meal for breakfast meal production and service?

- ☐ Increased labor costs per meal for preparing and serving breakfast
- ☐ Decreased labor costs per meal for preparing and serving breakfast
- ☐ Don't know

7.2a How did CEP affect average labor costs per meal for lunch meal production and service?

- ☐ Increased labor costs per meal for preparing and serving lunch
- ☐ Decreased labor costs per meal for preparing and serving lunch
- ☐ Don't know

7.3 In your opinion, did CEP affect average food costs per meal?

- ☐ Yes
- ☐ No (go to 7.5)
- ☐ Don't know (go to 7.5)

7.4 How did CEP affect average breakfast food costs per meal?

- ☐ Increased food costs per meal of school breakfast
- ☐ Decreased food costs per meal of school breakfast
- ☐ Don't know

7.4a How did CEP affect average lunch food costs per meal?

- ☐ Increased food costs per meal of school lunch
- ☐ Decreased food costs per meal of school lunch
- ☐ Don't know

7.5 In your opinion, did CEP affect the average quality of foods (food that is fresher and/or more nutritious) offered for reimbursable school meals?

- ☐ Yes
- ☐ No (go to 7.7)
- ☐ Don't know (go to 7.7)

7.6 How did CEP affect the average quality of breakfast foods offered?

- ☐ Increased quality of foods offered at breakfast
- ☐ Decreased quality of foods offered at breakfast
- ☐ Don't know

7.6a How did CEP affect the average quality of lunch foods offered?

- ☐ Increased quality of foods offered at lunch
- ☐ Decreased quality of foods offered at lunch
- ☐ Don't know

7.7 In your opinion, did CEP affect the average variety of foods offered for reimbursable school meals?

- ☐ Yes
- ☐ No (go to 7.9)
- ☐ Don't know (go to 7.9)

7.8 How did CEP affect the average variety of breakfast foods offered?

- ☐ Increased variety of foods offered at breakfast
- ☐ Decreased variety of foods offered at breakfast
- ☐ Don't know

7.8a How did CEP affect the average variety of lunch foods offered?

- ☐ Increased variety of foods offered at lunch
- ☐ Decreased variety of foods offered at lunch
- ☐ Don't know

7.9 In your opinion, did CEP affect the average pay per hour for cafeteria workers?

- ☐ Yes
- ☐ No (go to 7.11)
- ☐ Don't know (go to 7.11)

7.10 How did CEP affect the average pay per hour of cafeteria workers?

- ☐ Increased pay per hour
- ☐ Decreased pay per hour
- ☐ Don't know

7.11 Thinking about average daily attendance in your LEA, in your opinion, how would you say the attendance in your LEA during SY 2013-14 compares to the attendance during SY 2016-17?

- ☐ Average daily attendance has increased (go to 7.12)
- ☐ Average daily attendance has decreased (go to 7.14)
- ☐ Average daily attendance has not changed (go to 7.16)
- ☐ Don't know (go to 7.16)

7.12 In your opinion, was CEP a factor in the increase in attendance?

- ☐ Yes
- ☐ No
- ☐ Don't know

7.13 In general, which type of school experienced the greatest increase in average daily attendance? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know (go to 7.16)

7.14 In your opinion, was CEP a factor in the decrease in attendance?

- ☐ Yes
- ☐ No
- ☐ Don't know

7.15 In general, which type of school experienced the greatest decrease in average daily attendance? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know

7.16 Thinking about average daily participation in SBP, in your opinion, how would you say SBP participation in your LEA during SY 2015-16 compares to participation during SY 2016-17?

- ☐ Average daily participation in school breakfast has increased (go to 7.17)
- ☐ Average daily participation in school breakfast has decreased (go to 7.20)
- ☐ Average daily participation in school breakfast has stayed the same (go to 7.23)
- ☐ Don't know (go to 7.23)

7.17 Which of the following was the biggest factor for the increase in average daily participation in school breakfast? (Select one)

- ☐ More schools offering school breakfast
- ☐ More students enrolled in school
- ☐ More students participating in school breakfast at least once in the school year
- ☐ More breakfasts per year taken by students that participate in school breakfast at least once a year
- ☐ Don't know

7.18 In your opinion, was CEP a factor in the increase in school breakfast participation?

- ☐ Yes
- ☐ No
- ☐ Don't know

7.19 In general, which type of school experienced the greatest increase in school breakfast participation? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know (go to 7.23)

7.20 Which of the following was the biggest factor for the decrease in average daily participation in school breakfast? (Select one)

- ☐ Fewer schools offering school breakfast
- ☐ Fewer students enrolled in school
- ☐ Fewer students participating in school breakfast at least once in the school year
- ☐ Fewer breakfasts per year taken by students that participate in school breakfast at least once a year
- ☐ Don't know

7.21 In your opinion, was CEP a factor in the decrease in school breakfast participation?

- ☐ Yes
- ☐ No
- ☐ Don't know

7.22 In general, which type of school experienced the greatest decrease in school breakfast participation? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know

7.23 Thinking about average daily participation in the school lunch program, in your opinion, how would you say the NSLP participation in your LEA during SY 2013-14 compares to participation during SY 2016-17?

- ☐ Average daily participation in school lunch has increased (go to 7.24)
- ☐ Average daily participation in school lunch has decreased (go to 7.27)
- ☐ Average daily participation in school lunch has stayed the same (go to 7.30)
- ☐ Don't know (go to 7.30)

7.24 Which of the following was the biggest factor for the increase in average daily participation in school lunch? (Select one)

- ☐ More students enrolled in school
- ☐ More students participating in school lunch at least once in the school year
- ☐ More lunches per year taken by students that participate in school lunch at least once a year
- ☐ Don't know

7.25 In your opinion, was CEP a factor in the increase in school lunch participation?

- ☐ Yes
- ☐ No
- ☐ Don't know

7.26 In general, which type of school experienced the greatest increase in school lunch participation? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know (go to 7.30)

7.27 Which of the following was the biggest factor for the decrease in average daily participation in school lunch? (Select one)

- ☐ Fewer students enrolled in school
- ☐ Fewer students participating in school lunch at least once in the school year
- ☐ Fewer lunches per year taken by students that participate in school lunches at least once a year
- ☐ Don't know

7.28 In your opinion, was CEP a factor in the decrease in school lunch participation?

- ☐ Yes
- ☐ No
- ☐ Don't know

7.29 In general, which type of school experienced the greatest decrease in school lunch participation? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know

7.30 Thinking about total revenues from <u>non-federal sources</u> (which may include student payments from reimbursable meals, other food sales, and local funds), in your opinion, how would you say revenues from non-federal sources during SY 2015-16 compare to revenues from non-federal sources during SY 2016-17?

- ☐ Increased (go to 7.31)
- ☐ Decreased (go to 7.33)
- ☐ Stayed the same (go to 7.35)
- ☐ Don't know (go to 7.35)

7.31 Which of the following was the biggest factor for the increase in total revenues from non-federal sources? (Select one)

☐ Increase in student payments for reimbursable meals **(Do not select this option for districtwide schools)**
☐ Increase in revenues from food sales outside of school meals, including a la carte, vending machine, snack bar, and school store sales
☐ Increase in State funding
☐ Increase in local funding
☐ Don't know

7.32 In your opinion, was CEP a factor in the increase in total revenues from non-federal sources?

☐ Yes
☐ No
☐ Don't know (go to 7.35)

7.33 Which of the following was the biggest factor for the decrease in total revenues from non-federal sources? (Select one)

☐ Decrease in student payments for reimbursable meals
☐ Decrease in revenues from food sales outside of school meals, including a la carte, vending machine, snack bar, and school store sales
☐ Decrease in State funding
☐ Decrease in local funding
☐ Don't know

7.34 In your opinion, was CEP a factor in the decrease in total revenues from non-federal sources?

☐ Yes
☐ No
☐ Don't know

7.35 Thinking about whether your LEA Food Service is able to break even, that is, whether revenues from all sources are at least equal to costs, in your opinion, how does your ability to break even during SY 2013-14 compare to your ability to break even during SY 2016-17?

☐ It has become easier to break even (go to 7.36)
☐ It has become harder to break even (go to 7.38)
☐ No change in ability to break even (go to end of survey)
☐ Don't know (go to end of survey)

7.36 Which of the following was the biggest factor that made it easier to break even? (Select one)

☐ Increase in revenues from federal reimbursements
☐ Increase in student payments for reimbursable meals **(Do not select this option for districtwide schools)**
☐ Increase in revenues from food sales outside of school meals, including a la carte, vending machine, snack bar, and school store sales
☐ Increase in State funding
☐ Increase in local funding
☐ Decrease in food and labor costs
☐ Decrease in administrative costs
☐ Don't know

7.37 In your opinion, was CEP a factor in making it easier to break even?

☐ Yes
☐ No
☐ Don't know (go to end of survey)

7.38 Which of the following was the biggest factor that made it harder to break even? (Select one)

☐ Decrease in revenues from federal reimbursements
☐ Decrease in student payments for reimbursable meals
☐ Decrease in revenues from food sales outside of school meals, including a la carte, vending machine, snack bar, and school store sales
☐ Decrease in State funding
☐ Decrease in local funding
☐ Increase in food and labor costs
☐ Increase in administrative costs
☐ Don't know

7.39 In your opinion, was CEP a factor in making it harder to break even?

☐ Yes
☐ No
☐ Don't know

That completes the survey. Thank you so much for taking the time to participate. Your input is very valuable.

THANK YOU!

APPENDIX G. NON-PARTICIPATING LEA SURVEY

Community Eligibility Provision Characteristics Study (CEP)

LEA Foodservice Director Web Survey

Eligible and Non-Participating LEAs

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0612, and it expires 09/30/2019. The time required to complete this information collection is estimated to take 60 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any questions or comments concerning the accuracy of time estimates or suggestions for improving this form, please contact:

U.S. Department of Agriculture
Food and Nutrition Service
Office of Policy Support
Alexandria, VA 22302
Attention: Dr. John Endahl

Prepared for:
US Department of Agriculture
Food and Nutrition Service
Office of Policy Support

Prepared by:
2M Research Services

This survey is being conducted for the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), as part of a study called Community Eligibility Provision (CEP) Characteristics Study. 2M Research Services has been hired by the USDA FNS to conduct this survey. Information provided in this survey will be kept private, to the extent provided by law. No data will be attributed to specific survey respondents. De-identified data from this study will be provided to the USDA FNS. Responses to the study will in no way affect your agency's receipt of funds from USDA's school meals program.

The study is authorized by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), and participation by selected states, local education agencies, and schools is required under Section 305 of HHFKA. Section 305 of HHFKA states that "States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts."

Throughout this survey numerous terms and acronyms are utilized. You can always click the definitions link (give location on web page) to see the definitions of these terms while you are completing the survey.

Please note, if you cannot complete the survey in one sitting, you can save it and complete it at a later date. You may also share the login credentials with appropriate personnel as you deem necessary in order to report accurate information. This survey will take about 60 minutes to complete.

We thank you for your cooperation and participation in this very important study.

If you have any questions about the study or about completing this survey, please email CEP@2mresearch.com or call 1-844-503-7045 (toll-free).

Date: _____
MM/DD/YYYY

LEA Name: _____

Contact information for the School Food Authority Director:

Name: _____

Address: _____

Suite, Bldg.: _____

_____
City *State* *Zip Code*

Phone Number: _____
(XXX) XXX-XXXX Ext. XXXX

Email Address: _____

Name and address of person filling out this survey (if other than the SFA Director):

Name: _____

Address: _____

Suite, Bldg.: _____

_____
City *State* *Zip Code*

Phone Number: _____
(XXX) XXX-XXXX Ext. XXXX

Email Address: _____

1 Community Eligibility Provision Schools

1.1 During SY 2016-17, please provide in the table below, (1) the total number of schools in your LEA and (2) the number of schools eligible for CEP (either individually or as part of a group).

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

School Type	1-Number of Schools in your LEA	2-Number of Schools CEP-Eligible but not Participating
Elementary Schools		
Middle or Junior High Schools		
High Schools		
Other Schools		
Total:		

☐ Please confirm that the total number of schools in your LEA is correct. (Select to continue)

1.2 Of the eligible schools in your LEA that do not participate in CEP, how many currently use the following?

Reimbursement Type	Number of Schools
Traditional	
Provision 1	
Provision 2	
Provision 3	
Other systems where free meals are provided to all students (*Specify):*	
Total:	

1.3 You have [from 1.1] schools eligible to participate in CEP. How many of these schools are participating in the School Breakfast Program (SBP) during SY 2016-17?

(type in number of schools—if zero go to 2.1)

1.3.1 (Answer this question if 1.3 is a number greater than zero.) In the schools you recorded in Q1.3 (i.e., the number of schools that are eligible to participate in CEP and who also participate in SBP), please indicate the locations that schools serve breakfast

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

Breakfast Location	Elementary Schools	Middle Schools	High Schools	Other Schools
Cafeteria or other food service area	☐	☐	☐	☐
School buses	☐	☐	☐	☐
Classrooms	☐	☐	☐	☐
Outdoors (other than a food service area)	☐	☐	☐	☐
Grab-and-go	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐
Don't know	☐	☐	☐	☐

1.3.2 (Answer this question if 1.3 is a number greater than zero.) In the schools you recorded in Q1.3 (i.e., the number of schools that are eligible to participate in CEP and who also participate in SBP), please indicate the time periods that breakfast is served.

Please record your responses separately for:

- Elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade; K-4, 4-6, K-5);
- Middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9; 6-8, 6-7, 7-8, 6-9); or
- High schools (i.e., schools that have no grade lower than 9 and continue through 12th grade).
- Other schools include any school that does not meet the elementary, middle or junior high, or high school definition; (6-12, K-8, K-12).

