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BEYOND ELIGIBILITY: WHAT DRIVES CEP PARTICIPATION IN TEXAS SCHOOLS

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Executive Summary

This report examines how Texas school districts are evaluating and implementing the Community Eligibility Provision (CEP), a federal program that allows schools to provide free meals to all students. Drawing on interviews, survey data, and policy analysis, it finds that while CEP is widely recognized as an effective tool for reducing children's food insecurity, increasing meal participation, and eliminating social stigma, adoption across Texas remains uneven.

The primary driver of district decision-making is not eligibility, but financial feasibility. Although recent federal policy changes have expanded eligibility by lowering the Identified Student Percentage (ISP) threshold to 25 percent, many districts, particularly those in the moderate ISP range - face funding gaps because federal reimbursement does not fully cover the cost of providing meals. Districts with higher ISPs tend to operate CEP sustainably, while those near the eligibility threshold often fear financial strain or opt out entirely.

Several barriers continue to limit CEP participation and long-term sustainability, including:

- Declining direct certification rates, driven in part by changes to federal benefit programs and reduced participation among mixed-status families, which lower Identified Student Percentages (ISPs) and reduce federal reimbursement even as student need remains high.
- Buy American requirements, which require schools participating in the National School Lunch and School Breakfast Programs to source an increasing share of food products from U.S. producers, creating additional procurement and cost challenges for some districts.
- Rising operational costs and evolving nutrition requirements, which increase the complexity of managing financially sustainable school nutrition programs.
- Loss of application-based socioeconomic data, creating challenges for identifying student need and administering other education funding programs.
- Financial self-sufficiency expectations, as school nutrition departments are often expected to operate without district financial support, limiting their ability to absorb rising costs or invest in program improvements.
- Limited inclusion of school nutrition professionals in policy and decision-making, reducing opportunities for practitioner expertise to inform policies that directly affect meal programs.
- The need for stronger collaboration and advocacy, including better connecting school nutrition to student attendance, academic achievement, and food security outcomes while creating opportunities for practitioners to share best practices and coordinate policy recommendations.

Despite these constraints, districts consistently report strong outcomes where CEP is implemented, including improved academic or attendance outcomes (26% of participants reported improvement), increased meal participation (68% of participants reported positive program operations and participation), reduced stigma (74% of participants reported positive student well-being and engagement), elimination of meal debt, and meaningful financial relief for families (58% of participants reported positive financial impact). Overall, 79% of the schools interviewed (n=19) were very satisfied with CEP. However, some districts rely on local funding or district support to sustain the program, creating uneven access across the state.

Overall, CEP is both a proven solution and an underutilized opportunity. Expanding participation will require coordinated policy action to address the gap between eligibility and sustainability, particularly through improvements to federal reimbursement, strengthened data systems, and additional state-level support.

This report includes policy action recommendations at the district, state, and federal levels to expand and enable CEP participation. Further details are at the end of this report.

For districts and practitioners:

1. Develop clear financial decision-making frameworks for CEP viability.
2. Maximize direct certification practices to improve ISP and garner more coverage.
3. Use strategic grouping to raise the overall ISP to improve financial outcomes.
4. Plan for participation increases and operational shifts with staff, food, and kitchen resources.
5. Diversify revenue streams where possible to help offset funding gaps.
6. Strengthen community engagement and communication to promote participation through education and built trust.
7. Evaluate Provision 2 as a complementary option.

For the state:

1. Establish supplemental state funding for CEP to cover reimbursement gaps.
2. Align state policies with CEP participation incentives.
3. Build advocacy and information sharing coalitions for school nutrition professionals and stakeholders to provide input on education policies that affect them.
4. Maximize technical assistance and regional support for CEP implementation best practices.
5. Develop standardized alternative income data collection tools for districts.
6. Provide implementation grants for districts adopting CEP to support the transition.

For the federal level:

1. Reevaluate the CEP reimbursement multiplier.
2. Strengthen and expand benefits systems that affect direct certification.
3. Mitigate benefit cliffs and participation barriers in federal programs that are used for CEP viability and ISP rate calculations.
4. Provide targeted financial support for newly eligible schools.
5. Increase flexibility in program implementation requirements for districts with supply or cost constraints.
6. Stabilize and expand supplemental grant programs to be more predictable sources of additional funding.

Introduction & CEP Landscape

Landscape Overview: Community Eligibility Provision

The Community Eligibility Provision (CEP) is a federal program that allows participating schools and districts to provide breakfast and lunch at no cost to students, without requiring families to complete free or reduced meal applications. Instead of using household applications to determine eligibility, CEP relies on pulling student data to determine the number of students whose families participate in certain benefits programs such as SNAP, TANF, or Medicaid, as well as students who fall into certain risk categories (e.g. foster care involvement, runaway youth, and unhoused youth) through a process called direct certification. This direct certification number is then compared to the overall student population to generate an "Identified Student Percentage" (ISP), on which the applicant is then reimbursed. An individual campus, grouping of campuses, or district must have an ISP rate of at least 25% to participate in CEP, although in practice most participating groupings have an ISP far higher than the minimum.

CEP was created to reduce administrative burden for school districts and families, increase access to meals, and remove the stigma tied to income-based eligibility. By eliminating applications and meal payments, the program simplifies operations for school nutrition staff and makes it easier for families to access meals. Since it became available nationwide in 2014, CEP has been an important approach for addressing children's food insecurity, particularly in communities with a higher concentration of students from low-income households. District leaders consistently describe the program as having a direct and measurable impact on families, both in terms of access to food and financial relief.

CEP operates within the larger National School Lunch Program (NSLP) and School Breakfast Program (SBP), which are federally funded and administered by U.S. Department of Agriculture. Under the traditional model, schools serve meals at free, reduced-price, or paid levels based on income eligibility determined through applications. Eligibility and reimbursement under CEP are governed by a school's Identified Student Percentage (ISP): the share of enrolled students who qualify for free meals without an application. Under the reimbursement formula, the share of meals claimed at the federal free rate equals the ISP rate multiplied by 1.6, capped at 100 percent. Any remaining meals are reimbursed at the lower federal paid rate.

This reimbursement structure creates a clear financial dynamic that shapes district decision-making. While CEP expands access to free meals, it does not guarantee that federal reimbursement will fully cover the cost of providing those meals. Districts must evaluate whether their ISP is high enough to sustain the program financially or whether they will need to rely on other funding sources to cover the gap. As a result, CEP participation is driven not only by eligibility, but by financial feasibility, participation rates, and local cost conditions.

In September 2023, the USDA lowered the minimum ISP required to qualify for CEP from 40% to 25%, effective in the 2024–2025 school year. While this change expanded eligibility to a larger number of schools, it did not alter the underlying reimbursement formula. As a result, many schools in the 25% to 39.9% ISP range may still find CEP financially challenging to implement without additional supports. In practice, districts often rely on strategies such as grouping schools to increase their combined ISP, improving direct certification processes, or identifying supplemental funding sources to make participation viable.

Federal Landscape

Shifts in the federal benefit landscape have reduced the pool of identified students in ways largely outside districts' control. Stricter SNAP and Medicaid eligibility requirements have reduced direct certification counts,[i] making it harder for schools to qualify for CEP and lowering reimbursement amounts for those that do participate. This dynamic is not unique to Texas, though it is acutely felt in states with large immigrant-origin and mixed status student populations.

The immigration enforcement climate compounds the problem. Researchers documented a 35.6 percent decrease in SNAP participation among mixed-status households between 2016 and 2019 during a prior period of heightened enforcement activity,[ii] and schools are again seeing rising absenteeism and benefit avoidance among families with undocumented members.[iii] When mixed-status families withdraw from SNAP or Medicaid over immigration concerns, they are no longer counted in ISP data, even if their children remain enrolled in school. The result is a growing gap between actual student need and the administrative data used to measure it — one that depresses ISP calculations and undermines CEP eligibility and reimbursement in communities where food insecurity is likely to rise, not fall. Among the districts we surveyed, ISP rates have decreased on average almost 2.5 percentage points just since last year.[iv] These decreases could be the deciding factor in whether a district decides to continue in the CEP program. As one Houston-area district shared, they do not want to disappoint families who rely on school meals but may have to if anticipated funding shortfalls materialize.

School nutrition directors are also navigating new federal nutrition requirements and guidelines. The U.S. Department of Agriculture's Buy American provision requires NSLP and SBP (including CEP) participating schools to purchase 90% of their food from domestic sources—this number will be increased to 92% next school year.[v] The Buy American provision is a federal requirement within the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that requires schools to purchase, to the maximum extent practicable, food products that are grown, raised, or processed in the United States. The goal of the policy is to support domestic agriculture while ensuring that school meal programs contribute to the U.S. food economy. Under this requirement, schools must prioritize U.S.-produced foods in their procurement processes, including items such as fruits, vegetables, grains, dairy, and meat products.

Nutrition guidelines have also changed in the past few months,[vi] and while these guidelines have not been tied to strict nutrition program changes yet, nutrition directors are attempting to prepare for how the new food pyramid may change their daily offerings.

Texas Landscape

Texas administers CEP elections through the Texas Unified Nutrition Programs System (TX-UNPS), where districts can form site groupings for CEP purposes.[vii] At the same time, direct certification matching – which determines identified student counts and therefore ISP – is conducted through the Texas ELMS system (TX-ELMS), where districts upload enrollment data and receive match results.[viii] Because ISP and claiming percentages depend directly on identified student counts, the quality and timeliness of TX-ELMS uploads and matching practices can materially affect a site's ISP and, in turn, CEP viability. Variability in student identifiers,[ix] timing of uploads,[x] and household-extension practices can and do result in undercounts that reduce ISP and reimbursement amounts.

The 89th Texas Legislature provided additional funding that has changed the baseline economics of school meal service through a separate state policy that affects those schools or districts that participate in the National School Lunch and Breakfast Program, but do not participate in CEP. For SY 2025-2026 and SY 2026-2027, Texas reimburses school food authorities for the reduced-price copay amount, up to $0.30 per reduced-price breakfast and up to $0.40 per reduced-price lunch, effectively eliminating out-of-pocket charges for reduced-price eligible students.[xi] This policy operates independently of CEP but alters the financial districts use to evaluate it. Outside of CEP, districts can still collect paid student meals as a significant revenue stream while also receiving the new state reimbursement for reduced-price. Under CEP, all families pay nothing, meaning districts forgo paid student meal price revenue entirely. However, it is important to note that districts or schools participating in CEP can still collect paid student food revenue in the form of "a la carte extras." For some schools, this included coffee or snack bars; for others it was simply an option at the end of the lunch line, such as extra snacks or desserts. At lower ISPs, where a larger share of meals is reimbursed at the paid rate, this foregone revenue increases the likelihood of a funding gap – making CEP adoption a more complex decision for campuses near the new 25% eligibility threshold.

Funding & Financial Sustainability for Universal School Food Programs

Core CEP Funding Mechanics

Under CEP, school districts continue to receive federal reimbursement through the NSLP and SBP, but the structure of the reimbursement changes. Instead of claiming meals based on individual student eligibility, districts are reimbursed using a formula tied to their identified student percentage (ISP).[xii] The ISP is multiplied by a federal multiplier set factor, currently 1.6, to determine the share of meals reimbursed at the free rate. The remaining meals are reimbursed at the much lower paid rate. The number of meals a district, grouping, or school can get reimbursed for depends on meals served, or their meal participation rate; typically, the higher the participation rate, the more financially viable CEP will be for the district, grouping, or school.

