



How Restricting Categorical Eligibility for SNAP Affects Access to Free School Meals

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The administration has proposed significant changes to broad-based categorical eligibility (BBCE) in the Supplemental Nutrition Assistance Program (SNAP),¹ which allows states to reduce some of the administrative burden associated with enrolling someone in SNAP. These changes will also affect the National School Lunch Program, which interacts with SNAP to determine free lunch eligibility for both individual students and entire schools. The US Department of Agriculture (USDA) calculates that the proposed revision to BBCE could cause 982,000 students to lose their automatic eligibility for free lunch. However, this estimate only relates to individual students. Because of the participation requirements of the Community Eligibility Provision (CEP), the BBCE revisions could result in entire schools losing their ability to provide free lunches to all students. Thus, students not participating in SNAP will also lose free meals. This brief explores this impact, which the administration's original analysis omitted.

We estimate that roughly 142,000 students (1.1 percent of students at schools with community eligibility) attend schools that could lose community eligibility entirely. As stated, if a school loses community eligibility, it loses the ability to provide free lunch to all of its students. Enrollment at a CEP school has proven health, educational, and

behavioral benefits for all students, not just those who qualify for free lunch because of their family's income.

Additionally, we estimate that 1.05 million students, 7.7 percent of students at CEP schools, could see their schools lose full reimbursement for school meals. The federal government reimburses schools for the cost of free lunch based on the percentage of students who are directly certified for free meals through their participation in SNAP or other safety net programs. If the share of students identified as free lunch eligible through an administrative match dips below 62.5 percent, each student not directly certified represents an additional financial cost imposed on the school. This increased financial burden could lead schools to opt out of CEP.

Despite several unknowns that limit our analysis, we find compelling evidence that the potential nutritional and financial impact of this rule change is greater than the administration originally reported. The proposed restrictions on BBCE would put many more students at risk of losing universal free meals at their school, despite the substantial associated benefits.

What Is Broad-Based Categorical Eligibility?

Broad-based categorical eligibility is a policy option in SNAP that states use to extend benefits to households with slightly higher incomes who are also coping with high expenses, like rent.² BBCE is also designed to streamline eligibility determination, saving time and administrative costs. BBCE allows states to make people automatically eligible for SNAP if they receive cash or noncash benefits from other assistance programs, such as Temporary Assistance for Needy Families.³ The policy can extend benefits to more families in need by allowing states to raise gross income limits up to 200 percent of the federal poverty guidelines and remove or align asset tests with those for state-funded Temporary Assistance for Needy Families programs. Thirty-nine states plus the District of Columbia, Guam, and the Virgin Islands apply BBCE in various ways (CRS 2019; Waxman and Joo 2019).⁴

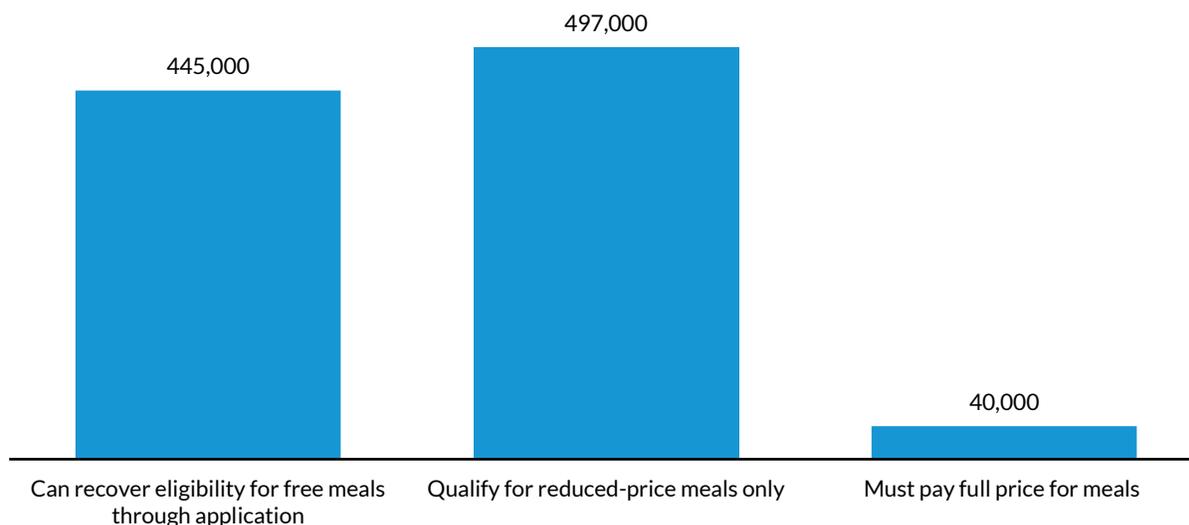
In an earlier brief, we reported on recent estimates indicating that if the administration's proposed changes to BBCE for SNAP are implemented, 1.1 million people in households with children would no longer meet SNAP's income test, and an additional 1 million would live in households no longer passing its asset test (Waxman and Joo 2019). This means over 2 million people in households with children would lose an average of \$240 every month, reducing total benefits by just under \$165 million monthly.⁵

