



School meals are one of the most important tools in the fight against childhood hunger and ensuring future student success. Students who participate in school meals benefit from improved health outcomes, better test scores, fewer school absences, and fewer behavioral referrals.

School meal programs are critical to Kansas kids' educational success and overall well-being, especially with childhood hunger rapidly increasing. In Kansas, 1 in 5 children do not know where their next meal is coming from. Over 130,000 children in the state face food insecurity. However, many children who depend on school meals are unable to access them due to barriers such as cost and limited eligibility for meal-assistance programs.

The Community Eligibility Provision (CEP) is a federal option that allows high-need schools to serve breakfast and lunch to all students at no cost to students or families. CEP provides much-needed nutritious meals and eases the financial burden for their families. CEP ensures every student has consistent access to nutritious meals so they can focus, learn, and thrive.

## **DIRECT CERTIFICATION & IDENTIFIED STUDENT PERCENTAGE (ISP)**

Under the traditional model, income-eligible families must complete an application to receive free or reduced-price meals. CEP eliminates applications entirely. Instead, eligibility is based on a school's Identified Student Percentage (ISP), which reflects the share of students who are directly certified for free meals through participation in means-tested programs such as SNAP, TANF, or Medicaid, or through categorical eligibility, including foster care, homelessness, migrant status, or Head Start.

## **CEP Benefits:**

- Students who participate in school meals benefit from improved health outcomes, better test scores, fewer school absences, and fewer behavioral referrals.
- Increases participation in school meal programs.
- Reduces stigma by offering meals to all students at no charge, regardless of income.
- Strengthens program integrity through direct certification.
- Lowers administrative costs by eliminating tracking of meal eligibility and processing free/reduced meal applications.
- Eliminates most unpaid school meals debt.
- Streamlines meal service, with no need for payments, swipe cards, or other systems during service.
- Supports innovative breakfast models, such as Breakfast in the Classroom.
- Preserves local authority and flexibility.
- Maximizes available federal reimbursements.
- Provides budget stability for districts and families

Direct certification is more accurate than paper applications and produces significantly lower error rates. School meal programs already operate with strong integrity, and CEP strengthens integrity further by relying on verified data.

Schools with an ISP of 25% or higher are eligible to participate in CEP. In other words, at least one in every four students is directly certified to receive free school meals.

The “identified students” rate is calculated by taking the total number of directly certified students (plus migrant, homeless, runaway, Head Start, and foster students, if not already included in the direct certification list) and dividing that number by the number of students with access to school lunch or breakfast (in most cases, equal to enrollment).

$$\frac{\text{\# of students identified through direct certification}}{\text{\# of total enrolled students with access to school meals}} \times 100 = \text{Identified Student Percentage}$$

### SCHOOL/SITE ELIGIBILITY AND APPLICATION FOR CEP

CEP can be adopted at the district level or individual school building level, allowing districts to choose what works best for their communities. To be eligible, sponsors and/or schools must:

- Meet a minimum level of 25% of “identified students” for free meals in the year prior to implementing Community Eligibility.
- Agree to offer free breakfasts and lunches to all students.
- Agree to cover with non-Federal funds any costs of providing free meals to students above the amounts provided by Federal assistance.
- Schools can qualify individually, in groups, or by district. They must accurately determine their identified student percentage as of April 1 and complete the CEP application with KSDE by June 30.
- Once approved, schools can participate for four consecutive years without reapplying. Sites can provide new direct certification numbers annually to increase the reimbursement percentage if not at 100% free reimbursement.

### REIMBURSEMENT

The ISP determines the school or district’s eligibility as well as the reimbursement rate. Multiply the ISP by 1.6 to determine the percentage of meals to be reimbursed at the federal “free meal” rate. If the percentage is less than 100 percent, the remaining percentage will be reimbursed at the federal “paid meal” rate.

Because the ISP also determines the federal reimbursement formula, some eligible schools may determine participation is not financially feasible unless their ISP approaches 62.5 percent or higher. Any sites with an ISP of 62.5% or higher would be fully reimbursed at the “free meal” reimbursement rate (capped at 100%), while any site with an ISP below 62.5% would not be fully reimbursed and would have to pay the difference.

Utilize the USDA’s CEP Slider Tool to calculate your potential reimbursement rates.

