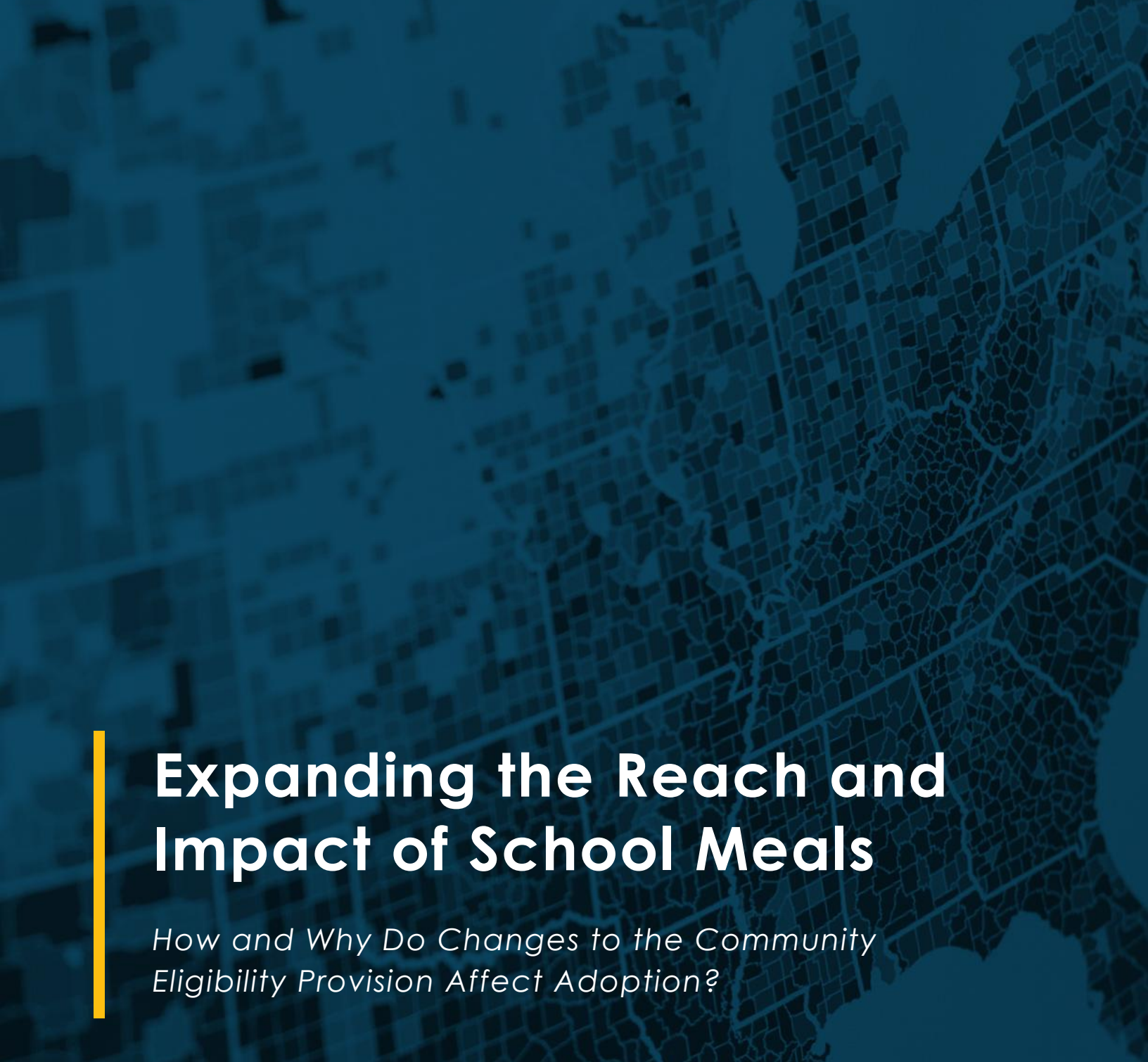




Expanding the Reach and Impact of School Meals

How and Why Do Changes to the Community Eligibility Provision Affect Adoption?

Emily Gutierrez
Urban Institute

Ariella Meltzer
Urban Institute

Erin Hysom
Food Research & Action Center



RESEARCH REPORT
July 2026





ABOUT THE URBAN INSTITUTE

The Urban Institute is a nonprofit research organization founded on one simple idea: To improve lives and strengthen communities, we need practices and policies that work. For more than 50 years, that has been our charge. By equipping changemakers with evidence and solutions, together we can create a future where every person and community has the opportunity and power to thrive.



ABOUT THE FOOD RESEARCH & ACTION CENTER

The Food Research & Action Center (FRAC) improves the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States through advocacy, partnerships, and by advancing bold and equitable policy solutions.

Contents

Acknowledgments	iv
Executive Summary	v
1. Introduction	1
2. Prior Research	2
3. Background and History of CEP	6
4. Barriers to CEP Adoption	11
5. Data	14
6. Methodology	17
7. Results	20
8. Conclusion	46
Appendix A	50
Appendix B	52
Appendix C	53
Appendix D	55
Appendix E	57
Appendix F	58
Appendix G	64
Appendix H	65
Appendix I	66
Notes	71
References	73
About the Authors	75
Statement of Independence	76

Acknowledgments

This report was funded by Healthy Eating Research. We are grateful to them and to all our funders, who make it possible for Urban to advance its mission.

The views expressed are those of the authors and should not be attributed to the Urban Institute, its trustees, or its funders. Funders do not determine research findings or the insights and recommendations of Urban experts. Further information on the Urban Institute’s funding principles is available at urban.org/fundingprinciples.

This report was written by the Food Research & Action Center’s Erin Hysom. The findings and conclusions presented in this report are those of the Food Research & Action Center alone.

The authors gratefully acknowledge assistance from Kristin Blagg, Mattie Mackenzie-Liu, and Maggie Reeves, and we thank David Hinson for his careful editing.

Executive Summary

The Community Eligibility Provision (CEP) allows eligible schools and school districts to provide breakfast and lunch to all students at no charge, using a reimbursement formula based on the share of students directly certified for free meals through participation in certain public assistance programs. Since CEP became available nationwide in 2014, participation has expanded substantially, reaching millions of students across the United States.

In 2023, the US Department of Agriculture lowered the CEP eligibility threshold from an identified student percentage (ISP) of 40 percent to an ISP of 25 percent, making additional schools eligible to participate. At the same time, states have adopted complementary policies—including Medicaid direct certification initiatives, CEP reimbursement supplements, and Healthy School Meals for All policies—that influence CEP participation and financial feasibility.

This study combines national CEP participation data with school demographic, geographic, and fiscal data to examine patterns of CEP adoption and discontinuation, the effects of recent policy changes on participation, and the fiscal consequences of CEP implementation.

Key Findings

- **CEP participation is associated with school poverty levels and demographic characteristics.** Schools participating in CEP generally have higher ISPs than eligible nonparticipating schools and are more likely to be located in urban areas. Participating schools also serve larger shares of Black and Hispanic students and smaller shares of white students than eligible schools that do not participate.
- **Lowering the eligibility threshold increased the number of eligible schools but resulted in limited initial adoption.** The reduction of the eligibility threshold from 40 percent to 25 percent expanded eligibility to thousands of additional schools. Among the newly eligible schools included in this analysis, approximately 7 percent adopted CEP during the first full year following implementation, suggesting that factors beyond eligibility status influence participation decisions.

- **Medicaid direct certification is associated with higher ISP rates and greater CEP participation.** States participating in the Medicaid Direct Certification Demonstration Project experienced increases in average ISP rates and in the number of CEP-participating schools.
- **Most schools that adopt CEP remain participants.** Although some schools discontinue participation, CEP adoption appears stable over time. Schools with higher ISP rates tend to remain in the program longer than schools with lower ISP rates, suggesting that reimbursement levels play a role in long-term participation decisions.
- **CEP adoption is associated with changes in school food service finances.** Districts that adopted CEP experienced reductions in local food service revenue and increases in federal food service revenue. On average, increases in federal reimbursements exceeded reductions in local revenue, resulting in higher overall food service revenues and expenditures, in line with previous research that finds participation and therefore expenditures increase post-CEP adoption.
- **Fiscal effects vary across geographic contexts.** The magnitude of CEP's financial effects differed across district types. Town, suburban, city, and rural districts all experienced shifts from local funding sources to federal funding sources, though revenue and expenditure changes varied across locales. Rural districts generally exhibited smaller and less precisely estimated fiscal effects than other district types.

Policy Implications

The results of this study demonstrate several policy implications.

1. **The results suggest that expanding eligibility does not necessarily translate into widespread participation.** Financial considerations, reimbursement levels, administrative requirements, and state policy contexts likely influence adoption decisions among eligible schools and districts.
2. **The findings highlight the role of direct certification systems in shaping CEP eligibility and participation.** Changes in Medicaid direct certification or eligibility for federal social safety net programs and other data-matching approaches affect school ISP rates and reimbursement levels, with implications for both CEP eligibility and financial viability.

3. **State policy environments appear relevant to participation decisions.** States vary in how they measure student need for education funding and for accountability purposes, and these differences can affect the incentives schools face when considering CEP participation.
4. **The findings suggest that CEP’s fiscal effects are concentrated within school nutrition operations, and federal reimbursements generally make up for loss of local revenue among schools that remain enrolled in CEP.** Although the program is associated with changes in food service revenues and expenditures, the analysis found limited evidence of broader effects on district instructional spending.

Looking Ahead

The study finds that CEP participation has expanded considerably, but participation remains uneven among eligible schools. Future participation decisions will depend on a combination of federal reimbursement policies, direct certification practices, eligibility rules for federal social safety net programs, state funding systems, and local financial considerations. Continued research will be important for understanding how these factors influence participation and how CEP affects student outcomes, school nutrition operations, and educational equity over the long term.

1. Introduction

The National School Lunch Program (NSLP) and the School Breakfast Program constitute two of the largest federal nutrition assistance programs in the United States, serving tens of millions of children each school day. All children can participate if the school they attend operates the program, but meals are served at no charge or at a reduced price for students who meet the means-tested eligibility criteria. Over the past decade, however, policymakers have increasingly adopted universal free meal (UFM) approaches, including the Community Eligibility Provision (CEP), which allows schools serving high-poverty populations to offer meals to all students at no charge, regardless of household income. These policies are intended to increase participation, reduce food insecurity, eliminate stigma associated with free meals, reduce administrative burdens, and eliminate unpaid school meal fees (FNS 2025). At the same time, scholars have debated whether UFM policies generate broader educational and health benefits, as well as whether they create unintended consequences for school finances or student health.

A growing body of causal and quasi-experimental research has evaluated both traditional school meal programs and UFM policies. This literature suggests that school meal programs improve food security, nutritional intake, educational attainment, and some measures of student well-being. Evidence on UFM programs is generally positive, though it reveals heterogeneous effects across populations and outcomes.

This study goes beyond describing who participates in CEP and examines how policy changes affect participation and school finances. Using national data spanning more than a decade, we track schools and districts before and after key changes to CEP eligibility, Medicaid direct certification, and school meal policies. We employ rigorous longitudinal and quasi-experimental methods that allow us to compare changes within the same schools, districts, and states over time rather than relying solely on cross-sectional comparisons. These methods provide stronger evidence about the factors associated with CEP adoption and discontinuation and help us assess whether differences in school poverty levels or changes in revenues and expenditures are likely related to CEP participation rather than other coinciding trends. By combining descriptive, longitudinal, and fiscal analyses, this study provides one of the most comprehensive examinations of how CEP eligibility, adoption, and financial sustainability interact across different types of schools and communities.

2. Prior Research

Background on School Meal Programs and Child Outcomes

Research on CEP builds on earlier studies showing that school meal programs can affect children's nutrition, health, and academic development. Gleason and Suitor (2003) found that participation in the NSLP was associated with higher intake of several key nutrients, though dietary effects varied across student populations. Similarly, Hinrichs (2010) found evidence that exposure to the NSLP was linked to long-term educational and health outcomes, while Frisvold (2015) found that access to the School Breakfast Program improved cognitive achievement.

The nutritional quality of school meals has also improved. Following implementation of the Healthy, Hunger-Free Kids Act of 2010, federal nutrition standards were revised to better align with dietary guidelines. Cohen and coauthors (2021) found that these changes were associated with improvements in the nutritional quality of meals served through the NSLP and the School Breakfast Program.

CEP and Universal Free School Meals

Researchers have examined whether the means-tested nature of traditional school meal programs contributes to social stigma. Qualitative and survey-based studies have reported that some students perceive distinctions between students receiving subsidized meals and those paying full price (Bhatia et al. 2011).

Universal free school meal policies, including CEP and state-level School Meals for All initiatives, provide meals to all students, regardless of household income. Proponents argue that universal approaches may reduce administrative burdens, increase participation, and eliminate distinctions based on income status, while critics have raised concerns about program costs. As a result, a growing body of research has examined the effects of universal meal policies on student and household outcomes.

Meal Participation and Stigma

One of the most consistent findings in the CEP literature is that providing meals free of charge to all students increases participation in school meal programs. Leos-Urbel and coauthors (2013) found that universal free breakfast in New York City increased breakfast participation. Ruffini (2022) similarly found that CEP increased breakfast and lunch participation. Spill and coauthors (2024), in a systematic review of universal free school meal studies, concluded that increased participation is the most consistent outcome associated with universal meal policies, though estimates vary across settings and populations.

Researchers suggest that increased participation may be partly explained by reductions in meal-related stigma. Gutierrez (2021) found that CEP in New York City increased participation even among students who previously qualified for free meals, suggesting that universal meal policies may influence student behavior through mechanisms beyond financial access alone. More explicitly, Orta-Aleman and coauthors (2026) found that universal school meal policies were associated with lower self-reported embarrassment about eating school lunch among students with low household income, though perceptions varied across socioeconomic groups.

Food Security

Researchers have also examined whether universal meal policies affect food hardship among households with children. Toosi (2024) found that states that continued universal free school meal policies postpandemic experienced lower food insecurity among households with children. Orta-Aleman and coauthors (2026) similarly found that statewide universal school meal policies were associated with lower household food insecurity, supporting the broader argument that universal school meal access may reduce household food-related hardship.

Academic Outcomes

A growing body of evidence evaluates CEP's effects on academic outcomes. Ruffini (2022) found that universal access to free meals through CEP increased meal participation and improved academic achievement, with effects concentrated among students most likely to gain access to free meals. Gordanier and coauthors (2020) examined CEP in South Carolina and found positive effects on elementary school students' math achievement, though effects were smaller or statistically insignificant

for other outcomes and student groups. Schwartz and Rothbart (2020), studying New York City's Universal Free Meal program, found improvements in mathematics and English language arts scores. More recently, Zhao (2025) found that universal free school meal policies were associated with increased graduation rates, suggesting that meal access may be linked to long-term educational outcomes.

Recent evidence has extended the literature beyond individual district and CEP evaluations to statewide universal free school meal policies. Using variation in state adoption of universal free school meal policies, Ramponi and coauthors (2026) found reductions in chronic absenteeism and improvements in educational outcomes, including academic performance and graduation rates.

School Climate and Discipline

In addition to academic achievement, researchers have examined behavioral and school environment outcomes. Gordon and Ruffini (2021) found that schoolwide free meals reduced suspensions, suggesting that universal meal access may influence student behavior and school disciplinary outcomes. Gutierrez (2021) similarly found evidence that UFM improved student perceptions of school climate, including measures related to safety, respect, and bullying. Although the literature on school climate remains limited, existing findings suggest that CEP influences students' experiences within the school environment.

Student Health Outcomes

Researchers have also examined whether UFM policies affect children's physical health, particularly body weight and obesity. Earlier research on school meal programs suggests that school meals can improve dietary intake, though evidence that UFM affect obesity are mixed. Cohen and coauthors (2021) and Davis and coauthors (2024) found little evidence that UFM programs increase students' body mass indexes or obesity rates, while Rothbart and coauthors (2023) found CEP was associated with obesity declines in secondary grades.

More recent causal evidence has produced similar findings. Localio and coauthors (2024) found that CEP participation was associated with reductions in obesity prevalence among students, suggesting that access to nutritionally regulated school meals may partially replace less nutritious food sources consumed outside of school. In addition, Localio and coauthors (2025) found that participation in CEP

was associated with lower rates of elevated blood pressure among students, indicating potential cardiovascular health benefits.

Fiscal Implications of CEP

In addition to student outcomes, researchers have evaluated the fiscal implications of CEP adoption. Rothbart and coauthors (2023) found that increased meal participation under CEP generated additional federal reimbursement revenue that offset a substantial portion of the costs associated with providing meals free of charge to all students. But fiscal effects varied across district types. Although increased federal reimbursements generally offset higher food service costs, rural districts were more likely than urban and suburban districts to experience food service funding shortfalls, suggesting that the financial sustainability of CEP depends on poverty levels and, therefore, reimbursement rates. Their findings suggest that CEP can expand access to school meals without requiring reductions in instructional spending or other educational resources, and that CEP may be fiscally sustainable for many districts, though financial effects can vary depending on local demographic and economic conditions.

Overall, the existing causal evidence suggests that CEP and related UFM policies are associated with increased meal participation and improvements in several student outcomes and suggests that expanded meal access affects student outcomes through multiple pathways, including increased participation, reductions in food hardship, and improved school engagement. Evidence points to positive effects on food security, academic achievement, graduation rates, school climate, discipline, and selected health outcomes, though findings vary across contexts and study designs. Additional research is needed to better understand long-term effects, heterogeneous impacts across student populations, and the mechanisms through which expanded meal access influences student well-being.

3. Background and History of CEP

Introduction of the Community Eligibility Provision

The Healthy, Hunger-Free Kids Act of 2010 established CEP, a UFM program, which allows high-poverty schools to offer all students school meals at no charge. CEP was designed to increase access to school meals at no cost to students, eliminate paperwork for households, ease administrative burdens for schools, and eliminate unpaid meal balances (FNS 2025). CEP eligibility and reimbursement rely on students who are automatically certified for free meals through their participation in social safety net programs, or children who are categorically eligible for free school meals, rather than the use of meal applications.

School Eligibility Determination

As opposed to meal applications to determine a child's eligibility for free and reduced-price meals, direct certification is a method that automatically certifies students for free and reduced-price meals based on their participation in specific, means-tested federal programs or because they fall within a specific eligibility category (i.e., students who are homeless, migrants, runaways, or in foster care or Head Start).¹ Students are also automatically certified by matching school rosters to enrollment in means-tested programs, including the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families, and the Food Distribution Program on Indian Reservations. Additionally, as of the 2025–26 school year, 44 states use Medicaid² and household income data to directly certify children for free and reduced-price school meals.

Eligibility for CEP relies on a school's or district's identified student percentage (ISP), which is a subset of directly certified students and a smaller share of children than would be eligible for free and reduced-price meals if the school collected school meal applications. A directly certified child is included in the ISP if they are categorically eligible or directly certified for free school meals via participation in SNAP, Temporary Assistance for Needy Families, the Food Distribution Program on Indian Reservations, or, in most states, Medicaid (with household incomes up to 130 percent of the federal poverty level). Only children who are directly certified for free school meals can be counted toward a school's ISP.

When CEP was first introduced, schools, groups of schools within a single school district, or entire school districts were required to have an ISP of at least 40 percent to participate. But in September

2023, the US Department of Agriculture Food and Nutrition Administration released a final rule that lowered the minimum eligibility threshold from a 40 percent ISP to a 25 percent ISP.³ The rule went into effect on October 26, 2023, and some states sought and received waivers to implement immediately instead of waiting for the 2024–25 school year.

CEP Adoption

Before the national rollout of CEP in 2014–15, there were three pilot years where schools in specific states could adopt CEP: schools in Illinois, Kentucky, and Michigan could adopt it beginning in 2011–12; schools in the District of Columbia, New York, Ohio, and West Virginia could adopt it beginning in 2012–13; and schools in Georgia, Florida, Massachusetts, and Maryland could adopt it beginning in 2013–14.

Since CEP’s nationwide implementation in 2014–15, adoption has increased by more than 200 percent (Hysom and Bylander 2025). In 2014–15, 14,184 schools adopted CEP, reaching more than 6.6 million students. School-level adoption has continued to increase, peaking in 2024–25, the last year data are available, with 54,234 CEP-participating schools reaching more than 27.1 million students. Last school year, 73.8 percent of all eligible schools adopted CEP (Hysom and Bylander 2025), and an estimated 28 million students (58 percent of US public school students) attended schools with universal free school meal programs (Gutierrez 2026).