The 1.6 multiplier is established in federal statute as the default factor used in this calculation. It was originally developed in 2010 based on analysis conducted during the drafting of the Healthy, Hunger-Free Kids Act, which found that for every 10 students directly certified for free meals, up to 6 additional students qualified through the application process for free or reduced-price meals. Early evaluations of CEP in pilot states also showed that this multiplier closely reflected the typical relationship between directly certified students and those identified through applications in participating districts.

In practice, the multiplier serves as a bridge between direct certification data and the broader population of students who would otherwise qualify for free or reduced-price meals. Because reimbursement is tied directly to this calculation, the multiplier plays a central role in determining whether CEP is financially sustainable for a district. While it simplifies the process by removing the need for applications, it also means that districts must rely on the accuracy of this proxy when estimating revenue under CEP. This formula creates a predictable financial tradeoff: lower ISPs result in a larger share of meals reimbursed at the paid lunch rate. At an ISP of 25 percent, for example, 40 percent of meals are reimbursed at the free rate while 60 percent are reimbursed at the paid rate. The "free meal" rate is roughly \$4.60 for lunch and \$2.46 for breakfast; the "paid meal" rate is roughly \$.44 for lunch and \$.40 for breakfast, at baseline. These reimbursement rates may go up by several cents based on the characteristics of a district, school grouping, or individual school. Federal rules require the local educational agency to cover any difference between the full cost of serving meals at no charge and the federal assistance received, using non-federal funds. Financial viability therefore depends heavily on ISP level, meal participation rates, the paid student meal price revenue that would otherwise be collected outside of CEP, and local operating costs. To improve viability, districts may elect CEP at the school, group-of-schools, or districtwide level, combining schools so that the group's blended ISP is higher than some individual sites, thereby raising the group's free-rate claiming percentage. Schools are locked into their ISP rate for the grant's four-year cycle and one additional "grace year," unless the population changes motivate the school to perform a re-calculation for a higher ISP. If recalculated, the 4-year cycle starts over again. The "grace year" is given to schools that fall under the 25% cut-off, but are still in their 4-year cycle; they receive a grace year of CEP coverage while they manage their ISP.

This formula means that CEP funding is driven by the proportion of students who are directly certified rather than the total number of students who may qualify through applications. As a result, districts must closely monitor their ISP and understand how it translates into reimbursement. While CEP can simplify operations and increase participation, the funding model requires districts to balance meal costs against the mix of free and paid reimbursement rates.

A key consideration for districts evaluating CEP is identifying the point at which the program becomes financially sustainable. While schools may meet the minimum eligibility requirement (25% of population) to participate, that threshold does not necessarily ensure that reimbursement will cover the full cost of providing meals to all students. Districts often refer to internal "tipping points" or ISP thresholds that indicate when CEP is likely to break even or generate a surplus. Districts can utilize several tools provided by the United States Department of Agriculture, including a sliding scale to determine what percentage of meals will be reimbursed at the free versus paid rate,[xiii] and a reimbursement calculator tool that helps schools project their reimbursement amount.[xiv] This requires schools to understand their reimbursement rates and meal participation rates; schools may also seek expertise to understand projected increase in participation that often accompany CEP implementation.

These tipping points can vary depending on local factors such as food costs, labor, participation rates, school meal debt policies, and existing revenue sources. Broader financial factors such as the impacts of new state or federal regulations, tariffs, inflation, and supply shortages affect food costs, making expenses more difficult to confidently project. In practice, districts often establish their own minimum ISP benchmarks to guide decision-making. School meal debt may also affect the financial calculus. For several of the districts interviewed, their board had established a policy that no child would be refused a meal and that the district would not withhold graduation or school services from families based on the school meal debt they owed. For these districts, implementing CEP meant they no longer had to track school meal debt or account for that financial loss on their books—making the federal reimbursement CEP offers even more attractive. Below these thresholds, districts may face funding gaps and need to rely on general funds or other sources to cover costs. Above them, CEP can provide more stable funding and support expanded access to meals. Understanding these financial dynamics is central to how districts decide whether to adopt, maintain, or exit CEP.

Provision Two Details

Provision 2 is an alternative federal option under the National School Lunch Program and School Breakfast Program that, like CEP, allows schools to provide meals at no cost to all students, but it operates under a different funding and data structure. Instead of relying on direct certification data to determine reimbursement, Provision 2 uses a "base year" in which school nutrition staff collect household applications and establish the percentage of students eligible for free, reduced-price, and paid meals. These percentages are then applied in subsequent years for a total of four years, allowing schools to serve meals at no cost without collecting applications annually. This model maintains a connection to application-based eligibility while reducing administrative burden after the initial base year. Provision 2 is an especially helpful option for those districts with "hidden poverty" or whose true poverty rates are not well captured by the direct certification process or benefits enrollment. In Texas, this may be especially true for mixed status communities who may fear accessing federal benefits. In districts where their ISP rate is below 55% and the free and reduced income data represents a student percentage well above that point, Provision 2 may be the more financially viable option for that district.

Compared to CEP, Provision 2 captures a broader group of students who may qualify for free or reduced-price meals but are not included in direct certification data. This can include families who meet income eligibility requirements but are not enrolled in programs like SNAP or TANF. As a result, Provision 2 may provide a more complete picture of student need in certain districts, particularly those with moderate levels of poverty where direct certification rates may underrepresent overall eligibility. However, reimbursement under Provision 2 is based on historical data from the base year, which can create financial risk if student demographics or participation patterns shift over time.

From a financial and operational perspective, Provision 2 introduces a different set of tradeoffs for districts. While it allows for universal free meals like CEP, it does not eliminate reliance on application-based data systems and requires careful planning during the base year to ensure accurate representation of student eligibility. Additionally, because reimbursement rates are fixed based on past data, districts may face challenges if costs increase or if the base year percentages do not reflect current need. As a result, districts must weigh CEP's universal meal access and administrative simplicity against Provision 2's application-based structure, which may more accurately reimburse districts for income-eligible students, and its retention of individual eligibility data for Title I and other means-tested funding streams. For the 2025-2026 school year, 12 districts across Texas were enrolled in Provision 2.

Supplementary Funding Streams

State and federal funding are key factors in determining whether and how districts choose to participate in CEP. While the federal reimbursement formula provides the foundation for the program, it does not always fully cover the cost of providing meals to all students, particularly for districts with moderate identified student percentages. Programs eliminated by recent federal budget cuts, such as the Farm to School program, have changed budget calculations. Based on interviews with school nutrition leaders, financial feasibility remains one of the primary barriers to adoption, even in districts that meet eligibility requirements. As a result, state-level investments can significantly influence whether districts are able to move forward with CEP or sustain participation over time.

In several states, including California, Colorado, Maine, Massachusetts, Michigan, Minnesota, New Mexico, and Vermont, policymakers have addressed this gap by providing supplemental funding to support universal free meals. These states use a combination of CEP participation and state dollars to ensure that all students can access meals at no cost, regardless of federal reimbursement levels. This approach reduces the financial risk for districts by covering the difference between federal funding and the actual cost of meal service. In doing so, state funding allows districts to prioritize access, participation, and student outcomes without relying heavily on local budgets to fill funding gaps.

District decisions around CEP are shaped not only by federal policy, but also by the broader funding environment in which they operate. In states without supplemental funding, districts must carefully weigh the financial tradeoffs of participation, often leading to partial implementation or decisions not to adopt CEP at all. In contrast, state investments create more stable conditions for districts to expand access and maintain participation. As interest in universal school meals continues to grow, state funding has emerged as a central lever for enabling a broader and more equitable implementation of CEP.

In some districts, local funding is used to help cover gaps when federal CEP reimbursement does not fully meet the cost of providing meals. Across interviews, district leaders consistently described relying on local funds to close budget gaps, whether through general funds, indirect cost allocations, or support from district leadership. Even in districts participating in CEP, local funding is frequently used to stabilize operations, especially in years when identified student percentages decline or food and labor costs increase.

In addition to district-level funding, some schools benefit from local partnerships and community-based support. This can include contributions from nonprofit organizations, education foundations, or community groups that help offset costs, support specific programs, or address student needs more directly. In some cases, districts also described informal support systems, such as community members helping cover unpaid meal balances or schools coordinating with local food pantries to support families. While these funding streams are helpful and appreciated, they are seldom consistent or scalable.

At the same time, reliance on local funding introduces variability in how districts are able to implement or sustain CEP. Districts with stronger local resources or community partnerships may have more flexibility to absorb financial risk and expand access to free meals. In contrast, districts with limited local funding capacity may be more constrained, even if they meet eligibility requirements. This reinforces a broader finding from the interviews that CEP participation is shaped not only by federal policy, but also by the availability and stability of funding at the local level.

District Characteristics

Table 1 presents demographic characteristics of districts included in the interview and survey samples. The interview data represents 19 districts, while the survey data include responses from 25 districts.

Across both samples, districts exhibited substantial variation in the percentage of students identified as economically disadvantaged. Among interviewed districts, the proportion ranged from 4% to 94%, with a mean of 62%. Survey respondents reported a similar range (11%–94%) and a higher mean economic disadvantage rate of 68%.

District size varied widely in both samples. Interviewed districts ranged from 1 to 114 campuses (mean = 20.3), while survey respondents ranged from 1 to 272 campuses (mean = 23.9).

CEP enrollment status differed between the two samples. Among interviewed districts, 10 reported full CEP participation, 3 reported partial participation, and 6 reported no participation. In the survey sample, 22 districts reported participating in CEP and 6 reported not participating; no districts reported partial participation.

Districts from multiple regions of Texas were represented in both samples. The largest numbers of districts were located in Central Texas and the Greater Houston/Gulf Coast region. Additional representation came from East Texas/Piney Woods, North Texas/DFW, and other regions.

District enrollment size categories indicate representation across a range of district scales. Interviewed districts included systems serving fewer than 1,000 students as well as districts enrolling 50,000 or more students. Survey respondents were similarly distributed across enrollment categories, with the largest number of districts falling within the 1,000–4,999 and 5,000–9,999 student ranges.

Table 1. Demographic Characteristics of Interviewed and Surveyed School Districts

Metric	Interviews	Survey
Number of Districts (N)	19	25
Economic Disadvantage % Range (mean)	4%–94% (62%)	11%–94% (68%)
# of Campuses Range (mean)	1–114 (20.263)	1–272 (23.880)
CEP Enrollment		
Yes	10	22
Partial	3	0
No	6	6
Region		
Central Texas	5	10
Greater Houston / Gulf Coast	4	9
East Texas / Piney Woods	4	3
North TX/DFW	4	1

Other	2	2
District Size		
Under 1,000	5	4
1,000-4,999	3	8
5,000-9,999	4	5
10,000-29,999	3	3
25,000-49,999	1	2
50,000 and above	2	2

Findings

How Districts Decide About CEP

District decisions about CEP rest on the interaction of three factors: the enabling conditions that make adoption viable, the barriers that make it risky or impossible, and the underlying values that shape the decision in either direction. The statewide survey shows the relative weight of these forces in aggregate; the interviews reveal how district leaders navigate these factors in practice.

Decision Frame: Values, Constraints, and Risk

On values, the two data sources are fully aligned. Student-facing motivations drive adoption; administrative motivations, despite often being marketed as a primary CEP benefit, rank last. Among current adopters in the survey, 89% cited improving food access and reducing food insecurity as their main reason for participating, with stigma reduction and increased participation second at 63%. Financial and governance considerations followed at 42%, and administrative efficiency last at 32%. When the same respondents were asked to rank decision factors more directly (Table 2), student access (mean:2.26) and financial feasibility (mean: 2.41) were effectively tied at the top, with a clear gap before the next tier and administrative workload landing last at 3.86.