Impacts on Students Directly Certified for Free Lunch

In addition to affecting families who participate in SNAP, revisions to BBCE will have secondary impacts on eligibility for free school meals. Students whose families participate in SNAP are automatically eligible for free school lunch. For most students, this automatic eligibility is carried out through direct certification, whereby students are linked to their family's SNAP record via an administrative data match. Because of direct certification, families participating in SNAP do not have to submit school lunch eligibility forms to participate in the free lunch program.⁶ Those who rely on BBCE may be more likely to have incomes near or just above the gross income eligibility threshold for SNAP (which is also the free lunch eligibility threshold), so these students may not be able to recover their free lunch status through paper applications.

As mentioned, USDA estimates that 982,000 students, roughly 7 percent of school-age children participating in SNAP, would lose their automatic eligibility for free school meals under BBCE revision.⁷ Only 45 percent (445,000) of these children would be able to recover their free meal status through a paper application. As shown in figure 1, the remaining students have a household income that qualifies them only for reduced-price lunch (30 cents for breakfast, 40 cents for lunch) or would not qualify them for free or reduced-price meals at all, meaning they would pay the cost for lunch set by the school district.

FIGURE 1
Number of Students Projected to Lose Automatic Eligibility for Free School Lunch, by Students' Resulting Costs for School Meals



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Source: October 2019 US Department of Agriculture analysis.

Direct Certification and Community Eligibility

Directly certifying students for free lunch also facilitates another element of the school lunch program: the Community Eligibility Provision. Schools that have a high share of students who are directly certified as low income, through their participation in SNAP and other safety net programs or who have special need designation,⁸ may participate in CEP. The share of students in a school that are identified as eligible for free school lunch through SNAP or other program participation or special need status is often known as the identified student percentage (ISP).

If at least 40 percent of students at a school, district, or a group of schools are identified as having low incomes through administrative data, all students at the school may receive free school lunch through participation in CEP. If a school, group of schools, or a district has an ISP of 62.5 percent or higher, the school receives a full reimbursement for the free meals they serve (schools with ISPs between 40 and 62.5 percent receive only partial reimbursement for meals). Thus, these two ISP thresholds are critical for CEP schools. At the 62.5 ISP threshold, the decision to participate in CEP is relatively easy, though many schools with lower ISPs opt to participate (FRAC 2018).

School participation in CEP has increased over time, especially since the program was made available to all schools starting in the 2014–15 school year. In the 2018–19 school year, more than 13.6 million students in more than 28,000 schools received free lunch through CEP (Maurice et al. 2019). School districts with similar ISPs vary in their adoption of CEP, primarily because of differences in location (e.g., region of the country and urbanicity) and district size (Rogus, Guthrie, and Ralston 2018).

For school administrators, there are many benefits to using CEP: As may be expected, the share of students who choose to eat school meals tends to increase when schools adopt CEP (FNS 2014b), perhaps because the stigma of receiving a free lunch is reduced. Paper eligibility forms are eliminated (though states may still direct schools to collect income data for other purposes). Further, schools may gain some flexibility in how they deliver meals to students. Without having to collect payments for school breakfast, for example, schools are more likely to experiment with in-classroom breakfast or other models for meal delivery (FNS 2014a).

When schools adopt CEP, their students see benefits that go beyond daily nutrition. Adoption of CEP yields better academic performance, in the form of state standardized test scores (Gordanier et al. 2019; Ruffini 2018; Schwartz and Rothbart 2019). CEP adoption is also associated with a decline in student suspension rates (Gordon and Ruffini 2018) and an increased share of students who have a healthy body mass index (Davis and Musaddiq 2018). In some cases, researchers observe that benefits accrue to students who may not have been eligible for free lunch under a traditional school lunch program. This may indicate that such students needed meal assistance even though their families are above the eligibility threshold for free school meals, or that their income-eligible families did not complete the paperwork needed to receive the meals.