Federal Reimbursement Structure

The decision to implement CEP often comes down to a district’s fiscal ability to offer all children school meals at no charge. In addition to determining a school’s eligibility for CEP, the ISP is used to determine the amount of federal reimbursement a CEP school or district receives. Rather than relying on individual student eligibility, a multiplier of 1.6 is applied to a school’s ISP to determine the share of meals reimbursed at the federal free rate (generally, \$2.94 for breakfasts and \$4.71 for lunches).⁴ The remainder of meals served are reimbursed at the lower, federal paid rate (\$0.40 and \$0.55, respectively). Mathematically, schools or districts with an ISP of 62.5 percent or higher are reimbursed at the federal free rate for 100 percent of meals served ($62.5 \text{ percent} \times 1.6 = 100 \text{ percent of meals served}$), making the decision to participate in CEP easy.

The Pandemic and State UFM Policies

Pandemic

The Families First Coronavirus Response Act, signed into law on March 18, 2020, authorized the US Department of Agriculture to issue nationwide waivers that gave school districts flexibility to operate child nutrition programs during the height of the pandemic. In states that opted into these waivers, program operators were able to serve meals through the Seamless Summer Option and the Summer Food Service Program, which operate during summer months and during unanticipated school closures. These waivers allowed schools to serve meals to all students at no charge and receive the free reimbursement rate for all meals served, instead of operating the traditional NSLP and the School Breakfast Program, essentially creating a nationwide UFM program available to all schools, regardless of ISP (Severn et al. 2023). These waivers were released in spring 2020 and were available in the 2020–21 and 2021–22 school years (FNS 2023).

CEP Subsidy States

Even before the pandemic, some states considered policies that would subsidize the cost of offering all students free meals in CEP-eligible schools that receive the federal free rate for less than 100 percent of meals served (i.e., CEP schools or districts with ISPs lower than 62.5 percent). For example, Oregon passed the Student Success Act of 2019, which was amended in 2020 to include a CEP Incentive Program that provides state funds to CEP schools that receive the federal free rate for less than 90 percent of meals served (ODE, n.d.). The policy was to be implemented in 2020–21, but the pandemic-related waivers delayed full implementation of Oregon’s CEP incentive until 2022–23.

Schools’ and students’ experiences with UFM programs during the pandemic led to an increased interest in continuing UFM programs (Gutierrez 2022). Postpandemic, Washington state (in 2022–23) and New York (in 2023–24) passed statewide policies that supported schools’ ability to implement CEP by providing state funding to supplement the federal reimbursements and help cover the costs of offering all children free school meals. North Carolina implemented a more targeted CEP incentive program in 2024–25 for schools with ISPs greater than 55 percent that were not participating in CEP in 2023–24 (DPI, n.d.).

Statewide UFM

Since the pandemic, nine states have passed legislation that created UFM policies, often referred to as Healthy School Meals for All policies, where the state covers the difference between the federal free and paid reimbursements (Bylander et al. 2024). California, Maine, Massachusetts, and Vermont passed policies to make school meals available to all students at no charge starting in 2022–23. Nevada used pandemic relief funds to extend UFM through 2023–24, before ultimately returning to the traditional school meal system in 2024–25. Colorado, Minnesota, Michigan, and New Mexico passed UFM policies that started in 2023–24, and New York transitioned from a CEP subsidy state to a permanent UFM state in 2025–26.

Factors Affecting ISP Rates

Medicaid Demonstration Project

Beginning in 2012–13, states became eligible to join the Medicaid Demonstration Project, allowing schools to incorporate Medicaid and its household income data into their direct certification process.⁵ California, Florida, Illinois, Kentucky, Massachusetts, New York, and Pennsylvania began using Medicaid and household income data to certify children for free school meals (i.e., those earning up to 130 percent of the federal poverty level) in 2012–13. Beginning in 2016–17, states began using Medicaid and household income data to certify children for free and reduced-price meals (i.e., those earning up to 185 percent of the federal poverty level), though only students directly certified for free school meals count toward a school's ISP. These states include California, Florida, Massachusetts, Nebraska, Utah, Virginia, and West Virginia, followed by Connecticut, Indiana, Iowa, Michigan, Nevada, Texas, Washington, and Wisconsin in 2017–18; Alabama, Illinois, Kansas, Louisiana, Maryland, Minnesota, North Carolina, and South Carolina in 2022–23; Arizona, Colorado, Delaware, Georgia, Montana, New Mexico, Ohio, Oklahoma, Oregon, Pennsylvania, Tennessee, Vermont, and Wyoming in 2023–24; and Arkansas, Idaho, Maine, New Jersey, North Dakota, and Rhode Island in 2024–25.

As of 2025–26, 44 states use Medicaid and its household income data to directly certify children for free and reduced-price meals. Including Medicaid in the direct certification process increases the number of income-eligible children identified via direct certification and therefore schools' ISPs, making more schools eligible for CEP and increasing the share of meals reimbursed at the federal free rate.

Broad-Based Categorical Eligibility Flexibility

Although federal regulations establish SNAP's core requirements, states have flexibility in administering certain aspects of the program, including the adoption of Broad-Based Categorical Eligibility (BBCE). Under BBCE, states may waive or raise SNAP asset limits, increase the gross income threshold up to 200 percent of the federal poverty level, and simplify application and verification requirements. Households receiving Temporary Assistance for Needy Families–funded benefits may be categorically eligible for SNAP, and states can eliminate the asset test altogether. As a result, in BBCE states, households with gross incomes between 130 percent and 200 percent of the federal poverty level may qualify for SNAP but only if their deductions for expenses such as housing, utilities, and child care reduce their net incomes to no more than 100 percent of federal poverty level.

As of 2025–26, 43 states and the District of Columbia have BBCE policies.⁶ Under these circumstances, eligible households who qualify for SNAP are directly certified for free school meals and are included in a school's ISP. It is likely that states with BBCE policies have higher ISPs and therefore more CEP participation. Very few states substantially changed their BBCE policies during the time frame of this analysis.⁷

Federal Changes to the Social Safety Net and Consequences for UFM

Changes to SNAP and Medicaid at the federal level that limit participation can have effects for schools' direct certification and ISP rates (Gutierrez 2026). The 2025 budget reconciliation law (H.R. 1) made several changes to SNAP and Medicaid that will have participation implications for both programs. For example, the law eliminated SNAP eligibility for legally present asylum seekers and refugees based on humanitarian reasons, resulting in the automatic loss of SNAP benefits for child asylees and refugees as of November 2025.

Additionally, at the time of this report, states will be required to take on additional SNAP administrative costs (25 percent), and states with SNAP error rates greater than or equal to 6 percent will be required to pay a percentage of SNAP benefit costs. These increased costs to states—potentially as high as \$11 billion nationwide—not to mention the eventual cost shifts associated with Medicaid, could add significant strain to budgets, potentially resulting in programmatic changes that decrease caseloads, which would affect direct certification numbers and therefore ISPs, threatening schools' CEP eligibility and reimbursement structures. Schools in CEP subsidy and UFM states may also be affected, as the decrease in federal school meal reimbursements will increase the states' costs of subsidizing free school meals, jeopardizing states' abilities to continue funding their CEP and UFM policies.

4. Barriers to CEP Adoption

Several factors can contribute to school and district leaders' initial decisions to adopt CEP, including CEP's reimbursement components and how the state measures student need to provide additional aid in the state education funding formula. Other aspects, such as changes in student participation in breakfast and lunch, school food revenues and expenditures, and school meal application data, can affect a school or district's decision to continue or discontinue participation in CEP, even before the end of the four-year cycle.

Difficulty Covering Costs

For a school, a group of schools, or a district to be eligible for CEP, they must have ISPs of at least 40 percent before 2023–24 and ISPs of at least 25 percent as of 2024–25. One important consideration in whether a school or district participates is CEP's reimbursement structure. Rather than individual student eligibility, CEP schools are reimbursed for meals served based on a formula. Reimbursements are calculated by multiplying the ISP by 1.6 to determine the percentage of meals that will be reimbursed at the federal free rate, with the remainder of meals served reimbursed at the lower, federal paid rate. For example, a school with 50 percent identified students would be reimbursed at the free rate for 80 percent of meals served ($50 \text{ percent} \times 1.6 = 80 \text{ percent}$) and at the paid rate for 20 percent of meals served. There is no reduced-price reimbursement rate under CEP. Schools and districts with lower ISP rates receive less federal reimbursement. For example, schools and districts with ISPs of 40 percent are reimbursed at the federal free rate for only 64 percent of meals served ($40 \text{ percent} \times 1.6$), with 36 percent of meals reimbursed at the lower, paid rate, creating a gap the school or district must cover.

At the same time, the school or district loses the school meal fee revenue from students who previously paid “full” or reduced prices, which could be a larger issue for schools or districts that had high participation rates among paying students before CEP. But another consideration for schools or districts considering CEP is CEP's financial impact on school meal debt. CEP eliminates the issue of school meal debt, as all meals are free to all students under CEP.⁸

Research in New York school districts generally finds that post-CEP adoption, local food service revenues decline, but increased federal reimbursements more than compensate for local food revenues and expenditures changes (Rothbart et al. 2023). Moreover, although total food expenditures increase,

spending per meal declines, supporting the notion that schools that achieve economies of scale can capitalize on lower meal production costs.

In addition to covering food costs, schools and districts must consider total operational costs (e.g., labor, equipment, and indirect costs) when assessing financial feasibility. Moreover, with increased production costs (e.g., food, labor, and indirect costs), many schools report that the federal free reimbursement rate is inadequate to produce a school meal (SNA 2024). Schools and districts must consider the costs required to produce more meals, including the costs of procuring ingredients and the potential need to hire more staff members or to purchase more equipment, as breakfast and lunch participation often increases post-CEP adoption.

The fiscal consequences of CEP can be particularly difficult in rural areas. Rothbart and coauthors (2023) find that schools with lower school meal participation rates and lower ISP rates are less likely to be able to cover the gaps in revenues under CEP and that this is most common in rural areas. In addition, although Alaska and Hawaii get slightly higher reimbursement rates because of increased food and living costs, the current reimbursement rate may still not be enough to cover the costs of producing free meals for all students.

Loss of Student Need Data

Schools or districts may be hesitant to adopt CEP because of the potential loss of data used to determine state education funding allocations and, therefore, the potential loss of state aid. State education funding formulas often rely on the share of students eating free and reduced-price meals to allocate additional aid to school districts.⁹ At least 19 states allocate aid for student need based on free and reduced-price meal shares.¹⁰ But one priority of CEP is to reduce administrative burden by eliminating the collection of free and reduced-price meal applications. CEP schools no longer collect, process, or verify FNA school meal applications. As a result, schools in states that rely on individual student eligibility data for state education funding often require alternative household income applications, but federal regulations prohibit CEP schools from using school food service funds to collect or process these alternative applications. Therefore, CEP-eligible schools and districts may choose not to participate, even though the funds that were previously used to collect forms results in additional financial resources to support school meals under CEP.

For example, before changing the way student poverty was accounted for in Colorado's state funding formula, hardly any eligible schools in Colorado participated in CEP, largely because the state

used the data collected via free and reduced-price meal applications to provide additional aid to districts (Blagg et al. 2022). After the state changed how it measures student need in its funding formula, barriers to CEP adoption were eliminated, and the state passed UFM statewide.

Some of these changes can be roughly calculated by school and district leaders before deciding to adopt CEP (i.e., using the CEP monthly federal reimbursement estimator tool), but some lessons can happen only postadoption, which may inform the discontinuation of CEP.¹¹ Post-CEP adoption, schools and districts learn how much participation in school meals changes. A school might see a shift in reimbursements from predominantly free federal reimbursement to a greater proportion of meals reimbursed at lower, federal paid rates. Schools and districts can experience the lack of school meal debt and more concretely understand how the combination of the federal reimbursement rate, the ISP rate, and loss of school meal fee revenue results in abilities (or inabilities) to cover gaps in school food expenditures and revenues, though tools such as the reimbursement estimator can help guide schools before deciding to adopt CEP.

Research Questions and Hypotheses

This study is the first to combine the Food Research & Action Center’s (FRAC’s) national CEP data containing school-level ISP information with school-level data in the Common Core of Data to examine CEP uptake among eligible schools and districts, particularly in light of the recent federal eligibility expansions to CEP. The goal of this analysis is to understand patterns in adoption, discontinued participation, and the associated effects for district revenues and expenditures on a national scale.

Our analysis considers the gradual introduction of CEP, changes to the program, changes associated with the pandemic, state policy responses, and changes to direct certification counting to answer the following research questions:

1. How do observable characteristics—including ISPs, student demographics, and geographic context—differ between CEP-eligible schools that participate in CEP and those that do not?
2. How much did lowering the ISP eligibility threshold from 40 percent to 25 percent increase CEP adoption among newly eligible schools and districts?
3. What are the ISP levels of schools and districts that discontinue CEP participation?
4. What are the causal effects of CEP adoption on school district revenues and expenditures, and how do these effects vary by geographic context and intensity of CEP participation?

5. Data

Common Core of Data

We use school-level data from the Common Core of Data (CCD) from the National Center for Education Statistics via the Urban Institute’s Education Data Portal for school years 2014–15 through 2024–25 and district-level CCD fiscal data for 2010–11 through 2021–22 (later years were not available at the time of analysis). The school-level CCD data contain information on student demographics, including race, ethnicity, and school urbanicity. The district-level CCD data include information on school food revenues and expenditures collected via the F-33 survey and information on the number of students the district is financially responsible for and is adjusted by the Consumer Price Index for All Urban Consumers to reflect 2020 dollars. See appendix A for details on each of the school food revenue and expenditure variables.

The Urban Institute’s MEPS Data

We use school-level data from the Urban Institute’s Model Estimates of Poverty in Schools (MEPS) via the Education Data Portal for 2010–11 through 2022–23 to account for school poverty levels, as the traditional free and reduced-price lunch data became increasingly unreliable post-CEP expansion.¹² MEPS is the estimated share of students in each school from households earning up to 100 percent of the federal poverty level and provides a consistent measure of student poverty across time and place. We matched these data to the CCD data.

FRAC’s ISP Data

The Center on Budget and Policy Priorities initiated national CEP data collection and analysis in 2014–15. In the second year, FRAC partnered with the Center on Budget and Policy Priorities on this work and later assumed full responsibility for CEP data collection and analysis. FRAC annually collects school-level ISP and CEP participation data from state agencies that administer the NSLP. These data are combined with the CEP eligibility data that states are required to publicly post to create the full landscape of CEP eligibility and participation for each state.¹³ The ISPs that state agencies report for CEP-eligible schools reflect data from the prior school year because CEP eligibility is based on the previous year’s ISP, and the ISPs that FRAC reports for CEP-participating schools represent the

claiming ISPs that schools use to determine federal reimbursement for meals served. In some cases, this claiming ISP may differ from a school's individual ISP when the school participates in CEP as part of a group or district-wide arrangement.

We use FRAC's ISP and CEP participation data for 2014–15 through 2024–25. But the data do not necessarily contain state or federal numeric school identifiers needed to match schools to other publicly available data, such as the Common Core of Data. Some state or federal numeric identifiers are available for 2019–20 through 2024–25, but prior years include only the state, the district name, and the school name.

We match schools in FRAC's data to the universe of CCD data each year to have school- and district-level information, including indicators on student demographics and rural and urban geographies for 2014–15 through 2024–25. Based on the availability of state or federal numeric identifiers in FRAC's data, we match to schools in the CCD using two methods: numerically matching state or federal school and district IDs or, when such IDs are not available or are unusable, using a string-matching process where we match based on school and district names and state (for more information on the matching process, see appendix B).

In this dataset, we also include indicators relative to the state and year for when states could pilot CEP, when states adopted CEP subsidies or statewide UFM policies, and when states began participating in the Medicaid Direct Certification Demonstration Project.

Sample

Our sample includes all eligible US schools and districts from 2014–15 through 2024–25 without statewide CEP subsidy or UFM policies. Each analysis uses different years to best answer each research question and are described below.

There are three ways schools can participate in CEP: (1) as an individual school, (2) as a group of schools within a district, or (3) district-wide if, collectively, the group or district meets the 25 percent ISP threshold. We create three samples accordingly. For individual schools participating in CEP, we use the ISP that determines their federal reimbursement, which, depending on the school's year within its CEP cycle, may come from any of the prior four school years.¹⁴ For individual schools not participating in CEP, we use their listed ISP as of April 1 of the prior school year or the proxy ISP (i.e., the ISP from October 31 of the prior school year) if their April 1 ISP is unavailable. We create an identifier for groups of schools based on whether schools in the same district report the same claiming ISP, depending on the

year. There are instances where entire districts operate a few individual CEP schools and a few groupings of CEP schools and other instances where districts operate several groupings of CEP schools rather than district-wide CEP. We differentiate accordingly. We create an identifier for district-wide adoption based on whether all schools in the district participate in CEP and report the same ISP.

6. Methodology

Descriptive Analysis

Demographics, Geography, and ISP Rates

For our descriptive analysis, we examine student demographics, geographies, and ISP rates among schools eligible for CEP in 2024–25. We compare schools that are not participating in CEP with those that are participating by individual, group, and district-wide adoption. These schools do not have to be present in other years of data, and they exclude schools in UFM states and states subsidizing CEP.

Newly Eligible Schools and CEP Adoption

To examine the increase in CEP adoption under the lower eligibility threshold of 25 percent, we identify schools in non-UFM, non-CEP-subsidy states that were previously ineligible (schools with ISPs below 40 percent or with missing ISPs, as ISPs were not required to be reported if they were not “near eligible,” or at least 30 percent, before the threshold change) in 2022–23, the last full school year with a 40 percent threshold. We then observe whether these schools (1) still had ISPs below 40 percent in 2024–25 (i.e., the first full school year with the 25 percent threshold available nationwide) and (2) were participating in CEP. Because the threshold changed in October 2023, and some schools took advantage of the new threshold midyear, we omit the 2023–24 school year from this comparison.

Longitudinal Analysis

Medicaid Demonstration Adoption and ISPs

To determine the effects of Medicaid Demonstration Project participation on ISP rates and CEP participation, we use a state-level dataset, including total state ISP rates and total number of CEP schools in the state. We exploit the staggered participation in the Medicaid Demonstration Project over time using a dynamic difference-in-differences specification—that is, the de Chaisemartin et al. (2025) event-study estimator—where the outcome variable is a vector of ISP rates and the number of CEP schools for each state, in each year, and using year and state fixed effects. To examine the effects on ISP rates and CEP adoption, we remove UFM and subsidy states and limit the time frame to 2010–11 to

2019–20, before the pandemic, when emergency flexibilities were granted to SNAP and Medicaid and then removed in later years (i.e., “unwinding”).

Patterns in CEP Adoption and Discontinuation and ISPs

To examine patterns in CEP adoption, discontinuation, and the associated ISPs, we create a sample of schools with ISP data that are continuously observed for a minimum of four consecutive years in non-UFM and nonsubsidy states. Because of the child nutrition waivers implemented during 2020–21 and 2021–22, CEP schools and districts may have ceased their CEP participation after that period because they were able to offer free meals to all students under the waiver’s conditions. Therefore, we limit our analysis to 2014–15 through 2019–20. We also remove CEP schools or districts in CEP pilot states during the first four years of their pilot because pilot years began in 2011–12 and our data begin in 2014–15. We cannot see when these schools adopted CEP and therefore cannot know how many years they continued or discontinued.

Fiscal Analysis

We create a district-level sample for longitudinal analysis to examine the fiscal implications of CEP adoption from 2010–11 through 2020–21 and use districts in non-UFM, nonsubsidy states.

To determine the effects of CEP on per pupil local, state, federal, and total school food revenues, as well as school food personnel and total school food expenditures, we build upon Rothbart et al. (2023) by exploiting the staggered adoption of CEP over time in a difference-in-differences specification among districts that ever adopt CEP.

In light of recent advancements in difference-in-differences methodologies, we use a difference-in-differences event-study estimator, which is suitable for panel data where treatment timing or treatment intensity varies across groups and time—that is, the de Chaisemartin (2025) event-study estimator. This estimator also allows for continuous treatment (i.e., percentage of students attending a CEP school in a district) and dynamic effects over time.

This method requires four assumptions:

1. Parallel trends: Absent the treatment change, treated districts and their controls would have followed similar outcome trends.