Figure 1. School Motivations to Participate in CEP

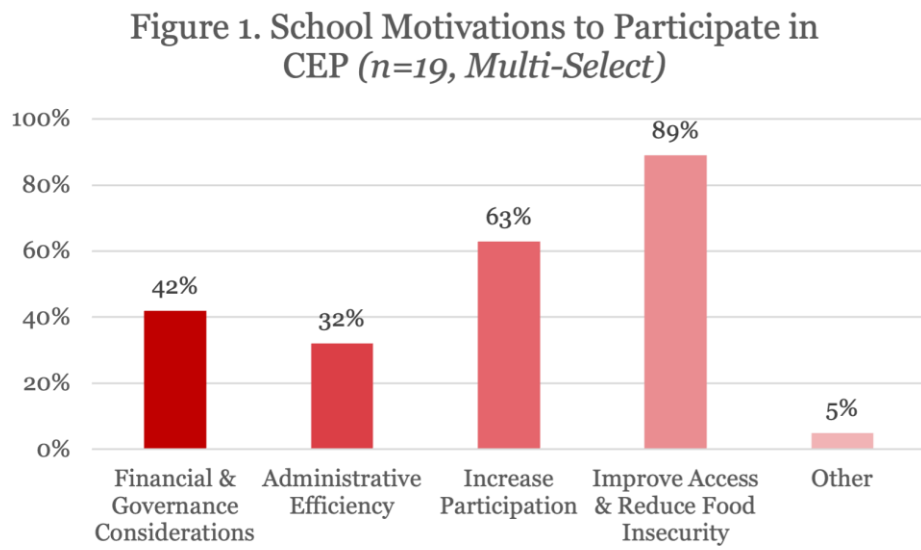


Table 2. Factors Influencing CEP Decision Ranked

Rank	Decision Factor
1	Student access and need
2	Financial feasibility
3	Meal participation and student experience
4	District/network decision-making
5	Administrative capacity and workload

The interviews show why those two top-ranked factors sit so close together. Across the entire interview sample — districts on CEP, off CEP, and partial CEP alike — directors expressed a strong and consistent equity orientation. They described feeding students as central to the school's mission and named stigma reduction as one of CEP's most visible day-to-day benefits.

> *"If you got free lunch, there was kind of a, you know, the stigma behind getting a reduced price or a free lunch, and now by everyone having free, there's no stigma to it."*
>
> — Director, small rural district (on CEP)
>
> *"It gets rid of the stigma where it's like meals are just part of the school day."*
>
> — Director, large urban district (some schools on CEP)

Equity values, however, did not determine adoption on their own. Even directors strongly committed to universal access described declining or scaling back CEP when the financial math did not work, and the framing was nearly identical on both sides of the participation line. As one director from a non-participating district put it, 'we're not here to make a profit, but we still want to break even. When your profit margin is so slim, $250,000 for me is huge.' Another, from a participating district, framed the same constraint from the opposite direction: '[the Food & Nutrition staff] feed every kid if you let them … it's not a matter of desired will. It's a matter of what we are allowed to do under compliance of the federal government.'

The synthesis is straightforward, showing that district nutrition directors in this study share an equity-driven motivational orientation almost universally, and what differs is fiscal capacity and in some cases, administrative commitment. The survey ranking and the interview reasoning describe the same decision in different forms: a sequential filter where equity is the goal, and financial viability is the constraint that decides whether the goal is achievable. The much lower ranking of administrative simplification in both datasets is consistent with the idea that paperwork reduction is real and welcome, but it doesn't drive the decision.

That financial constraint is not static. Among non-participants, 38% identified financial feasibility support (projections, modeling, financial assistance) as a top desired support, even though zero respondents had cited financial feasibility as their actual reason for not participating. The two findings reconcile easily once the structural risk is in view: districts want financial-modeling tools not because they are blocked by money today, but because they need the ability to assess how quickly conditions could shift if benefit policies, enrollment, or food prices move. CEP, viewed this way, is less a one-time adoption decision than an ongoing risk-management posture. Nutrition programs are expected to be financially self-sustaining, and directors often feel a lot of pressure to ensure that they will not face shortfalls.

Enabling Conditions

ISP Thresholds: Eligibility vs. Viability

The strongest internal enabler of CEP adoption is sufficiently high Identified Student Percentage (ISP). Federal eligibility begins at 25%, but in practice, district leaders and regional Education Service Centers (ESCs) alike treat that as a floor rather than a working target. Across the interviews, directors converged on a viability range that sits considerably higher — at least 55% for break-even operations, and 62% or above for maximal sustainability. The federal eligibility threshold and the financial viability threshold, in other words, are different numbers, and districts know it.

> *"I think that, honestly, I wouldn't even consider CEP without it being probably at least 55 percent [ISP]. I would prefer 60. I mean, I know, you know, 63 is going to be pretty much your break[even]."*
>
> — Director, low-poverty suburban district (not on CEP)

Several directors described doing the math themselves: at a 60% ISP multiplied by the federal 1.6 multiplier, a district recovers roughly 96% of meals at the free reimbursement rate, which one described as the point at which costs are reliably covered. Another director, working with their regional ESC on the question, was told plainly that 'financially it really needs to be around 80% [reimbursement rate]' — which translates to a 55% ISP. Districts operating well above the viability range, particularly small high-poverty rural districts in the interview sample, report stable or revenue-positive operations and have sustained CEP for multiple cycles. Districts that sit barely above the federal eligibility line report the opposite.

Leadership and Board Alignment

A second enabler is administrative and board-level support. Several directors who successfully adopted CEP described leadership backing as a precondition rather than an outcome, with one saying that their superintendent's 'biggest thing was to get the kids fed' and that this priority cleared the way for adoption even when financial concerns were raised. In other districts, that internal alignment came only after multiple presentations to district leadership, making the case for CEP. Anecdotally, and in contrast, a couple of districts who do not participate in CEP or are looking at ending their participation in CEP cited their leadership's concerns around income data gathering and other risks associated with CEP, even though both districts' ISP rate is relatively high.

External Technical Support

External support, particularly through Education Service Centers, also functions as an enabler. ESC's receive federal funding passed down from the USDA through the TDA to provide NSLP and SBP administrative support to the districts in their region. Unlike many other services that ESCs provide, districts are usually not directly paying for ESC nutrition team support. ESCs emerged in the interviews as the single most consistently praised implementation support. Directors described ESCs as the entity that validates CEP campuses, advises on grouping and clustering strategies, models financial scenarios, provides training, and serves as the first point of contact when questions arise. Several said explicitly that the validation work that was a major adoption hurdle now sits primarily with ESCs, which has made the technical lift considerably lighter. It should be noted that ESCs across the state provided differing levels of support or training due to resource and budgetary fluctuation.

> *"If they think we need training on this [CEP], we tell them [our ESC] we need training on this. They'll make it happen. So, our ESCs are very, very supportive in everything."*
>
> — Director, small rural district (on CEP)

Where ESC support is engaged, implementation barriers fall sharply, suggesting that scaling existing regional capacity is a more efficient lever than building parallel structures. This matters most for small, under-resourced districts where nutrition directors wear multiple hats and ESCs fill gaps in data analysis and financial modeling. One discrepancy worth noting: regional ESCs are recommending differing ISP thresholds for financial viability, which could reflect genuine geographic variation in operating costs or inconsistency across the state — this warrants further investigation. This could be attributed to nutrition directors becoming confused between the reimbursement rate and the ISP.

The Texas Department of Agriculture (TDA), by contrast, was referenced primarily as the compliance and policy authority rather than a frontline support resource. Directors described a layered routing pattern in which ESCs serve as the practical first contact, and TDA is consulted through ESCs when a question requires escalation. As one director described it, 'TDA recommends that we go through our ESC. If it's something that we need to confront or talk to TDA about, we have to go to our ESC first because they may know the answer. If they don't, they find that answer for us.' This reinforces the central role of the regional layer in connecting state policy to district practice.

External and Structural Constraints

Financial Viability Barrier

On barriers, the survey data and interview data diverge sharply; however, a close reading of the data sources reveals the friction point. Specifically, the issue is not whether districts qualify for CEP, but whether participation is financially sustainable once they do. On the survey, eligibility fit dominates as the reason for non-participation: 62.5% of non-participants pointed to it, while exactly zero respondents cited financial feasibility. Read alone, this would suggest that money is not really the issue rather, districts that don't participate simply don't qualify. This framing, however, obscures an important distinction between qualifying for CEP and being able to afford to participate.

Table 3. Reasons for Not Participating in CEP

Reason	Response Rate
Eligibility and program fit	63%
Decision-making and priorities	25%
Other (write-in)	13%
Financial feasibility and sustainability	0%
Capacity, information, and readiness	0%

The interviews tell a different story. Among the six non-participating school districts, financial non-viability — not eligibility — was the most frequently cited barrier. Several reported being CEP-eligible but choosing not to apply because reimbursement, given their ISP and current food costs, would not cover operations. These districts fall into a financial gap, where eligibility is met but funding is insufficient. In these cases, districts have enough identified students to qualify, but not enough reimbursement to make participation viable. The framing was nearly identical across multiple districts in this category.

> *"We do not participate in CEP because we do, like we qualify, but we would lose a lot of money. And so we can't afford to lose all the money that it would require."*
>
> — Director, small district (qualifies, declines)
>
> *"For us right now it's just not [financially feasible]. I would love to feed every kid for free all year but … in this current economic climate with groceries costing an arm and a leg … it just isn't feasible."*
>
> — Director, mid-sized district (not on CEP)

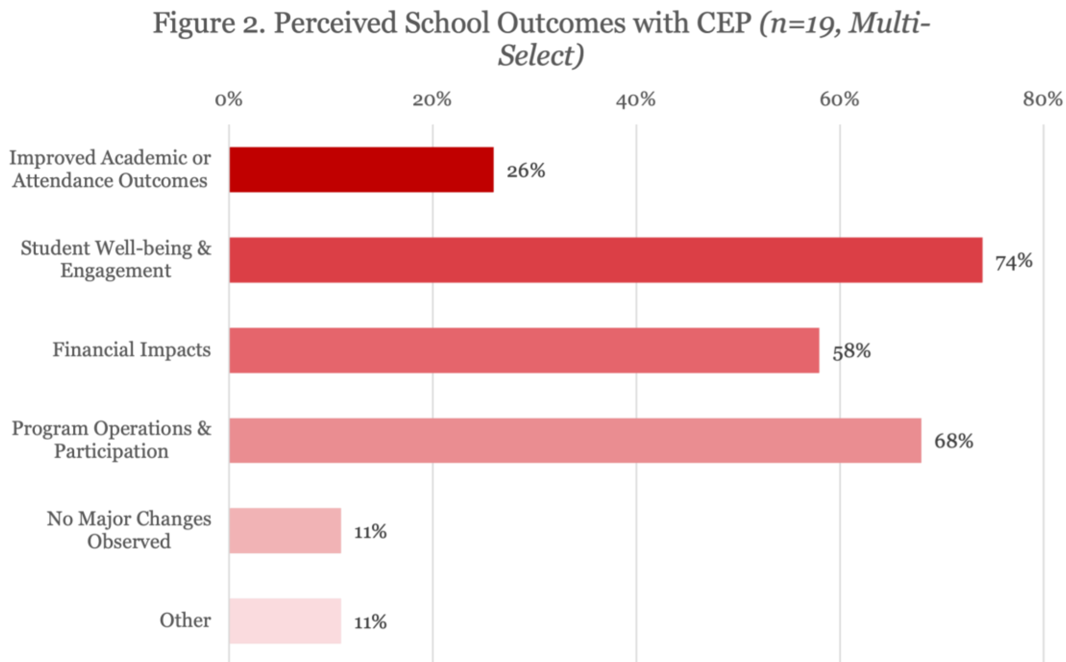
The divergence reflects sample composition. Survey non-participants tend to be districts where eligibility is the binding constraint — low-poverty schools where the conversation never reaches the financial-modeling stage. The EDOT interview sample, by contrast, includes several districts whose ISP rates are high enough to qualify but not high enough to sustain CEP under the current 1.6 federal multiplier. In fact, over 10 districts emailed back to decline an interview, stating that their ISP rate was simply too low to qualify and therefore they would not have much to say via interview.