### NAVIGATING CEP AND FUNDING CONCERNS

In the current school finance formula, Kansas ties at-risk funding to free and reduced-price meal eligibility, using meal application data as a proxy for student need. This funding formula creates a

**Example:**

A school that has a 50% ISP would be reimbursed by the federal government for 80% of the meals they serve at the federal free rate, with the remaining 20% of meals served reimbursed at the lower federal “paid meal” reimbursement rate (50% x 1.6 = 80%).

disconnect between how at-risk services are funded and how those services are actually delivered. Funding is determined by submission of a meal application; services are provided based on academic need.

Because CEP eliminates traditional meal applications and instead relies on direct certification data, some districts worry that adopting CEP could complicate how student need is reflected in state funding calculations. Families no longer need to complete free and reduced-price meal applications. Instead, schools can use alternative income sources (such as household economic surveys) to collect data from all students that would otherwise be collected through a meal application. Alternative income forms can be required by the district (unlike meal applications), but must not be associated with school meal programs.

CEP can work without sacrificing at-risk funding. These concerns about losing at-risk funding can be managed with intentional processes and strategic cross-department alignment. The key is ensuring districts have the internal structure and commitment to support the collection of household income information and the verification processes.

- At-risk funding is sustainable under CEP when the district is aligned. CEP does not inherently reduce at-risk eligibility. What threatens funding is low response rates or the final verification processes. Districts can typically maintain the same at-risk percentages as before CEP with intentional processes and cross-departmental alignment.
- Systems and processes matter. Districts can continue collecting income information through household economic surveys, but success depends on clear timelines, strong communication, and consistent follow-up expectations.
- Verification remains a required component. CEP districts that claim at-risk weighting based on household economic survey data must complete verification for 3% of meal applications, as in the traditional process. Ensuring there is a well-defined workflow, including translation support, family outreach expectations, and secure documentation methods, helps maintain compliance and protect funding.

## What new state school meals law (HB 2402) means for your district:

Recent legislation encourages districts to fully consider CEP adoption. HB 2402 was recently passed by both chambers and signed into law. This bill:

- Asks school boards that have an ISP of 50% or higher to formally consider CEP participation, ensuring districts do not miss a proven opportunity to support students
- Instructs the Kansas State Department of Education to assist districts interested in CEP with technical guidance and implementation support
- Includes a financial hardship exception, recognizing that CEP may not be feasible for every eligible district
- Maintains local authority, allowing districts to decide what works best for their community



# Comparison: Traditional Model and CEP

Feature	Traditional NSLP Operation	Community Eligibility Provision (CEP)
<b>Meal Application</b>	Required annually for each household to determine free/reduced eligibility.	Not required; uses direct certification (SNAP, TANF, Medicaid).
<b>Student Cost</b>	Tiered: Free, Reduced-Price (\$0.40), or Paid.	Free for all students, regardless of income.
<b>Counting &amp; Claiming</b>	Must track meals by category (Free, Reduced, Paid) daily.	Simplified: Total meals served are claimed based on a claiming percentage.
<b>Reimbursement Rate</b>	Based on the exact number of free, reduced, and paid meals served.	Federal rate based on Identified Student Percentage (ISP) $\times$ 1.6. The higher the poverty rate (ISP) the more federal reimbursement received; the lower the poverty rate (ISP), the less federal reimbursement received.
<b>Administrative Burden</b>	High (applications, verification, daily meal counts).	Low (no applications, simplified counting).* <i>*CEP removes meal applications but it does not remove accountability. Kansas schools still collect household economic surveys to determine at-risk eligibility.</i>
<b>Stigma</b>	Potential stigma for free/reduced students.	All students eat for free, increasing participation.
<b>Financial Risk</b>	Lower (paid meals help cover costs).	Higher if ISP is low; requires financial analysis.
<b>Eligibility Threshold</b>	N/A (open to all schools).	Schools must have at least 25% Identified Students (ISP).* <i>*Schools with higher ISPs are much more likely to have financial feasibility to operate CEP</i>

**Kansas students are counting on school meals.**

**The Community Eligibility Provision is a great tool for equity among Kansas schools. It allows schools to serve breakfast and lunch to all students, which strengthens school communities and supports student health. It eliminates meal debt, reduces stigma, streamlines operations, and stabilizes school nutrition budgets.**

**Everyone does better when all students are nourished and ready to learn.**

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