2. No anticipation: Groups do not change behavior before the treatment because they know it is coming.
3. Comparable controls: For each treated district and time of treatment, there must be groups with usable treatment histories.
4. Correct treatment timing and intensity: The treatment variable must accurately capture when and how treatment changes.

In this analysis, the outcome is a vector of per pupil revenues and expenditures for each district in each year, with district and year fixed effects, controlling for district characteristics, including percentage of students in poverty and student race or ethnicity. The treatment variable is a binary variable indicating whether the district has at least one CEP school. We also analyze the effect on instructional spending per pupil, the results of which can be found in appendix F.

We then evaluate how effects vary with the extent of CEP adoption within a district, where the treatment variable is a continuous measure of the percentage of children in the district that attend a CEP school. We also include a binary variable to indicate whether all schools in the district have CEP for at least 90 percent of students. The results reflect the effects of changes in the extent of CEP adoption within a district on fiscal outcomes.

Heterogeneous Effects

Lastly, we explore heterogeneity in the effects by urbanicity by restricting the sample to CEP adoption by city, suburb, town, or rural district designation.

7. Results

Descriptive Results

Demographics

Comparing CEP-eligible, nonparticipating schools with CEP-participating schools in 2024–25, CEP schools, on average, enroll fewer students, have higher ISPs, and are more likely to serve elementary school students and are less likely to serve high school students compared with their non-CEP counterparts (table 7.1). CEP schools are also more likely to be located in cities and are less likely to be located in suburban, town, or rural areas compared with non-CEP schools. CEP schools in 2024–25, on average, serve fewer white and Asian students and serve more Black and Hispanic students.

TABLE 7.1

Mean Values of CEP-Eligible Participating and Nonparticipating Schools, 2024–25

	Nonparticipating schools	Participating schools
School characteristics		
Enrollment	532	519
ISP (%)	41.1	59.8
Elementary school	60.2	64.3
Middle school	32.3	32.3
High school	25.0	22.4
City	20.6	33.9
Suburban	28.2	23.2
Town	14.2	12.0
Rural	37.0	30.9
Race or ethnicity (%)		
Asian	2.5	1.9
Black	15.1	23.8
Hispanic	22.1	29.3
White	53.3	37.3
Number of schools	17,601	27,525

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

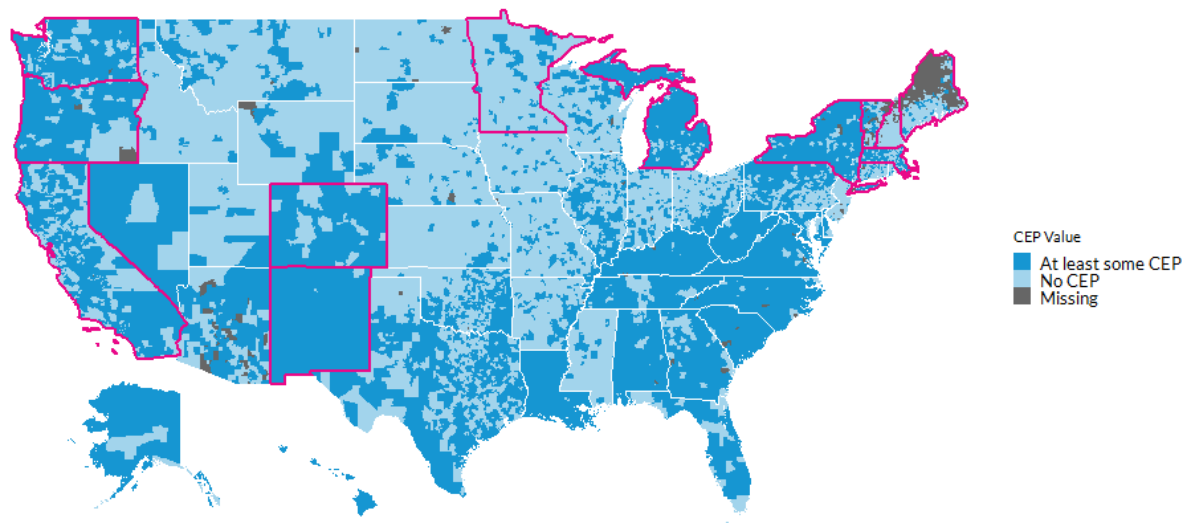
Notes: CEP = Community Eligibility Provision; ISP = identified student percentage. All schools have ISPs of at least 25 percent. City, suburb, town, and rural refer to the National Center for Education Statistics' urban-centric locale definitions.

Geography

Figure 7.1 shows geographically where districts with any CEP participation (as a single school, as a group of schools, or district-wide) are located in 2024–25. Districts located in the middle of the US are much less likely to participate in CEP compared with districts located in the south or on the coasts.

State-by-state student demographic information by school CEP participation status is available in appendix C, and state-by-state comparisons of eligible and nonparticipating schools and eligible participating schools can be found in graphs 2 and 3 of “Community Eligibility: The Key to Hunger-Free Schools, School Year 2024–25” (Hysom and FitzSimons 2024).

FIGURE 7.1
Districts with Any CEP Participation, 2024–25



Source: Authors’ analysis of the Food Research & Action Center’s Community Eligibility Provision database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Outlined states have either statewide universal free meal policies or CEP subsidy policies. California, Colorado, Massachusetts, Maine, Michigan, Minnesota, New Mexico, and Vermont are UFM states, and New York, Oregon, and Washington are CEP subsidy states.

ISP Rates and CEP Participation

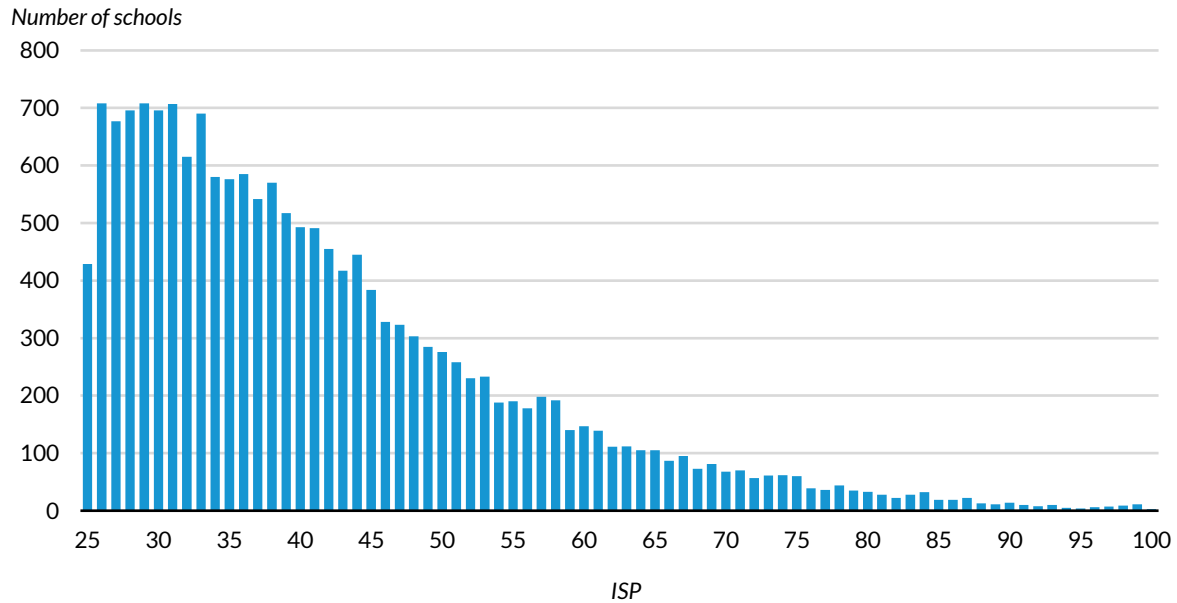
Individual School CEP Participation

Figure 7.2 shows the number of CEP-eligible schools by ISP rate. In this sample, of the almost 19,600 eligible schools, 17,200 are eligible but not participating, and almost 2,500 individually participated in CEP in 2024–25, most around the 62.5 percent ISP rate.

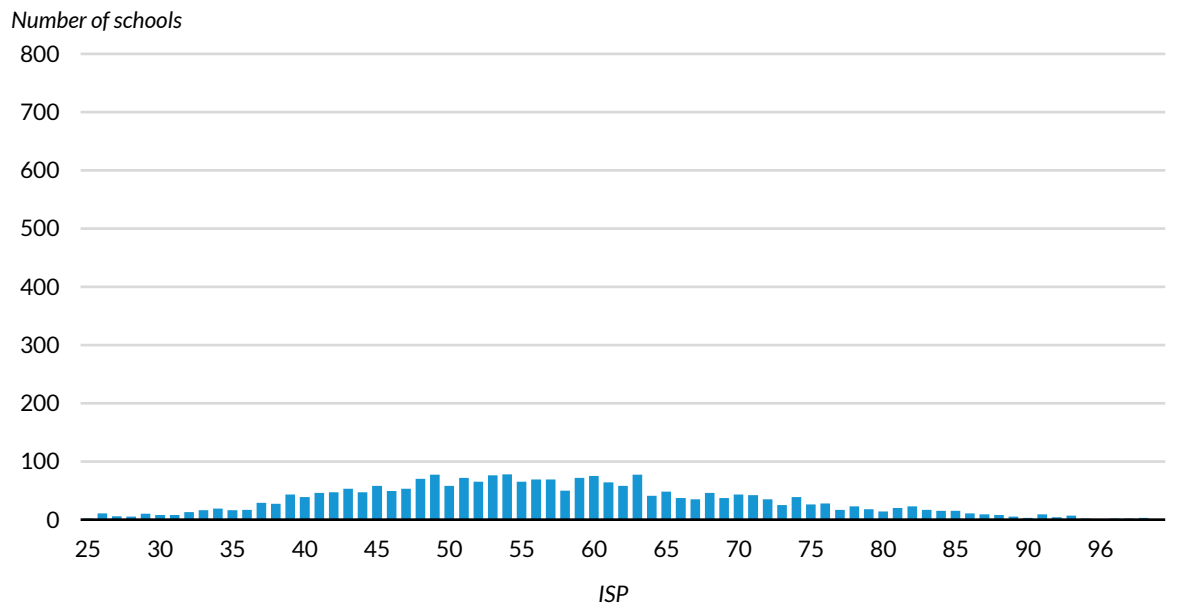
FIGURE 7.2

ISP Distribution of CEP-Eligible Schools, by CEP Participation, in Non-UFM, Nonsubsidy States, 2024–25

Schools eligible for but not participating in CEP



Schools eligible for and participating in CEP



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

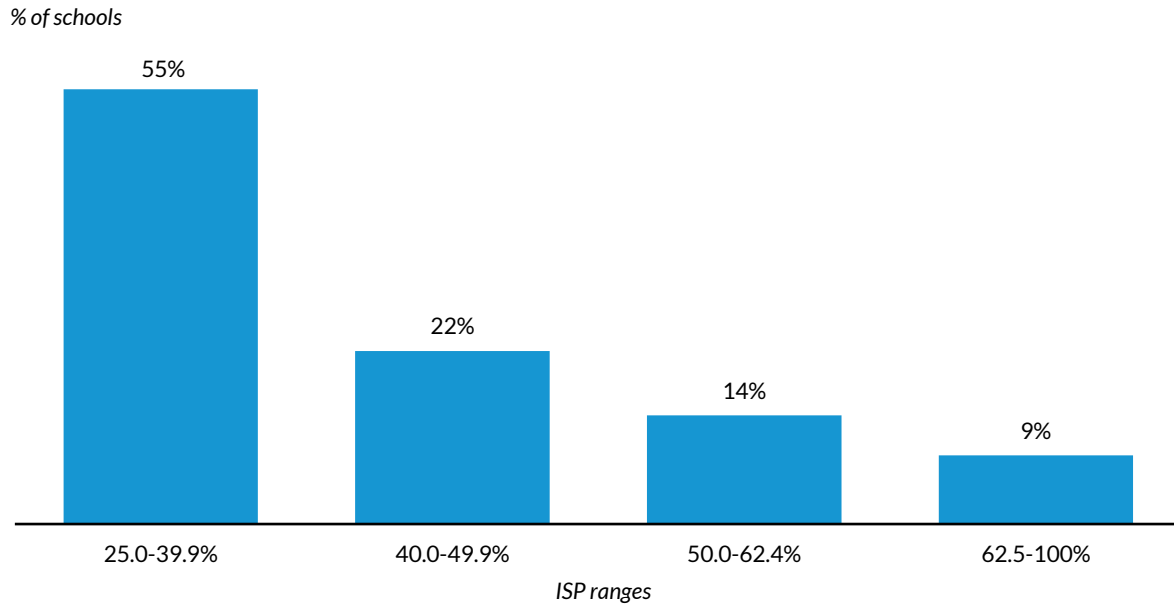
Notes: CEP = Community Eligibility Provision; ISP = identified student percentage; UFM = universal free meal. Sample contains 17,204 eligible non-CEP schools and 2,427 individual CEP schools in non-UFM, nonsubsidy states.

Figure 7.3 shows the shares of CEP and non-CEP schools by ISP rate range. More than 50 percent of eligible but nonparticipating CEP schools have ISPs between 25 and 40 percent compared with 9 percent of such schools with ISPs from 62.5 to 100 percent. Those approximately 1,500 schools would be reimbursed at the federal free rate for 100 percent of meals served. More information about these schools can be found in appendix D. Alternatively, most individually participating CEP schools have ISPs greater than 50 percent. Ten percent have ISPs below 40 percent, 23 percent have ISPs between 40 and 50 percent, 35 percent have ISPs between 50 and 62.5 percent, and 32 percent have ISPs greater than 62.5 percent.

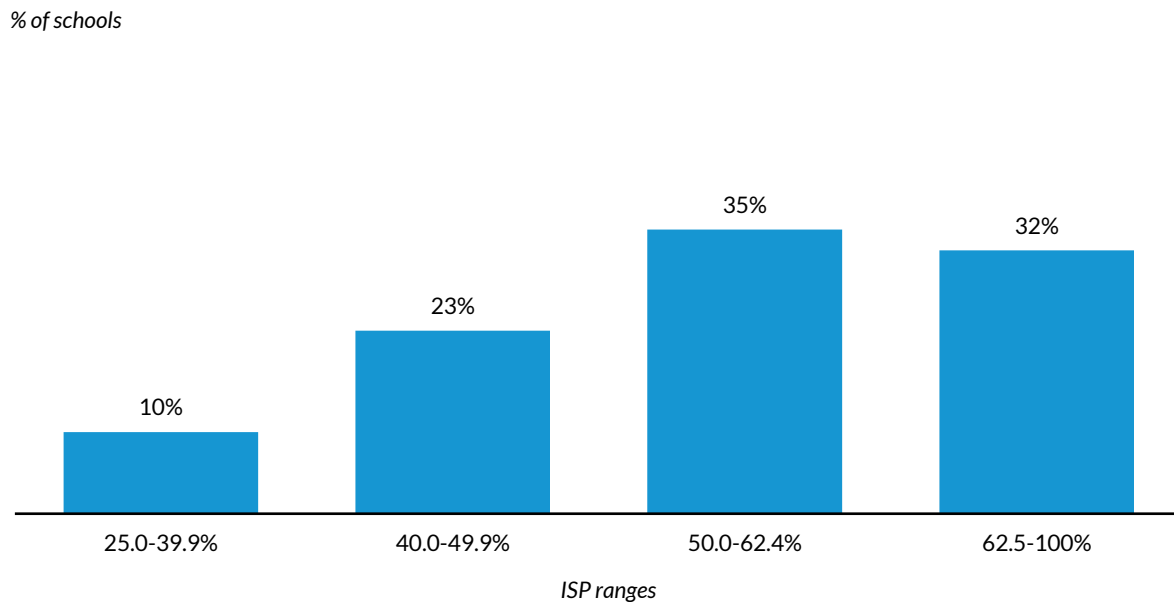
FIGURE 7.3

ISP Ranges of CEP-Eligible Schools, by CEP Participation, in Non-UFM, Nonsubsidy States, 2024–25

Schools eligible for but not participating in CEP



Schools eligible for and participating in CEP



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; ISP = identified student percentage; UFM = universal free meal. Sample contains 17,204 eligible non-CEP schools and 2,427 individual CEP schools in non-UFM, nonsubsidy states.

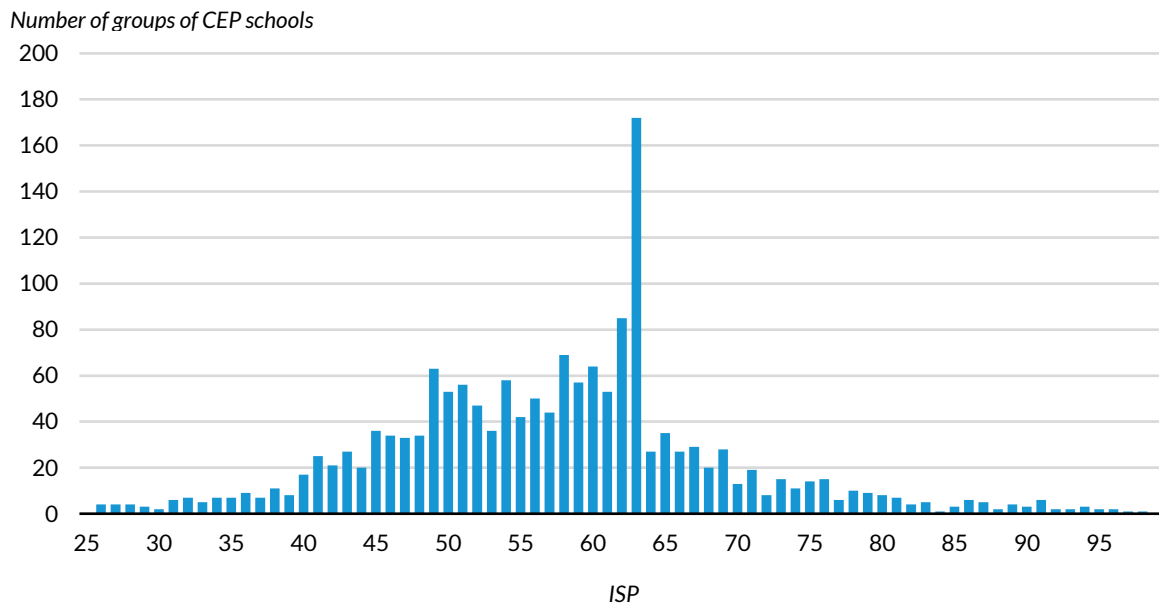
CEP Participation Among Groups of Schools

Of the 17,201 schools in 1,642 groups that participated in CEP in 2024–25, there was a spike at a 62.5 percent ISP, likely from schools strategically grouping to receive the federal free reimbursement for 100 percent of meals served. Among groups of schools that participate, three-fourths have ISPs greater than 50 percent, and a third have ISPs above 62.5 percent (figure 7.4).

FIGURE 7.4

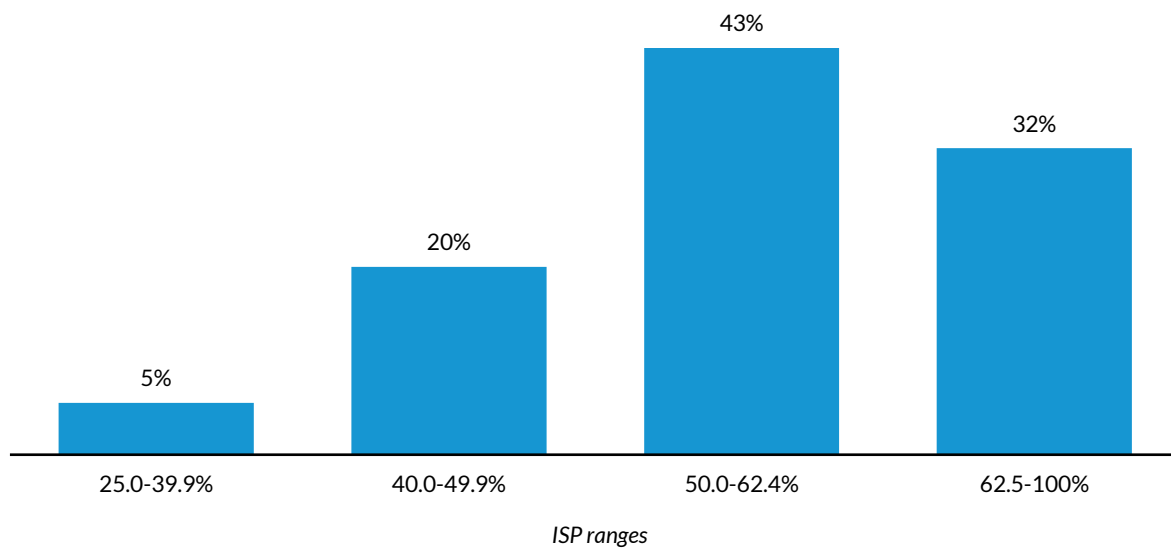
ISPs of Groups of CEP Schools in Non-UFM, Nonsubsidy States, 2024–25

ISP distribution of groups of CEP schools



ISP ranges of groups of CEP schools

% of groups of schools with CEP



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; ISP = identified student percentage; UFM = universal free meal. Sample contains 1,642 groups of CEP schools and 17,201 schools in non-UFM, nonsubsidy states.