Realities of a CEP Budget

How does CEP look financially in practice? Reading the survey and interviews together, three patterns emerge, sorted by ISP.

Districts above roughly 62% ISP (high poverty) generally report stable or revenue-positive operations under CEP. In the survey, 58% of current participants reported financial benefits including reduced meal debt and program stability, and the interviews include several long-tenured CEP districts that describe operating in the black, with one director reporting that they 'don't have any [meal debt]. And we're profiting every month.' Another, from a district with an ISP near 88%, described being able to 'pay our own payroll' and 'pay all of our own bills' without drawing on the district's general fund. These findings suggest that once districts reach a sufficiently high ISP, CEP shifts from a financial risk to a stable, and often self-sustaining model.

Figure 2. Outcomes Since Implementing CEP



Districts in the 50% to 62% ISP range describe CEP as viable but precarious — financially fragile, sensitive to participation rates, food costs, and any decline in ISP at their next four year cycle. These districts often run with deliberate cost-control strategies: careful menu design, grant funneling, and layered alternative programs. Several directors in this band described their next CEP cycle as an open question, contingent on whether reimbursement or eligibility rules change.

> *"Unless something changes with how they're identifying those kids or up the [ISP] percentage, the [reimbursement rate] multiplier … then it will be a serious discussion whether we'll get to do [CEP] again for our third cycle."*
>
> — Director, small rural district (on CEP)

Districts below approximately 50% ISP describe CEP as a clear net loss under current reimbursement terms, regardless of whether they technically qualify. The arithmetic shows up repeatedly: a 25% ISP multiplied by 1.6 covers only 40% of meals at the free rate, which several directors described as nowhere near enough to cover food and labor costs. In response to the limitations of the current formula, districts consistently pointed to a single policy lever: the federal multiplier. Lowering eligibility, multiple respondents observed, does not help if the reimbursement formula doesn't move with it.'

> *"I just think that increasing the multiplier would be nice. I think that's the only way to make it more feasible ... to give you a larger than a 1.6 multiplier for how many you can claim at the free rate."*
>
> — Director, large rapidly-growing district (partial CEP)
>
> *"[The State needs to] also increase the multiplier for CEP, reducing the ISP to allow campuses to qualify doesn't help if it's not supported with additional reimbursement."*
>
> — Statewide survey respondent

Data Loss and Downstream Funding Anxiety

A smaller but persistent third barrier surfaced in both data sources: concern about losing the data that household applications generate. Free-and-reduced applications feed into Title I allocations, technology funding, and other downstream resources, and several directors described real anxiety about what happens when those forms go away. As one put it, 'You're no longer going to have those meal applications. That's scary to a district.' Survey write-ins surfaced an equivalent concern from an early college program, where reduced application submissions complicate Access Outcomes Based Measurement (AOBM) requirements. This barrier will be discussed at more length later in this report.

Living With CEP: Operational Realities After the Decision

Beyond the participation decision itself, both datasets surface a consistent set of operational realities that shape whether CEP, once adopted, can be sustained. Adoption is not the same as resolution. These are the day-to-day mechanics — data, money, staffing, support — that determine whether the program functions as designed.

Fragile Environment

CEP makes a district's nutrition program directly sensitive to external policy and demographic shifts that the district does not control: SNAP and Medicaid eligibility rule changes, enrollment fluctuations, neighborhood demographic change, hurricane and weather disruptions, even TEA takeover dynamics in some cases. Multiple directors described this exposure as a permanent operating condition when on CEP. Three pressures recur most consistently across the interviews: rising food costs, policy-driven fluctuations in direct certification rates, and erosion of ISP from a combination of federal, demographic, and pipeline factors.

Rising Food Costs

Rising food costs surfaced as a direct concern in 35% of the qualitative sample, cutting across participation tiers but sharpening most for districts operating below the 90% reimbursement rate threshold. Directors with CEP experience described food cost increases as the financial risk programs most consistently underestimate; one that doesn't show up in the initial reimbursement math but compounds over time as commodity prices climb faster than federal rates adjust. The pattern showed up in concrete terms across the sample, with districts reporting double-digit percentage increases on core procurement staples like chicken, beef, and produce within a single budget year. These increases don't operate in isolation: a district already absorbing ISP erosion faces the squeeze from two directions at once, and the fixed 1.6 federal multiplier adjusts for neither.

> *"Once you get into anything like under 90% of your meals free, where you're subsidizing 10% of your meals or more, it starts to get risky. Because I think what people don't anticipate is the rise in food cost."*
>
> — Director, low-poverty suburban district (not on CEP; prior CEP experience)
>
> *"There was an increase in chicken [costs], like 10% increase in chicken, and 15% increase in beef, and 15% increase in all of our fruits and vegetables. And it has dramatically affected our budget this year as well."*
>
> — Director, small rural district, (on CEP, third year)

A subtler concern surfaced in the survey's open-ended responses: at high free-meal splits, the pressure to control costs can push menus toward processed foods, which directly conflicts with child nutrition program goals. One respondent operating CEP at a 76/24 free-to-paid split described feeling the structural pressure to lean into processed foods despite the program's healthy-eating mission, a tension that points to a real policy problem rather than an objection to CEP itself. Other districts went in the opposite direction to control costs, investing in labor and scratch cooking to ultimately reduce food costs. Both high and low poverty districts noted significant decreases in food costs when they reoriented toward purchasing individual baseline ingredients versus "ready-made" and typically, more processed, options. This strategy offers hope to both reduce costs and potentially improve both nutrition and participation rates, and will be covered in more detail later in the report.

Operational constraints compound the cost pressure. Limited staffing, insufficient kitchen capacity, and logistical challenges related to meal service can restrict a district's ability to scale up participation. For example, increasing meal access through models like breakfast in the classroom requires coordination across school staff, scheduling adjustments, and additional labor. Districts that lack the capacity to implement these changes may struggle to fully realize the benefits of CEP or expand it to additional campuses. Staffing attitudes toward the value of school nutrition also affect school meal participation and therefore financial viability. Some districts described staff that reminded children to eat breakfast, directing them to the cafeteria before entering class. These staff members played a key role in making the nutrition program work well, even if they did not serve on the school nutrition team. Other school staff, especially those dubious of the nutritional value of school meals, were either neutral or made decisions that negatively impacted school meal participation, student experience, and nutrition revenues.

Direct Certification

The federal benefit landscape was the single most common external concern in the interviews, and it works through direct certification. ISP depends on student enrollment in SNAP, Medicaid, TANF, and similar programs as described earlier, so when eligibility rules for those programs tighten, ISPs fall, sometimes sharply, even when local need has not changed. Several directors described their direct certification rates dropping by double digits over a single year as families lost benefits, with one reporting a fall from the low 90s to roughly 68% ISP after federal SNAP rule changes.

> *"The government has been … doing a lot of changes where people can't go and get on food stamps and Medicaid and all these kinds of SNAP [benefits] like they used to."*
>
> — Director, mid-sized rural district (on CEP)

Calculating ISP correctly, monitoring it through enrollment changes, and grouping campuses to maximize the rate is non-trivial technical work, particularly for larger districts experiencing growth or demographic shifts. One director from a rapidly-growing district described pulling fresh direct certification numbers monthly and continuously re-modeling which campuses can claim which rates, a level of effort closer to ongoing financial management than to one-time program enrollment.

Changes in ISP Due to Federal Benefit Policy, Demographic Shifts, & Benefit Gaps

The cumulative effect of these pressures is visible in the data. For the 20 districts surveyed, the districts lost 2.46 ISP percentage points on average since 2025, with five districts losing between 5.52 and 7.1 percentage points. Just a 5 percentage-point decrease in ISP leads to an 8 percentage-point decrease in the district's reimbursement rate, which can mean tens of thousands of dollars for midsize districts to even millions for large districts that administrators will l have to find elsewhere. All but three districts had lower ISP rates than the year before, directly and negatively impacting the federal reimbursement that these districts receive. Three forces drive this erosion.

The first is federal benefit policy. Tightening eligibility rules for SNAP and Medicaid mechanically reduce the share of students who qualify for direct certification, even when local need has not changed. This pattern is well-documented in the interviews and consistent with what districts described.

The second is neighborhood-level demographic change. One director described the slow erosion of ISP as middle-class families move into a previously lower-income area, gradually pulling the district away from the financial-viability threshold without any change in administration or program design. Another pointed to the upcoming five-year recertification cycle, where their reimbursement rate is projected to fall from 88% to 61%, a swing large enough to change the entire financial picture even with the same underlying student population.

The third is the gap between which families are eligible for benefits and which families actually enroll. A theme that surfaced repeatedly in the interviews, but that has not been formally coded or analyzed in the qualitative findings to date, is that most districts in the sample do not actively connect families to the SNAP, Medicaid, and TANF programs that determine their direct certification rates. This is a notable gap given how often the same districts cite federal benefit policy changes as the primary external threat to their ISP. The chain runs in one direction: enrollment in SNAP, Medicaid, and TANF feeds direct certification, which feeds ISP, which determines whether CEP is financially viable. But districts largely experience that chain as something happening to them rather than something they actively shape. Multiple directors described having no district-wide infrastructure for benefits navigation, with one noting that the only meaningful family-side support comes from individual parent support specialists rather than any coordinated program. Directors at both a small high-poverty rural district and a very small rural district said similarly that they do not engage in benefits navigation, with the latter explicitly citing capacity limits.

> *"And that's [Federal Benefits Navigation] one thing that we've, we as our [Food & Nutrition] department, would love to see the district have a better understanding of the importance of SNAP and having those people that could be a resource to families to help them through that application."*
>
> — Director, large urban district (Some schools on CEP)

The implication is meaningful for how this report frames the relationship between federal benefit policy and CEP feasibility. Tightening SNAP and Medicaid eligibility absolutely lowers ISP rates and makes CEP harder to sustain. Districts often attribute fluctuations in ISP rates to federal policy changes. Those fluctuations are also shaped by local enrollment practices that influence whether eligible families complete applications. Where benefits navigation is absent or under-resourced, ISP rates reflect not only the eligibility rules in effect but also the share of eligible families who actually complete enrollment. This points to a possible upstream lever for protecting CEP viability that the current dataset does not capture in detail: stronger benefits-connection infrastructure, whether through district staffing, school-based partnerships with SNAP outreach organizations, or coordination with community health and social service providers, could partially offset the ISP erosion that federal policy changes produce. None of the interviewed districts described this as a strategy they are actively pursuing, but several described the absence of such a strategy as a real gap they would want to address.

Data Themes

Two themes shape life under CEP: districts lose the data that household applications generated, but they also gain meaningful relief from the workload those applications required.

Application Data Loss

The loss of application data is the trade-off that defines CEP. The administrative simplification adopters celebrate also strips districts of a key data feed for Title I allocations, technology funding, and other allocations historically tied to free-and-reduced data. This concern showed up across both data sources — in survey write-ins about Access Outcomes Based Measurement requirements at early college programs, and in interviews from districts that ultimately adopted CEP but described real anxiety about the data they would lose in the process.