Breakfast Time	**Elementary Schools**	**Middle Schools**	**High Schools**	**Other Schools**
Before school doors open	☐	☐	☐	☐
After school doors open but before the first class	☐	☐	☐	☐
During the first class	☐	☐	☐	☐
After the first class	☐	☐	☐	☐
All day	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐
Don't know	☐	☐	☐	☐

2 Calculation of the Identified Student Percentage (ISP)

The Identified Student Percentage (ISP) is defined as the number of students directly certified plus the number of students identified as eligible for free meals through other agency lists (such as, runaway, homeless, migrant, Head Start, and foster children) divided by the number of students enrolled. To be eligible for CEP, a LEA, school, or group of schools must have an ISP of 40% or more.

2.1 What is the district-wide ISP that was most recently calculated for your LEA?

☐ Select here to enter % (ISP):

☐ Not applicable – LEA only has ISPs for individual or groups of schools (go to 2.7)

☐ Don't know

2.2 Do you know when the most recent district-wide ISP was calculated?

☐ Yes

☐ No (go to 2.3)

2.2.1 When was the most recent district-wide ISP calculated for your LEA?

Month/Year:_____

2.3 Who calculated the most recent district-wide ISP for your LEA? (Select one)

☐ The State calculated the ISP without input from the LEA (go to 2.7)

☐ The LEA provided information to the State and then the State calculated the ISP

☐ The LEA calculated the ISP using its own data

☐ Both the LEA and State calculated the ISP

☐ Other (*Specify*):

☐ Don’t know (go to 2.7)

2.4 What data were used to calculate the most recent district-wide ISP for your LEA? (Select all that apply)

☐ Directly Certified (go to 2.4.1)

☐ Identified from other agency lists (go to 2.4.2)

2.4.1 Direct certification was based on data from? (Select all that apply)

- ☐ SNAP
- ☐ TANF
- ☐ FDPIR
- ☐ Extended eligibility benefits for other children in the household
- ☐ Medicaid in pilot States only

2.4.2 Select all the other agency lists used to calculate the most recent district-wide ISP:

- ☐ Homeless
- ☐ Runaway
- ☐ Migrant
- ☐ Head Start
- ☐ Foster children
- ☐ Approved by local authorities

2.5 Approximately, what percentage of identified students came from direct certification with:

☐	SNAP	%
☐	TANF	%
☐	FDPIR	%
☐	Medicaid in pilot States only	%
☐	Extended eligibility benefits for other children in the household (go to 2.5.1)	%
☐	Don't know	%

2.5.1 Which extended eligibility benefits for other children in the household did you use? (Select all that apply)

- ☐ SNAP
- ☐ TANF
- ☐ FDPIR
- ☐ Medicaid in pilot States only

2.6 As of the date in 2.2.1, where did you obtain data to calculate the district-wide ISP? (Select all that apply):

- ☐ POS or other electronic system
- ☐ Match conducted by LEA
- ☐ Direct Certification list provided by State
- ☐ Other agency list
- ☐ School enrollment file
- ☐ Other

2.7 Who calculated the most recent ISP for individual schools or groups of schools in your LEA? (Select one)

- ☐ The State calculated the ISPs without input from the LEA (go to 2.12)
- ☐ The LEA provided information to the State and then the State calculated the ISPs
- ☐ The LEA calculated the ISPs using its own data
- ☐ Both the LEA and State calculated the ISP
- ☐ Other (*Specify*):

- ☐ Don't know (go to 2.12)

2.8 What data were used to calculate the most recent ISP for your individual schools or groups of schools? (Select all that apply)

- ☐ Directly Certified (go to 2.8.1)
- ☐ Identified from other agency lists (go to 2.8.2)

2.8.1 Direct certification was based on data from? (Select all that apply)

- ☐ SNAP
- ☐ TANF
- ☐ FDPIR
- ☐ Extended eligibility benefits for other children in the household
- ☐ Medicaid in pilot States only

2.8.2 Select all the other agency lists used to calculate the most recent ISP for your individual schools or groups of schools:

- ☐ Homeless
- ☐ Runaway
- ☐ Migrant
- ☐ Head Start
- ☐ Foster children
- ☐ Approved by local authorities

2.9 Approximately, what percentage of identified students for your individual schools or groups of schools came from direct certification with:

☐	SNAP	%
☐	TANF	%
☐	FDPIR	%
☐	Medicaid in pilot States only	%
☐	Extended eligibility benefits for other children in the household (go to 2.9.1)	%
☐	Don't know	%

2.9.1 Which extended eligibility benefits for other children in the household did you use? (Select all that apply):

- ☐ SNAP
- ☐ TANF
- ☐ FDPIR
- ☐ Medicaid in pilot States only

2.10 Were the most recent ISPs for individual schools or groups of schools in your LEA calculated at once or at various times depending on when CEP was implemented in school or group of schools?

☐ At once (go to 2.10.1)
☐ At various times depending on when CEP was implemented in school or group of schools (go to 2.10.2)
☐ Don't know (go to 2.11)

2.10.1 When was the most recent ISP calculated for your individual schools or groups of schools?

Month/Year:_____

2.10.2 Please indicate the Month and Year the majority of your individual schools or groups of schools calculated the most recent ISP?

Month /Year:_____

2.11 Where did you obtain data to calculate the ISP for your individual schools or groups of schools? (Select all that apply):

☐ POS or other electronic system
☐ Match conducted by LEA
☐ Direct Certification list provided by State
☐ Other agency list
☐ School enrollment file
☐ Other(*Specify*):

☐ Don't know

2.12 In addition to household applications and direct certification with SNAP, what additional sources does your LEA use for determining eligibility for FRP meals? (Select all that apply)

- ☐ Direct certification using TANF
- ☐ Direct certification using FDPIR
- ☐ Extended eligibility benefits for other children in household of directly certified child
- ☐ Identified as homeless
- ☐ Identified as runaway
- ☐ Identified as migrant youth
- ☐ Identified as foster child
- ☐ Identified as Head Start
- ☐ Identified as Even Start
- ☐ Identified in state-funded pre-kindergarten programs
- ☐ Medicaid in pilot States only
- ☐ Other (*Specify*):

- ☐ Don't know

3 Other Programs Affected by Community Eligibility Provision

3.1 Does your LEA use FRP meals-eligibility data for any purpose other than for school meals eligibility (such as, for other funding eligibility, allocating funds among schools, or identifying economically disadvantaged students)? (Select one)

- ☐ Yes
- ☐ No (go to 3.3)
- ☐ Don't know (go to 3.3)

3.2 Aside from school meals eligibility, for what other purpose does your LEA use FRP meals eligibility data? (Select all that apply)

- ☐ Title 1 Funds
- ☐ National Assessment of Education Progress (NAEP)
- ☐ No Child Left Behind (NCLB) (measurement of adequate yearly progress)
- ☐ Other foodservice programs (Summer Feeding Program, Afterschool Snack Program, etc.)
- ☐ E-rate initiatives
- ☐ Early childhood education programs
- ☐ Vocational and technical education
- ☐ Literacy and reading programs
- ☐ State or local education funding
- ☐ Student loan forgiveness programs (for teachers)
- ☐ Waivers (AP or other test fees, sports fee, transportation, etc.)
- ☐ Reduced fees/free programs (such as, for summer school, tutoring programs, textbooks)
- ☐ Other (*Specify*):

- ☐ Don’t know

3.3 Aside from SBP and NSLP, in what other food assistance or USDA Food and Nutrition Service programs and initiatives does your LEA participate? (Select all that apply)

- ☐ Fresh Fruit and Vegetable Program
- ☐ Child and Adult Care Food Program
- ☐ Special Milk Program
- ☐ Summer Food Service Program
- ☐ Farm to School
- ☐ Healthier US School Challenge
- ☐ Team Nutrition
- ☐ Other (*Specify*):

- ☐ Don't know

4 Decision Regarding the Adoption of Community Eligibility Provision

Now, we'd like to understand your views on the potential benefits and costs of adopting CEP.

4.1 Although your LEA is not participating in CEP, were there any aspects of CEP that your LEA saw as potentially beneficial? (Select one)

- ☐ Yes
- ☐ No (go to 4.4)
- ☐ Don't know (go to 4.4)

4.2 Which of the following expected benefits, in your opinion, of CEP did your LEA consider in deciding whether to adopt CEP? (Select all that apply)

- ☐ Increased revenue
- ☐ Decreased administrative burden
- ☐ Decreased costs
- ☐ Decreased stigma for students in need
- ☐ Improved academic performance
- ☐ Reduce the wait in breakfast and/or lunch lines
- ☐ More schools offering breakfast
- ☐ More students participating in breakfast
- ☐ Increase in number of breakfasts served per week
- ☐ Increased school lunch participation
- ☐ Increased school breakfast participation
- ☐ Improved nutritional quality of meals
- ☐ Relief for families under financial burden
- ☐ Improved student behavior (such as fewer disciplinary incidents)
- ☐ Improved student health (such as fewer sick days or visits to school nurse)
- ☐ Increased attendance
- ☐ Reduced tardiness
- ☐ No unpaid meal charges
- ☐ Other (*Specify*):

- ☐ Other (2) (*Specify*):

- ☐ Other (3) (*Specify*):

- ☐ Other (4) (*Specify*):

☐ Other (5) (*Specify*):

☐ Don't know (go to 4.4) (exclusive choice)

4.3 Shown below are the expected benefits to adopting CEP. Rate the importance of each of these expected benefits in the decision to adopt or not adopt CEP. (Only respond to benefits you selected in Q4.2)

Expected Benefits to Adopting CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
Increased revenue	☐	☐	☐	☐	☐
Decreased administrative burden	☐	☐	☐	☐	☐
Decreased costs	☐	☐	☐	☐	☐
Decreased stigma for students in need	☐	☐	☐	☐	☐
Reduce the wait in breakfast and/or lunch lines	☐	☐	☐	☐	☐
Improved academic performance	☐	☐	☐	☐	☐
More schools offering breakfast	☐	☐	☐	☐	☐
More students participating in breakfast	☐	☐	☐	☐	☐
Increase in number of breakfasts served per week	☐	☐	☐	☐	☐
Increased school meal participation	☐	☐	☐	☐	☐
Improved nutritional quality of meals	☐	☐	☐	☐	☐
Relief for families under financial burden	☐	☐	☐	☐	☐
Improved student behavior (such as fewer disciplinary incidents)	☐	☐	☐	☐	☐
Improved student health (such as fewer sick days or visits to school nurse)	☐	☐	☐	☐	☐
Increased attendance	☐	☐	☐	☐	☐
Reduced tardiness	☐	☐	☐	☐	☐
No unpaid meal charges	☐	☐	☐	☐	☐
Other (1) (*Specify*):	☐	☐	☐	☐	☐
Other (2) (*Specify*):	☐	☐	☐	☐	☐

Expected Benefits to Adopting CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
Other (3) (*Specify*):	☐	☐	☐	☐	☐
Other (4) (*Specify*):	☐	☐	☐	☐	☐
Other (5) (*Specify*):	☐	☐	☐	☐	☐

4.4 Which of the following possible barriers did your LEA see as making implementation of CEP difficult or causing your LEA to decide against adopting the Provision? (Select all that apply)

Possible Barriers to Adopting CEP

☐ CEP not financially viable
☐ Increased administrative burden
☐ Uncertainty or concern about how much reimbursement the LEA would receive
☐ Uncertainty or concern about how the Provision will affect funding for educational programs
☐ Not enough time to implement the Provision and train staff
☐ LEA/schools participating in the Provision being treated differently than other LEAs/schools
☐ LEAs/schools participating in CEP may be viewed as low-income
☐ Difficulty establishing an SBP
☐ Community not supportive
☐ Key LEA and/or school officials not supportive
☐ Increased cost in overall school programs
☐ Other (*Specify*):

☐ Other (2) - (*Specify*):

☐ Other (3) - (*Specify*):

☐ Other (4) - (*Specify*):

☐ Other (5) - (*Specify*):

☐ Don't know (go to 4.7)

4.5 Shown below are the possible barriers to adopting CEP. Rate the importance of each of these possible barriers in the decision to adopt CEP. (Only respond to barriers you selected in Q4.4)

Possible barriers to adopting CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
CEP not financially viable	☐	☐	☐	☐	☐
Increased administrative burden	☐	☐	☐	☐	☐
Uncertainty or concern about how much reimbursement the LEA would receive	☐	☐	☐	☐	☐
Uncertainty or concern about how the Provision will affect funding for educational programs	☐	☐	☐	☐	☐
Not enough time to implement the Provision and train staff	☐	☐	☐	☐	☐
LEAs/schools participating in the Provision being treated differently than other LEAs/schools	☐	☐	☐	☐	☐
LEAs/schools participating in CEP may be viewed as low-income	☐	☐	☐	☐	☐
Difficulty establishing an SBP	☐	☐	☐	☐	☐
Community not supportive	☐	☐	☐	☐	☐
Key LEA and/or school officials not supportive	☐	☐	☐	☐	☐
Increased cost in overall school programs	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (2) - (*Specify*):	☐	☐	☐	☐	☐
Other (3) - (*Specify*):	☐	☐	☐	☐	☐
Other (4) - (*Specify*):	☐	☐	☐	☐	☐
Other (5) - (*Specify*):	☐	☐	☐	☐	☐

4.6 Shown below are the barriers to adopting CEP that you indicated your LEA considered. Please indicate for which school type these barriers were a determining factor in choosing not to adopt CEP. (Select all that apply). (Only respond to barriers you selected in Q4.4)

Possible barriers to adopting CEP	Elementary	Middle	High	Other	All
CEP not financially viable	☐	☐	☐	☐	☐
Increased administrative burden	☐	☐	☐	☐	☐
Uncertainty or concern about how much reimbursement the LEA would receive	☐	☐	☐	☐	☐
Uncertainty or concern about how the Provision will affect funding for educational programs	☐	☐	☐	☐	☐
Not enough time to implement the Provision and train staff	☐	☐	☐	☐	☐
LEAs/schools participating in the Provision being treated differently than other LEAs/schools	☐	☐	☐	☐	☐
LEAs/schools participating in CEP may be viewed as poor	☐	☐	☐	☐	☐
Difficulty establishing an SBP	☐	☐	☐	☐	☐
Community not supportive	☐	☐	☐	☐	☐
Key LEA and/or school officials not supportive	☐	☐	☐	☐	☐
Increased cost in overall school programs	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐