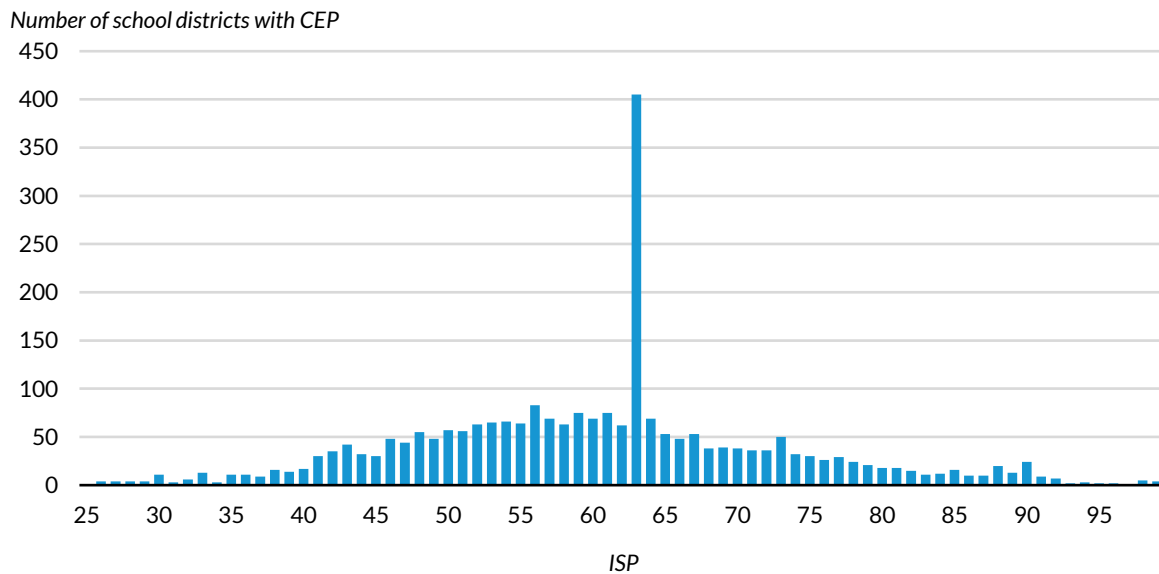
District-wide CEP Participation

Similar to the groups of schools, districts are more likely to adopt CEP if their ISP reaches 62.5 percent (figure 7.5). In fact, almost half of districts that participated in CEP in 2024–25 had ISPs of at least 62.5 percent, and a third had ISPs between 50 and 62.5 percent, whereas only 5 and 15 percent of CEP districts had ISPs between 25 and 40 percent and between 40 and 50 percent, respectively.

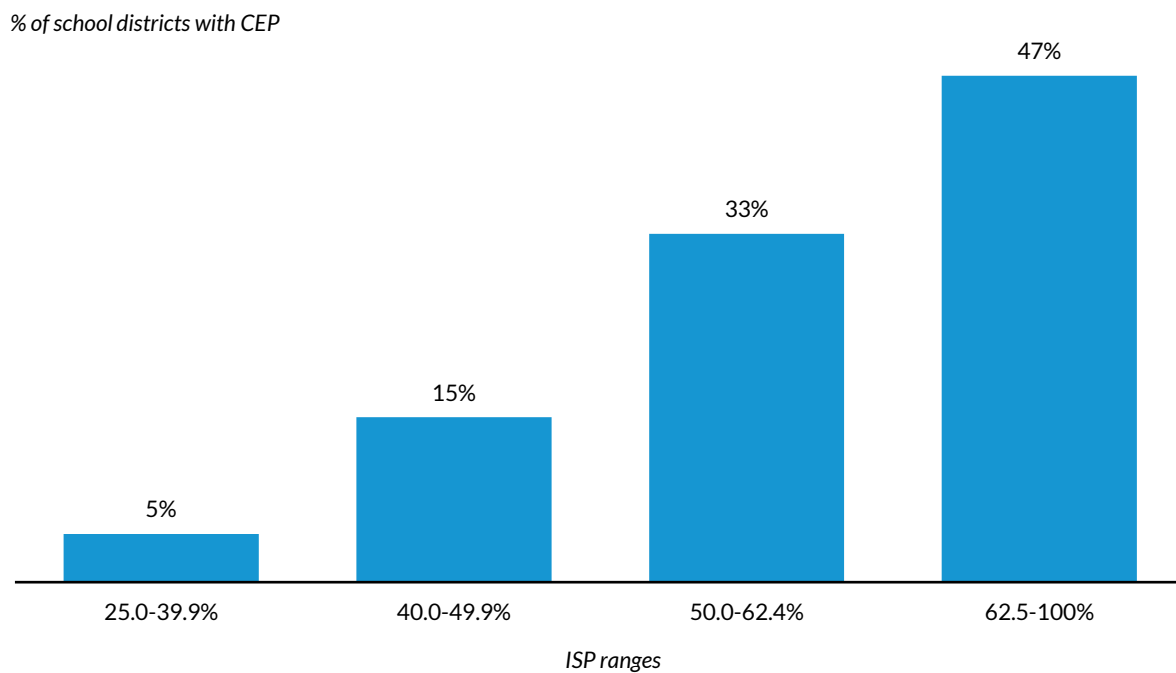
FIGURE 7.5

ISPs of CEP School Districts in Non-UFM, Nonsubsidy States, 2024–25

ISP distribution of CEP school districts



ISP ranges of CEP school districts



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; ISP = identified student percentage; UFM = universal free meal. Sample contains 2,599 CEP school districts and 8,106 schools in non-UFM, nonsubsidy states.

Newly Eligible Schools and CEP Adoption

In this sample, 8,991 schools appeared in both 2022–23 and 2024–25, had ISPs below 40 percent (or missing) in 2022–23, were not participating in CEP in 2022–23, and had ISPs between 25 and 40 percent in 2024–25. We find that only 7 percent of newly eligible schools adopted CEP in 2024–25. Of those, 24.0 percent participated as individual schools, 38.1 percent participated as part of a group of schools, and 38.0 percent participated as part of their entire district. The average ISP among individual school, group, and district-wide participation was 34 percent.

Longitudinal Results

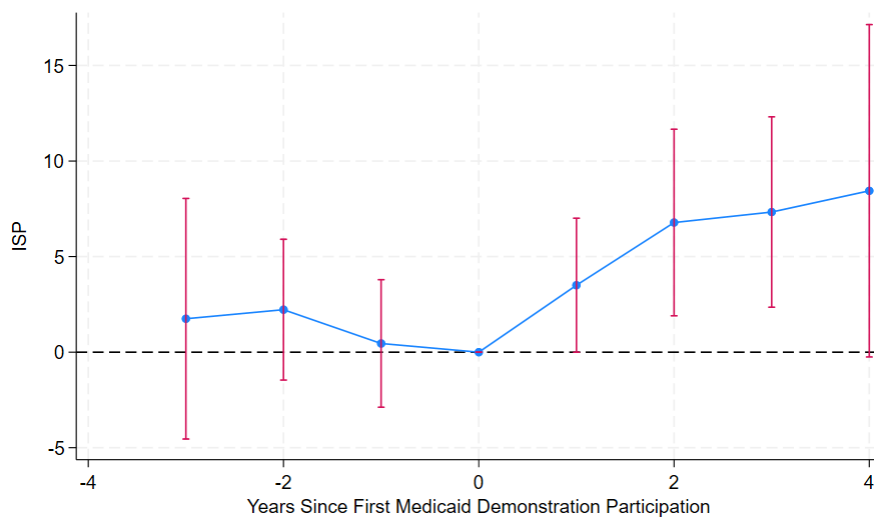
Post-Medicaid Demonstration

Changes to ISPs

We find the percentage of ISP students increases 6 percentage points, on average, in the years following their joining the Medicaid Demonstration Project. Additional supporting results can be found in appendix E.

FIGURE 7.6

Changes in ISP Rates Following Participation in the Medicaid Demonstration Project



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

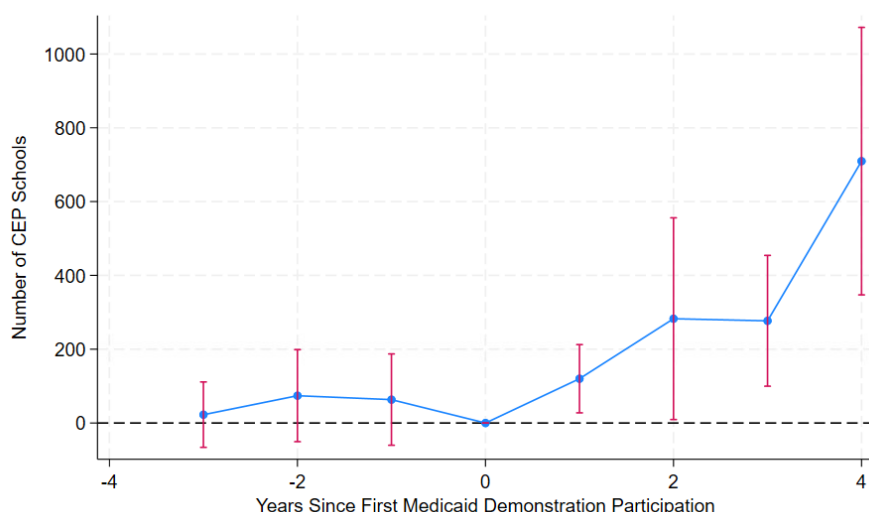
Notes: ISP = identified student percentage. Zero indicates the school year following each state's joining of the Medicaid Demonstration Project.

Changes to CEP Adoption

We find the number of CEP-participating schools in a state increases, on average, by 271 schools after a state's participation in the Medicaid Demonstration Project. Additional supporting results can be found in appendix E.

FIGURE 7.7

Changes in the Number of CEP Schools Following Participation in the Medicaid Demonstration Project



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Zero indicates the school year following each state's joining of the Medicaid Demonstration Project.

Decisions to Adopt or Discontinue CEP

We observe 29,694 schools with ISP data and at least four years of observations from 2014–15 through 2019–20, regardless of CEP participation status. Of those, 46 percent (13,778 schools) participate in CEP at least once. Schools often change how they participate in CEP, from an individual school to a group of schools to a district. Of these schools that participate in CEP during our time frame, 68 percent participated as an individual school at some point, 79 percent participated as part of a group, and 32 percent participated as an entire district.

CEP Adoption

Of the 13,778 schools that participated in CEP at least once, 6,435 schools are observed in the time frame as not participating in CEP before adopting CEP. We find that the remaining 7,765 schools (53

percent) had already been participating in CEP in the first year they appear in the data. Ninety-six percent (13,234) of the CEP schools adopted it only one time during this time frame, compared with 4 percent (539 schools) that adopted, discontinued for at least one year, and then adopted one more time, and 5 schools that adopted three times.

How Many Years Do We Observe Schools Participating in CEP?

Table 7.2 shows the number of schools that are observed for four, five, or six years and the number of years they participated in CEP, the number of schools that discontinued CEP, and those that discontinued and readopted CEP later.

Among schools observed for four years, the largest share had participated in CEP for four years (1,793 schools, or 38.9 percent), followed by three years (1,616 schools, or 35.0 percent), one year (617 schools, or 13.4 percent), and two years (588 schools, or 12.7 percent). Of schools observed participating in CEP for one year, 118 (19.1 percent) were observed only one year before they discontinued CEP, and of those, none adopted it again. But two-fifths of those observed participating in CEP for two years discontinued it, and 142 readopted it some time during the four years.

Among schools observed for five years, most had participated in CEP for five years (1,842 schools, or 55.5 percent). Smaller numbers had participated for three years (678 schools, or 20.4 percent), one year (290 schools, or 8.7 percent), two years (278 schools, or 8.4 percent), and four years (230 schools, or 6.9 percent). A similar pattern occurs for those observed for five years as those observed for four years: Some of these schools discontinued CEP, and some of those eventually readopted sometime during the five years.

Among schools observed for six years, the majority had participated in CEP for the full six years (3,130 schools, or 53.5 percent), followed by five years (921 schools, or 15.8 percent), three years (778 schools, or 13.3 percent), one year (340 schools, or 5.8 percent), four years (342 schools, or 5.9 percent), and two years (335 schools, or 5.7 percent). A similar pattern of discontinuation and readoption occurs for these schools as well.

TABLE 7.2

Number of Schools, by Years Observed and Number of Years Participating in CEP

Years participating in CEP	Observed 4 Years			Observed 5 Years			Observed 6 Years		
	Total	Dropped CEP	Adopted again	Total	Dropped CEP	Adopted again	Total	Dropped CEP	Adopted Again
1	617 (13.4%)	118 (19.1%)	0	290 (8.7%)	35 (12.1%)	0	340 (5.8%)	138 (40.6%)	0
2	588 (12.7%)	246 (41.8%)	142	278 (8.4%)	47 (16.9%)	6	335 (5.7%)	112 (33.4%)	34
3	1,616 (35.0%)	83 (5.1%)	27	678 (20.4%)	57 (8.4%)	34	778 (13.3%)	99 (12.7%)	27
4	1,793 (38.9%)	-	-	230 (6.9%)	135 (58.7%)	57	342 (5.9%)	271 (79.2%)	112
5	-	-	-	1,842 (55.5%)	-	-	921 (15.8%)	232 (25.2%)	105
6	-	-	-	-	-	-	3,130 (53.5%)	-	-
		447	169		274	97		852	278
Total schools	4,614	(9.7%)	(37.8%)	3,318	(8.3%)	(35.4%)	5,846	(14.6%)	(32.6%)

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Note: CEP = Community Eligibility Provision.

What Are the ISPs of Schools, by Number of Years Participating in CEP and CEP Participation?

The first panel of figure 7.8 shows the average ISP of schools by the number of years they participated in CEP for schools that do not discontinue CEP during this time frame. Schools observed for longer periods, particularly four or more years, have higher average ISPs, demonstrating that schools with longer CEP participation have ISP levels closer to the 62.5 percent break-even threshold.

The second panel shows the same information but for schools that drop CEP and do not readopt it during our time frame. The average ISP for these schools does not exceed 58 percent, and schools that discontinued CEP at or before the four-year mark had average ISPs between 49 and 53 percent, suggesting that lower ISPs and the therefore lower shares of meals reimbursed at the federal free rate may be discontinuing CEP for financial reasons.

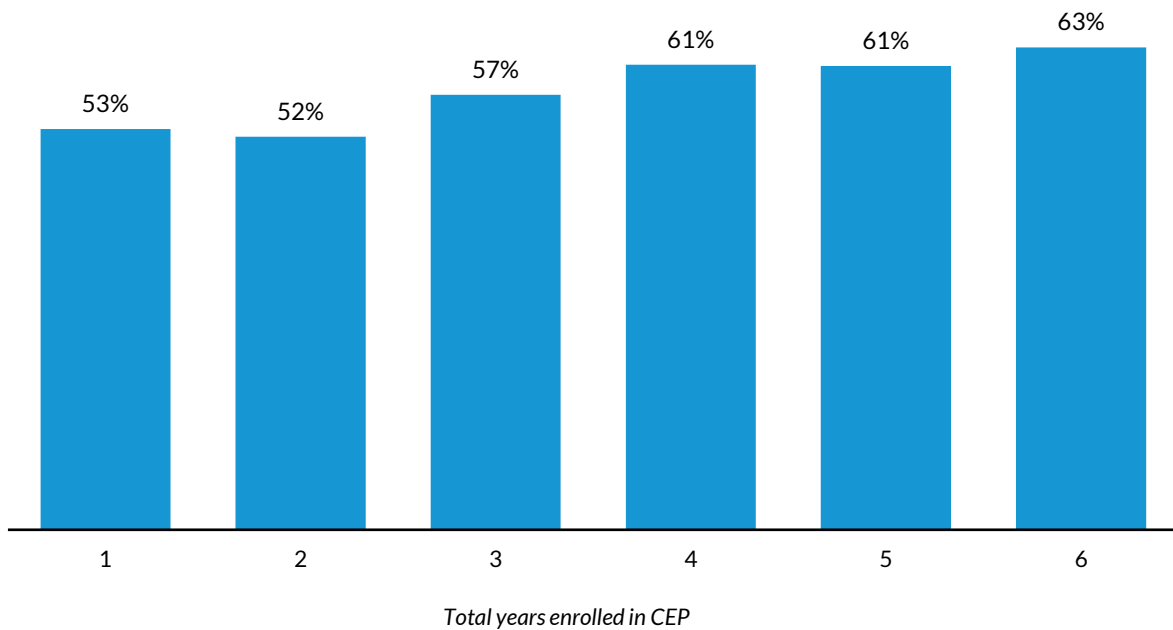
The third panel shows information for those that drop CEP and readopt it at some point. These schools had ISPs closer to the 62.5 percent threshold and are seen as readopting as a group or entire district.

FIGURE 7.8

Mean ISPs of Schools

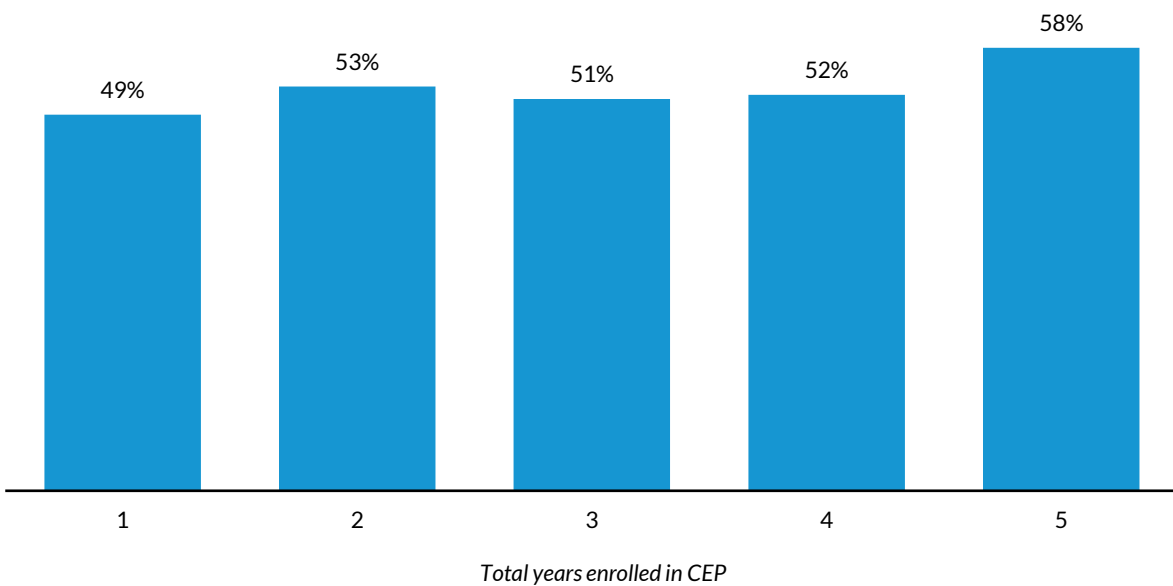
Average ISPs, by years participating in CEP, for schools that did not discontinue CEP

Mean ISP

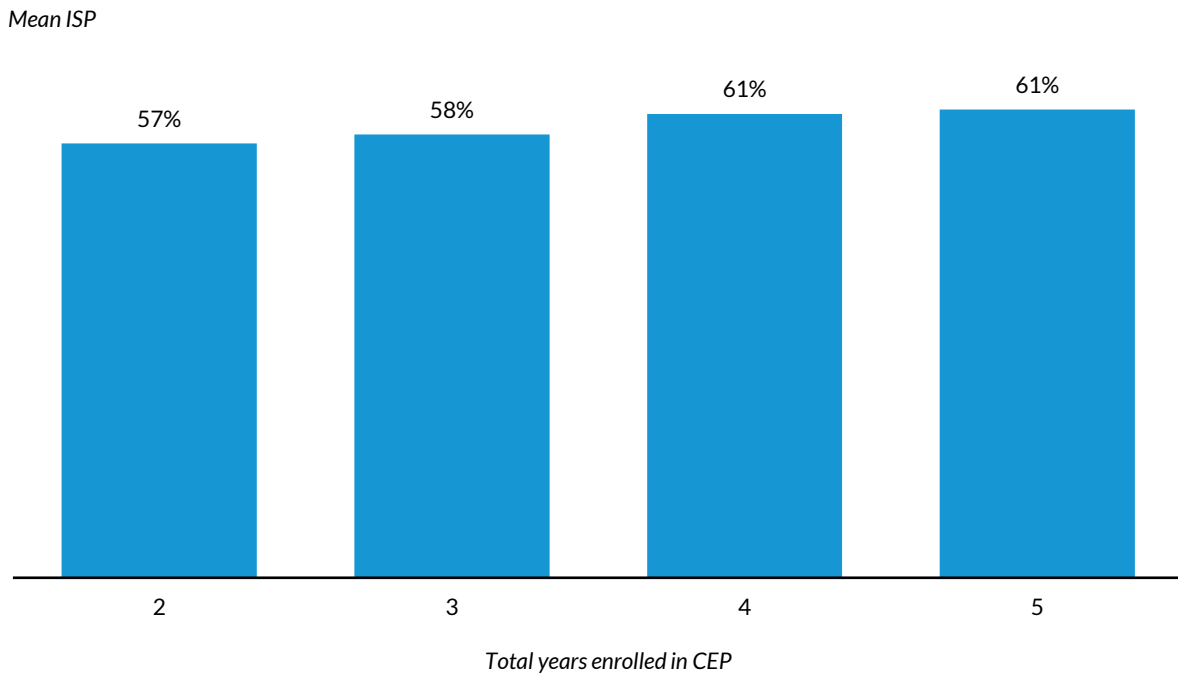


Average ISPs, by years participating in CEP, for schools that discontinued CEP

Mean ISP



Average ISPs, by years participating in CEP, for schools that discontinued CEP and readopted it later



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Note: CEP = Community Eligibility Provision; ISP = identified student percentage.