> *"You're no longer going to have those meal applications. That's scary to a district."*
>
> — Director, large urban district (some schools on CEP)

Application Burden

Both data sources confirm that CEP reduces administrative burden meaningfully, and both confirm that the reduction is welcome but not what drives the adoption decision. Survey respondents ranked administrative capacity last among five decision factors (Table 4), and only 32% of adopters cited administrative efficiency as a motivation — less than half the rate of food access and stigma reduction. The interviews echo that pattern. Directors uniformly described the elimination of free-and-reduced applications as a real relief, particularly for small offices, with one calling it among the program's biggest benefits 'that people don't talk about,' and another saying simply, 'I hate applications.' But every director who described that relief also placed it well behind financial and student-facing concerns when explaining why the district participates or does not.

On the implementation side, the survey and interviews map cleanly onto each other. Among adopters, 47% reported no significant challenges during rollout, with the biggest reported friction points being family communication and engagement (26%), financial sustainability (21%), staffing and operations (16%), and eligibility/claiming/documentation (11%). The interviews fill in the texture: directors who described difficult rollouts pointed to point-of-sale system reconfigurations, student coding changes between systems, and the work of validating CEP campuses. Districts with prior CEP experience or strong external support, by contrast, described implementation as relatively easy once systems were established.

Table 4. Implementation Challenges Faced by CEP Adopters

Implementation Challenge	Survey Rate (n=19)	Interview Echo
No significant challenges	47%	Districts with prior CEP or ESC support
Family communication and engagement	26%	Form-timing, language, mistrust
Financial feasibility / sustainability	21%	Persistent across all participation tiers
Staffing, operations, logistics	16%	POS systems, schedule changes
Eligibility, claiming, documentation	11%	Direct certification tracking, ISP modeling

Outcomes and Impacts

Outcomes reported across both data sources fall into three categories: meal participation trends, perceived impacts on students and families, and the alternative pathways districts pursue when CEP is not financially viable. On all three, the survey and interviews tell consistent stories, though the qualitative data adds important texture that the survey alone cannot.

Students and Families

The two data sources are most strongly aligned with their perceived impact on district families. Student well-being and engagement was the most frequently reported outcome in the survey at 74%, and the interviews repeatedly described stigma reduction, eliminating meal debt, and reduced family financial stress as the most visible day-to-day benefits of CEP. The qualitative voice on this point is consistent across districts:

> *"When all students receive free meals, it takes away the stigma many middle schoolers feel who do receive free or reduced lunch. Fitting in during the middle schools is a priority to our students."*
>
> — Statewide survey respondent

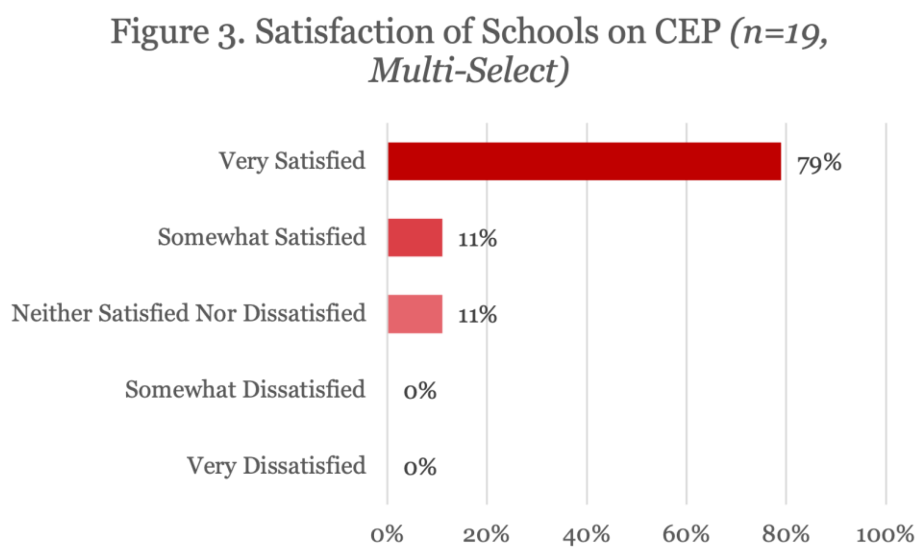
> *"And so that allows our kids that maybe wouldn't be able to afford lunch to actually have lunch every day and breakfast every day. Just to have the option, whether they want to eat or not, just to have the option is a good thing."*
>
> — Director, small rural high-poverty district (on CEP)

Family-side benefits include the elimination of application paperwork — which directors specifically identified as a barrier reducer for households facing language barriers, immigration-related fears, or unstable conditions — the disappearance of meal debt, and direct financial relief at scale. One mid-sized district director, having calculated cumulative family savings during their tenure, described CEP as 'an economic boon for this area' with significant money flowing back into the local economy.

Access, Stigma Reduction, Meal Participation

Both datasets point to meaningful participation gains under CEP, with the magnitude varying by starting point. In the survey, 68% of current participants reported outcomes related to meal program operations and participation, the second most frequently cited outcome category. Satisfaction was uniform: 79% very satisfied, 0% dissatisfied, and 84% would recommend CEP to similar schools, which is a remarkably clean signal even accounting for the modest sample size (Figure 3).

Figure 3. Overall Satisfaction With CEP



Interview directors described participation gains in similar but more nuanced and textured terms. Districts with already-high participation before adoption saw smaller marginal increases, while districts adopting from a lower baseline reported double-digit gains. One small high-poverty district reported reaching 90%+ daily meal participation under CEP. A rapidly growing district described its CEP campuses serving 'a ton of kids' with middle and high school participation in the mid-80s and elementary participation close to 80%. A small rural district that had recently adopted CEP reported a roughly 12% participation increase in the first year. And several directors made the point that universal free meals raise participation across income distribution, not just among historically eligible students:

> *"Yes, yes, it [meal participation] did [increase] … even parents that make all the money, like if my kid can eat for free, like, heck yeah, they're growing teenagers, they're expensive."*
>
> — Director, very small rural district (not on CEP; observed historically during COVID-era Free Meals)

While CEP removes the cost barrier for students, participation is still driven by whether students want to eat the meals being offered. Districts that prioritize menu quality, student preferences, and consistency in meal service are more likely to see higher participation rates, which in turn supports program sustainability. A key area within this is the balance between scratch cooking and pre-prepared foods. Some districts have invested in scratch cooking as a method to improve meal quality, increase student satisfaction, and differentiate their programs. Scratch cooking can also lower food costs, provide greater flexibility in menu planning, and increase opportunities to incorporate fresh ingredients. However, it requires investment and commitment to infrastructure, including trained staff, appropriate kitchen facilities, and sufficient preparation time. Districts with the capacity to support scratch cooking often view it as a long-term investment in program quality and participation. At the same time, many districts continue to use pre-prepared foods as a practical solution to staffing and operational constraints. These options can reduce labor demands, simplify meal preparation, and ensure consistency across campuses. For districts facing staffing shortages or limited kitchen infrastructure, pre-prepared foods may be necessary to maintain operations. Successful programs often find a balance between these approaches, using pre-prepared items where needed while incorporating scratch-prepared elements to enhance quality and appeal.

Because it can be difficult to introduce new foods, ISDs adopted several means of receiving feedback from students, parents, and staff. Taste testing, focus groups, and feedback sessions are all used by ISDs to boost participation and gather data on what is popular. One ISD puts out a menu item 3 times before making a final decision on whether to permanently add it to the current menu, and another allows students to sample items before putting it on menus (e.g., One small rural district gave students a potsticker sample on Asian Food Day). Another suburban district uses a Block Party every summer to put on a food show and test nearly a hundred food items. These community events provide not only an opportunity to garner feedback on menu items but also help nutrition directors to exhibit the quality and nutritional value of their food to staff, parents, and the community, providing more buy in. These data gathering methods are essential in increasing meal participation through student preferences.

For breakfast, engagement is trickier than lunch. Breakfast-in-classroom is contested, and therefore meal participation in breakfast is less than with lunch; BIC requires buy-in from janitorial staff, administrative staff, and teachers. Grab-and-go breakfasts, breakfast carts, kiosks where buses get off, and second-chance breakfast all help increase uptake in breakfast participation if BIC is not agreed upon. Several districts with high sports participation especially noted the importance of offering breakfast for extended morning hours.

For lunch, spicy food, cheesy food, and international foods are popular and increase meal participation. One mid-sized district specifically mentioned trying to stay up to date with food trends and scoping out both Starbucks and Buc-ee's to understand what kinds of foods students enjoy eating. They have experimented with ramen bars, a Mexican line, and a nacho day; they cook macaroni cheese, spaghetti sauce, taco meat, and enchiladas in house. Participation increased with "something fun…a cookie pizza." Yet another large suburban district followed popular social media platforms like TikTok to identify trending food items and recipes. Another rural district held an ice cream contest and labeled their foods with Renaissance-style names to increase interest. For meal diversity, they have an "International day" on Wednesdays and have learned that Mexican, Asian, and Italian food are popular. Some districts have introduced limited-time or one-time menu offerings to increase student interest and boost meal participation. Others have found that offering customizable meal options, particularly at the high school level, can improve participation, such as implementing build-your-own meal lines similar to popular fast-casual restaurants. Menus frequently have savory and sweet combinations, and while there are vegetarian options every day, it is a "hit or miss" on whether students eat it. One of the challenges with a diverse menu is maintaining consistency across multiple schools in a larger ISD.

While experimenting with novelty foods, nutrition departments also understand where their students come from and what they may be open to trying. They know that sometimes students just want "old Cholula and some fried breakfast potatoes" or "those little individual powdered and chocolate covered donuts," and recognize when enticing and familiar foods bring in more students and increase participation. Consistent menus help maintain participation because students "have their favorites, and they know what their favorites are." Nutrition departments also recognize that, in highly underserved areas, it is helpful to have nutritious and calorie-dense foods (e.g., a baked potato bar).

Operational Outcomes

For some high-ISP districts operating well above the viability threshold, CEP generates more than financial stability — it creates enough margin to reinvest in program infrastructure. A small number of districts described using CEP-enabled revenue to fund kitchen equipment upgrades and system improvements that would otherwise have been deferred, with one noting that after their first year in the positive on CEP, they went ahead and replaced equipment they'd been putting off: "Our kitchens are only 11 years old, but we went ahead and replaced a few things... Yeah, we replaced a few ovens." For these districts, CEP functions less as a break-even mechanism and more as a modest engine for program improvement over time.

Alternative Strategies Where CEP Is Not Viable

A finding that surfaces primarily in the interviews, and that the survey does not capture directly, is the deliberate use of alternative nutrition programs in districts where CEP is not financially viable. Non-participating districts in the interview sample described layered approaches involving the Child and Adult Care Food Program (CACFP) at-risk afterschool meals, second-chance breakfast, fresh fruit and vegetable programs, weekend backpack programs, in-school food banks, partnerships with regional food banks, and community donor coverage of student meal debt. These were not described as substitutes for an absent commitment, but as the available toolkit for advancing similar equity goals within tighter financial constraints.