4.7 What were the most important determining factors that were considered in deciding not to participate in CEP? (Select all that apply)

- ☐ ISP or rate of reimbursement for school meals
- ☐ Staffing needs
- ☐ Financial impact on school meals revenue
- ☐ Financial impact on other education funding
- ☐ Impact on loss of other benefits/services for economically disadvantaged students
- ☐ Need to continue to collect student-level data for other funding sources
- ☐ Rate of participation in school meals programs
- ☐ Logistics or difficulty implementing
- ☐ Considerations around schools being labeled as low income
- ☐ Consideration around students being labeled as low income
- ☐ Availability of CEP for the long term
- ☐ Eligibility of individual schools and/or entire district to participate
- ☐ Other (*Specify*):

- ☐ Don't know

4.8 To what extent do you agree with each of the following statements about CEP? (Provide a response for each statement)

I believe that CEP would...	Strongly Agree	Somewhat Agree	Somewhat Disagree	Strongly Disagree
…be more costly to implement than what is currently in place.	☐	☐	☐	☐
…be well-received by school staff and students.	☐	☐	☐	☐
…be confusing to implement.	☐	☐	☐	☐
…improve academic performance	☐	☐	☐	☐
…reduce the wait in breakfast and/or lunch lines	☐	☐	☐	☐
…result in increased meal participation that would be overwhelming to the staff.	☐	☐	☐	☐
…result in increased meal participation that would benefit students (access to more foods, healthy foods).	☐	☐	☐	☐
…create issues for determining eligibility for other assistance programs due to lack of FRP data.	☐	☐	☐	☐
…result in a lot more work to serve breakfast.	☐	☐	☐	☐
…increase plate waste.	☐	☐	☐	☐

4.9 How likely is your LEA to participate in CEP in the next year? (Select one)

- ☐ Very likely
- ☐ Somewhat likely
- ☐ Somewhat unlikely
- ☐ Very unlikely
- ☐ Don't know

4.10 What changes could be made to CEP that would make it appealing to your LEA? (Select all that apply. Add additional changes if not listed)

- ☐ Increase the multiplier
- ☐ Not requiring to implement SBP to operate under CEP
- ☐ More training provided
- ☐ Available to all schools in an LEA and not just schools that are eligible
- ☐ Allow ISP data in qualifying for other State and Federal funds (for example, Title 1 funds, other Child Nutrition programs, assistance programs, education funding and/or benefits to low-income students, etc.)
- ☐ Other (*Specify*):

- ☐ Other (2) (*Specify*):

- ☐ Other (3) (*Specify*):

- ☐ Other (4) (*Specify*):

- ☐ Other (5) (*Specify*):

- ☐ Don't know (go to 4.11)

4.10.1 Below are the changes that you indicated would make CEP more appealing to your LEA. Please indicate whether your LEA would elect CEP if each change were made.

LEA would elect CEP next year if change were made…	Yes	Maybe	No
Increase the multiplier	☐	☐	☐
Elimination of SBP requirement	☐	☐	☐
More training provided	☐	☐	☐
Available to all schools in an LEA and not just schools that are eligible	☐	☐	☐
Using ISP data to qualify for other assistance programs	☐	☐	☐
Other (Specify):	☐	☐	☐
Two or more of these changes must be made	☐	☐	☐
Three or more of these changes must be made	☐	☐	☐
All changes must be made	☐	☐	☐
I would not elect CEP (Specify):	☐	☐	☐

4.11 Have any schools in your LEA previously operated under CEP? (Select one)

☐ Yes
☐ No (go to 5.1)
☐ Don't Know (go to 5.1)

4.12 How many schools previously operated under CEP?

Number of schools:

☐ Don't know

4.13 For what reasons did the schools counted in question 4.12 end participation in CEP?

☐ CEP is not cost effective
☐ No decrease in administrative burden
☐ Negative impact of the Provision on funding for educational programs
☐ LEAs/schools participating in CEP are treated differently than other LEAs/schools
☐ Difficulty establishing the School Breakfast Program
☐ Too difficult to meet demands of increased meal participation
☐ Community not supportive
☐ Key LEA and/or school officials not supportive
☐ School closed or consolidated with another school (Answer 4.14.1)

☐ Increased meal participation strains the capacity to serve meals

☐ Other (*Specify*):

☐ Other (2) (*Specify*):

☐ Other (3) (*Specify*):

☐ Other (4) (*Specify*):

☐ Other (5) (*Specify*):

☐ Don't know (go to 4.15)

4.14 Shown below are the Reasons for Ending Participation in CEP indicated in question 4.13. Rate the importance of each of these reasons for discontinuing participation in your LEA. (Only respond to reasons selected in Q4.13)

Reasons for Ending CEP	Very Important	Moderately Important	Not Very Important	Not at All Important	Don't Know
CEP is not cost effective	☐	☐	☐	☐	☐
No decrease in administrative burden	☐	☐	☐	☐	☐
Negative impact of the Provision on funding for educational programs	☐	☐	☐	☐	☐
LEAs/schools participating in CEP are treated differently than other LEAs/schools	☐	☐	☐	☐	☐
Difficulty establishing the School Breakfast Program	☐	☐	☐	☐	☐
Too difficult to meet demands of increased meal participation	☐	☐	☐	☐	☐
Community not supportive	☐	☐	☐	☐	☐
Key LEA and/or school officials not supportive	☐	☐	☐	☐	☐
School closed or consolidated with another school (Answer 4.14.1)	☐	☐	☐	☐	☐

Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐
Other (*Specify*):	☐	☐	☐	☐	☐

Answer 4.14.1 if "School closed or consolidated with another school" in 4.13.

4.14.1 How many schools closed or consolidated?

NUMBER OF SCHOOLS:

4.15 The CEP Resource Center website provides resources for parents, teachers, and school officials at the local, state, and Federal level to better understand CEP, along with tools to help facilitate implementation of the Provision. Examples of the available resources include a CEP webinar series which provide guidance on topics such as outreach, administrative reviews, and direct certification and reporting, among others. Were you aware of the CEP Resource Center?

☐ Yes
☐ No (go to 5.1)

4.16 How did your LEA become aware of the CEP Resource Center website?

☐ Superintendent
☐ Food Service Director
☐ Food Service Contract Management Company
☐ Other LEA administrator
☐ Other (*Specify*):
☐ Don't know

4.17 Did your LEA use the CEP Resource Center website?

☐ Yes
☐ No (go to 5.1)
☐ Don't know (go to 5.1)

4.18 Which of the following resources did your LEA use?

☐ CEP Fact Sheet
☐ CEP Perceived Barriers to Implementation Info Sheet
☐ CEP Webinar Series (Specify):

☐ CBPP Eligibility Status Searchable Database
☐ USDA State List of Eligible Schools/LEAs
☐ CEP Estimator
☐ ISP Worksheet
☐ CEP Memos and Policy Guidance
☐ USDA Blog
☐ Partner Websites and Resources
☐ Other (Specify):

☐ Don't know

4.19 How useful was the CEP Resource Center when considering whether to implement CEP in your eligible schools?

☐ Very useful
☐ Moderately useful
☐ Not very useful
☐ Not at all useful
☐ Don't know

4.20 Overall, how important was the information that your LEA used from CEP Resource Center in your LEA's decision to not implement CEP in eligible schools?

☐ Very important
☐ Moderately important
☐ Not very important
☐ Not at all important
☐ Don't know

5 Changes in Attendance, School Meals Participation, and Revenues

5.1 Thinking about average daily attendance in your school, in your opinion, how would you say the attendance in your school during SY 2013-2014 compares to the attendance during SY 2016-2017?

- ☐ Average daily attendance has increased (go to 5.2)
- ☐ Average daily attendance has decreased (go to 5.3)
- ☐ Average daily attendance has not changed (go to 5.4)
- ☐ Do not know (go to 5.4)

5.2 In general, which type of school experienced the greatest increase in average daily attendance? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know (go to 5.4)

5.3 In general, which type of school experienced the greatest decrease in average daily attendance? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know

5.4 Thinking about average daily participation in the SBP, in your opinion, how would you say the participation in your school during SY 2015-16 compares to participation during SY2016-17?

- ☐ Average daily participation in school breakfast has increased (go to 5.5)
- ☐ Average daily participation in school breakfast has decreased (go to 5.7)
- ☐ Average daily participation in school breakfast has stayed the same (go to 5.9)
- ☐ Don't know (go to 5.9)

5.5 Which of the following was the biggest factor for the increase in average daily participation in school breakfast? (Select one)

☐ More schools offering school breakfast
☐ More students enrolled in school
☐ More students participating in school breakfast at least once in the school year
☐ More breakfasts per year taken by students that participate in school breakfast at least once a year
☐ Don't know

5.6 In general, which type of school experienced the greatest increase in school breakfast participation? (Select one)

☐ Elementary school
☐ Middle school
☐ High school
☐ Other school
☐ No difference by school type
☐ Don't know (go to 5.9)

5.7 Which of the following was the biggest factor for the decrease in average daily participation in school breakfast? (Select one)

☐ Fewer schools offering school breakfast
☐ Fewer students enrolled in school
☐ Fewer students participating in school breakfast at least once in the school year
☐ Fewer breakfasts per year taken by students that participate in school breakfast at least once a year
☐ Don't know

5.8 In general, which type of school experienced the greatest decrease in school breakfast participation? (Select one)

☐ Elementary school
☐ Middle school
☐ High school
☐ Other school
☐ No difference by school type
☐ Don't know

5.9 Thinking about average daily participation in the NSLP, in your opinion, how would you say the participation in your school during SY 2013-14 compares to participation during SY 2016-17?

- ☐ Average daily participation in school lunch has increased (go to 5.10)
- ☐ Average daily participation in school lunch has decreased (go to 5.12)
- ☐ Average daily participation in school lunch has stayed the same (go to 5.14)
- ☐ Don't know (go to 5.14)

5.10 Which of the following was the biggest factor for the increase in average daily participation in school lunch? (Select one)

- ☐ More students enrolled in school
- ☐ More students participating in school lunch at least once in the school year
- ☐ More lunches per year taken by students that participate in school lunch at least once a year
- ☐ Don't know

5.11 In general, which type of school experienced the greatest increase in school lunch participation? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know (go to 5.14)

5.12 Which of the following was the biggest factor for the decrease in average daily participation in school lunch? (Select one)

- ☐ Fewer students enrolled in school
- ☐ Fewer students participating in school lunch at least once in the school year
- ☐ Fewer lunches per year taken by students that participate in school lunches at least once a year
- ☐ Don't know

5.13 In general, which type of school experienced the greatest decrease in school lunch participation? (Select one)

- ☐ Elementary school
- ☐ Middle school
- ☐ High school
- ☐ Other school
- ☐ No difference by school type
- ☐ Don't know

5.14 Thinking about total revenues from non-federal sources (which may include student payments for reimbursable meals, other food sales, and local funds), in your opinion, how would you say revenues from non-federal sources during SY 2015-16 compare to revenues from non-federal sources during SY 2016-17?

- ☐ Increased (go to 5.15)
- ☐ Decreased (go to 5.16)
- ☐ Stayed the same (go to 5.17)
- ☐ Don't know (go to 5.17)

5.15 Which of the following was the biggest factor for the increase in total revenues from non-federal sources? (Select one)

- ☐ Increase in student payments for reimbursable meals
- ☐ Increase in revenues from food sales outside of school meals, including a la carte, vending machine, snack bars, school store sales, and catering for school related events
- ☐ Increase in State funding
- ☐ Increase in local funding
- ☐ Don't know (go to 5.17)

5.16 Which of the following was the biggest factor for the decrease in total revenues from non-federal sources? (Select one)

- ☐ Decrease in student payments for reimbursable meals
- ☐ Decrease in revenues from food sales outside of school meals, including a la carte, vending machine, snack bars, and school store sales
- ☐ Decrease in State funding
- ☐ Decrease in local funding
- ☐ Don't know

5.17 Thinking about whether your LEA foodservice is able to break even, that is, whether revenues from all sources are at least equal to costs, in your opinion, how does your ability to break even during SY 2013-14 compare to your ability to break even during SY 2016-17?

- ☐ It has become easier to break even (go to 5.18)
- ☐ It has become harder to break even (go to 5.19)
- ☐ No change in ability to break even (go to end of survey)
- ☐ Don't know (go to end of survey)

5.18 Which of the following was the biggest factor that made it easier to break even? (Select one)

- ☐ Increase in revenues from federal reimbursements
- ☐ Increase in student payments for reimbursable meals
- ☐ Increase in revenues from food sales outside of school meals, including a la carte, vending machine, snack bars, and school store sales
- ☐ Increase in State funding
- ☐ Increase in local funding
- ☐ Decrease in food and labor costs
- ☐ Decrease in administrative costs
- ☐ Don't know

5.19 Which of the following was the biggest factor that made it harder to break even? (Select one)

- ☐ Decrease in revenues from federal reimbursements
- ☐ Decrease in student payments for reimbursable meals
- ☐ Decrease in revenues from food sales outside of school meals, including a la carte, vending machine, snack bars and school store sales
- ☐ Decrease in State funding
- ☐ Decrease in local funding
- ☐ Increase in food and labor costs
- ☐ Increase in administrative costs
- ☐ Don't know

That completes the survey. Thank you so much for taking the time to participate. Your input is very valuable.

THANK YOU!

APPENDIX H. TECHNICAL APPENDIX

Overview

Appendix H covers the technical details of various aspects of the Community Eligibility Provision (CEP) Characteristics Study. There are three main sections. First, we discuss the creation of the *AnalysisFile,* which is the main administrative data file used for describing the universe of eligible non-participating and participating Local Education Agencies (LEAs). Next, we present details of the LEA sampling plan (i.e., the construction of the sample) and the final responding samples to the surveys. This includes how the final weights were derived and statistical considerations due to nonresponse. The final section deals with the Impact Study. In this section, we discuss how the States were selected, how the longitudinal data were constructed, and details of the models used to detect the impacts.