Fiscal Results

General Effects

Sample Descriptives

Table 7.3 presents descriptive statistics for the entire analytic sample in the year immediately preceding districts' CEP adoption. The sample includes 1,019 school districts, of which some first adopted CEP in 2020–21 (i.e., not yet adopted CEP) and will serve as the comparison group, while others adopted between 2014–15 and 2019–20 (i.e., adopted CEP).¹⁵ This analysis excludes CEP districts in UFM and subsidy states.

Districts that adopted CEP sometime between 2014–15 and 2019–20, compared with districts that adopted CEP in 2020–21, served more students in poverty (27.1 percent versus 19.4 percent) and were more heavily Black (30.0 percent versus 15.3 percent) and less heavily white (39.0 percent versus 52.6 percent). Hispanic enrollment shares were similar across groups.

Total school food revenue is the sum of local, state, and federal school food revenues, and total food expenditures include personnel food expenditures. Across all districts, average local food revenue was \$76.70 per pupil, while federal food revenue averaged \$481.60 per pupil, resulting in total food revenue of \$572.60 per pupil. Average food expenditures totaled \$704.70 per pupil, including \$239.50 in personnel food expenditures. On average, before CEP, districts were spending approximately \$130 more on school food programs than they earned.

Districts that adopt CEP later earned slightly more in state and local revenue (\$84.50 versus \$75.70 per pupil) and less in federal revenue per pupil. They were also spending more in total food expenditures per pupil (\$752.80 versus \$698.20 per pupil) before adoption.

We do a similar robustness analysis to examine whether CEP adoption affects district instructional expenditures, which can be found in appendix F.

TABLE 7.3
Summary Statistics for Pretreatment Sample

	All Schools That Eventually Adopt CEP		Not Yet Adopted CEP	Adopted CEP	City	Suburb	Town	Rural
	Mean	SD	Mean	Mean	Mean	Mean	Mean	Mean
District characteristics								
Enrollment	1,728	6,656	1,615	1,742	1,604	4,736	1,779	751
MEPS	26.20	8.70	19.40	27.10	30.60	24.70	22.20	23.50
Race or ethnicity (%)								
Asian	1.03	3.39	1.43	0.98	1.47	1.85	0.88	0.35
Black	28.27	34.34	15.27	29.95	52.93	33.63	11.05	6.40
Hispanic	20.86	26.78	23.86	20.46	26.32	22.80	15.84	16.18
Other	9.28	19.00	6.88	9.59	4.74	5.30	7.41	15.89
White	40.56	35.78	52.56	39.00	14.54	36.42	64.79	61.17
Revenues per pupil (\$)								
Local food	76.70	108.80	84.50	75.70	42.10	98.80	108.90	90.80
State food	14.20	61.00	22.50	13.10	13.50	15.10	9.90	15.90
Federal food	481.60	372.40	444.60	486.70	471.70	449.50	433.80	515.30
Total food	572.60	387.80	551.70	575.50	527.30	563.40	552.60	622.10
Expenditures per pupil (\$)								
Personnel food	239.50	286.20	278.90	234.20	104.10	152.80	241.00	391.90
Total food	704.70	598.70	752.80	698.20	664.70	583.60	601.50	813.40
Districts (#)	1,019	-	122	897	362	138	120	398

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; MEPS = Model Estimates of Poverty in Schools; SD = standard deviation. Sample includes districts that adopted CEP in at least one school from 2014–15 through 2020–21. Statistics measured in the year immediately preceding CEP adoption (or 2019–20 for districts that adopted CEP in 2020–21). Revenue and expenditure data are in 2020 dollars. Identified student percentage data become available starting in 2014–15, and we therefore use MEPS or the estimated share of students living at or below 100 percent of the federal poverty level to control for poverty throughout the time frame.

The demographic composition of districts varied markedly by locale. City districts served more students in poverty (30.6 percent) and were predominantly Black, with Black students composing approximately 53 percent of enrollment, on average, compared with only 6 percent in rural districts. Conversely, white students represented approximately 15 percent of enrollment in city districts but more than 60 percent of enrollment in town and rural districts. Hispanic enrollment shares were highest in city districts (26.3 percent) and lowest in town districts (15.8 percent).

City districts reported the lowest average local food revenue per pupil (\$42.10), whereas town districts reported the highest average (\$108.90). Federal food revenue constituted approximately \$433.80 per pupil in town districts and \$515.30 per pupil in rural districts. Consequently, rural districts reported the highest total food revenue per pupil (\$622.10), while city districts reported the lowest total (\$527.30).

Rural districts also reported the highest personnel food expenditures (\$391.90 per pupil) and total food expenditures (\$813.40 per pupil), whereas city districts reported the lowest personnel food expenditures (\$104.10 per pupil). Suburban districts reported the lowest total food expenditures (\$583.60 per pupil). These differences suggest variation in the scale and cost structures of food service operations across district types.

Overall, the descriptive statistics reveal heterogeneity across district types in both financial and demographic characteristics. These differences underscore the importance of accounting for district characteristics when estimating the effects of CEP adoption and suggest that the program's impacts may vary across geographic contexts.

Pretrend Results

The panels in figure 7.9 present event-study estimates from the dynamic difference-in-differences models examining the effects of CEP adoption on school food service finances. Consistent with the average total effects reported in table 7.4, the results suggest that financing and operation of school meal programs changed substantially post-CEP adoption.

The panels display the estimated effects on food service revenues and expenditures. Local food revenue declines immediately following CEP adoption and remains persistently below preadoption levels throughout the posttreatment period. The magnitude of the decline generally increases, indicating a sustained reduction in local food service revenue consistent with the loss of student paid fees. In contrast, federal food revenue increases beginning in the first postadoption year and continues to rise, likely because of the increase in participation post-CEP adoption that prior research has found.

As federal reimbursements increase, total food revenue also rises steadily throughout the posttreatment period, suggesting that gains in federal funding more than offset reductions in local revenue.

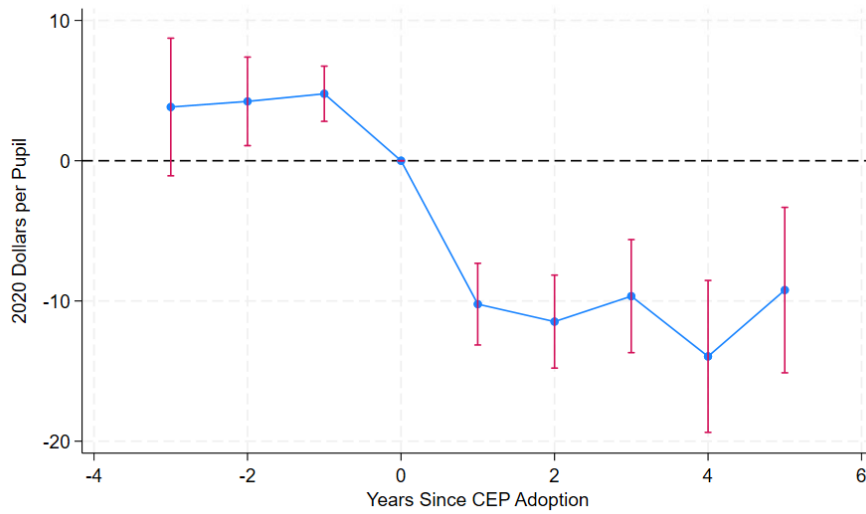
The expenditure estimates largely mirror these revenue patterns. Personnel food expenditures remain relatively stable immediately after adoption but begin increasing in later posttreatment years. Similarly, total food expenditures rise progressively, with the largest increases occurring several years after CEP implementation.

The pretreatment estimates provide additional insight into the validity of the identification strategy. Revenue outcomes, particularly local food revenue and federal food revenue, reflected nonzero estimates before CEP adoption, but the years before CEP adoption have overlapping confidence intervals. Event-study results indicate that financial structure of school food service programs changed post-CEP adoption by shifting revenue from local sources to federal reimbursements and increasing food service expenditures.

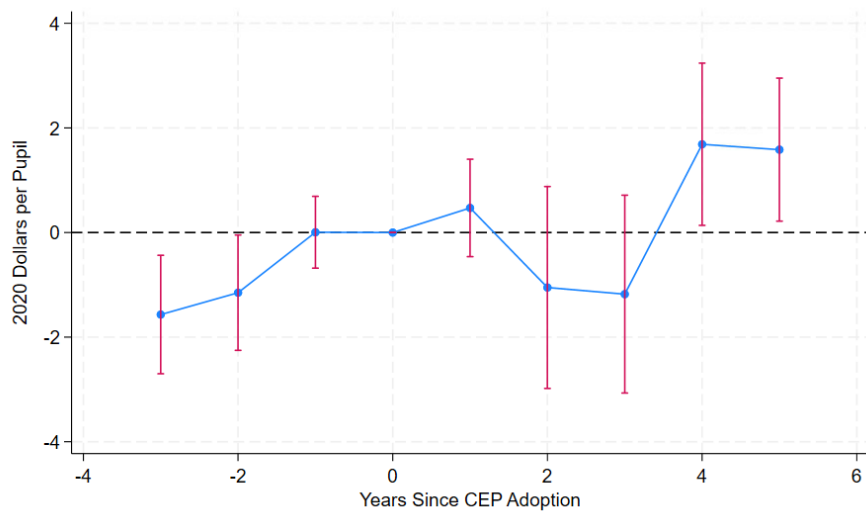
FIGURE 7.9

Pretrend and Post Effects of CEP Adoption

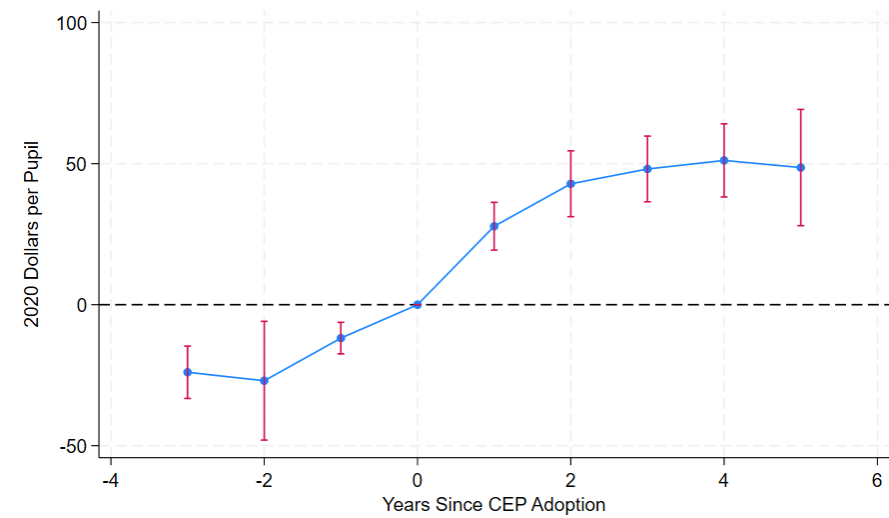
Local food revenue per pupil



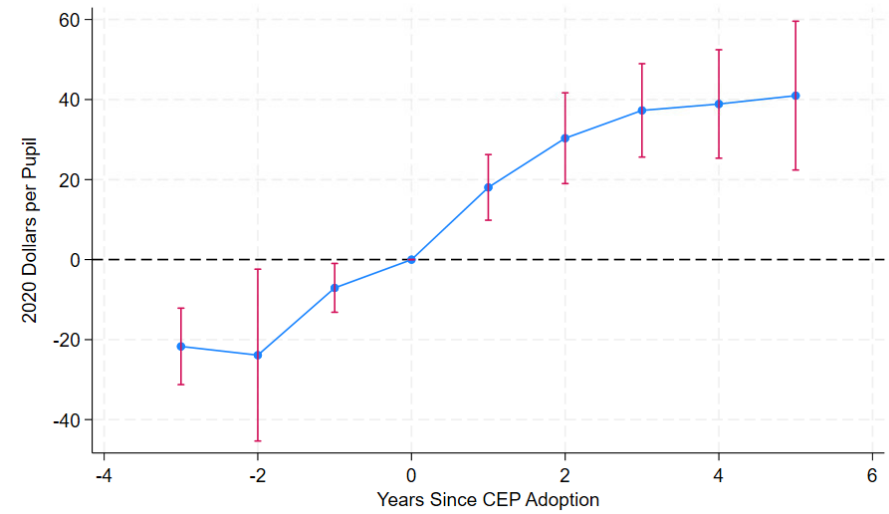
State food revenue per pupil



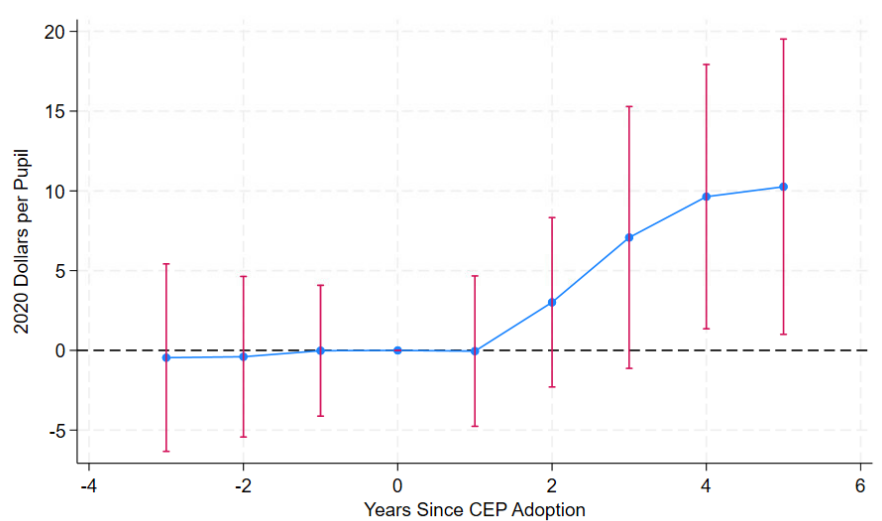
Federal food revenue per pupil



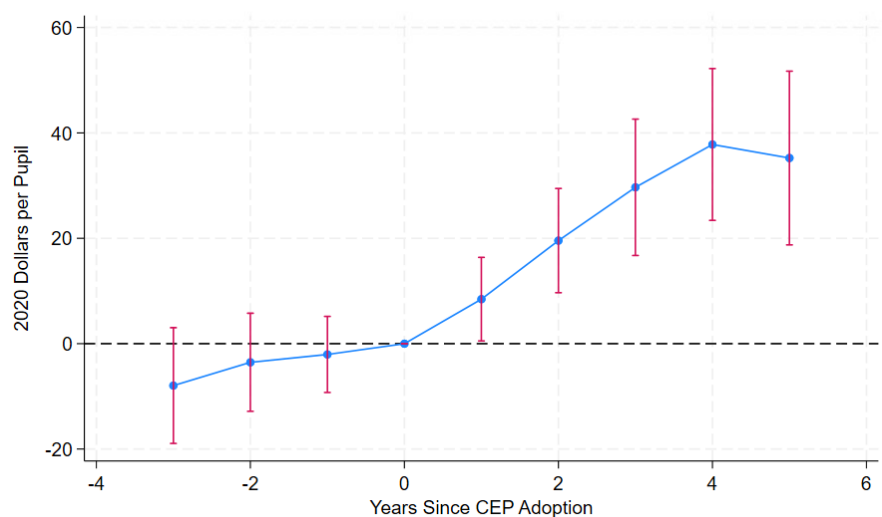
Total food revenue per pupil



Food personnel expenditures per pupil



Total food expenditures per pupil



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level. Point estimates can be found in appendix G.

Difference-in-Differences Results

Table 7.4 presents the average cumulative treatment effects from the dynamic difference-in-differences estimator. The results indicate that school food service finances changed substantially post-CEP adoption. Following CEP adoption, local food revenue declined by \$10.85 per pupil, while federal food revenue increased by \$42.48 per pupil.¹⁶ As a result, total food revenue increased by roughly \$31.82 per pupil. The magnitude and statistical significance of these estimates suggest that increases in

federal reimbursements more than offset reductions in local food revenue associated with CEP participation.

CEP adoption was also associated with higher food service expenditures. Personnel food expenditures increased by \$5.36 per pupil, though the estimate was not statistically significant. Total food expenditures increased by \$24.42 per pupil and were statistically significant. The increase in expenditures is consistent with the historical increase in school breakfast and lunch participation under CEP and, therefore, the observed increase in total food service revenues.

The placebo tests provide additional information regarding the validity of the identifying assumptions. Placebo tests fail to reject the null hypothesis of no pretreatment effects for personnel food expenditures ($p = 0.988$) and food expenditures ($p = 0.408$), providing support for the parallel trends assumption for these outcomes. But the placebo tests are statistically significant for local food revenue, state food revenue, federal food revenue, and total food revenue, suggesting the presence of differential pretreatment trends for revenue outcomes. Consequently, the estimated revenue effects should be interpreted with caution.

TABLE 7.4
Dynamic Difference-in-Differences Results

Outcome	Average total effect	SE	Joint effects p -value	Placebo p -value
Local food revenue	-10.85***	1.74	<0.001	<0.001
State food revenue	0.19	0.64	0.005	0.021
Federal food revenue	42.48***	6.04	<0.001	<0.001
Total food revenue	31.82***	5.86	<0.001	<0.001
Personnel food expenditure	5.36	3.09	0.114	0.988
Food expenditure	24.42***	5.67	<0.001	0.408

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: SE = standard error. Standard errors clustered at the local education agency level. Average total effects represent cumulative treatment effects across posttreatment periods. Placebo-test p -values assess the joint null hypothesis of no pretreatment effects.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

Extent of CEP Adoption

Table 7.5 presents estimates from the continuous-treatment specification, which examines the effects of changes in CEP enrollment intensity (i.e., the share of students in a district enrolled in CEP schools) rather than the binary adoption of CEP. The results indicate that greater CEP participation is associated with substantial shifts in school food service finances.