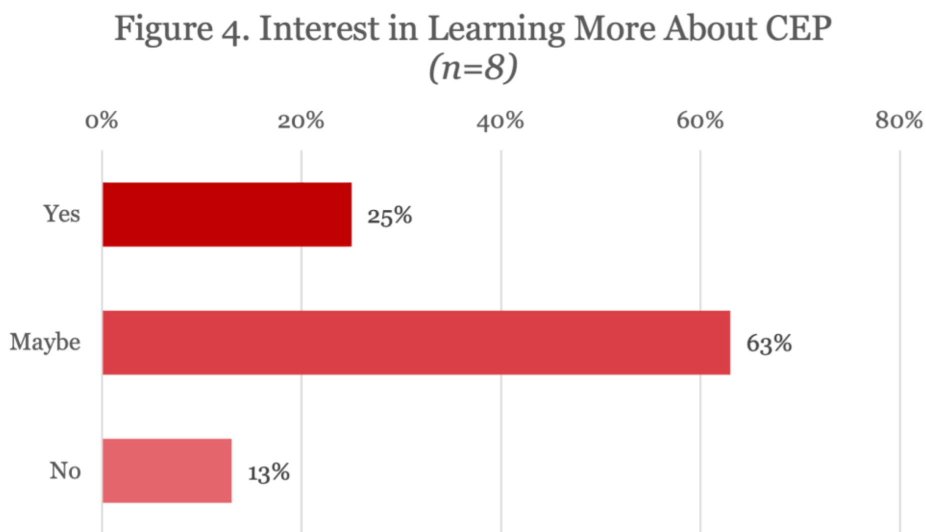
There are some differences between rural and urban ISDs' implementations of CEP and these alternative approaches. Regardless of whether they participate in CEP, at least 6 rural ISDs interviewed are also supported by the USDA DoD grant for fresh fruits and vegetables. Smaller ISDs in rural areas appear better able to support underserved students who may not be getting food outside school. In mixed-geography ISDs that cover a large geographic area, such as one of the larger consolidated districts surveyed, implementation of CEP can be difficult because of the variation between campuses. However, the variety and accessibility of different kinds of foods in rural areas is limited, and urban ISDs may have an easier time sourcing Buy American vendors.

Reinforces Equity Motivation Even Among Non-Participants

The portfolio approach reinforces the broader finding from earlier: non-participation in CEP rarely reflects a rejection of the program's purpose. Districts that decline CEP are often actively pursuing alternative pathways to similar outcomes within the financial limits they face.

Districts in this study share an equity-driven view of student meals almost universally, regardless of their CEP status; differences in adoption mostly reflect differences in fiscal capacity rather than differences in commitment, although district leadership outside of the nutrition department may still prove a barrier to CEP adoption, even for high ISP districts. **The single most actionable policy lever to emerge from the combined data is the federal reimbursement multiplier**: lowering eligibility without raising the multiplier produces little benefit for districts in the 25–50% ISP band, who qualify on paper but cannot sustain the program in practice. Where Education Service Center support is engaged, the implementation barriers fall meaningfully, a finding that points toward scaling existing regional supports rather than building parallel new structures. Administrative simplification, frequently promoted as a primary CEP benefit, shows up in both datasets as real but secondary; outreach and recruitment messaging built around paperwork reduction will under-perform messaging built around student access and equity.

Figure 4. Interest in Learning More About CEP



Non-participation in CEP rarely represents a closed door. Nearly nine in ten survey non-participants remain open to future engagement, and most non-CEP districts in the interview sample are actively running alternative nutrition practices that pursue similar equity goals through different, albeit less formal, consistent, or systemic, means. The pathway from non-participation to participation, in short, runs through reimbursement adequacy, eligibility math, and alternative means to gaining income datasets, not through a values shift.

Policy Implications

Federal Policy

Findings from district interviews and research highlight that federal CEP policy is functioning to expand eligibility but is not consistently enabling sustainable participation. The current reimbursement structure, particularly the reliance of the fixed 1.6 multiplier, creates a gap between eligibility and financial viability. As a result, many districts that qualify for CEP are unable to adopt or maintain it without absorbing additional costs. For 2026 and beyond, policy makers have addressed how to increase access to the program but have not fully addressed the conditions needed for long-term scalability.

The Buy American provision further illustrates how federal policy decisions, while aligned with broader economic goals, can create operational challenges at the district level. In practice, the requirement directly shapes how districts work with vendors, plan menus, and manage costs. Compliance depends heavily on vendor availability and supply chains, which vary significantly by region. Districts reported mixed experiences, with some able to adapt relatively easily while others face ongoing difficulty sourcing compliant products, especially in rural areas. Inconsistent availability, particularly for fresh produce, often requires districts to frequently adjust menus and procurement strategies. While the intent of the policy is clear, the responsibility for implementation falls largely on school nutrition programs, placing added strain on districts with limited staffing capacity or fewer vendor options.

Recent USDA nutrition guidelines introduce another layer of complexity for districts implementing CEP. Changes to requirements around added sugars, sodium, and milk options require districts to adjust menus, procurement practices, and in some cases, kitchen operations. While these guidelines are designed to improve student health outcomes, districts reported that implementation can be challenging due to constraints such as limited storage space, equipment capacity, and staffing. For example, schools are now allowed to serve whole milk at lunch, but most district nutrition directors, when asked about this change, said they would not make changes to their menu. These changes often require retraining staff and renegotiating vendor contracts, all while maintaining participation and staying within budget. The directors also expressed frustration—why lunch and not breakfast, when a higher fat content could slow carbohydrate absorption? Where would this extra milk be stored? During these interviews, nutrition directors expressed the feeling that they were not engaged in overall policy or administrative decision making, even when policies affected their ability to manage costs or feed their students. The timeline for implementation, including proposed rules, public comment periods, and phased rollouts, has also created uncertainty for districts attempting to plan ahead.

Federal grant programs, including the Department of Defense (DoD) Fresh Fruit and Vegetable Program and other USDA-supported nutrition grants, play an important supplemental role but are not consistent enough to serve as a stable funding source. Districts noted that these programs can enhance menu quality and provide access to fresh produce, but funding levels, produce quality, eligibility, and availability can change from year to year. This variability makes it difficult for districts to rely on these programs as part of long-term planning. Instead, they are often used to enhance existing programs when available, rather than to support core meal operations.

Research From Other States

Research from the Center for Policy Research at the Syracuse University, using New York State administrative data and a difference-in-differences design, finds that CEP increases both lunch and breakfast participation and does not worsen student weight outcomes; if anything, it lowers rates of obesity in many schools.[xv] Local school food service revenues decline after CEP adoption, but increased federal reimbursements more than offset this decline on average, and there is no evidence that CEP adoption crowds out instructional spending. The same research notes, however, that rural districts experience larger revenue impacts and may face negative fiscal effects, including a food service funding gap in some cases. Rural districts experience larger fiscal impacts from CEP, including a food service funding gap not seen in other district types, but more pronounced reductions in student obesity than both metro and town districts, suggesting rural locations might be the most responsive to CEP.

A 2021 NBER working paper by Handbury and Moshary noted that an underappreciated benefit of CEP that extends beyond direct program participants: its effect on local grocery prices.[xvi] The study finds that local adoption of the CEP causes households with children to reduce their grocery purchases, leading to a 10% decline in grocery sales at large retail chains. Retailers respond with chain-level price adjustments: chains with the most exposure lower prices by 2.5% across all outlets in the years following adoption, so that the program's welfare benefits propagate spatially. Because grocery chains set prices uniformly across stores rather than store by store, the price reductions spread to communities, including those without children, that may not have direct CEP exposure in their local schools. Using a stylized model of grocery demand, the authors estimated that, by 2016, the indirect benefit had reduced grocery costs for the median household by approximately 4.5%. This finding suggests that the fiscal return to CEP adoption is broader than what district-level reimbursement analyses capture, and that community-level economic benefits should be factored into how policymakers and advocates frame the value of the program.

High-Uptake States' Models

States that have successfully expanded access to no-cost meals at lower ISPs have generally taken one of two approaches. Several states – including Colorado, Minnesota, New Mexico, and Michigan – have adopted statewide universal meal policies that use state dollars to fill the gap remaining after federal reimbursement is maximized.[xvii] These programs typically require schools to participate in NSLP/SBP and to claim federal reimbursement first, with the state then reimbursing eligible remaining costs. Other states, such as North Dakota, have expanded access through targeted supplements rather than universal mandates by extending income eligibility thresholds so that families up to 225 percent of the federal poverty level receive free meals, effectively converting meals that might otherwise be paid or reduced-price.[xviii] Across high-uptake states, common design features include explicit requirements to maximize federal funding before drawing on state resources, stable and recurring appropriations that enable district-level planning, and investments in administrative capacity – including direct certification systems and training – that raise ISP and improve claiming accuracy.

Lincoln Public Schools (LPS) in Nebraska offers a useful model for how districts can strategically expand CEP uptake following an eligibility reassessment.[xix] In the 2024-2025 school year, LPS added 15 schools to the CEP program, bringing total participation to 23 sites and expanding the number of students receiving free meals from approximately 3,500 to 12,000. The district's approach was deliberate: administrators reviewed the success of the original eight CEP schools over multiple years before pursuing expansion. The district's Director of Nutrition Services cited both student wellbeing and administrative simplification as driving goals, noting that CEP removes the need for individual household applications at participating schools and allows the district to eliminate unpaid meal balances for CEP students and families. The Lincoln example also illustrates the operational co-benefits of CEP: reduced paperwork burden on nutrition staff allows resources to be redirected toward meal quality and student outreach rather than application processing and debt collection.

Rise & Shine Illinois represents a state-level public-private infrastructure that has helped districts navigate the administrative and outreach dimensions of school meal programs, including CEP.[xx] The coalition, a partnership of Share Our Strength's No Kid Hungry campaign and the Greater Chicago Food Depository, was launched in 2012 in response to a recommendation of the Illinois Commission to End Hunger, with a mission of connecting students with breakfast, after-school meals, and summer meals. Illinois was among the first three states to pilot CEP beginning in 2011-2012, and Rise & Shine's infrastructure helped support that early rollout by working with schools on alternative breakfast service models such as Breakfast in the Classroom, Grab 'N' Go, and Second Chance Breakfast. The Illinois experience illustrates the value of sustained, coordinated outreach support alongside eligibility policy: expanding CEP access requires not only that schools be financially able to elect the program, but that they have the technical assistance and community engagement capacity to implement it well and maximize participation once enrolled.

Texas Policy

At the state level, district interviews and research point to a clear role for policy in stabilizing and expanding CEP participation. While federal policy determines the structure of the program, state-level decisions can shape how feasible it is for districts to implement it. In Texas, districts navigate CEP within tight budget constraints, rising operational costs, and limited access to supplemental funding. As a result, participation is uneven and often limited to districts that are already financially positioned to absorb potential shortfalls. Without additional state-level support, CEP expansion will remain constrained despite broader eligibility.

In the 89th legislative session, Senate Bill (SB) 25 introduced additional considerations for school nutrition programs that intersect with CEP implementation. SB 25 outlined new expectations related to nutritional standards, including limits on certain ingredients, increased emphasis on whole and minimally processed foods, and restrictions on items considered low in nutritional value during the school day.[xxi] Districts must evaluate ingredient lists more closely, adjust recipes, and in some cases eliminate or replace commonly used products to remain compliant. This is particularly challenging given existing federal nutrition requirements, effectively layering state-level expectations on top of USDA guidelines.

SB 25 also included provisions tied to physical activity and broader student wellness, reflecting a more comprehensive approach to improving student health outcomes beyond just nutrition. The legislation emphasized the importance of integrating regular physical activity into the school day, which may include requirements or recommendations for structured recess, physical education, or movement-based learning opportunities. In addition, the bill promotes a whole-child wellness framework, encouraging schools to consider how nutrition, physical activity, and overall student well-being are interconnected. For districts, this creates an added layer of responsibility, as they must coordinate across departments, including nutrition services, campus administration, and physical education staff, to ensure alignment with these expectations. While these provisions support long-term health goals, they also require additional planning, staffing coordination, and, in some cases, resource allocation, which can be challenging for districts already managing multiple operational and funding constraints.

Texas policy has an opportunity to play a stronger role in aligning nutrition goals with program feasibility. This could include continued technical assistance, improving access to data systems, or exploring funding mechanisms that help offset the gap between federal reimbursement and actual costs. As districts continue to balance competing priorities, state-level policies that recognize the financial and operational realities of school nutrition programs will be critical in determining whether CEP can be sustained and expanded across the state.