Creating the Analysis Files

The source for several tabulations in the Analytic Tables and contextual comments in the Report is listed as *AnalysisFile*. The *AnalysisFile* is composed of several linked data files that provide characteristics on CEP-eligible LEAs, participating LEAs, CEP-eligible schools, and participating schools for school years (SY) 2014–15, 2015–16, and 2016–17. The analysis variables in each year are similar.

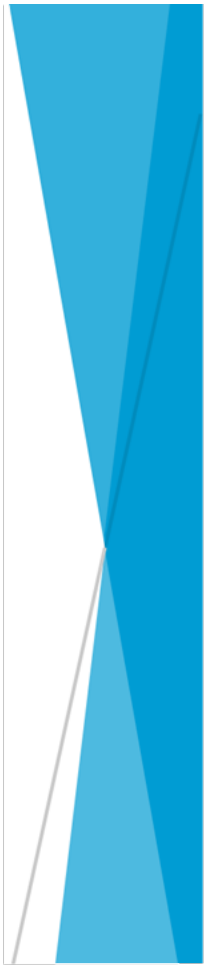
Definitions

Identified Students: Students certified to receive SNAP, TANF, or FDPIR benefits plus students documented as
(a) participating in Head Start
(b) migrant children
(c) runaway children
(d) homeless children
(e) foster children
(f) non-applicant children certified through other means
(g) Medicaid participants, if LEA is participating in the Medicaid Direct Certification pilot

ISP (Identified Student Percentage): The ratio of identified students to total students for an LEA, group of schools, or individual school

Eligible: LEA, group of schools, or individual school with an ISP ≥ 40 percent

Participating: LEA, group of schools, or individual school operating under CEP



In general terms, the project team processed lists of LEAs and schools that identified the LEAs and schools as ***eligible*** to operate under CEP and the LEAs and schools that ***participated*** in CEP in any given school year. This process provided initial lists, which were then checked against other data sources and augmented with LEA- and school-level data. As seen in Table 2-1, the Food and Nutrition Service (FNS) provided the lists of LEAs and schools electing to participate in CEP in each year, in addition to data used to create the initial lists of eligible LEAs and schools. In some years, multiple lists of eligible LEAs and schools, as well as multiple lists of participating LEAs and schools, were available.

Once the LEAs and schools were identified, they were matched to data from the National Center for Education Statistics (NCES) and data from respective years from the Form 742 Verification Collection Report (VCR) from FNS. NCES maintains the Common Core of Data (CCD), which has information on public LEAs and schools, as well as the data from the Private Schools Survey (PSS), which has data on private schools. The VCR has data on School Food Authorities (SFAs), which often, but not always, correspond to the NCES LEA or private school.

The initial lists of eligible and participating LEAs and schools were then augmented using data from other sources. In cases where the number of schools and/or students in eligible or participating LEAs were missing, we first tried matching the LEA to the respective year of the Form 742 VCR data provided by FNS. The VCR has measures for the overall number of schools and students as well as the number of schools and students in those schools that participate in CEP. Not every case could be matched to the VCR data; however, in these situations, we attempted to match the LEA to the data from the NCES Public LEAs Universe file to assign the values for schools and students. When the number of students in eligible and/or participating schools was missing, we attempted to match the schools to the NCES Public Schools Universe file to assign the number of students. The same procedure was used for private schools (i.e., we first tried to match initial lists to the VCR data and then to the NCES Private School Universe Survey data). Note that the latest year of NCES Private School Universe Survey data was SY 2015–16, meaning that the assignment of values from these files has some potential for error.

In some years, multiple lists of eligible LEAs and schools, as well as multiple lists of participating LEAs and schools, were available. In these cases, the research team decided to be as inclusive as possible in creating the master (or universe) eligibility lists. For example, in some cases, a list of eligible LEAs contained a school district that never appeared on any of the lists of eligible schools for a given school year. Conversely, school lists sometimes contained schools from LEAs that did not appear on lists of eligible LEAs. In these cases, we included the LEA/school in their respective master list. To the extent that such cases represented errors in the lists, our decision rule **overcounted** the eligible LEAs and schools.

Specific Notes for SY 2016–17

The master lists of **eligible** LEAs and schools were created in four steps:

1. Using the 2016 Annual Notification of LEAs and schools (received from FNS on October 16, 2016), we created an intermediate dataset from the individual State spreadsheets with all LEA-wide eligible LEAs (identified by their State, LEA Name, and an LEA ID) that had an ISP ≥ 40 percent or the "eligible" field checked. If the LEA tab included the number of eligible students and schools for the LEA, these variables were included in the dataset. Any LEAs that were eligible LEA-wide that did not have information on the number of students and/or the number of schools were merged to the SY 2016–17 VCR data and the values from the VCR were used to replace the missing values.[91] To the extent possible, any remaining cases without data for students and schools were populated with data from NCES. Completion of this process resulted in the master list of all LEAs that were eligible LEA-wide in SY 2016–17.

[91] All schools and students are eligible if the school district is LEA-wide eligible.

2. An initial master list of eligible schools was created by selecting all schools listed in the CEP School Master File (included with the 2016 Annual Notification of LEAs and schools) with an ISP ≥ 40 percent, marked as eligible, or marked as currently participating in CEP. Most cases included the number of students in the school. Those schools without student counts were merged to the NCES schools' files to get an estimate of the number of students attending eligible schools.
3. A list of LEAs that contained at least one eligible school was created by removing from the master schools list (identified in Step 2 above) the schools associated with an LEA identified in Step 1 above. Combining these LEAs with those from Step 1, we obtained our initial master list of eligible LEAs and schools.
4. After processing the participating LEAs and schools (see steps below), any participating LEAs and schools not in the initial lists were added to create the final master lists of eligible LEAs and schools.

The master lists of **participating** LEAs and schools were created in two steps:

1. The final version of the September 2016 CEP elections (received from FNS on December 15, 2016) contained a national list of participating LEAs and a national list of participating schools. We created a master list of participating LEAs by adding to the participating LEAs list any LEAs associated with schools on the schools list that were not already on the national LEA list. Most cases in the master LEA list included the number of participating schools and students associated with participating schools, as well as indicators for determining partial or LEA-wide participation and the LEA-wide ISP.[92]
2. For the most part, the participating schools list was used, as is, to make the master participating schools list. The cases without school enrollment data were merged to the NCES CCD and PSS school files to supplement this particular variable.

Specific Notes for SY 2014–15 and SY 2015–16

Initial lists of potentially eligible LEAs and schools were downloaded from the Center for Budget and Policy Priorities (CBPP) website for each school year. These files list eligible schools, LEAs, ISPs, enrollment, and, in the case of SY 2015–16, an indicator of participation in SY 2014–15, which we used as a check on the list of participating LEA/schools in SY 2014–15. Not all entries included enrollment, so these files were merged to NCES CCD and PSS files to estimate the missing enrollment data. For SY 2014–15, we also used the SY 2014–15 VCR data to supplement the list of participating LEAs—any LEA with participating schools that was not on the SY 2014–15 list from CBPP was included in the list of participating LEAs. Similarly, for SY 2015–16, the list of participating LEAs was checked against the VCR data and the National Election Data for SY 2015–16 provided by FNS. Unique LEAs from these lists were included in the master list for SY 2015–16.

[92] The LEA-wide ISP is not available from these sources for the LEAs that are not participating LEA-wide.

SAMPLING PLAN AND FINAL WEIGHTS FOR LEA SURVEY DATA

The study plan for the CEP Characteristics Study called for primary data to be collected from (1) a nationally representative sample of SFAs with at least one school participating in CEP as of SY 2016–17, and (2) a nationally representative sample of SFAs that have at least one school eligible to participate but had, as of SY 2016–17, no schools participating in CEP. In most cases, the sample unit (SFA) was the same as the school district, which is referred to as the LEA.[93] LEAs with schools participating in CEP were called "participating LEAs," while LEAs with eligible schools that do not participate were called "non-participating LEAs." The sampling frame (or universe or population) for participating and non-participating LEAs was the *AnalysisFile* for SY 2016–17 described in the previous section. The project team removed duplicates from the lists and standardized school and LEA names to compare the list of eligible to the list of participating LEAs. Participating LEAs were removed from the eligible LEAs list, leaving the non-participating LEAs. In summary, there were N_1 = 3,542 participating LEAs and N_2 = 4,263 non-participating LEAs. Following the study plan, a nationally representative sample of 483 was selected from each universe, plus an additional reserve sample of non-participating LEAs of size N_3 = 50. Because all reserve sample was released, the remainder of this memo refers to all (N_2 + N_3 =) 533 as the non-participating sample.

Sample Section

A primary goal from the data analysis was to be able to make comparisons between the participating and non-participating LEAs. Such comparisons will usually be presented in terms of proportions. A total responding sample of 772 (386 for each group) enabled the detection of significant differences greater than 0.1 (from 0.5) with 80 percent power at the 95 percent confidence level. Assuming an 80 percent response rate to the data collection, the sample needed to be 483 per group.

Participating LEAs

The research questions required representation of the LEAs with participating schools by length of time participating in CEP. As illustrated in Table H-1, the sample of participating LEAs was allocated to four mutually exclusive strata. Within the strata, the LEAs were sorted by their ISP. A proportional systematic sampling method was then used to select the sample of participating LEAs. Because the sampling rates were similar within each stratum, a responding sample of size 386 would satisfy the precision requirements of the study. Therefore, assuming an 80 percent response rate, 483 participating LEAs were sampled for this study (Table H-1).

[93] If an LEA was selected into the sample, their respective SFA was asked to complete the survey.

Table H-1 | Distribution of Participating LEAs into Four Strata

Stratum Length of Time in CEP[1]	Stratum Number	Universe Size	Sample
0 Years (New in SY 2016–17)	1	779	112
1 Year (New in SY 2015–16)	2	1,104	154
2 Years (New in SY 2014–15)	3	1,150	147
3 or more Years (New in SY 2013–14)	4	506	70
All LEAs	**Total**	**3,542**	**483**

[1]Excludes the 16 participating LEAs that did not report the initial start date for participation in CEP.

Non-Participating LEAs

The non-participating LEAs did not have a corresponding length of time in CEP. However, some LEAs have had exposure to the availability of CEP longer than others. In particular, LEAs in the States that implemented CEP prior to its national availability had the longest exposure to CEP. Therefore, to ensure representation over length of exposure to CEP, the non-participating LEAs were placed into one of two strata as shown in Table H-2. In this case, with two strata (LEAs in early-implementing States versus LEAs not in early-implementing States), the allocated sample was 94 and 389, respectively. Within the strata, the LEAs were sorted by their ISP. A proportional systematic sampling method was then used to select the sample of non-participating LEAs. As noted above, a sample of 483 (assuming an 80 percent response rate) was needed to ensure the precision requirements for this study.

When determining CEP eligibility status for each LEA, there was some ambiguity regarding how LEAs reported school-level eligibility. There were instances when an LEA reported an ISP lower than 40 percent, but also placed a check under the “Eligible” column, and vice versa. Based on these discrepancies, the project team decided to add to the sample 50 additional non-participating LEAs to ensure that LEAs asked to take either survey did indeed have eligible schools. The primary non-participating sample was drawn as described in the paragraph above. Those 483 LEAs were then removed from the sample, and a systematic sample of 50 non-participating LEAs was selected from the remainder, making the total non-participating sample 533 (Table H-2).

Table H-2 | Distribution of Non-Participating LEAs into Strata

Stratum Location in an Early-Implementing State	Stratum Number	Universe Size	Sample
LEA in an early-implementing State	1	999	118
LEA not in an early-implementing State	2	3,264	415
All LEAs	**Total**	**4,263**	**533**

Characteristics of the Samples

Approximately 75 percent of the participating LEAs in the sample were participating district-wide in CEP. Tables H-3 through H-6 show the distribution of the universe and sample of participating LEAs over LEA size in terms of number of students (Table H-3), LEA size in terms of number of schools (Table H-4),

public/private status (Table H-5), and FNS Region (Table H-6). Similarly, Tables H-7 through H-10 illustrate the same distributions, respectively, for the non-participating universe and sample.