Increases in CEP enrollment intensity were associated with significant changes in food service revenues. Specifically, a 10 percentage-point increase in the share of students enrolled in CEP schools was associated with a reduction of approximately \$2.16 per pupil in local food revenue and an increase of approximately \$8.47 per pupil in federal food revenue. As a result, total food revenue increased by approximately \$6.35 per pupil, consistent with CEP participation shifting school meal funding away from local sources and toward federal reimbursements, and resulting in a net increase in overall food service revenue.

CEP enrollment intensity was also associated with higher food service expenditures. A 10 percentage-point increase in CEP enrollment was associated with an increase of approximately \$4.88 per pupil in total food expenditures. Although personnel food expenditures had a positive estimated effect, the estimate was not statistically significant. These findings suggest that districts with greater numbers of students attending CEP schools expanded food service spending in line with the increased school food revenues.

The placebo tests provide mixed support for the identifying assumptions. Placebo estimates are statistically insignificant for personnel food expenditures and for food expenditures, providing evidence consistent with parallel pretreatment trends for these outcomes. But placebo tests are statistically significant for local food revenue, state food revenue, federal food revenue, and total food revenue, indicating the presence of differential pretreatment trends in revenue outcomes. Consequently, the revenue estimates should be interpreted with caution. Nevertheless, the consistency of the findings across both the binary and continuous-treatment specifications suggests that greater CEP participation is associated with increased federal food revenues and increased food service expenditures.

TABLE 7.5

Extent of CEP Adoption

Outcome	Average cumulative effect	SE	Joint effects p-value	Placebo p-value
Local food revenue	-0.216***	0.033	<0.001	<0.001
State food revenue	0.004	0.013	0.005	0.022
Federal food revenue	0.847***	0.119	<0.001	<0.001
Total food revenue	0.635***	0.116	<0.001	<0.001
Personnel food expenditures	0.107	0.062	0.114	0.988
Total food expenditures	0.488	0.111	<0.001	0.460

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; SE = standard error. Standard errors clustered at the local education agency level. Average cumulative effects represent the cumulative effect of a 1 percentage-point increase in CEP enrollment intensity across posttreatment periods. Placebo-test *p*-values assess the joint null hypothesis of no pretreatment effects. Additional supporting point estimates are available in appendix H.

* *p* < 0.10; ** *p* < 0.05; *** *p* < 0.01.

Heterogeneity: Urbanicity***Difference-in-Differences Results***

Table 7.6 presents heterogeneous treatment effects of CEP adoption by district locale. Although the overall pattern of results is broadly consistent across geographic contexts, the magnitude and statistical significance of CEP's effects vary across city, suburban, town, and rural districts.

Across all district types, and as expected, CEP adoption was associated with significant declines in local food revenue and substantial increases in federal food revenue. Local food revenue declined by \$9.73 to \$15.27 per pupil, with the largest reductions occurring in town and rural districts. At the same time, federal food revenue increased significantly in all locales, ranging from \$35.05 per pupil in suburban districts to \$57.10 per pupil in town districts.

The resulting effects on total food revenue were generally positive. Total food revenue increased significantly in city, suburban, and town districts, with the largest gains observed in town districts (\$41.78 per pupil). Rural districts also experienced positive revenue gains, but the estimate was not statistically distinguishable from zero, further supporting prior research that rural districts could have a more difficult time making ends meet under CEP. As expected, state food revenue exhibited no significant changes in any locale.

The expenditure results indicate that CEP adoption increased food service spending, though the magnitude of these effects differed across locales. Total food expenditures increased significantly in city, suburban, and town districts, with estimated increases ranging from \$18.27 to \$29.21 per pupil. Town districts experienced the largest increase in food expenditures. Personnel food expenditures

increased significantly only in town districts, where spending rose by approximately \$13.55 per pupil. Personnel expenditure effects in city, suburban, and rural districts were not statistically significant.

The placebo tests provide important context for interpreting these results (see appendix I). For revenue outcomes, placebo tests frequently reject the null hypothesis of no pretreatment effects, particularly for local food revenue and federal food revenue in suburban and town districts and for federal revenue outcomes in rural districts. These findings suggest that some revenue estimates may be influenced by differential pretreatment trends and should therefore be interpreted cautiously. By contrast, placebo tests generally support the parallel trends assumption for food expenditure outcomes, particularly in city and suburban districts.

Across all district types, CEP adoption reduced local revenues while increasing federal reimbursements, resulting in higher overall food service revenues and expenditures. The effects were strongest in town districts, which experienced the largest increases in federal revenues, total revenues, and food service expenditures. Overall, the results indicate that school food finances changed markedly post-CEP adoption, though the magnitude of these effects varied across geographic contexts.

TABLE 7.6
CEP Adoption, by Urbanicity

Outcome	City	Suburb	Town	Rural
Local food revenue	-11.67*** (2.55)	-9.73*** (3.61)	-15.27*** (2.24)	-14.82*** (3.58)
State food revenue	-0.45 (1.46)	0.34 (0.82)	-0.05 (1.71)	0.38 (1.37)
Federal food revenue	42.88*** (8.67)	35.05*** (9.01)	57.10*** (5.37)	38.48* (19.79)
Total food revenue	30.75*** (8.30)	25.66*** (8.49)	41.78*** (5.77)	24.04 (22.17)
Personnel food expenditures	4.23 (4.55)	3.73 (4.62)	13.55*** (3.92)	-4.60 (15.67)
Total food expenditures	25.13*** (7.72)	18.27** (9.19)	29.21*** (5.05)	8.17 (27.17)

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: Standard errors clustered at the local education agency level. Average cumulative effects represent cumulative treatment effects across posttreatment periods. Additional point estimates are available in appendix I.

8. Conclusion

Summary of Findings

The Community Eligibility Provision has become an increasingly popular mechanism for expanding access to school meals. This report examines patterns of CEP eligibility, adoption, and discontinuation across US schools and districts and assesses the fiscal consequences of CEP. The findings provide insight into both the characteristics of schools and districts that participate in CEP and the financial implications of adoption for districts that continue operating CEP.

The analyses reveal substantial variation in CEP participation across districts and geographic contexts. Although CEP participation has expanded considerably since the program's nationwide implementation, many eligible districts continue to forgo participation. The report also documents evidence of CEP discontinuation among some districts. Although most participating districts remain in the program once they adopt, some districts later exit CEP. These discontinuation patterns suggest that financial sustainability remains a concern for some districts, particularly when reimbursement levels, which rely on ISPs, do not fully offset program costs or when districts face uncertainty regarding future revenues. The eligibility, adoption, and discontinuation trends indicate that district decisions regarding CEP are shaped by a combination of financial incentives, administrative considerations, and local contextual factors.

CEP-participating districts generally serve larger shares of economically disadvantaged students and report different patterns of food service revenues and expenditures. Important differences were also evident across city, suburban, town, and rural districts. City CEP districts served substantially larger proportions of Black and Hispanic students, while town and rural districts served larger proportions of white students. Rural CEP districts reported the highest food service expenditures. These patterns suggest that CEP adoption decisions differ not only by student poverty levels but by district fiscal capacity, demographic composition, and local policy environments.

The fiscal analyses indicate that school meal program finances change substantially post-CEP adoption. Across multiple model specifications, adoption was associated with significant declines in local food revenue and significant increases in federal food revenue. Although the magnitudes vary across specifications and district types, the overall pattern is highly consistent: Federal reimbursements more than offset reductions in local revenue, resulting in net increases in total food service revenue. Districts also increased food service expenditures following CEP adoption, particularly total food

expenditures associated with meal program operations. Event-study estimates demonstrate that these effects persist and generally increase, suggesting that districts continue to adjust and expand food service programs in the years following adoption.

The continuous-treatment analyses reinforce these findings. Districts with greater CEP participation experienced larger increases in federal food revenues and total food expenditures. Notably, the continuous-treatment results indicate that the financial effects of CEP scale with the extent of participation, suggesting that districts serving larger shares of students through CEP experience correspondingly larger changes in food service finances.

The heterogeneity analyses reveal that CEP's fiscal effects are not uniform across district types. Although all locales experienced reductions in local food revenue and increases in federal food revenue, the magnitude of these effects varied considerably. Town districts consistently exhibited the largest increases in federal revenues, total revenues, and food service expenditures following adoption, suggesting that CEP may generate particularly large benefits in these settings. City and suburban districts also experienced significant increases in food service revenues and expenditures, while rural districts generally exhibited positive but less precisely estimated effects. Despite these differences in magnitude, the overall pattern across locales was remarkably consistent: CEP shifted food service funding away from local sources and was replaced by federal reimbursements while increasing resources available for meal program operations.

Policy Implications

Several policy implications emerge from these findings. First, the persistence of eligible nonparticipating districts indicates that eligibility alone is insufficient to ensure adoption. Financial uncertainty, concerns regarding reimbursement adequacy, and administrative considerations continue to influence district decisionmaking. Policymakers seeking to expand CEP participation should therefore focus not only on eligibility criteria but on improving the financial predictability of participation and reducing uncertainty regarding reimbursement levels, as any cuts to child enrollment in SNAP and Medicaid will decrease schools' ISPs and, therefore, their ability to operate CEP.

Second, the findings highlight the importance of state policy environments. Many states have historically relied on free and reduced-price meal applications for school funding allocations and accountability systems. Because CEP eliminates these applications, districts may perceive participation as financially risky if the state still relies on traditional free and reduced-price meal applications.

Continued efforts to modernize state funding formulas through direct certification, census-based poverty measures, Medicaid data, income tax data, or other indicators of disadvantage may reduce barriers to adoption and improve program accessibility.

Third, recent federal policy changes aimed at expanding CEP eligibility may not, by themselves, generate substantial increases in participation. Although the reduction of the identified student percentage threshold from 40 percent to 25 percent dramatically expanded eligibility, the descriptive analyses indicate that few newly eligible districts elected to adopt CEP except in states that provide additional funding either through CEP subsidies or Healthy School Meals for All policies (Hysom and Bylander 2025). This finding suggests that financial considerations remain important even after eligibility barriers are removed. Expanding programs such as Medicaid direct certification and other mechanisms that account for eligible children in ISPs may therefore encourage participation better than eligibility expansion alone.

Finally, the results suggest that policymakers should continue exploring strategies that enhance CEP's financial sustainability, particularly for eligible but low-ISP districts. Previous research reveals that states that offer CEP subsidies or have Healthy School Meals for All policies have significantly higher CEP adoption among low-ISP schools, likely indicating that the current federal reimbursement structure works best for schools that receive the free reimbursement rate for all or nearly all of their meals (i.e., ISPs of at least 60 percent) (Hysom and Bylander 2025). If the goal is for CEP-eligible schools to adopt CEP, federal policies that increase the CEP multiplier above the current 1.6 would reinforce a reimbursement structure for these schools to adopt CEP and maintain financial viability. Such efforts may be particularly important for rural districts and other districts where reimbursement levels may not fully offset operating costs or where food costs are higher than national averages.

Limitations and Future Research

Several limitations should be acknowledged. The fiscal analysis was possible only for CEP districts that adopted CEP and *did not discontinue it*, and future research should consider the financial implications of CEP for districts that discontinue participation. The placebo tests indicate evidence of differential pretreatment trends for several revenue outcomes, suggesting that those estimates should be interpreted with caution. Nevertheless, the consistency of the findings across dynamic event-study models, average total effect estimates, continuous-treatment specifications, and locale-specific analyses provides evidence that CEP is associated with meaningful changes in school food service finances. Future research should continue to examine whether these changes translate into

improvements in meal quality, student nutrition, attendance, academic achievement, and other indicators of student well-being. Additional research should examine the impact of dropping CEP and returning to traditional school meal service models on child food insecurity, health, and academic achievement, as well as school nutrition finances.

Overall, the evidence indicates that once a school adopts CEP, it is very likely to keep using it. But the initial decision to adopt the program depends largely on the school's nutrition budget, the school or district's ISP, and whether providing all children with school meals at no charge is financially sustainable under the current federal reimbursement structure. The program increases federal support for school meal programs, reduces reliance on local revenue sources, and supports expanded food service operations that increases children's access to school meals. As policymakers continue to address food insecurity and educational inequities, understanding the financial dynamics of CEP will remain critical for designing effective, equitable, and sustainable school meal policies.

Appendix A

Revenues

- Local school meal revenue: Gross receipts from sales of school breakfasts, lunches, and milk (from students, teachers, and adults but not from state or federal funds).
- State school meal revenue: School meal matching payments.
- Federal school meal revenue: All federal revenues from school meal and child nutrition programs authorized under the Child Nutrition Act and includes federal reimbursement revenues provided under the National School Lunch Act, the School Breakfast Program, the Special Milk Program, à la carte sales, and so on. Reports cash payments only and excludes the value of donated commodities.
- Total school meal revenue: Sum of local, state, and federal school meal revenues.

Expenditures

- Personnel food services expenditures: Salaries and wage gross expenditures for cafeteria operations.
- Total food services expenditures: Gross expenditures for cafeteria operations, including the purchase of food but excluding the value of donated commodities and the purchase of food service equipment. Includes personnel salaries and benefits.
- Instructional salary expenditures: Salaries and wage expenditures for activities dealing with the interaction of teachers and students in the classroom, home, or hospital, as well as cocurricular activities. Reports amounts for activities of teachers and instructional aides or assistants engaged in regular instruction, special education, and vocational education programs. Excludes adult education programs.
- Instructional benefits expenditures: Benefit expenditures for activities dealing with the interaction of teachers and students in the classroom, home, or hospital, as well as cocurricular activities. Reports amounts for activities of teachers and instructional aides or assistants

engaged in regular instruction, special education, and vocational education programs. Excludes adult education programs.

- Total instruction expenditures: Total current operation expenditures for activities dealing with the interaction of teachers and students in the classroom, home, or hospital, as well as cocurricular activities. Reports amounts for activities of teachers and instructional aides or assistants engaged in regular instruction, special education, and vocational education programs. Excludes adult education programs. Includes personnel salaries and benefits.

Source: US Census Bureau, "[2024 Annual Survey of School System Finances](#)" (US Census Bureau, 2025).

Appendix B

ISP Data Matching

Numeric Matching

Only ISP files for 2019–20 through 2024–25 have numeric identifiers. For these years, when possible, we identified similar numeric patterns across states’ school and district school or federal IDs in both the ISP and CCD data. This often meant taking substrings of a state’s school ID in ISP data and adding leading zeroes or dashes or state abbreviations for it to match the state school ID as it appears in CCD data.

String Matching

For schools in 2019–20 through 2024–25 that could not be matched numerically, as well as all schools in 2014–15 through 2018–19, we used a fuzzy matching process (i.e., STATA command `Reclink2` or `Matchit`) that reviews the similarities between two strings of texts (in our case, the CCD school and district names and ISP school and district names) and identifies a match percentage based on how similar the strings are. We used a match threshold of 90 percent, meaning that the strings had to present a similarity of 90 percent or more to be matched.

We then reviewed fuzzy match rates for district and school names for all years (2013 through 2024–25) to see how well the CCD and ISP school and district names matched. In cases where the fuzzy match rate was below 50 percent, we browsed the data to see how easily matches could be fixed. In the cases where the school or district was a match but simply had a low match rate, we made edits to improve match rates.

Appendix C

TABLE C.1

Shares of Students Attending CEP-Eligible Schools, by CEP Participation Status, 2024–25

State	CEP-Eligible School, Not Participating							CEP-Eligible School, Participating						
	White	Black	Hispanic	Asian	Other	Rural	ISP	White	Black	Hispanic	Asian	Other	Rural	ISP
AK	51	2	9	6	32	24	30	17	3	6	7	68	56	54
AL	59	21	12	2	6	33	46	46	36	12	1	5	48	68
AR	51	27	15	1	6	41	31	40	44	10	1	5	36	41
AZ	37	6	47	2	8	17	41	15	7	66	1	10	11	64
CA	23	5	57	7	8	13	41	15	5	65	9	6	7	49
CO	53	5	34	2	6	14	32	42	5	44	3	6	14	43
CT	58	8	22	5	6	13	34	23	19	49	4	5	3	54
DC	7	65	23	1	3	0	54	1	87	10	0	2	0	65
DE	33	32	29	1	6	24	35	30	38	22	3	6	7	40
FL	34	23	35	2	5	12	45	27	23	43	2	4	11	60
GA	34	32	24	4	6	27	44	29	47	17	2	5	34	64
HI	8	1	19	25	48	24	32	6	0	21	15	57	35	50
IA	75	5	13	2	5	41	36	46	16	24	3	10	9	57
ID	69	1	25	1	5	37	29	54	4	34	1	7	14	39
IL	59	8	23	5	5	25	38	29	25	38	3	5	9	62
IN	72	8	13	3	5	41	41	40	28	23	2	7	12	60
KS	56	5	30	2	8	29	36	34	14	38	3	9	12	57
KY	76	8	9	2	6	25	44	70	11	11	2	6	38	57
LA	32	52	11	1	4	13	55	42	40	12	2	5	34	60
MA	43	11	38	4	4	9	54	43	13	33	6	5	8	53
MD	31	32	26	5	6	18	36	19	44	29	4	5	6	56
ME	89	3	3	1	5	64	33	68	18	6	2	6	29	45
MI	71	12	8	2	7	28	43	60	21	10	3	6	24	54
MN	58	12	13	7	9	28	41	33	26	19	11	11	10	54
MO	65	15	11	1	7	32	38	41	38	13	1	7	28	76
MS	27	58	7	1	7	51	40	15	70	8	1	5	49	56
MT	82	1	7	1	10	42	35	62	1	6	0	31	45	53
NC	51	18	20	4	7	31	37	36	29	26	2	7	42	58
ND	60	8	11	2	19	23	30	29	9	8	2	51	42	52
NE	62	4	25	2	7	30	42	31	18	37	6	8	6	62

State	CEP-Eligible School, Not Participating							CEP-Eligible School, Participating						
	White	Black	Hispanic	Asian	Other	Rural	ISP	White	Black	Hispanic	Asian	Other	Rural	ISP
NH	66	6	17	3	8	24	37	90	2	3	0	4	66	44
NJ	13	22	59	4	3	5	38	8	37	51	2	2	4	53
NM	16	2	73	0	9	16	47	18	2	65	1	14	27	47
NV	32	9	44	5	10	8	36	22	14	49	5	10	7	50
NY	22	51	20	4	4	18	72	36	15	33	11	5	13	57
OH	73	10	8	2	7	32	39	48	31	11	1	8	17	54
OK	46	6	21	2	24	32	41	35	11	25	1	28	37	59
OR	71	2	18	1	8	35	38	55	3	28	4	10	16	46
PA	74	5	12	3	5	26	35	53	17	21	2	7	25	62
RI	24	16	52	3	6	2	37	22	16	51	3	9	0	59
SC	58	21	12	3	7	33	39	42	35	16	1	7	33	62
SD	49	8	18	5	20	25	34	15	2	7	1	75	69	60
TN	49	23	21	2	5	24	38	57	23	14	1	5	37	58
TX	31	14	46	4	4	23	43	14	13	69	2	3	16	61
UT	43	3	42	2	11	6	26	30	4	49	3	14	12	53
VA	48	14	22	8	8	27	31	38	29	23	4	7	27	52
VT	-	-	-	-	-	-	-	85	4	4	3	5	45	41
WA	57	4	21	5	12	18	33	40	6	36	7	12	12	47
WI	73	4	13	3	7	36	35	35	24	26	6	9	10	59
WV	90	3	2	1	4	22	53	87	4	3	1	5	52	54
WY	75	1	17	1	6	23	33	53	2	24	0	21	33	45

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; UFM = universal free meal. California, Colorado, Massachusetts, Maine, Michigan, Minnesota, New Mexico, and Vermont are UFM states, and New York, Oregon, and Washington are CEP subsidy states.

Appendix D

TABLE D.1

Characteristics of CEP-Eligible but Nonparticipating Schools with ISPs Above 62.5 Percent, 2024–25

School characteristics	Mean values
Enrollment	419.0
ISP (%)	73.0
Elementary school	71.2
Middle school	36.4
High school	23.5
City	43.6
Suburban	23.8
Town	13.4
Rural	19.1
Race or ethnicity (%)	
Asian share of students	1.5
Black share of students	37.7
Hispanic share of students	27.3
White share of students	26.8
Number of schools	1,504

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; ISP = identified student percentage. All schools have ISPs of at least 62.5 percent. City, suburb, town, and rural refer to the National Center for Education Statistics' urban-centric locale definitions.