Tradeoffs

Findings from this work point to a set of tradeoffs that can shape district decision making around CEP. The most highlighted issue is the balance between maintaining access to socioeconomic data and expanding access to free meals. Under traditional school meal programs, districts collect household applications that are used not only for meal eligibility but also for other funding streams and accountability measures. CEP removes this application requirement, which simplifies operations and increases access to meals, but also limits the availability of application-based data. As a result, districts must weigh the benefits of universal meal access against potential impacts on other funding sources that rely on this data. This tradeoff is particularly relevant in districts that depend heavily on accurate socioeconomic data for broader educational funding and planning.

A second key tradeoff exists between financial sustainability and equity. CEP is designed to provide universal access to meals, but in practice, districts must determine whether they can afford to offer meals at no cost to all students. Districts with higher identified student percentages are more likely to achieve financial stability under CEP, while those with moderate or lower ISPs may face funding gaps. This creates a situation where districts must decide whether to prioritize universal access or maintain a financially balanced program. In some cases, districts may choose partial implementation, grouping schools or limiting CEP to certain campuses as a way to manage this tension. While this approach can improve financial feasibility, it may also lead to inconsistencies in access across schools and communities and create challenges in communicating with families who may question why one school provides meals, but another does not.

Vendor relationships introduce an additional layer to these tradeoffs. Districts rely on food service vendors and cooperatives to source compliant products, manage costs, and maintain consistent supply chains. However, vendor availability and pricing can influence menu decisions and overall program costs, particularly in the context of federal and state requirements like Buy American or SB 25. Districts may face limited options for certain products, fluctuating prices, or challenges in sourcing items that meet both cost and compliance standards. In other words, regulations may not only increase food prices directly, but they can also decrease competition by reducing the vendors who can comply with those regulations and thereby indirectly increasing food prices. This can also restrict menu flexibility and impact participation if preferred items are not available.

These vendor-related constraints further complicate the balance between financial viability and program quality. Districts must work within the constraints of what vendors can supply while also meeting nutrition standards, maintaining student satisfaction, and staying within budget. Strong vendor relationships and participation in purchasing cooperatives can help mitigate some of these challenges, but they do not eliminate the underlying tension. These tradeoffs highlight that CEP implementation is not a single decision point, but an ongoing process of balancing competing priorities related to data, funding, equity, and operations.

Recommendations & Next Steps

District & Practitioner Recommendations

1. Develop clear financial decision-making frameworks
Districts and ESCs should establish internal benchmarks ("tipping points") for CEP viability based on:

- ISP thresholds
- Meal participation rates
- Cost per meal
- Lost paid meal revenue

Regular scenario modeling can support more informed adoption or continuation of decisions.

2. Maximize direct certification practices
Districts can improve ISP by:

- Increasing frequency of data uploads to state systems
- Investing in benefits navigation resources or partners
- Ensuring accurate student identifiers
- Applying household extension practices consistently

Even small ISP increases can significantly impact reimbursement.

3. Use strategic grouping to improve financial outcomes
Districts should actively evaluate grouping schools to raise the overall ISP and increase the share of meals reimbursed at the free rate. This is one of the most effective tools available within current policy constraints.

4. Plan for participation increases and operational shifts
CEP typically increases meal participation, which affects:

- Staffing needs
- Food procurement volumes

- Kitchen capacity

Proactive planning can help districts manage these shifts without compromising quality or cost control.

5. Diversify revenue streams where possible
While CEP eliminates paid meal revenue, districts can explore alternative sources such as:

- A la carte sales (e.g. coffee bars, meal ”extras”, dessert bars)
- Catering services
- Grants and community partnerships

These can help offset funding gaps.

6. Strengthen community engagement and communication
Clear communication with families and stakeholders is essential, particularly in mixed-implementation districts. Districts should:

- Explain differences between CEP and non-CEP schools
- Promote participation to maximize reimbursement
- Educate non-nutrition staff on the role of school meals in improving student food security and health
- Build trust with communities that may be hesitant to engage with public benefits systems

7. Evaluate Provision 2 as a complementary option
For districts where direct certification underrepresents need, Provision 2 may offer a more accurate and financially viable alternative. Districts should periodically assess both models based on updated data.

Texas State Recommendations

1. Establish supplemental state funding for CEP
Texas could significantly expand CEP participation by providing state-level funding to cover the gap between federal reimbursement and actual meal costs. This could take the form of a per-meal subsidy, a guaranteed minimum reimbursement level, or targeted support for moderate-ISP districts.

2. Align state policies with CEP participation incentives
Current policies—such as reduced-price copay reimbursement outside of CEP—alter district financial incentives. The state should evaluate how existing funding structures influence CEP adoption and consider adjustments that ensure neutrality or alignment with universal meal access goals.

3. Build advocacy and information sharing coalitions for school nutrition professionals and stakeholders

School nutrition directors and other stakeholders repeatedly expressed that policy decisions were made that directly affected school nutrition programs with limited input from school nutrition professionals. Coalition building, both at the state and local level, would help school nutrition professionals to develop recommendations, provide input on education policies that affect their programs, and share best practices across districts.

4. Maximize technical assistance and regional support
Education Service Centers (ESCs) and the Texas Department of Agriculture (TDA) should expand and recruit for technical assistance focused on:

- CEP financial modeling
- Grouping strategies
- Direct certification best practices
- Operational implementation
- Data gathering practices

Targeted support is especially critical for small and mid-sized districts.

5. Develop standardized alternative income data collection tools for districts
To address the loss of application-based socioeconomic data under CEP, the state should create and promote standardized alternative income forms that can be used by school districts for accountability and funding purposes (e.g., Title I, state compensatory education).

6. Provide implementation grants for districts adopting CEP
Short-term state grants could support startup costs, including staffing adjustments, communication efforts, and system changes needed to transition to CEP.

Federal Policy Recommendations

1. Reevaluate the CEP reimbursement multiplier
The current 1.6 multiplier is a central driver of financial viability challenges, particularly for schools with ISPs between 25–50 percent. Congress and the U.S. Department of Agriculture (USDA) should evaluate increasing the multiplier or introducing a tiered structure that better reflects current participation patterns and the gap between direct certification and true eligibility.

2. Strengthen and expand benefits systems that affect direct certification
Federal agencies should improve cross-agency data sharing. Increasing the accuracy and completeness of direct certification would raise ISPs and better align reimbursement with actual student need.

3. Mitigate benefit cliffs and participation barriers in federal programs
Changes to SNAP and Medicaid eligibility have reduced the number of students captured through direct certification. Policymakers should consider strategies to stabilize enrollment in

these programs and reduce administrative churn, which directly impacts CEP eligibility and funding.

4. Provide targeted financial support for newly eligible schools
With the ISP threshold now at 25 percent, federal policy should include transitional funding or planning grants for schools in the 25–39.9 percent range. This would help districts assess feasibility, build participation, and implement grouping strategies without assuming immediate financial risk.

5. Increase flexibility in program implementation requirements
Federal policies such as Buy American provisions and evolving nutrition standards should include clearer guidance, phased implementation timelines, and flexibility for districts facing supply or cost constraints. Aligning policy intent with operational realities would reduce administrative strain.

6. Stabilize and expand supplemental grant programs
Programs such as Farm to School and DoD Fresh should receive more consistent and predictable funding. While not substitutes for core reimbursement, these programs enhance meal quality and can support participation and cost management.

Conclusion

Findings from this report point to a clear and urgent reality: while the Community Eligibility Provision (CEP) has proven to be one of the most effective tools for expanding access to school meals, its reach is currently limited by structural and financial constraints many districts cannot overcome on their own. Across Texas, districts are not deciding whether student need exists. That need is widely acknowledged and consistently prioritized. Instead, districts are navigating whether they can afford to meet that need within the current policy and funding environment. This distinction is critical. CEP is not constrained by lack of interest or commitment, but by the gap between eligibility and sustainability.

At the same time, the opportunity remains significant. Where CEP is financially viable, districts report strong outcomes: increased meal participation, reduced stigma, elimination of meal debt, and meaningful financial relief for families. In some cases, districts are even able to reinvest in their nutrition programs and infrastructure. These outcomes reinforce that CEP is not just a school nutrition policy, but a broader community investment with impacts on student health, academic engagement, and household stability. The consistency of these benefits across districts underscores the potential for CEP to serve as a scalable, statewide strategy to address child food insecurity.

Scaling CEP will require addressing the tradeoffs and constraints districts face in practice. Financial feasibility remains the most significant barrier, particularly for districts in the moderate ISP range, where reimbursement does not fully cover costs. Declining direct certification rates, rising food and labor costs, and additional policy requirements at both the federal and state levels further complicate implementation. Districts are already adapting through strategies such as grouping schools, leveraging alternative programs, and seeking supplemental funding, but these approaches alone are not sufficient to drive widespread adoption. Without targeted changes, CEP will continue to expand unevenly, concentrated in districts that are already best positioned to absorb financial risk.

The path forward requires coordinated action across federal, state, and local levels. At the federal level, improving the reimbursement structure, strengthening direct certification systems, and reevaluating key components such as the multiplier are essential to aligning funding with actual student need. At the state level, policy can play a critical role in stabilizing participation through supplemental funding, stronger data systems, and expanded technical assistance. At the district level, continued focus on strategic planning and advocacy, operational capacity, and community engagement will remain key to successful implementation. These efforts are interconnected, and progress in one area will strengthen outcomes across the system.

Ultimately, CEP represents both a proven solution and a missed opportunity. The program has demonstrated its ability to ensure student nutrition and well-being and support student success, yet too many districts remain unable to participate or sustain participation under current conditions. Bridging this gap will require aligning policy goals with operational realities, ensuring districts are not forced to choose between financial stability and equitable access to meals. With the right investments and policy adjustments, CEP can move beyond a targeted program and function as a scalable, sustainable strategy to ensure that all students have consistent access to nutritious meals.

Appendices

Appendix A

Methodology

Study Design

This study employed a mixed methods design to examine how school districts make decisions about participation in the Community Eligibility Provision (CEP). Qualitative data were collected through semi-structured interviews to explore factors shaping CEP enrollment decisions. These findings were supplemented with descriptive analyses of administrative survey data distributed statewide through the EDOT network to provide broader contextual insight into district decision-making patterns and support needs.

Data Collection

Qualitative Interviews

Semi-structured interviews were conducted with district administrators and food service directors who were responsible for, or closely involved in, CEP enrollment decisions. Districts were recruited through targeted outreach within the EDOT region, with the aim of capturing variation by district size, geographic context, and CEP participation status.

A total of 19 districts participated in interviews conducted via Zoom. One interview transcript was partially corrupted and could not be fully analyzed; as a result, 19 transcripts were included in the qualitative analysis. The interview protocol consisted of open-ended questions addressing motivations for participation or non-participation, perceived benefits and challenges, financial considerations, organizational capacity, and external supports or constraints. All interviews were audio recorded and transcribed for analysis with consent from participants.

CEP Administrative Survey

To complement the interview data, administrative survey data were collected via a mass email sent to school districts statewide through the EDOT network. The survey, administered using SurveyMonkey, gathered information on CEP awareness, implementation experiences, decision-making structures, perceived outcomes, barriers to participation, and technical assistance needs. **A total of 30 survey responses were received.**

Analysis

Interview transcripts were analyzed using a thematic analysis approach. A structured coding framework was developed to identify recurring themes related to district-level CEP enrollment decisions, with particular attention to organizational, cultural, financial, and contextual influences. Coding was conducted iteratively to refine themes and ensure consistency across transcripts.