Table H-3 | Distribution of the CEP Universe vs. Participating Sample, by LEA Size (Number of Students)

	Universe		Sample	
LEA size (number of students)	***N***	**%**	***n***	**%**
Small (1–999)	1,933	54.6	281	58.2
Medium (1,000–4,999)	1,003	28.3	127	26.3
Large (5,000–24,999)	474	13.4	59	12.2
Very large (25,000+)	132	3.7	16	3.3
Total	**3,542**	**100**	**483**	**100**

Table H-4 | Distribution of the CEP Universe vs. Participating Sample, by LEA Size (Number of Schools)

	Universe		Sample	
LEA size (number of schools)	***N***	**%**	***n***	**%**
Small (1 school)	1,266	35.7	189	39.1
Medium (2–5 schools)	1,215	34.3	171	35.4
Large (6–14 schools)	634	17.9	86	17.8
Very large (more than 14 schools)	427	12.1	37	7.7
Total	**3,542**	**100**	**483**	**100**

Table H-5 | Distribution of the CEP Universe vs. Participating Sample, by School Type

	Universe		Sample	
School type	***N***	**%**	***n***	**%**
Public	3,060	84.3	424	87.8
Private	477	13.5	59	12.2
Missing	5	.2	0	0
Total	**3,542**	**100**	**483**	**100**

Table H-6 | Distribution of the CEP Universe vs. Participating Sample by FNS Region

	Universe		Sample	
Region	***N***	**%**	***n***	**%**
Mid-Atlantic	389	11.0	59	12.2
Midwest	894	25.2	114	23.6
Mountain Plains	250	7.1	46	9.5
Northeast	380	10.7	38	7.9
Southeast	721	20.4	108	22.4
Southwest	532	15.0	75	15.5
Western	376	10.6	43	8.9
Total	**3,542**	**100**	**483**	**100**

Table H-7 | Distribution of the CEP Universe vs. Non-Participating Sample, by LEA Size (Number of Students)

	Universe		Sample	
LEA size (number of students)	***N***	**%**	***n***	**%**
Small (1–999)	1,939	44.6	243	45.9
Medium (1,000–4,999)	1,557	35.2	182	34.2
Large (5,000–24,999)	635	13.5	84	15.8
Very large (25,000+)	132	2.7	24	4.5
Total	**4,263**	**100**	**533**	**100**

Table H-8 | Distribution of the CEP Universe vs. Non-Participating Sample, by LEA Size (Number of Schools)

	Universe		Sample	
LEA size (number of schools)	***N***	**%**	***n***	**%**
Small (1 school)	997	23.4	104	19.5
Medium (2–5 schools)	1,884	44.2	250	44.9
Large (6–14 schools)	914	21.4	111	20.8
Very large (more than 14 schools)	468	11.0	68	12.8
Total	**4,263**	**100**	**533**	**100**

Table H-9 | Distribution of the CEP Universe vs. Non-Participating Sample, by School Type

	Universe		Sample	
School type	***N***	**%**	***n***	**%**
Public	3,722	87.3	478	89.6
Private	324	7.6	40	7.5
Missing	217	5.1	15	2.8
Total	**4,263**	**100**	**533**	**100**

Table H-10 | Distribution of the CEP Universe vs. Non-Participating Sample, by FNS Region

	Universe		Sample	
Region	***N***	**%**	***n***	**%**
Mid-Atlantic	376	8.8	58	10.9
Midwest	830	19.5	97	18.2
Mountain Plains	250	9.0	44	8.3
Northeast	385	10.3	72	13.5
Southeast	492	11.5	60	11.3
Southwest	867	20.3	111	20.8
Western	875	20.5	91	17.1
Total	**4,263**	**100**	**533**	**100**

Primary data for this study were collected with three web surveys. The Eligible and Participating LEA Food Service Director Survey (Participating LEA Survey) was administered to the nationally representative sample of 483 LEAs with at least one school participating in CEP as of SY 2016–17. The Eligible and Non-Participating LEA Food Service Director Survey (Non-Participating LEA Survey) was administered to the nationally representative sample of 533 LEAs with at least one school eligible to participate in CEP but, as of SY 2016–17, had no schools participating . The State Agency Child Nutrition Director Survey (SA Survey) was administered to the census of State Child Nutrition directors with schools participating in CEP. All but two States completed the SA Survey. This section describes the response rates for the two LEA surveys, the sufficiency of the responses to represent the population of LEAs that are eligible to participate in CEP, and adjustments to the base weights.

Response Rates

The CEP data collection period started in the second week of February 2017. The follow-up protocols (reminder emails and phone calls) began the first week of March 2017 and continued through the second week of May 2017, occurring approximately every 2 weeks. There was concern that the non-participating responding sample would not reach 80 percent of the sampled non-participating LEAs; thus, the reserve sample was released on March 16, 2017. To give the reserve sample (and others) enough time to respond, the data collection period was extended to June 14, 2017.

As with any survey, some of the sampled cases failed to respond to the surveys. There were two main reasons for LEAs not responding: ineligibility and behavioral nonresponse. In terms of ineligibility, some

LEAs identified their district as ineligible. The LEA either self-selected out of the survey based on screening questions or entered "0" as the number of schools eligible but not participating. Follow-up phone calls were made by the project team to confirm these entries, and most LEAs confirmed that their district was not eligible for CEP. By checking against the LEA Notification Report, however, the project team found that either the entry in the designated field for ISP or the entry in the designated field for eligibility on the reporting template indicated the LEA was eligible. In conversations with LEAs, the project team tried to reconcile these differences, concluding that, in general, LEAs appeared to not be aware of their eligibility or the entries in the reporting templates were incorrect.[94] Either conclusion might be attributed to a general lack of knowledge among some Food Service Directors regarding the CEP eligibility status of schools within their district. Other reasons for ineligibility include closure or merger of the LEA, dropping the Federal school meal programs, and extant circumstances such as personnel changes that make it excessively costly to participate in the survey. In total, there were 190 (9 from the Participating Survey and 181 from the Non-Participating Survey) ineligible sampled units.

In terms of behavioral nonresponse, some LEAs simply refused to participate or chose to only partially participate in the survey, regardless of follow-up attempts by the project team. There were two absolute refusals, one from the participating group and one from the non-participating group. To determine the validity of partially completed surveys, the project team identified key questions in each of the two surveys. A survey was considered valid if at least 80 percent of the key questions were answered.[95] Table H-11 and H-12 note these key questions and a brief description of their content domains. In total, 74 (29 from the Participating Survey and 45 from the Non-Participating Survey) LEAs were found to be nonresponsive.

[94] One possible area for further investigation is the cases in which just the "proxy ISP" or the eligibility designation field was used to identify a unit as eligible. Additionally, it may be worthwhile to compare the SY 2017–18 notifications to the SY 2016–17: Errors may fall as the States and LEAs become more familiar with the forms.

[95] At least 11 of 13 key questions on the Eligible Non-Participating Survey, and at least 14 of 17 key questions on the Participating Survey.

Table H-11 | Key Questions from the LEA Participating Survey Used to Determine the Validity of Responses

Section	Question(s)	Description
1	1.1, 1.2, 1.19, 1.19.4	• Number of schools in LEA, eligible for CEP, participating in CEP • How the LEA elected to participate in CEP • Participation in SBP before CEP • First year participating in CEP
2	2.1, 2.7	• Most recent district-wide ISP • Who calculated the most recent ISP for individual schools or groups of schools
3	3.1	• Use of free or reduced price (F/RP) meal eligibility data for purposes other than school meals eligibility (prior to CEP)
4	4.3	• Awareness of CEP Resource Center
5	5.4, 5.6	• Benefits of CEP • Problems of CEP
6	6.1, 6.9	• Schools that implemented CEP going back to previous reimbursement methods • CEP continued participation in the next year
7	7.11, 7.16, 7.23, 7.30, 7.35	• Average daily attendance (ADA) during SY 2013–14 vs. 2016–17 • Average daily participation (ADP) in SBP during SY 2013–14 vs. 2016–17 • ADP in NSLP during SY 2013–14 vs. 2016–17 • Revenues from non-Federal sources during SY 2013–14 vs. 2016–17 • Ability to break even during SY 2013–14 vs. 2016–17

Table H-12 | Key Questions from the LEA Non-Participating Survey Used to Determine the Validity of Responses

Section	Question(s)	Description
1	1.1, 1.3	• Number of schools in LEA eligible for CEP • Number of schools participating in SBP
2	2.1	• Most recent district-wide ISP
3	3.1	• Use of F/RP meal eligibility data for purposes other than school meals eligibility
4	4.1, 4.4, 4.7, 4.10	• Potential benefits of CEP • Possible barriers of CEP • Determining factors against participation in CEP • Changes to CEP to make it more appealing
5	5.1, 5.4, 5.9, 5.14, 5.17	• ADA during SY 2013–14 vs. 2016–17 • ADP in SBP during SY 2013–14 vs. 2016–17 • ADP in NSLP during SY 2013–14 vs. 2016–27 • Revenues from non-Federal sources during SY 2013–14 vs. 2016–17 • Ability to break even during SY 2013–2014 vs. 2016–2017

After considering these factors, the final overall response rate among LEAs was 91.1 percent (Table H-13). This value was determined by taking the ratio of the valid responses (753) to the sample size, less those that were ineligible (1,017 - 190 = 827). The response rate was calculated at 91 percent.[96]

[96] The American Association for Public Opinion Research. (2016). *Standard definitions: Final dispositions of case codes and outcome rates for surveys*. (9th Ed.). Retrieved from: http://www.aapor.org/AAPOR_Main/media/publications/StandardDefinitions20169theditionfinal.pdf

Table H-13 | Calculation of Response Rate

Case Disposition	Total Sample	Participating Sample[a]	Non-Participating Sample[b]
a. Valid Response	753	446	307
b. Invalid Response (Incomplete Survey/Never Logged On/Refused)	74	29	45
c. Ineligible	190	9	181
d. Sample Size	1,017	484	533
e. Response Rate (%)[c]	**91.1%**	**93.9%**	**87.2%**

[a] One LEA originally in the participating sample was actually non-participating.
[b] One LEA originally in the non-participating sample was actually participating.
[c] [(a) / (d - c)] × 100.
Notes: An extra sample unit was added to the participating sample (increasing the size from 483 to 484) to handle a case for which a participating *public* LEA and non-participating *private* LEA had very similar names and addresses. The private LEA was initially sampled but the Child Nutrition (CN) office provided contact information for the public LEA. who completed the Participating Survey. The private LEA was eventually provided the Non-Participating Survey.

Sufficiency of the Sample

This study was designed to produce estimates generalizable to all LEAs that are eligible to and participate in CEP with a precision of ±5 percentage points at the 95 percent level of confidence. As noted in the previous section, the project team approached this requirement by dividing the eligible LEAs into two groups—participating and non-participating LEAs—and then sampling with an expectation of 386 responses per group. Moreover, with 386 responses in each group, combining the samples would have represented the population of all eligible LEAs. As seen in Table H-13, the responding sample from the non-participating group was 307, meaning that the precision for this group was less than originally planned. As a result, it is important to consider whether the combined samples satisfy the first requirement—"generalizable to all LEAs that are eligible to participate in CEP." (The second requirement is satisfied.)

The overall sample size was large enough to represent the population of eligible LEAs. A study designed to specifically collect data for national estimates of the eligible universe would need the sample size of approximately 380 for both the participating and non-participating samples. Therefore, the question here was the sufficiency of the combined sample (n = 753) to represent this population. We provide information to answer this question by first adjusting the weights to compensate for the underrepresented sampling strata and then exploring various descriptions of the population tabulated from the combined sample using the adjusted weights.

Comparison of the Valid and Invalid Responses

Ideally, valid and invalid responses would have a similar distribution among key characteristics. Table H-14 shows a nonsignificant difference between the two groups within LEA urbanicity and number of students but a significant difference between the two groups within FNS Region. Among the invalid responses, a higher proportion come from the Mid-Atlantic Region, Midwest Region, and Northeast

Region, compared to valid responses. This should be interpreted with caution, however, due to small cell sizes within the FNS Region subgroup.

Table H-14 | Unweighted Sample Distributions for Valid and Invalid Responses

	Valid Response *n* = 753 (%)	Invalid Response *n* = 74 (%)	Chi-Square *p*-value
Urbanicity			0.37
City/Urban	19.9	19.3	
Suburban	20.3	29.8	
Town	20.8	15.8	
Rural	39.1	35.1	
FNS Region			<0.01
Mid-Atlantic	10.9	16.2	
Midwest	17.9	24.3	
Mountain Plains	9.8	2.7	
Northeast	9.4	25.7	
Southeast	19.1	10.8	
Southwest	20.1	9.5	
Western	12.8	10.8	
Number of Students			0.31
Small (1–999 Students)	49.8	56.8	
Medium (1,000–4,999 Students)	32.1	33.8	
Large (5,000–24,999 Students)	15.0	8.11	
Very large (25,000+ Students)	3.1	1.4	

Adjusted Weights

The combined samples can be considered to have come from a stratified sample of the eligible universe in which the strata were defined by length of participation in CEP crossed with location in an early-implementing State, as shown in **Error! Reference source not found.**Table H-15. As expected, the primary underrepresentation of the combined sample was in strata 8 and 9, which are strata for the non-participating sample. Stratum 8 is off by approximately 8 percent, while stratum 9 is off by more than 4 percentage points. However, other strata are also imprecise because location in an early-implementing State was not formally included in the sample design for the participating LEAs. The weights were adjusted using a post-stratification algorithm to align the weights to the population cell counts.[97]

[97] Lohr, S. L. (2010). Ratio and Regression Estimation In S. L. Lohr (2nd Ed.) *Sampling: Design and analysis* (pp. 344). Boston, MA: Brooks/Cole.

Table H-15 | Distribution of Population of Eligible LEAs by Strata

Stratum	Early-Implementing State	Length of Participation in CEP	Relative Frequency (Population %)	Relative Frequency (Base Sample %)	Relative Frequency (Adjusted Sample %)
1	No	0 Years	6.5	9.1	6.5
2	Yes	0 Years	2.6	3.2	2.6
3	No	1 Year	8.1	10.4	8.1
4	Yes	1 Year	4.8	7.0	4.8
5	No	2 Years	8.6	11.1	8.6
6	Yes	2 Years	3.7	4.7	3.7
7	Yes	≥ 3 Years	5.7	7.2	5.7
8	No	None	46.9	38.5	46.9
9	Yes	None	13.1	8.8	13.1

Table H-16 shows the representativeness of the weighted sample, along with some important classification variables. Note that the adjusted weighted distributions for each grouping of LEA urbanicity, FNS Region, and student size line up closely with the analogous population distributions. This illustrates the importance of applying weights to make the sample data representative and mitigate any distortions from nonresponse. Additionally, Table H-16 confirms that our adjustments based on the stratification of the eligible LEAs did not introduce distortions in these domains.

Table H-16 | Population[a] and Weighted Sample Distributions for Valid Responses

	Population Proportion (%)	Adjusted[b] Weighted Sample Proportion (%)
Urbanicity		
Urban/City	19.0	16.4
Suburban	20.0	22.0
Town	21.2	21.5
Rural	39.7	40.1
FNS Region		
Mid-Atlantic	11.9	9.8
Midwest	21.0	16.6
Mountain Plains	8.4	9.5
Northeast	11.9	11.4
Southeast	14.2	17.4
Southwest	17.5	21.1
Western	15.1	14.2
Number of Students		
Small (1–999 Students)	49.5	47.1
Medium (1,000–4,999 Students)	33.4	34.0
Large (5,000–24,999 Students)	13.9	16.3
Very large (25,000+ Students)	3.2	2.7

[a] Data provided by FNS, combined with the FNS 742 Database for 2015–16.

[b] Adjusted weights accounted for the sample design and nonresponse adjustments.