TABLE D.2

Location of CEP-Eligible but Nonparticipating Schools with ISPs Above 62.5 Percent, 2024–25

	Number of schools	Share of total schools
Alabama	42	2.79
Alaska	6	0.40
Arizona	49	3.26
Delaware	2	0.13
District of Columbia	53	3.52
Florida	298	19.81
Georgia	145	9.64
Hawaii	2	0.13
Illinois	18	1.20
Indiana	58	3.86
Iowa	8	0.53
Kansas	6	0.40
Kentucky	84	5.59
Louisiana	84	5.59
Maryland	13	0.86
Mississippi	46	3.06
Missouri	57	3.79
Montana	2	0.13
Nebraska	47	3.12
Nevada	2	0.13
New Hampshire	1	0.07
New Jersey	9	0.60
North Carolina	4	0.27
North Dakota	5	0.33
Ohio	36	2.39
Oklahoma	50	3.32
Pennsylvania	11	0.73
South Carolina	1	0.07
Tennessee	36	2.39
Texas	287	19.08
Virginia	2	0.13
West Virginia	27	1.80
Wisconsin	9	0.60
Wyoming	4	0.27
Total	1,504	100.00

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; ISP = identified student percentage. All schools have ISPs of at least 62.5 percent.

Appendix E

TABLE E.1
Dynamic Effects of Medicaid Demonstration Participation

	ISP rate	Number of CEP schools
Effect 1	3.50** (1.79)	120.07** (47.19)
Effect 2	6.78*** (2.49)	282.67** (139.48)
Effect 3	7.33*** (2.54)	276.96*** (90.46)
Effect 4	8.44* (4.44)	709.66*** (184.90)
Average total effect	5.99*** (2.05)	271.41*** (68.62)
Joint test of effects (<i>p</i> -value)	0.0037	<0.0001
Joint test of placebos (<i>p</i> -value)	0.4894	0.5152

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; ISP = identified student percentage. Standard errors are reported in parentheses.

Average total effect reports the cumulative treatment effect per treatment unit.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

Appendix F

Evidence of CEP's Effect on District Instructional Expenditures

TABLE F.1
Descriptive Statistics

	All Schools That Eventually Adopt CEP		Not Yet Adopted CEP	Adopted CEP	City	Suburb	Town	Rural
	Mean	SD	Mean	Mean	Mean	Mean	Mean	Mean
Instructional salaries	4,763.6	2,817.5	5,996.6	4,596.0	3,627.4	4,682.9	4,781.5	5,820.2
Instructional benefits	1,715.7	1,456.5	2,089.9	1,664.8	1,121.3	1,941.3	1,912.1	2,119.9
Total instructional expenditure	7,803.2	4,241.1	9,142.4	7,621.1	6,561.5	8,034.0	7,502.5	8,946.3
Number of districts	1,019		122	897	362	138	120	398

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Note: CEP = Community Eligibility Provision; SD = standard deviation.

Figures F.1A through F.1C examine the effects of CEP adoption on instructional expenditures. In contrast to the food service outcomes, the instructional spending estimates are generally small relative to their standard errors and show no consistent posttreatment pattern. Instructional salary expenditures fluctuate around zero throughout the study period and remain statistically indistinguishable from preadoption levels. Instructional benefits display a modest upward trajectory in the later posttreatment years, but confidence intervals remain wide and overlap zero for most periods. Total instructional expenditures similarly show no sustained upward or downward trend following CEP adoption. Overall, the instructional expenditure estimates provide little evidence that CEP adoption substantially affected district instructional spending decisions. In addition, instructional expenditure outcomes display relatively flat pretreatment trends and confidence intervals that generally encompass zero, providing stronger support for the parallel trends assumption for these measures.

TABLE F.1A

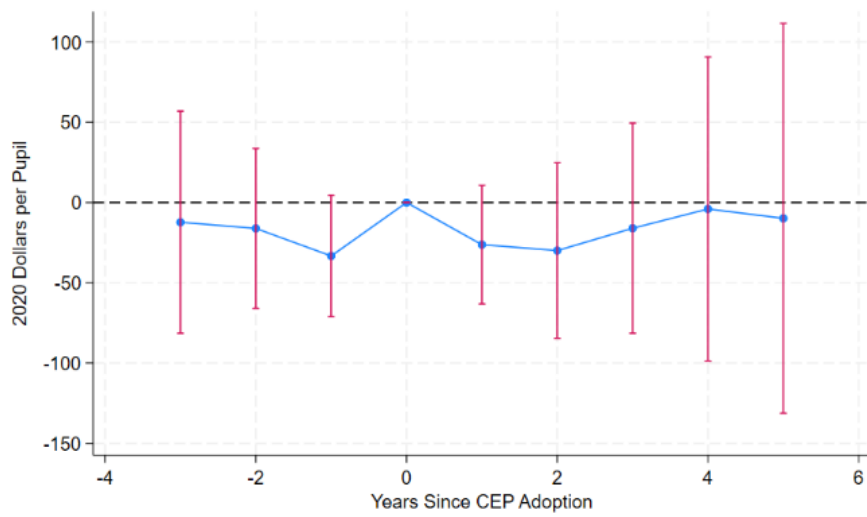
Instructional Salaries Expenditures per Pupil

FIGURE F.1B

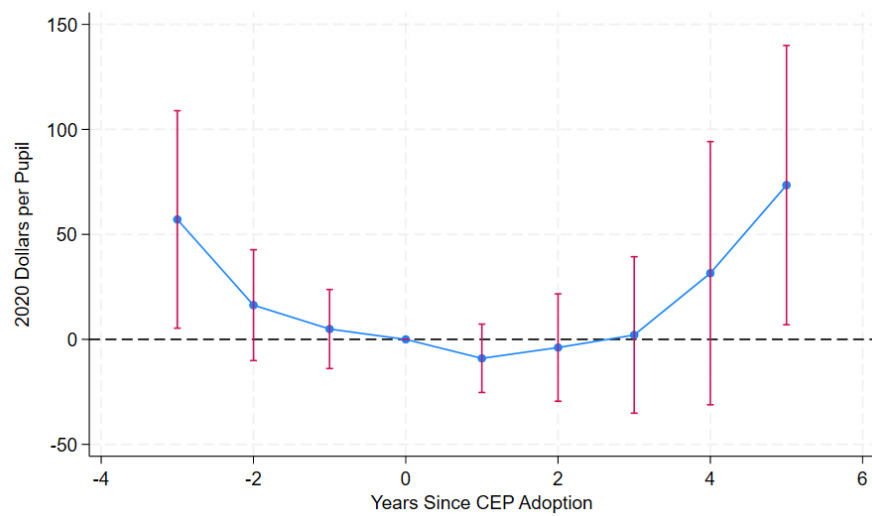
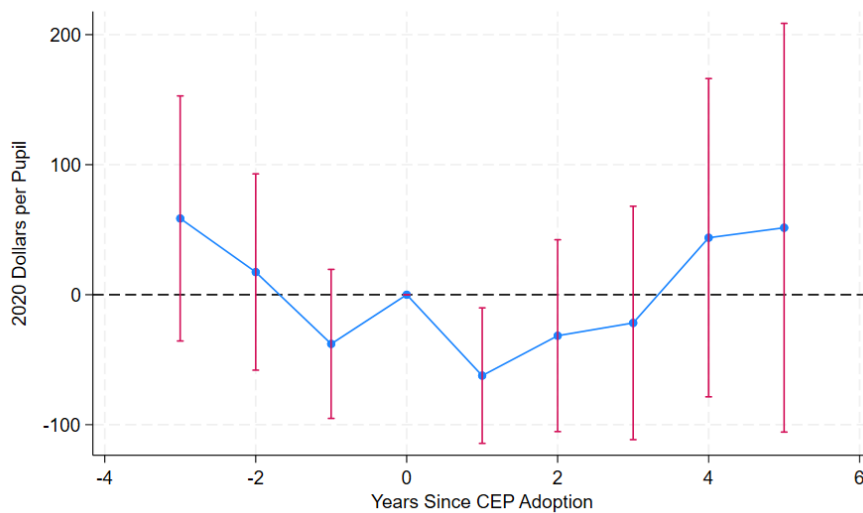
Instructional Benefits Expenditures per Pupil

FIGURE F.1C

Total Instructional Expenditures per Pupil



Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level. Average total effects represent cumulative treatment effects across posttreatment periods. Placebo-test p -values assess the joint null hypothesis of no pretreatment effects. Point estimates can be found in table F.2.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

CEP adoption does not appear to have meaningfully affected instructional spending (table F.2). Estimated effects on instructional salaries, instructional benefits, and total instructional expenditures were not statistically distinguishable from zero. Although instructional benefits increased by approximately \$14.69 per pupil and instructional salaries and total instructional expenditures exhibited small negative point estimates, the corresponding confidence intervals include zero and provide little evidence of systematic changes in instructional spending following CEP adoption.

The placebo tests provide additional information regarding the validity of the identifying assumptions. Placebo tests fail to reject the null hypothesis of no pretreatment effects for instructional salaries ($p = 0.293$), instructional benefits ($p = 0.183$), and total instructional expenditures ($p = 0.118$), providing support for the parallel trends assumption for these outcomes.

TABLE F.2

Dynamic Effects of CEP Adoption on Instructional Expenditures

	Instructional salary expenditures	Instructional benefits expenditures	Total instructional expenditures
Effect 1	-26.22 (18.82)	-9.02 (8.31)	-62.24** (26.60)
Effect 2	-29.92 (27.87)	-3.88 (13.05)	-31.54 (37.64)
Effect 3	-16.01 (33.38)	2.10 (19.01)	-21.72 (45.79)
Effect 4	-4.02 (48.29)	31.53 (31.96)	43.83 (62.44)
Effect 5	-9.82 (61.92)	73.47** (33.94)	51.51 (80.18)
Average total effect	-18.60 (31.94)	14.69 (17.60)	-10.91 (41.52)
Joint test of effects (<i>p</i> -value)	0.6765	0.0163	0.0443
Joint test of placebos (<i>p</i> -value)	0.2927	0.1827	0.1183

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

Dynamic Effects of the Extent of CEP Adoption on Instructional Expenditures

The continuous-treatment estimates provide little evidence that CEP participation affected instructional spending (table F.3). The estimated effects on instructional salaries, instructional benefits, and total instructional expenditures were not statistically distinguishable from zero. Instructional benefits displayed a positive point estimate, and instructional salaries and total instructional expenditures exhibited modest negative point estimates, but these effects were imprecisely estimated and cannot be distinguished from zero at conventional significance levels.

Placebo estimates are statistically insignificant for instructional salaries, instructional benefits, and total instructional expenditures, providing evidence consistent with parallel pretreatment trends for these outcomes.

TABLE F.3

Dynamic Effects of the Extent of CEP Adoption on Instructional Expenditures

	Instructional salary expenditures	Instructional benefits expenditures	Total instructional expenditures
Effect 1	-26.28 (18.91)	-9.05 (8.32)	-62.35** (26.94)
Effect 2	-29.92 (27.91)	-3.88 (12.97)	-31.54 (37.50)
Effect 3	-16.01 (33.50)	2.10 (18.95)	-21.72 (45.82)
Effect 4	-4.02 (48.39)	31.53 (31.85)	43.83 (62.63)
Effect 5	-9.82 (61.93)	73.47** (33.74)	51.51 (80.04)
Average total effect	-0.37 (0.64)	0.29 (0.35)	-0.22 (0.83)
Joint test of effects (<i>p</i> -value)	0.6745	0.0135	0.0503
Joint test of placebos (<i>p</i> -value)	0.2954	0.1947	0.1281

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; Standard errors are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

Instructional expenditure results provide little evidence that CEP adoption systematically affected educational spending across locales (table F.4). Most instructional expenditure estimates are statistically insignificant and are small relative to their standard errors. The only statistically significant instructional outcome is instructional benefits in town districts, which increased by approximately \$53.14 per pupil. Estimated effects on instructional salaries and total instructional expenditures were not statistically distinguishable from zero in any locale category.

TABLE F.4

Dynamic Effects of the Extent of CEP Adoption on Instructional Expenditures, by Urbanicity

Outcome	City	Suburb	Town	Rural
Instructional salaries	64.43 (56.95)	-36.49 (57.31)	-26.01 (21.28)	-170.29 (129.38)
Instructional benefits	35.52 (26.87)	-6.50 (32.06)	53.14*** (20.42)	-24.20 (39.63)
Total instructional expenditures	132.09 (86.24)	-46.99 (76.67)	32.13 (37.87)	-241.48 (170.49)

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level. Average cumulative effects represent cumulative treatment effects across posttreatment periods.

*** $p < 0.01$.

Placebo tests generally support the parallel trends assumption for many instructional expenditure measures, particularly in city and suburban districts. But several instructional outcomes in town and rural districts also exhibit significant placebo tests, indicating that these estimates may be less reliable indicators of causal effects.

The analyses provide little evidence that CEP substantially affects instructional spending. Across the primary specifications, instructional salaries, instructional benefits, and total instructional expenditures were generally not statistically distinguishable from zero. Although a small number of locale-specific estimates reached statistical significance, these findings were not consistently replicated across specifications and often coincided with evidence of pretreatment differences. Overall, the results suggest that CEP's fiscal effects are concentrated within school nutrition operations rather than broader instructional budgets. This finding is particularly important because concerns that CEP could divert resources away from instructional priorities have frequently been cited as barriers to participation by district administrators and policymakers.

Appendix G

TABLE G.1

Dynamic Effects of CEP Adoption on School Food Revenues and Expenditures

	Local revenue	State revenue	Federal revenue	Total revenue	Personnel exp.	Total food exp.
Effect 1	-10.23*** (1.49)	0.47 (0.48)	27.81*** (4.32)	18.05*** (4.18)	-0.05 (2.41)	8.45** (4.04)
Effect 2	-11.47*** (1.69)	-1.05 (0.98)	42.87*** (5.96)	30.34*** (5.79)	3.01 (2.71)	19.56*** (5.04)
Effect 3	-9.66*** (2.06)	-1.18 (0.97)	48.13*** (5.94)	37.29*** (5.96)	7.08 (4.19)	29.68*** (6.60)
Effect 4	-13.95*** (2.76)	1.69** (0.79)	51.16*** (6.62)	38.89*** (6.92)	9.64** (4.23)	37.80*** (7.35)
Effect 5	-9.22*** (3.01)	1.58** (0.70)	48.62*** (10.52)	40.98*** (9.49)	10.26** (4.72)	35.24*** (8.41)
Average total effect	-10.85*** (1.75)	0.19 (0.63)	42.51*** (5.76)	31.86*** (5.58)	5.36 (3.09)	24.45*** (5.54)
Joint test of effects (p-value)	<0.0001	0.0045	<0.0001	<0.0001	0.1223	<0.0001
Joint test of placebos (p-value)	<0.0001	0.0261	<0.0001	<0.0001	0.9911	0.4608

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; exp. = expenditures. Standard errors are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

Appendix H

TABLE H.1

Dynamic Effects of the Extent of CEP Adoption on School Food Revenues and Expenditures

	Local revenue	State revenue	Federal revenue	Total revenue	Personnel exp.	Total food exp.
Effect 1	-10.22*** (1.38)	0.47 (0.48)	27.83*** (4.23)	18.08*** (4.17)	-0.04 (2.41)	8.44** (4.04)
Effect 2	-11.47*** (1.67)	-1.05 (0.99)	42.87*** (5.86)	30.34*** (5.73)	3.01 (2.71)	19.56*** (5.05)
Effect 3	-9.66*** (1.99)	-1.18 (0.97)	48.13*** (5.96)	37.29*** (6.00)	7.08 (4.21)	29.68*** (6.70)
Effect 4	-13.95*** (2.69)	1.69** (0.78)	51.16*** (6.57)	38.89*** (6.94)	9.64** (4.23)	37.80*** (7.43)
Effect 5	-9.22*** (2.98)	1.58** (0.69)	48.62*** (10.38)	40.98*** (9.40)	10.26** (4.72)	35.24*** (8.40)
Average total effect	-0.22*** (0.03)	0.00 (0.01)	0.85*** (0.11)	0.64*** (0.11)	0.11* (0.06)	0.49*** (0.11)
Joint test of effects (p-value)	<0.0001	0.0043	<0.0001	<0.0001	0.1233	<0.0001
Joint test of placebos (p-value)	<0.0001	0.0271	<0.0001	<0.0001	0.9913	0.4599

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision; exp. = expenditures. Standard errors are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

Appendix I

TABLE I.1
Dynamic Effects of CEP Adoption on Local Food Revenue per Pupil

	City	Suburb	Town	Rural
Effect 1	-7.19*** (2.27)	-7.77*** (2.81)	-15.68*** (1.78)	-19.43*** (2.80)
Effect 2	-8.82*** (2.13)	-11.95*** (3.24)	-15.80*** (2.21)	-14.95*** (3.64)
Effect 3	-12.21*** (3.17)	-8.63** (4.13)	-13.09*** (2.60)	-9.46** (4.20)
Effect 4	-17.87*** (4.16)	-13.60** (5.37)	-18.70*** (3.60)	-17.24*** (4.91)
Effect 5	-12.99*** (4.64)	-7.51 (6.04)	-12.85*** (4.31)	-11.41* (6.34)
Average total effect	-11.45*** (2.58)	-9.79*** (3.47)	-15.25*** (2.24)	-14.82*** (3.57)
Effects <i>p</i> -value	0.0004	<0.0001	<0.0001	<0.0001
Placebo <i>p</i> -value	0.2735	<0.0001	<0.0001	0.3073

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.2
Dynamic Effects of CEP Adoption on State Food Revenue per Pupil

	City	Suburb	Town	Rural
Effect 1	-0.27 (0.86)	0.64 (0.66)	0.76 (1.28)	1.01 (0.74)
Effect 2	-1.36 (2.67)	-1.24 (1.14)	-1.89 (2.71)	-0.94 (1.38)
Effect 3	-2.64 (2.40)	-0.72 (1.56)	-1.01 (2.61)	0.10 (1.29)
Effect 4	1.34 (1.63)	1.70 (1.21)	1.10 (1.83)	1.36 (2.13)
Effect 5	1.39 (1.12)	2.18* (1.22)	1.07 (1.94)	0.72 (3.20)
Average total effect	-0.37 (1.44)	0.32 (0.87)	-0.11 (1.72)	0.39 (1.37)
Effects <i>p</i> -value	0.1120	0.1106	0.6507	0.1331
Placebo <i>p</i> -value	0.4113	0.0140	0.2120	0.8693

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.3

Dynamic Effects of CEP Adoption on Federal Food Revenue per Pupil

	City	Suburb	Town	Rural
Effect 1	24.41*** (7.60)	24.26*** (4.12)	44.12*** (3.83)	19.21 (15.86)
Effect 2	41.02*** (8.99)	38.31*** (8.83)	54.72*** (4.93)	35.62** (17.10)
Effect 3	52.13*** (9.37)	36.96*** (7.90)	60.83*** (7.38)	49.34*** (19.54)
Effect 4	59.98*** (11.60)	37.55*** (7.91)	72.28*** (8.65)	54.90** (25.69)
Effect 5	42.69*** (12.15)	45.14*** (16.92)	62.87*** (10.85)	44.48 (27.84)
Average total effect	42.91*** (8.69)	35.33*** (7.53)	56.86*** (5.31)	38.39* (19.73)
Effects <i>p</i> -value	<0.0001	<0.0001	<0.0001	0.0001
Placebo <i>p</i> -value	0.0281	0.0724	0.0001	0.0083

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.4

Dynamic Effects of CEP Adoption on Total Revenue per Pupil

	City	Suburb	Town	Rural
Effect 1	16.96** (7.00)	17.13*** (4.29)	29.20*** (4.00)	0.79 (17.73)
Effect 2	30.84*** (8.92)	25.12*** (8.51)	37.02*** (5.57)	19.73 (19.09)
Effect 3	37.28*** (9.30)	27.61*** (8.46)	46.73*** (8.01)	39.99* (21.87)
Effect 4	43.46*** (11.18)	25.65*** (9.82)	54.69*** (8.82)	39.02 (28.86)
Effect 5	31.10*** (11.87)	39.82*** (15.38)	51.09*** (11.32)	33.79 (31.04)
Average total effect	31.09*** (8.22)	25.87*** (7.52)	41.51*** (5.69)	23.95 (22.09)
Effects <i>p</i> -value	0.0031	0.0049	<0.0001	<0.0001
Placebo <i>p</i> -value	0.2360	0.0766	0.0454	0.0188