Qualitative interview findings and survey results were integrated during interpretation to identify areas of convergence and divergence. This triangulation strengthened the interpretive validity of the findings and supported a more comprehensive understanding of CEP decision-making across districts.

Limitations

While the survey was distributed statewide, it was administered with zero financial incentives and yielded a small number of responses (n = 30). As a result, survey findings are descriptive and may not be representative of all Texas school districts. Additionally, the exclusion of one partially corrupted interview transcript slightly reduced the qualitative sample. These limitations were considered when interpreting the results.

Appendix B

Survey Instrument

EDOT Survey

Children at Risk, a nonprofit organization, funded by the Episcopal Health Foundation, is conducting this survey to better understand how schools in Texas are implementing the Community Eligibility Provision (CEP) food program. Responses will be aggregated and reported anonymously. Individual schools will not be identified in any public-facing materials. Participation is voluntary, and you may skip most questions.

<u>Section 1: School Context</u>

(Purpose: provide basic context for interpreting responses; low burden)

Providing your school name, district, and county help us understand duplicate responses from the same school, geographic patterns, and allows us to match findings to additional school-related data. All identifiable information will be kept anonymous in public-facing documents, and findings will be reported only in aggregate.

1A. School name (required):

1B. School District (required):

1C. County (required):

2. What grade levels does your school serve?

☐ Elementary (e.g., PreK-5)

☐ Middle (e.g., 6-8)

☐ High (e.g., 9-12)

☐ Other/Mixed (e.g., K–8, 6–12) [Please specify]

3. What is your job position (title)?

☐ Superintendent

☐ Principal/Assistant Principal

☐ Administrator

☐ Teacher

☐ Other (please specify)

Section 2: CEP Status & Decision Context

4. Does your school currently participate in the Community Eligibility Provision (CEP)?*

** CEP is a federal program that lets eligible schools offer free breakfast and lunch to every student, eliminating the need for free and reduced-price meal applications.*

☐ Yes, we currently participate

☐ We have applied but have not begun implementation yet

☐ No, we do not currently participate

☐ I am unsure whether we participate or have applied to CEP

Section 2A: Respondents who answered YES to Question 8

5A. What were the main reasons your school decided to participate in CEP? (Select all that apply)

☐ Improve access & reduce food insecurity (e.g., ensuring students have reliable access to meals)

☐ Increase participation & reduce stigma (e.g., higher meal participation; reduced stigma)

☐ Administrative efficiency (e.g., reduced paperwork and administrative burden)

☐ Financial and/or governance considerations (e.g., reimbursement/financial sustainability; decision made at the district or network level)

☐ Other (please specify)

5B. What challenges did you face when implementing CEP? (Select all that apply)

☐ Financial feasibility & sustainability (e.g., reimbursement concerns; long-term sustainability)

☐ Staffing, operations & logistics (e.g., administrative/staffing capacity; vendor constraints; timing with the school calendar)

☐ Eligibility, claiming & documentation (e.g., uncertainty about eligibility/claiming rules; data or documentation requirements)

☐ Communication & engagement (e.g., communication with families or students)

☐ We did not have significant challenges implementing CEP

☐ Other (please specify)

5C. Since implementing CEP, which outcomes has your school experienced? (Select all that apply)

☐ Meal program operations & participation (e.g., increased meal participation; less administrative work)

☐ Financial impacts (e.g., reduced student meal debt; improved financial stability of the meal program)

☐ Student well-being & engagement (e.g., improved student well-being; improved student attention)

☐ Academic & attendance outcomes (e.g., improved student attendance; improved student achievement)

☐ No major changes observed

☐ Other (please specify)

5D. Overall, how satisfied is your school with CEP?

Scale:

☐ Very satisfied

☐ Somewhat satisfied

☐ Neutral

☐ Somewhat dissatisfied

☐ Very dissatisfied

5E. Would you recommend CEP to other schools with similar characteristics?

☐ Yes

☐ No

☐ Maybe (please specify)

Section 2B: Respondents who answered APPLIED BUT NOT IMPLEMENTED YET to Question 8

5A. Which best describes your school's current status with CEP implementation?

☐ Application approved, implementation planned for next school year

☐ Application submitted, awaiting approval

☐ Application approved, but implementation delayed

☐ Not sure of current status

5B. What factors, if any, are contributing to the delay in implementing CEP? (Select all that apply)

☐ Financial feasibility & planning (e.g., budgeting concerns; reimbursement projections)

☐ Capacity & operational readiness (e.g., staffing constraints; operational bandwidth)

☐ Coordination & decision-making (e.g., district/network-level decisions; grouping; internal approvals)

☐ Implementation logistics & external constraints (e.g., vendor constraints; timing with the school calendar; uncertainty about CEP requirements)

☐ Not applicable (e.g., no significant delays)

☐ Other (please specify)

5C. How confident does your school feel about successfully implementing CEP once it begins?

Scale:

☐ Not at all confident

☐ Not so confident

☐ Neutral

☐ Moderately confident

☐ Extremely confident

5D. What types of support would be most helpful to move from application to implementation? (Select all that apply)

☐ Planning & financial decision support (e.g., reimbursement projections; financial modeling)

☐ Implementation guidance & operational support (e.g., implementation checklist/timeline; staffing/vendor guidance)

☐ Technical assistance & ongoing coaching (e.g., dedicated consultant/coach; additional technical assistance)

☐ Engagement & peer learning (e.g., support engaging families/students; peer examples from recently implementing schools)

☐ Other (please specify)

5E. Do your school anticipate implementing CEP within the next school year?

☐ Yes

☐ No

☐ Maybe (please specify)

Section 2C: Respondents who answered NO to Question 8

The next questions ask generally about your school's experience with school meals and CEP, even if decisions are handled at the district level.

5A. Which factors best describe why your school does not currently participate in CEP? (Select all that apply)

☐ Eligibility & program fit (e.g., not eligible; current meal program works well as-is)

☐ Financial feasibility & sustainability (e.g., financial risk/uncertainty; long-term sustainability concerns)

☐ Capacity, information, & readiness (e.g., limited staffing/administrative capacity; lack of information or understanding of CEP)

☐ Decision-making & priorities (e.g., district/network-level determination or grouping; leadership prioritizing other initiatives)

☐ Other (please specify)

5B. How familiar are you with CEP and how it works?

☐ Not at all familiar

☐ Not so familiar

☐ Neutral

☐ Very familiar

☐ Extremely familiar

5C. What types of support would make CEP more feasible for your school? (Select all that apply)

☐ Financial feasibility support (e.g., clear financial projections or modeling)

☐ Application & CEP technical guidance (e.g., eligibility/application assistance; guidance on CEP grouping options)

☐ Operational implementation support (e.g., staffing support; service model guidance)

☐ Peer learning & examples (e.g., examples from similar schools)

☐ CEP would not be a good fit regardless of support

☐ Other (please specify)

8D. Is your school interested in learning more about CEP in the future?

☐ Yes

☐ No

☐ Maybe (please specify)

<u>Section 2D: Respondents who answered UNSURE for Question 8</u>

5U. Why are you unsure about your school's CEP status? (Select all that apply)

☐ Decisions are centralized (e.g., handled at the district/network level; schools are grouped or decisions made centrally)

☐ Not involved in decision-making (e.g., school meal decisions are handled by others)

☐ Limited information/communication (e.g., CEP discussed but outcome unclear)

☐ New to role or unfamiliar with CEP (e.g., new to role; unfamiliar with CEP)

☐ Other (please specify)

Redirect to Section 2C after this question*

<u>Section 3: Decision-Making & Perceptions (All Schools)</u>

(Great questions for advocacy purposes)

6. Who primarily makes decisions about CEP participation at your school?

☐ School leadership

☐ District or network leadership

☐ Food service vendor

☐ Shared decision

☐ Not sure

7. Which factors are most important in influencing your school's decision about CEP? (Rank List)

1. Financial feasibility (e.g., reimbursement levels, budget impact, long-term sustainability)

2. Student access and need (e.g., addressing food insecurity, ensuring all students can eat)

3. Meal participation and student experience (e.g., increasing participation, reducing stigma)

4. Administrative capacity and workload (e.g., reducing paperwork, staffing capacity)

5. District/network decision-making (e.g., decision made centrally, grouping considerations)

8. Is there anything you would like policymakers or advocates to better understand about CEP implementation at schools like yours? (Optional short answer)

Appendix C

Interview Protocol

Estimated timing: ~5 domains × ~2 questions each = 10 main questions + closing
Goal: Capture key insights on participation, barriers, family engagement, nutrition, and recess.

1) **CEP Participation & Context (5–6 min)**
    a) Does your district currently participate in the Community Eligibility Provision (CEP)?
        i) (If yes) What have been the main benefits or challenges of doing so?
        ii) (If no) What's prevented your district from participating?
    b) What factors did you consider when deciding about CEP?
    c) How has CEP participation (or nonparticipation) affected student meal participation overall?
    d) What would make CEP participation easier for districts like yours?
    e) (If time permits)
        i) (If CEP) Is there a model you think should be considered if districts choose not to participate in CEP?
        ii) (If not CEP) What meal program did your district choose? Is there a model you think should be considered?

Optional Substantive Questions:

Can you walk us through how the CEP decision was discussed internally — who was involved, what questions came up, and what ultimately mattered most?

(Optional Follow-Up) What information or assurances would have made that decision easier at the time?

2) **Student Meal Participation & Barriers (8–10 min)**
    a) How would you describe current student participation in school breakfast?
    b) How about current student participation in school lunch?
    c) And what would you say regarding student participation for afterschool meals?
    d) What trends have you seen in student participation in school meals — breakfast, lunch, or afterschool — over the past few years?
    e) What do you think has helped increase participation, and what barriers still make it hard for students to eat school meals?
    f) Are there grade levels or student groups where participation is especially low or high?
    g) Are there practices at certain schools that are working better than others? For schools that have low participation rates, what are those challenges?
    h) How do you gather feedback from students or families about school meals? How do you measure or evaluate student satisfaction or meal acceptance?
    i) What meal service model does your district use (e.g., cafeteria service, grab-and-go, classroom meals)? How has that design affected participation?

Optional Substantive Questions:

When participation increased or decreased, what do you think was the primary driver: scheduling, stigma, food quality, staffing, or something else?

Are there barriers you feel are within the district's control versus ones that feel largely outside your control?

Are there student groups or campuses where participation challenges feel especially persistent, and why?

3) **Family Engagement & SNAP (6–7 min)**
    a) Does your district track or have a sense of how many families participate in SNAP?
    b) Are there any ways you or your team work to connect families to SNAP or other nutrition supports? Even if it's as simple as information-sharing?

Optional Substantive Questions

How does your district see its role when it comes to connecting families to nutrition supports: more informational, or more hands-on?

(Optional Follow-Up) What limits how much you're able to do in this area?

4) **Nutrition Quality & Improvements (6–7 min)**
    a) With new nutritional recommendations, how is the implementation going?
    b) What's worked well — and what's been difficult — when trying to make those changes?

Optional Substantive Questions:

When implementing new nutrition standards, what tradeoffs have you had to make? For example, between cost, student acceptance, and operational feasibility?

Have any changes had unintended effects on participation or waste?

Closing (2–3 min)

- Is there anything else you'd like to share about student wellness, meals, or family engagement?

Optional Substantive Question to close:

If you were advising another district considering CEP or broader meal changes, what would you tell them to plan for early?

- If your district is interested in this initiative, how do you typically document that — for example, through a letter of interest or memorandum of understanding?
- (Optional) Would you be open to a quick follow-up later if we have clarifying questions?
- Thank you so much for your time, we really appreciate it!

A. Technical funding formulas

B. Additional data tables

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