Analysis of the Sampled LEAs Not Eligible for the Surveys

We conclude this section by discussing our analysis of the relatively large group of LEAs that were coded ineligible for the survey (190, or 18.7 percent of the combined sample). The analysis focused on finding observable characteristics that might significantly distinguish this group. One distinguishing factor was, of course, not participating in CEP. Beyond that, if other characteristics were related to this group of LEAs (compared to the group that was eligible to participate in a survey), then we might learn something about ineligible LEAs that would provide contextual information about the survey responses.

To conduct the analysis, we created a binary variable (0, 1) where 1 indicates membership in the group that was coded ineligible and 0 indicates everyone else in the combined sample. Then, we estimated logistic regressions with the classification variables for LEA size (based on number of students), urbanicity, and FNS Region. None of the significance tests for size or urbanicity were significantly different. However, for FNS Region, the LEAs in the Midwest Region were significantly less likely to be ineligible (*p*-value = 0.05, two-tailed test), while LEAs in the Southeast Region were significantly more likely to be ineligible (*p*-value = 0.05, two-tailed test). This finding may indicate some difference in communication about CEP or other policies or guidance that could vary by region. Lastly, we considered the reported ISP. For this effect, we made the following five categories:

1. ISP missing
2. ISP < 40 percent
3. 40 percent ≤ ISP < 46 percent
4. 46 percent ≤ ISP < 60 percent
5. ISP ≥ 60 percent

The effect of these categories was significant. Letting category 5 be the reference category, groups 1, 2, 3, and 4 were all more likely to be coded ineligible. Between these groups (1–4), however, only group 1 was significantly more likely to be in the ineligible group.[98] These findings may indicate issues with the original identification of the eligible universe. Presumably, if the data were perfect, there would be no difference in the CEP eligibility among LEAs in these five groups.

Summary Remarks

By combining the sample of participating LEAs with the sample of non-participating LEAs, our analysis showed that the size of the combined sample was sufficient to produce national estimates of the universe of eligible LEAs. Moreover, by adjusting the base weights in the sample to compensate for the relatively high percentage of LEAs that were sampled but not eligible to complete a survey, the distributions along important domains were closely reproduced by the sample. Once the ineligible LEAs were eliminated, the response rates to the surveys were relatively high (greater than 90 percent overall), and few differences were found between the characteristics of the respondents and the non-respondents.

[98] The LEAs with ISPs less than 40 percent were included in the universe file if they were designated eligible in the reporting template.

SUPPLEMENTARY INFORMATION ON THE IMPACT STUDY

Constructing the Matched Administrative State Data

The matched analytic sample used for estimating CEP impacts on State administrative data outcomes was constructed by matching treatment LEAs to comparison LEAs, using one-to-one propensity score matching (PSM), and constructing a time-series of outcome variables from the State meal claims data for those LEAs. This section provides more details on the variables and sample for PSM, and the final matched analytic sample. The first section describes the selection of States for the matched difference-in-differences (DD) impact analysis. The second section defines the variables included in the models and the rationale for their inclusion. The third section discusses the criteria for excluding LEAs from the pool of treatment and comparison LEAs for PSM and provides the final counts of treatment and comparison LEAs in the analytic sample. The fourth section presents two tests for equivalence of baseline LEA characteristics across groups of LEAs. The first test compared LEA characteristics between the treatment and matched comparison groups, while the second tested for equivalence between treatment LEAs included in the final analytic sample and treatment LEAs that were not matched or did not have outcome data. The fifth section describes the State administrative meal claims data and the distribution of the number of pre-CEP and post-CEP years among LEAs in the final sample.

Selection of States

A purposive sample of 12 States was selected (see Table 2-2). This sample fulfilled three criteria: (1) the total number of eligible but non-participating LEAs was sufficient to attain the LEA sample size required to achieve acceptable statistical power; (2) the pool of States was geographically diverse, representing all FNS Regions; and (3) the pool included several of the six "early-implementing" States, defined as States that started CEP in SY 2011–12 and SY 2012–13, as well as "late-implementing" States that started CEP in SY 2013–14, or States that started CEP after national rollout in SY 2014–15.[99,100]

The procedure for matching participating (treatment) and non-participating (potential comparison) LEAs exclusively looked for within-State matches to promote internal validity. LEAs within the same State share a State-specific educational context that affects LEA finances and food service policy but is hard to capture via available covariates.

Due to the restriction to within-State matches, the sample States whose LEAs would be included in the Impact Study were selected so that, as of SY 2016–17, there would be adequate numbers of eligible but non-participating LEAs from which to select suitable matches for each treatment LEA within the State. Power analyses for the Impact Study model revealed that the Impact Study needed 600 LEA pairs (an average of at least 50 treatment and 50 matched comparison LEAs per selected State) for the analyses to have adequate statistical power to detect impacts. Finding good matches for treatment group

[99] The States that were involved in the earlier evaluation of CEP are called "early-implementing" States; see Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Available online at: https://www.fns.usda.gov/community-eligibility-provision-evaluation

[100] Massachusetts implemented CEP in SY 2013–14, but only the Boston school district participated in the provision. In addition, the earlier report did not collect data from Massachusetts for the Impact Study. As a result, we consider it a "late-implementing" State.

members required that the pool of potential comparisons be considerably larger than the treatment group. While there are no strict guidelines, a common rule of thumb calls for having a potential comparison pool that is three or four times the size of the treatment group.[101] At the time of sampling in December 2016, FNS CEP participation data (SY 2016–17) provided the most current available data on the participation status of eligible LEAs. According to these data, 20 States had more treatment group (i.e., participation) LEAs than potential comparison (i.e., non-participating) LEAs. If one or more of these States were selected for the Impact Study, then it almost certainly would not be possible to find suitable matches for many (and, for some States, most) treatment LEAs. This would limit the number of treatment LEAs available to draw valid inferences from impact analyses and would create difficulties obtaining the necessary LEA sample size.

Matching of Treatment and Comparison Group LEAs

In general, the approach to constructing the comparison group for the matched DD design involved matching treatment LEAs with comparable eligible non-participating LEAs along an array of LEA characteristics.[102] Private school LEAs and those operated by State or tribal agencies were excluded from the sample.[103] For each State, the model matched eligible non-participating LEAs to participating LEAs that adopted CEP in SY 2016–17 or earlier. A separate PSM model was developed for each late-implementing State.

For each early-implementing State, two PSM models were used to construct two distinct comparison groups. These models corresponded to the following groups of treatment LEAs: (1) LEAs that implemented CEP before SY 2014–15, and (2) LEAs that implemented CEP during SY 2014–15 or later. To construct the comparison group for the first group of treatment LEAs, LEAs that implemented CEP during SY 2013–14 or earlier were matched to LEAs eligible or almost eligible during the same period. For the second group, treatment LEAs that started participating in CEP between SY 2014–15 and SY 2016–17 were matched to eligible LEAs during the same period. This technical appendix provides details on the covariates included in each State's PSM model.

The PSM model did not control for pretest outcomes on participation and reimbursements because the State administrative data for a number of LEAs were missing and needed to be imputed manually by inferring the applicable reimbursement formula. Missing outcomes were imputed for those LEAs in the matched sample constructed from the PSM model. While including pretest outcomes in the matching model might have resulted in a more balanced sample at baseline, the analytic strategy of using a DD model on the matched sample controls for differences in pretest outcomes between the two groups.

[101] Austin, P. C. (2010). Statistical criteria for selecting the optimal number of untreated subjects matched to each treated subject when using many-to-one matching on the propensity score. *American Journal of Epidemiology*, *172*(9), 1092–1097. http://doi.org/10.1093/aje/kwq224

[102] The matching variables used were the natural log of enrollment in the LEA, natural log of the number of schools in the LEA, average enrollment per school, percentage of students eligible for F/RP meals, difference between the percentage of students eligible for F/RP meals and the ISP, percentage of free NSLP lunches, percentage of reduced price NSLP lunches, percentages of students in LEA by grade level, percentages of students in LEA by race and ethnicity, percentage of students by English Language Learner status, percentage of schools in LEA that were Title I, urbanicity status of LEA, and whether the LEA was a charter school.

[103] Generally, there are relatively few such LEAs within a given State and, therefore, finding a suitable comparison group match would be unlikely. Moreover, the biannual Private School Survey does not have the same array of measures that were used for matching as the CCD has for public LEAs, and for measures common to both data sources, there may be a lag in measurement. The implication is that these results of the Impact Study cannot be generalized to private schools.

Of the 805 public LEAs (which included public charter school LEAs) in the sample States with available baseline data that participated in CEP at any time between SY 2011–12 and SY 2016–17, 500 were matched to a non-participating LEA within the same State.

Of the matched participating LEAs, 481 had available data on all participation and revenue outcomes and participated in the SBP before CEP implementation. Therefore, a total of 962 LEAs (481 treatment LEAs and 481 comparison LEAs) were included in the final analytic sample. A total of 324 participating LEAs were dropped from the analytic sample because they were not matched to an eligible non-participating LEA or because outcome data were missing and could not be imputed with existing data. These LEAs may have been different in terms of baseline characteristics from participating LEAs that were matched. Appendix H presents results from tests of equivalence of baseline covariates between the treatment LEAs included in the analysis and those excluded from the analysis. These results show that LEAs included and excluded in our Impact Study differed along a number of LEA characteristics: urbanicity, student racial composition, percentage of students eligible for F/RP meals, and percentages of F/RP meals served. These differences suggest that the impact results may not be generalizable to *all* LEAs within the 12 sample States. The counts of treatment and comparison LEAs are presented in Table H-17. It is notable that many of the LEAs in this sample of matched participating LEAs were from the same States that were studied in the earlier CEP Evaluation.[104]

Table H-17 | Number of LEAs in Matched Analytic Sample

State	FNS Region	Number of CEP-Eligible LEAs	
		Treatment	Comparison
Early-Implementing States			
Illinois	Midwest	61	61
Michigan	Midwest	65	65
New York	Northeast	58	58
Late-Implementing States			
Alabama	Southeast	12	12
California	Western	45	45
Massachusetts	Northeast	22	22
Minnesota	Midwest	15	15
Missouri	Mountain Plains	51	51
New Jersey	Mid-Atlantic	13	13
Texas	Southwest	105	105
Virginia	Mid-Atlantic	10	10
Washington	Western	24	24
Total		**481**	**481**

[104] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Available online at: https://www.fns.usda.gov/community-eligibility-provision-evaluation. The earlier evaluation included participating LEAs from five States, including Illinois, Michigan, and New York. LEAs in these three States made up 38 percent of the matched participating LEAs in the Impact Analysis in this report.

Across baseline characteristics that were common to all State PSM models, there were no significant differences between the treatment and comparison LEAs. There were small but significant differences with respect to ADP in NSLP and SBP. As mentioned above, baseline ADP measures were not included in the matching model. Treatment LEAs had a slightly higher participation rate, on average, than comparison LEAs (NSLP: 67 percent for treatment LEAs versus 65 percent for comparison LEAs; SBP: 40 percent for treatment LEAs versus 36 percent for comparison LEAs). Regardless, within each State, the two groups appear to be quite well-matched on the observed covariates used to identify comparison LEAs.

Timing of Data Matching

The timing of the State administrative data used for the matched DD analysis, in terms of the number of pre-CEP and post-CEP years, depends on when the LEA started participating in CEP. The project team constructed a longitudinal dataset on NSLP and SBP participation and Federal reimbursements from State administrative meal claims data. The main DD impact model required at least one year of pre-CEP data and 1 year of post-CEP data. In addition, the exploratory analysis of the sustainability of impacts required at least 2 years of post-CEP data.

All States provided data as far back as SY 2013–14; time before this was prior to the nationwide expansion of CEP. LEAs in the nine late-implementing States had at most 3 years of pre-implementation data and 1 year of post-implementation data if they started participating in CEP in SY 2016–17. LEAs that started participating in SY 2014–15 had 1 year of pre-implementation data and at most 3 years of post-implementation data. For LEAs in the three early-implementing States that started CEP before SY 2014–15, the project team used additional available data from SY 2009–10 to SY 2012–13. LEAs from the early-implementing States that started participating in CEP in SY 2011–12 had 1 year of pre-implementation data and at most 6 years of post-implementation data. LEAs that started participating in SY 2016–17 had at most 7 years of pre-implementation data and 1 year of post-implementation data. Appendix H presents the distribution of LEAs in the analytic sample by the number of pre- and post-CEP years for which State administrative outcome data were available.

Variables in the PSM Model

The direct certification process and LEA structures differed considerably across CEP States, so the project team anticipated that the relationship between observed characteristics and participation might also vary across these States. Therefore, the participation model was estimated independently for each State. The dependent variable in the PSM models was a binary variable that took on a value of one if the LEA had at least one participating school during SY 2011–12 to SY 2016–17, and zero otherwise. The relationship between the dependent variable and control variables, described below, was modeled using a logistic regression.

For Illinois, Michigan, and New York, the three States in the sample that implemented CEP before nationwide rollout, separate models were estimated for LEAs that implemented CEP before SY 2014–15 and for LEAs that implemented CEP after SY 2014–15. The pool of comparison LEAs for the early-implementing LEAs comprised non-participating LEAs that were eligible or nearly eligible[105] between SY 2010–11 and SY 2012–13 and that were also in the 2014 evaluation impact study's analysis database.

[105] LEAs were considered nearly eligible if they had a district-wide ISP between 30 and 40 percent and no eligible schools.

This earlier database contained baseline variables from SY 2010–11 constructed from CCD, Verification Collection Reports (VCR), and State administrative meal claims data. The pool of comparison LEAs for the late-implementing[106] LEAs in Illinois, Michigan, and New York were eligible and non-participating LEAs that were not matched to the 2014 evaluation impact study's database. These LEAs were eligible after SY 2014–15. The pool of comparison LEAs for the early- and late-implementing LEAs were separate and distinct to avoid the possibility of the same comparison LEA being matched to both an early- and late-implementing LEA.