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.5

Dynamic Effects of CEP Adoption on Personnel Food Expenditures per Pupil

	City	Suburb	Town	Rural
Effect 1	-1.71 (2.83)	5.32 (3.81)	4.45* (2.37)	-13.31 (12.31)
Effect 2	3.09 (4.09)	3.24 (3.58)	11.20*** (3.74)	-8.06 (13.58)
Effect 3	7.22 (5.40)	0.08 (5.03)	14.03*** (5.05)	-5.48 (15.21)
Effect 4	7.18 (5.99)	4.36 (6.90)	21.30*** (6.48)	4.62 (20.74)
Effect 5	7.63 (9.45)	6.26 (8.73)	25.05*** (8.54)	7.81 (21.29)
Average total effect	4.28 (4.56)	3.77 (4.54)	13.43*** (3.89)	-4.61 (15.62)
Effects <i>p</i> -value	0.4811	0.0940	0.0191	0.0003
Placebo <i>p</i> -value	0.6819	0.5074	0.0082	0.0938

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.6

Dynamic Effects of CEP Adoption on Total Food Expenditures per Pupil

	City	Suburb	Town	Rural
Effect 1	3.45 (4.68)	14.18** (5.58)	16.49*** (3.47)	-9.31 (21.40)
Effect 2	20.50*** (7.79)	14.48* (7.40)	27.48*** (5.38)	5.63 (23.62)
Effect 3	33.43*** (9.44)	15.60 (9.66)	34.76*** (6.69)	12.40 (26.54)
Effect 4	42.95*** (10.26)	27.59** (12.98)	35.97*** (9.01)	22.57 (35.58)
Effect 5	35.01** (13.79)	25.83 (18.14)	39.62*** (10.50)	22.30 (37.01)
Average total effect	25.53*** (7.67)	18.37** (8.83)	28.94*** (4.99)	8.17 (27.07)
Effects <i>p</i> -value	0.0001	0.0993	<0.0001	0.0154
Placebo <i>p</i> -value	0.6173	0.7286	0.4029	0.7707

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.7

Dynamic Effects of CEP Adoption on Institutional Salaries per Pupil

	City	Suburb	Town	Rural
Effect 1	8.15 (23.40)	-34.47 (26.11)	7.64 (11.99)	-117.36 (100.00)
Effect 2	58.18 (43.43)	-81.97 (55.86)	-26.00 (20.19)	-136.74 (109.24)
Effect 3	64.28 (55.85)	-47.39* (66.64)	-47.37* (25.07)	-146.50 (126.58)
Effect 4	49.69 (77.06)	42.69 (91.40)	-38.96 (41.14)	-270.85 (167.93)
Effect 5	162.46 (143.76)	-37.89 (114.53)	-52.94 (56.05)	-244.28 (185.79)
Average total effect	64.31 (57.19)	-36.92 (58.62)	-26.83 (21.31)	-170.18 (128.90)
Effects <i>p</i> -value	0.4459	0.1232	0.1048	0.0561
Placebo <i>p</i> -value	0.0737	0.4029	0.1156	0.0019

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.8

Dynamic Effects of CEP Adoption on Institutional Benefits per Pupil

	City	Suburb	Town	Rural
Effect 1	4.69 (11.76)	-19.37 (15.89)	5.29 (10.08)	-24.45 (30.33)
Effect 2	19.82 (20.11)	-16.61 (25.89)	25.75 (16.56)	-29.61 (34.47)
Effect 3	30.20 (30.11)	-13.72 (36.15)	57.37** (24.45)	-33.80 (40.50)
Effect 4	58.32 (40.21)	-13.69 (62.52)	97.77** (42.22)	-19.30 (52.43)
Effect 5	81.04 (57.97)	49.45 (55.93)	132.96*** (41.20)	-10.08 (67.92)
Average total effect	35.96 (26.84)	-6.27 (31.42)	52.77** (20.33)	-24.63 (39.47)
Effects <i>p</i> -value	0.7908	0.1431	0.0275	0.7963
Placebo <i>p</i> -value	0.8997	0.7790	0.0070	<0.0001

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

TABLE I.9

Dynamic Effects of CEP Adoption on Total Institutional Expenditures per Pupil

	City	Suburb	Town	Rural
Effect 1	-27.68 (33.93)	-73.10* (41.04)	-9.31 (21.08)	-168.66 (134.15)
Effect 2	92.28 (59.87)	-85.38 (79.32)	-4.76 (36.08)	-211.40 (145.52)
Effect 3	134.37 (86.74)	-89.81 (87.92)	10.78 (49.42)	-214.48 (167.40)
Effect 4	179.04 (119.26)	49.67 (123.72)	112.58* (67.65)	-332.80 (221.31)
Effect 5	341.26 (213.70)	13.16 (142.23)	110.53 (78.75)	-356.58 (238.32)
Average total effect	131.37 (86.23)	-47.39 (76.96)	31.51 (37.82)	-241.00 (169.87)
Effects <i>p</i> -value	0.2350	0.3363	0.4359	0.4319
Placebo <i>p</i> -value	0.3575	0.9668	0.0745	0.0001

Source: Authors' analysis of the Food Research & Action Center's CEP database and data from the Common Core of Data.

Notes: CEP = Community Eligibility Provision. Standard errors clustered at the local education agency level are reported in parentheses. Average total effect reports the cumulative treatment effect per treatment unit. Effects *p*-value reports the test of joint nullity of event-study effects. Placebo *p*-value reports the test of joint nullity of placebo estimates.

* $p < 0.10$; ** $p < 0.05$; *** $p < 0.01$.

Notes

- ¹ Lizbeth Silberman, “National School Lunch Program and Direct Certification with SNAP,” memorandum to program directors in all regions, October 25, 2011, <https://www.fna.usda.gov/snap/cert/national-school-lunch-program>.
- ² As of 2025–26, 42 states use Medicaid and household income data to directly certify children for free and reduced-price meals. Two states, Kentucky and New York, use Medicaid and household income data to directly certify children for free meals only. See “National School Lunch and School Breakfast Program Demonstration Projects to Evaluate Direct Certification with Medicaid,” US Department of Agriculture, Food and Nutrition Administration, last updated March 30, 2026, <https://www.fna.usda.gov/cn/direct-certification-medicaid-demonstration-project>.
- ³ “Final Rule: Child Nutrition Programs—CEP Increasing Options for Schools,” US Department of Agriculture, Food and Nutrition Administration, last updated September 26, 2023, <https://www.fna.usda.gov/cn/fr-092623>.
- ⁴ [National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rates](#), 90 Fed. Reg. 34827 (July 24, 2025).
- ⁵ “National School Lunch and School Breakfast Program Demonstration Projects,” US Department of Agriculture.
- ⁶ “Broad-Based Categorical Eligibility (BBCE),” US Department of Agriculture, Food and Nutrition Administration, last updated December 29, 2025, <https://www.fna.usda.gov/snap/broad-based-categorical-eligibility>.
- ⁷ Using 2014–20 data from the SNAP policy database, we identify the years that states changed their BBCE policies by adopting or dropping asset limits, asset tests, and income limits, as well as vehicle exemptions. If the state had the policy in June 2014, for example, it would affect direct certification rates for the 2014–15 school year. During this time frame, Indiana added BBCE, and Louisiana and Mississippi dropped their BBCE policies.
- ⁸ Carla Javier, “Schools Struggle 3 Years After End of Universal Free School Meals,” Marketplace, October 28, 2025, <https://www.marketplace.org/story/2025/10/28/schools-struggle-3-years-after-end-of-universal-free-school-meals>.
- ⁹ Kristin Blagg, Macy Rainer, Erica Greenberg, and Emily Gutierrez, “Measuring Student Poverty: Dishing Up Alternatives to Free and Reduced-Price Lunch,” Urban Institute, October 20, 2021, <https://www.urban.org/data-tools/measuring-student-poverty-dishing-alternatives-free-and-reduced-price-lunch>.
- ¹⁰ “K-12 Funding 2024: Funding for Students from Low-Income Backgrounds,” Education Commission of the States, accessed July 9, 2026, <https://reports.ecs.org/comparisons/k-12-funding-2024-06>.
- ¹¹ “Community Eligibility Provision Resource Center,” US Department of Agriculture, Food and Nutrition Administration, last updated March 17, 2026, <https://www.fna.usda.gov/cn/cep/resource-center>.
- ¹² “Model Estimates of Poverty in Schools,” Urban Institute, accessed June 23, 2026, <https://www.urban.org/projects/model-estimates-poverty-schools>; and Emily Gutierrez and Kristin Blagg, “How School-Reported Data on Student Economic Need Has Become Inconsistent—and Four Measures Policymakers Could Use Instead,” *Urban Wire*, Urban Institute, March 20, 2026, <https://www.urban.org/urban-wire/how-school-reported-data-student-economic-need-has-become-inconsistent-and-four-measures>.
- ¹³ Regulations at 7 CFR 245.9(f)(6) require state agencies to annually notify local education agencies of district-wide eligibility for CEP. Similarly, regulations at 7 CFR 245.9(f)(5) require local education agencies to annually submit school-level eligibility data to the state agency. Per 7 CFR 245.9(f)(7), by May 1 of each school year, state agencies must publish lists of eligible and near-eligible local education agencies and schools on their state agency website, defined as ISPs of 15 percent or greater as of 2024–25 and 30 percent or greater for prior years. State

agencies also provide the Food and Nutrition Administration a single link to these lists for publication on the Food and Nutrition Administration's CEP website.

- ¹⁴ CEP operates on a four-year cycle during which participating schools maintain the same federal reimbursement rates based on their initial eligibility data. At the end of the fourth year, schools must reevaluate their ISPs to determine whether they remain eligible to continue in the program. Schools may restart their CEP cycles at any point within the four years.
- ¹⁵ Districts that adopted CEP in 2020–21 could have instead taken advantage of child nutrition waivers at the time, but there are several reasons 2020–21 is still a fair comparison year. Although the application due date for CEP is the end of June, the decision to participate in CEP occurs in the spring of the prior school year. Additionally, although schools had the waivers, they knew the waivers were temporary and came with uncertainty. As a robustness check, we limit our analysis to districts that adopted CEP in 2019–20 as the “not yet adopted” group and find similar results.
- ¹⁶ Because we estimate this for districts with any CEP schools, there are still schools in some districts that do not operate CEP and therefore still collect paid fees under the traditional standard counting and claiming method. For this reason, districts, on average, are still collecting local food revenue.

References

- Bhatia Rajiv, Paula Jones, and Zetta Reicker. 2011. "Competitive Foods, Discrimination, and Participation in the National School Lunch Program." *American Journal of Public Health* 101 (8): 1380–86.
- Blagg, Kristin, Emily Gutierrez, Fanny Terrones, and Gabriella Garriga. 2022. [*Identifying a New "At-Risk" Measure: Building a Measure That Will Facilitate School District Funding and Increase Access to School Meals*](#). Urban Institute.
- Bylander, Alexis, Crystal FitzSimons, and Clarissa Hayes. 2024. [*"The State of Healthy School Meals for All: California, Maine, Massachusetts, Nevada, and Vermont Lead the Way."*](#) Food Research & Action Center.
- Cohen, Juliana FW, Amelie A. Hecht, Gabriella M. McLoughlin, Lindsey Turner, and Marlene B. Schwartz. 2021. "Universal School Meals and Associations with Student Participation, Attendance, Academic Performance, Diet Quality, Food Security, and Body Mass Index: A Systematic Review." *Nutrients* 13 (3): 911.
- Davis, Will, Daniel Kreisman, and Tareena Musaddiq. 2024. "The Effect of Universal Free School Meals on Child BMI." *Education Finance and Policy* 19 (3): 461–91. https://doi.org/10.1162/edfp_a_00409.
- De Chaisemartin, Clément, Diego Ciccia, Feliz Knau, et al. 2025. *Using did_multplegt_dyn to Estimate Event-Study Effects in Complex Designs: Overview, and Four Examples Based on Real Datasets*. SSRN.
- DPI (Department of Public Instruction). n.d. [*"Report to the North Carolina General Assembly."*](#) North Carolina State Board of Education, DPI.
- FNS (Food and Nutrition Service). 2023. [*"USDA Child Nutrition Program Operations During the COVID-19 Pandemic, March Through September 2020 \(Summary\)." US Department of Agriculture, FNS.*](#)
- FNS (Food and Nutrition Service). 2025. [*"USDA, Food and Nutrition Service: Child Nutrition Programs, Community Eligibility Provision."*](#) US Department of Agriculture, FNS.
- Frisvold, David E. 2015. "Nutrition and Cognitive Achievement: An Evaluation of the School Breakfast Program." *Journal of Public Economics* 124 (April): 91–104. <https://doi.org/10.1016/j.jpubeco.2014.12.003>.
- Gleason, Philip M., and Carol W. Suitor. 2003. "Eating at School: How the National School Lunch Program Affects Children's Diets." *American Journal of Agricultural Economics* 85 (4): 1047–61.
- Gordanier, John, Orgul Ozturk, Breyon Williams, and Crystal Zhan. 2020. "Free Lunch for All! The Effect of the Community Eligibility Provision on Academic Outcomes." *Economics of Education Review* 77 (August): 101999.
- Gordon, Nora, and Krista Ruffini. 2021. "Schoolwide Free Meals and Student Discipline: Effects of the Community Eligibility Provision." *Education Finance and Policy* 16 (3): 418–42. https://doi.org/10.1162/edfp_a_00307.
- Gutierrez, Emily. 2021. [*The Effect of Universal Free Meals on Student Perceptions of School Climate: Evidence from New York City*](#). Working Paper 21-430. Annenberg Institute for School Reform at Brown University.
- Gutierrez, Emily. 2022. [*"The Majority of Adults Support Permanent, Free School Meals for All Students."*](#) Urban Institute.
- Gutierrez, Emily. 2026. [*"Federal Changes to the Social Safety Net Are Tightening State Budgets. School Meal Programs Could Pay the Price."*](#) Urban Institute.
- Hinrichs, Peter. 2010. "The Effects of the National School Lunch Program on Education and Health." *Journal of Policy Analysis and Management* 29 (3): 479–505. <https://doi.org/10.1002/pam.20506>.
- Hysom, Erin Kennedy, and Alexis Bylander. 2025. [*"Community Eligibility: The Key to Hunger-Free Schools, School Year 2024–2025."*](#) Food Research & Action Center.
- Hysom, Erin Kennedy, and Crystal FitzSimons. 2024. [*"Community Eligibility: The Key to Hunger-Free Schools, School Year 2023–2024."*](#) Food Research & Action Center.

- Leos-Urbel, Jacob, Amy Ellen Schwartz, Meryle Weinstein, and Sean Corcoran. 2013. "Not Just for Poor Kids: The Impact of Universal Free School Breakfast on Meal Participation and Student Outcomes." *Economics of Education Review* 36 (October): 88–107.
- Localio, Anna M., Paul L. Herbert, Melissa A. Knox, et al. 2025. "School Provision of Universal Free Meals and Blood Pressure Outcomes Among Youths." *JAMA Network Open* 8 (9): e2533186.
- Localio, Anna M., Melissa A. Knox, Anirban Basu, Tom Lindman, Lina Pinero Walkinshaw, and Jessica C. Jones-Smith. 2024. "Universal Free School Meals Policy and Childhood Obesity." *Pediatrics* 153 (4): e2023063749.
- ODE (Oregon Department of Education). n.d. "[Community Eligibility Provision \(CEP\) Incentive Reimbursement Program Question and Answers](#)." ODE.
- Orta-Aleman, Dania, Marlene B. Schwartz, Anisha I. Patel, et al. 2026. "Statewide Universal School Meal Policies and Food Insecurity in Households with Children." *American Journal of Preventive Medicine* 70 (1): 107942. <https://doi.org/10.1016/j.amepre.2025.107942>.
- Orta-Aleman, Dania, Monica D. Zuercher, Leah E. Chapman, et al. 2026. "Universal School Meal Policies and Perceived Stigma: Quantitative Evidence from Eight US States." *Journal of School Health* 96 (1): e70098.
- Ramponi, Francesco, Hui Zhou, Lexis Lokko, Juliana Cohen, and Stéphane Verguet. 2026. "Estimated Impact of Universal Free School Meal Policies on Educational Outcomes in the United States." *American Journal of Preventive Medicine*. <https://doi.org/10.1016/j.amepre.2026.108472>.
- Rothbart, Michah W., Amy Ellen Schwartz, and Emily Gutierrez. 2023. "Paying for Free Lunch: The Impact of the Community Eligibility Provision on Educational Outcomes, Health, and School Finances." *Education Finance and Policy* 18 (4): 708–737. https://doi.org/10.1162/edfp_a_00380.
- Ruffini, Krista. 2022. "Universal Access to Free School Meals and Student Achievement: Evidence from the Community Eligibility Provision." *Journal of Human Resources* 57 (3): 776–820. <https://doi.org/10.3368/jhr.57.3.0518-9509R3>.
- Schwartz, Amy Ellen, Michah W. Rothbart. 2020. "Let Them Eat Lunch: The Impact of Universal Free Meals on Student Performance." *Journal of Policy Analysis and Management* 39 (2): 376–410.
- Severn, Veronica, Liana Washburn, Rachel Frisk, and Kevin Conway. 2023. [Child Nutrition Program Operations During the COVID-19 Pandemic, March through September 2020: School Meals Operations Study, Year 1 Report \(Final\)](#). US Department of Agriculture, Food and Nutrition Service, Office of Policy Support.
- SNA (School Nutrition Association). 2024. [2024 School Nutrition Trends Report](#). SNA.
- Spill, Maureen K., Rupal Trivedi, Rachel C. Thoeig, et al. 2024. "Universal Free School Meals and School and Student Outcomes: A Systematic Review." *JAMA Network Open* 7 (8): e2424082.
- Toossi, Saied. 2024. "The Effect of Universal Free School Meals on Children's Food Hardship." *Food Policy* 124 (April): 102606.
- Zhao, Vivian. 2025. "Free Food for Thought: The Effect of Universal Free School Meals on Graduation Rates in the US." *Economics Letters* 247 (February): 112127. <https://doi.org/10.1016/j.econlet.2024.112127>.

About the Authors

Emily Gutierrez is a senior research associate in the Work, Education, and Justice Division at the Urban Institute, where her research focuses on K–12 education policies that aim to mitigate educational inequities, disparities, and external factors that affect student success. Gutierrez previously spent time as a math teacher in Fort Worth, Texas. She received her BBA in economics, Spanish, and public administration and her MS in economics from Baylor University, and she holds a PhD in public administration from Syracuse University.

Ariella Meltzer is a research analyst in the Work, Education, and Justice Division, where she focuses on K–12 education policy. Her research interests include school and district governance, teacher and principal leadership and hiring pipelines, and the intersection of housing and education issues. Before joining Urban, Meltzer taught second-grade students in DC Public Schools and assisted with research projects at the Tennessee Education Research Alliance during graduate school. She completed a BA in political science at the University of Michigan and earned an MPP at Vanderbilt University's Peabody College of Education.

Erin Hysom is a senior child nutrition policy analyst on the Child Nutrition Programs and Policy team at the Food Research & Action Center. She serves as a resource to schools and partners seeking to expand participation in the School Breakfast Program and the National School Lunch Program. Hysom has 15 years' experience working on federal nutrition programs, starting as a dietitian with the Special Supplemental Nutrition Program for Women, Infants, and Children and later administering and operating the Child Nutrition Programs at the federal, state, and local level. Most recently, she served as a regional supervisor overseeing the production, service, and growth of more than 10,000 school meals per day in one of the 50 largest school districts in the country. Hysom holds a BS in nutritional sciences, dietetics, from Rutgers University and an MPH in maternal and child health, from the George Washington University. Additionally, she completed her dietetic internship with Saint Elizabeth University.

STATEMENT OF INDEPENDENCE

The Urban Institute strives to meet the highest standards of integrity and quality in its research and analyses and in the evidence-based policy recommendations offered by its researchers and experts. We believe that operating consistent with the values of independence, rigor, and transparency is essential to maintaining those standards. As an organization, the Urban Institute does not take positions on issues, but it does empower and support its experts in sharing their own evidence-based views and policy recommendations that have been shaped by scholarship. Funders do not determine our research findings or the insights and recommendations of our experts. Urban scholars and experts are expected to be objective and follow the evidence wherever it may lead.



500 L'Enfant Plaza SW
Washington, DC 20024
www.urban.org