The control variables for each PSM model were selected from the potential pool of variables. All variables were measured for the baseline school year, which varied for each State depending on when the State first started participating in CEP. The variables were derived from the CCD, VCR, and State administrative meal claims data and are listed below:

- Measures of size:
  - Natural log of enrollment in LEA
  - Natural log of number of schools in LEA
  - Average enrollment per school
- Measures of eligibility for F/RP meals
  - Percentage of students eligible for F/RP meals
  - Difference between percentage of students eligible for F/RP meals and ISP. This difference represents the percentage of students whose eligibility for F/RP meals was determined through an application process and not through direct certification.
  - NSLP lunches served free as a percentage of total NSLP lunches served in the LEA during the school year
  - NSLP lunches served at reduced price as a percentage of total NSLP lunches served in the LEA during the school year
- Student demographics
  - Percentages of students in LEA by grade level
  - Percentage of students in LEA by race and ethnicity
  - Percentage of students by English Language Learner status
  - Percentage of schools in LEA that are Title 1
  - Urbanicity status of LEA, binary indicator where 1 = City/Urban, 0 = Other

The specific variables included in each model varied slightly between States. All PSM models included the variables listed above, with the exception of the models for early-implementing LEAs in New York and late-implementing LEAs in Michigan. The samples for these LEAs were not sufficiently large to allow the model to converge with all potential control variables. Twenty-six LEAs in the PSM sample for New York started participating before SY 2014–15. Because there were only 22 LEAs in the comparison pool, we reduced the number of variables used in matching over to achieve convergence. Variables were iteratively removed from the regression equation until the model converged. The variables that were preventing convergence were identified by their large coefficients and coefficient standard errors at the final regression iteration. The final PSM model included the natural log of the number of students, urbanicity status, percentage of white students, and free NSLP lunches as a percentage of total NSLP

[106] Late-implementing LEAs are LEAs that first took up CEP after nationwide rollout in SY 2014–15. These also include LEAs in the phased-in States that took up CEP in SY 2014–15 or later.

lunches served in the LEA during the school year. In Michigan, only 13 LEAs started participating in CEP after SY 2014–15, as well as 25 potential comparison LEAs. We were unable to fit any PSM model for these LEAs, so we excluded them from the analysis.

The balance of this section describes the control variables actually used in the State models and the reasons for their inclusion. An LEA's decision to participate in CEP might be related to LEA and school size if larger LEAs realized more gains from the reduction in administrative paperwork after switching to CEP. To avoid allowing a few very large LEAs to determine the regression coefficients for measures of LEA size (number of schools and enrollment), the logarithmic transformation of the number of schools was used instead of raw number of schools. Similarly, the logarithmic transformation of number of students in the LEA was used instead of raw enrollment numbers.

The four measures of eligibility for F/RP meals were the percentage of students eligible for F/RP meals (F/RP percentage), the difference between the F/RP percentage and the ISP, and the percentages of meals served free and at reduced price, respectively. For the early-implementing States, the ISP was calculated as the number of directly certified and categorically eligible students divided by the total number of students enrolled, as reported in the FNS-742 forms. The ISP variable for Illinois and Michigan was constructed using data from the 2010 FNS-742 form and the ISP for New York from the 2011 form. The ISP was calculated as the sum of students directly certified and those categorically eligible approved by application, divided by the total number of students. In the 2010 FNS 742, LEAs reported data as of the last operating data in October of SY 2010–11. However, actual CEP eligibility for SY 2011–12 would be based on data reflective of April 1, 2011; thus, the LEA would include additional categorically eligible students directly certified for free school meals between October 2010 and April 2011, thereby increasing its reported ISP. For the late-implementing LEAs, the ISP was constructed using data from the 2013 FNS 742 form as the number of directly certified students divided by the total number of students enrolled. The count of categorically eligible LEAs was not included in the numerator.

LEAs with greater F/RP percentages at baseline were expected to be more likely to elect CEP because of greater administrative benefits from the elimination of F/RP applications. The second measure, the difference between the F/RP and ISP percentages, was related to expected gains or losses in Federal reimbursements from switching to CEP. The ISP was directly proportional to the amount of Federal reimbursements under CEP. To the extent that the F/RP percentage is smaller relative to the ISP, LEAs might expect to receive fewer Federal reimbursements under CEP compared to the conventional system. Therefore, LEAs with an F/RP percentage smaller than their ISP at baseline might be less likely to elect CEP. Measures of the share of F/RP meals served to indicate how participation in NSLP at baseline was distributed among students by F/RP status.

Interviews of State CN directors for the pilot evaluation of CEP indicated that LEAs were more likely to implement CEP at elementary schools compared to secondary schools. The project team therefore included the percentage of students in kindergarten through grade 5, the percentage of students in grades 6 through 8, and the percentage of students in grades 9 through 12 in the model.[107] Models for early-implementing LEAs did not include the percentage of students in grades 9 through 12, with that variable serving as the omitted reference category instead. Other LEA characteristics were demographic

[107] These variables did not sum to 1 for late-implementing States because the total number of students enrolled might also include ungraded students.

variables that were generally included in any LEA model and were expected to be related to CEP take-up. These included the percentage of students who were Black, percentage of students who were Hispanic, percentage of students who were White, percentage of students who were English Language Learners, percentage of schools that were Title I, and whether the LEA was urban or not.

Charter schools may face different challenges in food service operations than non-charter public schools, which might affect whether or not they elected CEP. Therefore, if a State had charter school LEAs, a binary variable indicating that an LEA was a charter school was also included in the model to allow for the variation in the probability of take-up between charter and non-charter schools. These States included California, Missouri, Texas, Virginia, Minnesota, New Jersey, Massachusetts, Michigan, and New York. Where possible, interaction terms of the charter school indicator with other control variables were included to separately account for the effect of the control variable on take-up in charter school LEAs. This was possible in the regressions for California, Texas, and early-implementing LEAs in Michigan because the sample sizes for those models were large enough to permit model convergence even with a greater number of control variables. Indeed, California had more than four comparison charter LEAs for every treatment charter LEA, leaving many potential comparison LEAs to choose from (Table H-18). On the other hand, the logistic models for Missouri, Virginia, Minnesota, New Jersey, Massachusetts, and late-implementing LEAs in New York only converged with a simple indicator for charter school or not. While early-implementing LEAs in New York had charter schools, the small sample size for early-implementers did not allow the model to converge with the inclusion of a charter indicator. Alabama, Washington, and Illinois had no charter schools, so the charter school indicator was not included in the PSM models for these States.

Table H-18 | Counts of Charter School LEAs

State	Total Number of Charter LEAs	Treatment Charter LEAs	Comparison Charter LEAs
California	171	31	140
Missouri	28	22	6
Texas	63	27	36
Virginia	3	2	1
Minnesota	49	33	16
New Jersey	30	13	17
Massachusetts	25	12	13
Michigan, early implementing	114	40	74
New York, early implementing	19	11	8
New York, late implementing	17	10	7

PSM Sample and Matched Analytic Sample Sizes

This section presents the criteria used to exclude eligible LEAs from the matching pool and final analytic sample and the reasons for retaining late-implementing LEAs with Provisions 2 or 3 schools in the sample. This discussion is followed by the resulting count of treatment and comparison LEAs in the matching pool, the count of treatment LEAs that were matched to a comparison LEA, and the final count of treatment LEAs in the analytic sample. The PSM procedure used one-to-one matching with a caliper

of 0.2 times the standard deviation of the propensity score. Treatment LEAs that were not matched were dropped from the sample.

LEA Exclusions from the PSM Sample

The universe of eligible LEAs for the Impact Study in the early-implementing States comprised LEAs that existed in the baseline year, SY 2010–11 and were eligible in any year from SY 2011–12 through SY 2016–17. In the late-implementing States, the universe comprised LEAs that existed in SY 2013–14 and were eligible in any year from SY 2014–15 through SY 2016–17. The sample used for PSM excluded eligible LEAs based on the following criteria:

- The LEA was a private school, juvenile detention center, State or Federally operated LEA, or regional education agency serving special populations.
- The LEA had an ISP of 0 in the baseline school year.
- VCR data on the number of students eligible for F/RP meals were inconsistent with the total number of students in the LEA. In these cases, the counts of F/RP students were greater than total enrollment.
- Data for one or more baseline CCD, VCR, or State Administrative Data covariate(s) were missing.[108]
- SY 2016–17 CEP eligibility status was missing. Lists of LEAs for SY 2013–14 to SY 2016–17 were merged to produce a time-series database of CEP-eligible LEAs (see Chapter 2.1). The eligibility status of LEAs for SY 2014–15 and SY 2015–16 were derived from the database of CEP-eligible schools constructed by CBPP. The eligibility status for SY 2016–17 was taken directly from FNS lists of eligible and participating LEAs. If an LEA was not on the FNS list of eligible LEAs, the project team excluded that LEA, even if it had some eligible schools according to the SY 2014–15 or SY 2015–16 CBPP data.

In addition, the project team used criteria established by the pilot evaluation to exclude LEAs from early-implementing States. These criteria were used in order to be consistent with the pilot evaluation's sampling approach for early-implementing LEAs that were also included in the pilot study. The pilot evaluation excluded LEAs that were sampled for the Direct Certification with Medicaid Study occurring at the same time as the pilot CEP evaluation. It also excluded LEAs with any schools that operated under Provisions 2 or 3 in the baseline year and in the first year of CEP participation. The rationale for exclusion can be found in the technical appendix of the Community Eligibility Provision Evaluation report.[109]

Provisions 2 or 3 Schools in Late-Implementing LEAs

Like CEP, Provisions 2 or 3 schools provide free meals to all students, with reduced application burdens. Under Provision 2, Federal reimbursements are determined by establishing a claiming percentage based on counts of students eligible for F/RP meals during a base year. This claiming percentage is used for the next 3 years, during which no new eligibility determinations are made. The schools count only the total number of reimbursable meals served. Under Provision 3, schools receive the same level of Federal

[108] Section 2.2.2 of the report lists the variables derived from each data source.

[109] Logan, C. W., Connor, P., Harvill, E. L., Harkness, J., Nisar, H., Checkoway, A., . . . Enver, A. (2014). *Community Eligibility Provision evaluation*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Available from: https://www.fns.usda.gov/community-eligibility-provision-evaluation

assistance for a period of 4 years. The level of assistance is the same as the amount received during the base year, when the last eligibility determinations were made.

The project team did not exclude LEAs with Provision 2 or 3 schools from the samples for late-implementing LEAs. Excluding treatment LEAs with any Provision 2 or 3 schools in the year before CEP and after CEP would have reduced the pool of participating LEAs for PSM, and might have reduced the likelihood of achieving a sample size with adequate statistical power to detect impacts. The limitation of including LEAs with Provisions 2 or 3 schools in the analytic sample is that the effect of Provisions 2 or 3 on meal program participation and revenues cannot be easily separated from the effect of CEP. In that sense, the operation of Provisions 2 or 3 in treatment LEAs that did not operate CEP district-wide may confound the impact of CEP on outcomes. However, the bias in the impact from the inclusion of CEP LEAs with Provisions 2 or 3 schools may be small if a nominal percentage of all schools in the LEA operated under Provisions 2 or 3. Of the 391 matched treatment LEAs in the States with late-implementing LEAs, a total of 25 treatment LEAs and 11 comparison LEAs operated Provisions 2 or 3 schools during the first year of CEP or the year before CEP. Among 20 treatment LEAs with available VCR data on Provisions 2 or 3 schools, the average percentage of schools that operated Provisions 2 or 3 during the school year before CEP implementation was 32 percent, while the average percentage of schools that operated Provisions 2 or 3 during the first year of CEP was only 19 percent.[110] Given that, on average, fewer than one in five schools operated Provisions 2 or 3 in CEP LEAs, the bias in the impact estimate was expected to be small.

Counts of LEAs in PSM Sample and Matched Treatment LEAs

Table H-19 shows the counts of eligible LEAs by State that were included in the PSM sample, and the counts of treatment LEAs that were matched to a comparison LEA. Out of the 805 treatment LEAs that were included in the PSM sample, 500 were matched to a comparison LEA. An additional 19 LEAs were excluded from the final analytic sample because they had incomplete State administrative data from which to construct the outcome variables. The final sample size comprised 481 treatment LEAs and 481 comparison LEAs.

[110] These averages are based on 20 treatment LEAs that operated Provisions 2 or 3 schools. Data on the number of schools operating Provisions 2 or 3 or the total number of schools for five LEAs was missing.

Table H-19 | Counts of Eligible LEAs in PSM Sample and Matched Treatment LEAs

State	Universe of LEAs eligible for CEP	Eligible LEAs in PSM Sample After Exclusions	Treatment LEAs in PSM Sample After Exclusions	Matched Treatment LEAs	Treatment LEAs in Final Analytic Sample
Alabama	121	115	37	12	12
California	546	414	56	47	45
Illinois, early implementing	234	119	50	29	27
Illinois, late implementing	540	137	52	37	34
Massachusetts	191	133	43	22	22
Michigan, early implementing	435	393	96	72	65
Michigan, late implementing	171	38	13	0	0
Minnesota	280	191	45	15	15
Missouri	312	237	90	51	51
New Jersey	216	109	38	16	13
New York, early implementing	145	48	26	8	7
New York, late implementing	652	180	60	51	51
Texas	717	474	127	105	105
Virginia	100	87	35	10	10
Washington	200	165	37	25	24
Total	**4,860**	**2,840**	**805**	**500**	**481**

The next section presents results from tests of baseline equivalence in LEA characteristics between the treatment and comparison LEAs in the final sample. It also presents results from baseline equivalence tests between treatment LEAs in the final sample, and treatment LEAs that were dropped because they were not matched to a comparison LEA or were dropped due to missing State outcome data.

Baseline Tests of Equivalence

The variables included in the tests for baseline equivalence were the variables used in the PSM regression models, as well as baseline pre-implementation variables of primary study outcomes—NSLP and SBP participation. Table H-20 presents the results from the test of baseline equivalence between treatment and comparison LEAs, pooled across all States.

Table H-20 | Baseline Equivalence Tests Between Matched Treatment and Comparison LEAs

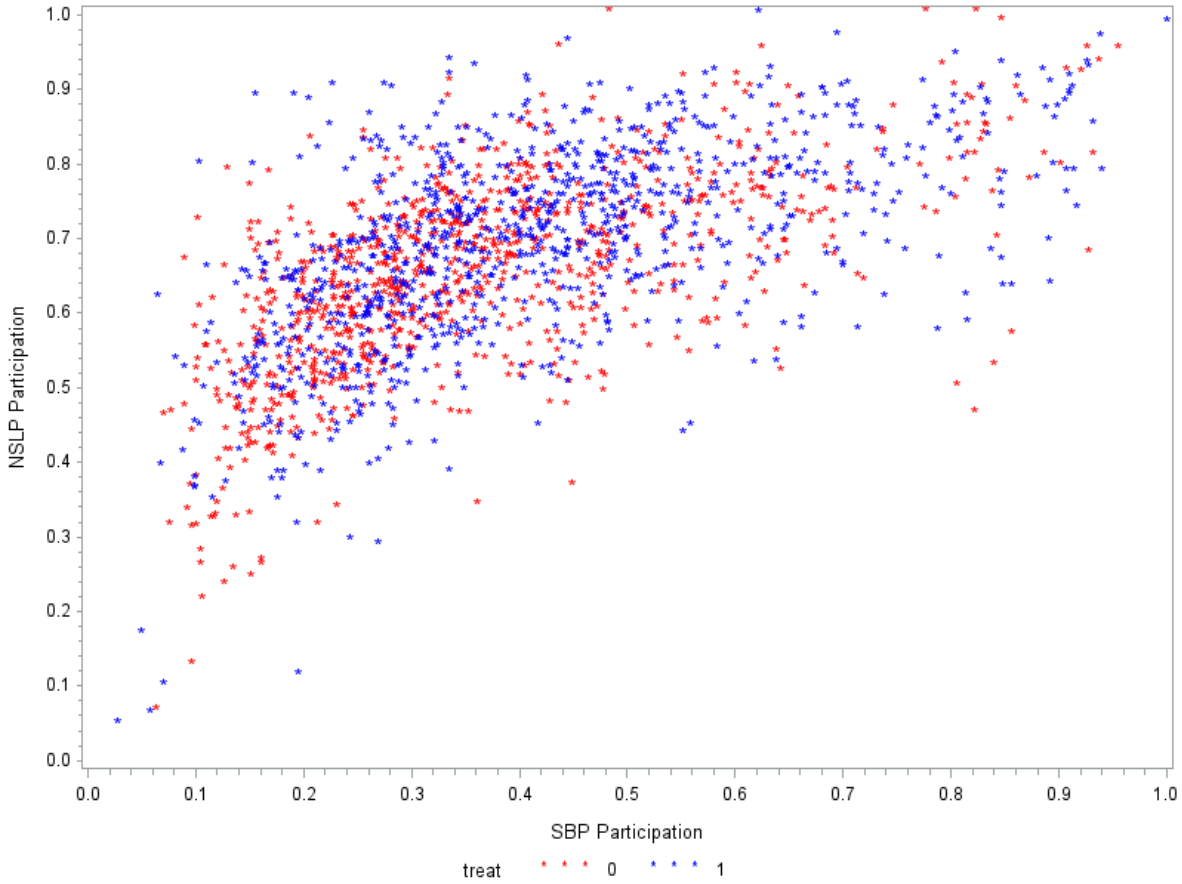
Variable	Treatment	Comparison	Difference	*p*-value
Average number of students per school	395.5	398.3	-2.8	0.85
Percentage of students in Grades K–5 in LEA	0.48	0.48	0.00	0.639
Percentage of students in Grades 6–8 in LEA	0.23	0.23	0.00	0.820
Percentage of Hispanic students in LEA	0.25	0.25	0.00	0.933
Percentage of Black students in LEA	0.18	0.16	0.02	0.207
Percentage of White students in LEA	0.52	0.54	-0.02	0.271
Percentage of English Language Learners in LEA	0.08	0.08	0.00	0.921
Percentage of students in Title 1 schools in LEA	0.84	0.84	0.00	0.935
Urbanicity, 1 = City/Urban, 0 = Other	0.22	0.20	0.02	0.337
Difference between F/RP percentage and ISP	0.29	0.29	-0.01	0.449
Percentage of students eligible for F/RP meals	0.67	0.68	0.00	0.757
Natural log of number of schools in LEA	1.48	1.47	0.01	0.875
Natural log of number of students in LEA	7.25	7.25	0.00	0.976
Percentage of NSLP lunches served free	0.70	0.70	0.00	0.628
Percentage of NSLP lunches served at reduced price	0.09	0.09	0.00	0.538
NSLP Participation Rate (pretest outcome)	0.67	0.65	0.02	0.05*
SBP Participation Rate (pretest outcome)	0.40	0.36	0.03	<0.01***
Number of LEAs	481	481		

Note: Pooled *t*-tests were used to test for baseline equivalence. ***= $p < 0.01$, **= $p < 0.05$, *= $p < 0.10$.

As shown in Table H-20, all the variables included in the PSM models were statistically equivalent at baseline. The pre-implementation outcomes for NSLP and SBP participation were statistically different at the 0.05 level or below. Any differences in baseline outcomes between the treatment and comparison LEAs were controlled for in the difference-in-differences regression model.

In addition to the baseline *t*-test, the project team plotted the pretest outcomes to visualize the distance in outcomes between treatment and comparison LEAs in the final sample. Figure H-1 plots the NSLP participation rate against the SBP participation rate for each of the 481 treatment and 481 comparison LEAs. Red stars represent comparison LEAs and blue stars represent treatment LEAs. The plots for treatment and comparison LEAs mostly overlap. There are no regions that are all blue or all red. This means that the analytic corrections involve mostly interpolation rather than extrapolation.

Figure H-1 | Baseline NSLP and SBP Participation Rates of Treatment and Comparison LEAs



The second test tested the difference between pre-CEP LEA characteristics of treatment LEAs included in the final analytic sample and those LEAs that were dropped in the process of PSM, or because State administrative outcome data were not available. The results from this test are presented in Table H-21**Error! Reference source not found.**, which pools LEAs across all States. These results show that matched and dropped LEAs differed along a number of LEA characteristics: urbanicity, percentage of students in Grades K–5, student racial composition, the percentage of students eligible for F/RP meals, and the percentage of NSLP lunches served free or at the reduced price. These differences in baseline covariates imply that impact results using the matched analytic sample may not be generalizable to all LEAs within the 12 sample States.

Table H-21 | Baseline Equivalence Tests Between Included and Excluded Treatment LEAs

Variable Label	Treatment LEAs Included in Final Sample	Treatment LEAs Dropped from Final Sample	Difference	*p*-value
Average number of students per school	395.51	389.90	5.61	0.736
Percentage of students in Grades K–5 in LEA	0.48	0.51	-0.03	0.014**
Percentage of students in Grades 6–8 in LEA	0.23	0.23	0.00	0.955
Percentage of Hispanic students in LEA	0.25	0.19	0.06	0.002***
Percentage of Black students in LEA	0.18	0.45	-0.28	0.000***
Percentage of White students in LEA	0.52	0.29	0.23	0.000***
Percentage of English Language Learners in LEA	0.08	0.10	-0.01	0.188
Percentage of students in Title 1 schools in LEA	0.84	0.85	-0.01	0.439
Urbanicity (1 = City/Urban, 0 otherwise)	0.22	0.44	-0.22	0.000***
Difference between F/RP percentage and ISP	0.29	0.27	0.02	0.039**
Percentage of students eligible for F/RP meals	0.67	0.79	-0.12	0.000***
Natural log of number of schools in LEA	1.48	1.42	0.06	0.516
Natural log of number of students in LEA	7.25	7.19	0.07	0.586
Percentage of NSLP lunches served free	0.70	0.81	-0.11	0.000***
Percentage of NSLP lunches served at reduced price	0.09	0.06	0.02	0.000***
Number of LEAs	418	323		

Note: Pooled *t*-tests were used to test for baseline equivalence. ***= $p < 0.01$, **= $p < 0.05$, *= $p < 0.10$.

State Administrative Data on Outcomes and Distribution of Pre-CEP and Post-CEP Years

The 12 States in the Impact Study sample were requested to provide monthly data on meal claims and other outcomes for SY 2013–14 to SY 2016–17. For the early-implementing States—Illinois, Michigan, and New York—data for SY 2009–10 to SY 2012–13 were taken from the pilot evaluation database. The data elements requested were breakfast and lunch counts claimed at the "free," "reduced price," and "paid" rates; Federal reimbursements for breakfast, lunch, and snacks; State payments; number of operating days; student enrollment; and ADA. All States provided data on meal counts, Federal reimbursements for breakfast and lunch, number of operating days, and student enrollment for all requested school years. Only four States provided data on ADA. Available data were used to construct variables for SBP ADP, NSLP ADP, Federal reimbursements per breakfast and lunch, and total Federal SBP and NSLP reimbursements per student, for LEAs in matched sample. Outcomes were constructed for every year of available data to produce a time-series database for the DD regression model. The construction of these variables is described in Section 6.2 of Chapter 6.

The time-series database consisted of multiple records per LEA, for which each record corresponded to each school year. The number of post-CEP and pre-CEP years varied by LEA, depending on when the LEA first participated in CEP. Table H-22 and Table H-23 show the distribution of the number of pre-CEP and post-CEP years, respectively, among the LEAs in the final sample.

When revenue data were missing for the impact analysis sample, we imputed revenues. For non-participating LEAs, we inferred the applicable reimbursement rate from prior months' data and multiplied that by the relevant meal counts. For participating LEAs, we first calculated the ISP using available data for a different month in the same CEP year, as follows:

$$Predicted\ ISP\ = \frac{total\ lunch\ reimbursements\ -\ (paid\ reimbursement\ rate\ \times\ total\ lunch\ meal\ counts)}{1.6\ \times\ total\ lunch\ meal\ counts\ \times\ (free\ reimbursement\ rate\ -\ paid\ reimbursement\ rate)}$$

If the backtracked ISP was less than or equal to 62.5 percent, we imputed total lunch reimbursements for months with missing data using the following formula:

$$\text{Total lunch reimbursements} = [1.6 \times \text{Predicted ISP} \times \text{total lunch meal counts} \times \text{free reimbursement rate}] + [(1 - [1.6 \times \text{Predicted ISP}]) \times \text{total lunch meal counts} \times \text{paid reimbursement rate}]$$

If the backtracked ISP was greater than 62.5 percent, we use the following formula for reimbursements:

$$\text{Total lunch reimbursements} = \text{total lunch meal counts} \times \text{free reimbursement rate}$$

We used the same method to calculate missing CEP breakfast reimbursements.

The derivation of this formula is as follows:

1. Start with the CEP reimbursement formula:

$$\text{total lunch reimbursements} = 1.6 \times \text{ISP} \times \text{free reimbursement rate} \times \text{total lunch meal counts} + \left[\left(1 - (1.6 \times \text{ISP})\right) \times \text{paid reimbursement rate} \times \text{total lunch meal counts}\right]$$

2. Expand the (1 – [1.6 x ISP]) expression:

$$total\ lunch\ reimbursements = (1.6 \times ISP \times free\ reimbursement\ rate\ \times total\ lunch\ meal\ counts) + (paid\ reimbursement\ rate\ \times total\ lunch\ meal\ counts) - ((1.6 \times ISP) \times paid\ reimbursement\ rate \times total\ lunch\ meal\ counts)$$

3. Factor common terms on the right-hand-side and move to left-hand-side:

$$total\ lunch\ reimbursements - (paid\ reimbursement\ rate\ \times total\ lunch\ meal\ counts) = ISP \times ((1.6 \times free\ reimbursement\ rate\ \times total\ lunch\ meal\ counts) - (1.6 \times paid\ reimbursement\ rate \times total\ lunch\ meal\ counts))$$

4. Solve for ISP:

$$Predicted\ ISP = \frac{total\ lunch\ reimbursements - (paid\ reimbursement\ rate\ \times\ total\ lunch\ meal\ counts)}{1.6\ \times\ total\ lunch\ meal\ counts\ \times\ (free\ reimbursement\ rate - paid\ reimbursement\ rate)}$$

Note that we do not know, a priori, if the ISP is greater than 0.625, in which case the above formula to backtrack is incorrect. However, if the ISP is greater than 0.625, the backtracked ISP using the above formula will always yield an ISP of greater than 0.625 (even though it is not the correct ISP); thus, we will determine whether the ISP is 0.625 or more. Also, this formula only works if all schools in the LEA are participating district-wide.

Table H-22 | Distribution of the Number of Pre-CEP Years among Treatment LEAs in Final Sample

State	More than 4 Pre-CEP Years	Exactly 4 Pre-CEP Years	Exactly 3 Pre-CEP Years	Exactly 2 Pre-CEP Years	Exactly 1 Pre-CEP Year
Alabama	0	0	5	0	7
California	0	0	26	2	17
Illinois, early implementing	0	4	4	19	0
Illinois, late implementing	34	0	0	0	0
Massachusetts	0	0	17	0	5
Michigan, early implementing	0	0	27	38	0
Minnesota	0	0	4	0	11
Missouri	0	0	17	0	34
New Jersey	0	0	9	0	4
New York, early implementing	0	3	4	0	0
New York, late implementing	51	0	0	0	0
Texas	0	0	30	1	74
Virginia	0	0	8	0	2
Washington	0	0	13	11	0

Table H-23 | Distribution of the Number of Post-CEP Years among Treatment LEAs in Final Sample

State	Exactly 1 Year Post-CEP	Exactly 2 Years Post-CEP	Exactly 3 Years Post-CEP	Exactly 4 Years Post-CEP	More than 4 Years Post-CEP
Alabama	5	0	7	0	0
California	26	2	17	0	0
Illinois, early implementing	0	0	0	4	23
Illinois, late implementing	16	0	18	0	0
Massachusetts	17	0	5	0	0
Michigan, early implementing	0	0	0	0	65
Minnesota	4	0	11	0	0
Missouri	17	0	34	0	0
New Jersey	9	0	4	0	0
New York, early implementing	0	0	0	3	4
New York, late implementing	44	0	7	0	0
Texas	30	1	74	0	0
Virginia	8	0	2	0	0
Washington	13	11	0	0	0