As the USDA notes, some of the more than 500,000 children who are not eligible for free meals based on their income may be enrolled in CEP schools and thus may regain their eligibility through this

program. However, it is difficult to know how many students may return to free meal status through community eligibility. About 27 percent of public school students across the country were enrolled in a CEP school in 2018–19.⁹ Even if those who lose eligibility are more likely to be enrolled in CEP schools, that most students are not enrolled in a CEP school suggests a substantial share of students will not regain their free lunch status because of CEP participation.

Calculating the Effect on Community Eligibility Provision Schools

Aside from the loss of direct certification for free meals, a second indirect effect of the BBCE rule change is on the number of schools (and thus students) that may see their CEP status change. Schools may either lose eligibility to participate in the CEP program (if their ISP falls below 40 percent) or lose full reimbursement for their school meal program (if their ISP falls below 62.5 percent). We attempt to estimate the share of schools and students who may experience a CEP status change because of the BBCE rule change.

Our analysis makes the following modeling assumptions:

- **The decline in eligibility will vary by state.** We do not know the school- or district-level share of students that will be affected by BBCE changes. Thus, we must rely on state-level estimates to account for the fact that some student populations will be more affected than others. States that don't employ BBCE will be unaffected by the new regulations, and we do not adjust their ISP or CEP status.

The effect of these changes will also vary among the 39 states that employ BBCE. Mathematica projects that the share of households with children below 18 that will be removed from SNAP could be as high as 19 percent in some states and as low as 1 percent in others.¹⁰ Though the share of households with children includes non-school age children, these state-level Mathematica numbers provide us with the best estimate of the varied impact across states.

- **Direct certification using Medicaid will “catch” many students dropped from SNAP.** Several states now certify additional students for free and reduced-price lunch through an administrative data link to their Medicaid participation.¹¹ Among children, there is substantial overlap in household eligibility for SNAP and household eligibility for Medicaid/the Children's Health Insurance Program (CHIP); nearly all SNAP-eligible children are likely also eligible for means-tested health care (Wheaton, Lynch, and Johnson 2017). However, the share of students in families that actually take up both programs is difficult to determine.

Survey-based estimates of the share of SNAP households that also take up Medicaid/CHIP vary; based on previous studies, perhaps 75 to 90 percent of SNAP households are also on Medicaid/CHIP.¹² However, it is possible that being enrolled in both programs does not guarantee a match in both programs, especially because the Medicaid link is much newer.¹³ For

this analysis, we assume 75 percent of all students dropped from the SNAP rolls in states that also certify using Medicaid get “caught” by this link, mitigating the reduction in ISP.

To conduct our analysis, we use data on the ISP and CEP status of each public school in the United States, as collected by the Food Research and Action Center (FRAC). As a check on our results, we run a second analysis using data from a sample of states that reported direct certification numbers (from which we can calculate ISP) in the 2017–18 Common Core of Data. We reduce each ISP by state-level estimates of the decline in SNAP households with school-age children.¹⁴ We then report the share of students and schools we estimate would lose CEP at the 40 percent and 62.5 percent thresholds.

The FRAC database is the most recent and complete publicly available source of school ISPs. The database includes the ISP that provides the basis for each school’s reimbursement. Any school that participates as part of a group of schools under a shared ISP will have the group’s ISP listed instead of the individual school’s ISP. It is not possible to predict how school districts or groups will respond when their aggregate ISP declines. If we adjust these reported group ISPs to account for BBCE changes, we would get a number that is likely a substantial overestimate of the students affected.¹⁵

Therefore, for our first analysis, we randomly assign an individual ISP to CEP schools that appear to report in groups. We assign each school an ISP that is at most 20 percentage points above or 5 percentage points below its group-reported ISP. This prevents all schools in the group from potentially falling out of eligibility when we reduce the ISP. This method also slightly increases most school groups’ student-weighted ISPs above their true value. Because we tend to shift the student-weighted mean ISP of these grouped schools upward, we may be generating a potential underestimate of the schools that might lose eligibility, relative to a scenario where we know the underlying school-level ISPs. However, this technique could provide a more accurate portrayal of how school groupings might respond: by building new groupings that exclude schools that pull the CEP average below the threshold.

For our second analysis, we look at slightly older data on community eligibility and direct certification from the 2017–18 Common Core of Data. Twenty states and the District of Columbia reported direct certification numbers in this data collection.¹⁶ In this subset of reporting states, we identify 3.66 million students enrolled in CEP schools. Because CEP has expanded, we expect that the numbers we obtain using this sample of states may be lower than what we estimate with the FRAC data. From 2017–18 to 2018–19, more than 3,600 new schools adopted CEP (Maurice et al. 2019). The sample of these 20 states and DC, though large, may not represent the nation; it is possible that this sample of states may be substantially less or more affected by BBCE changes.

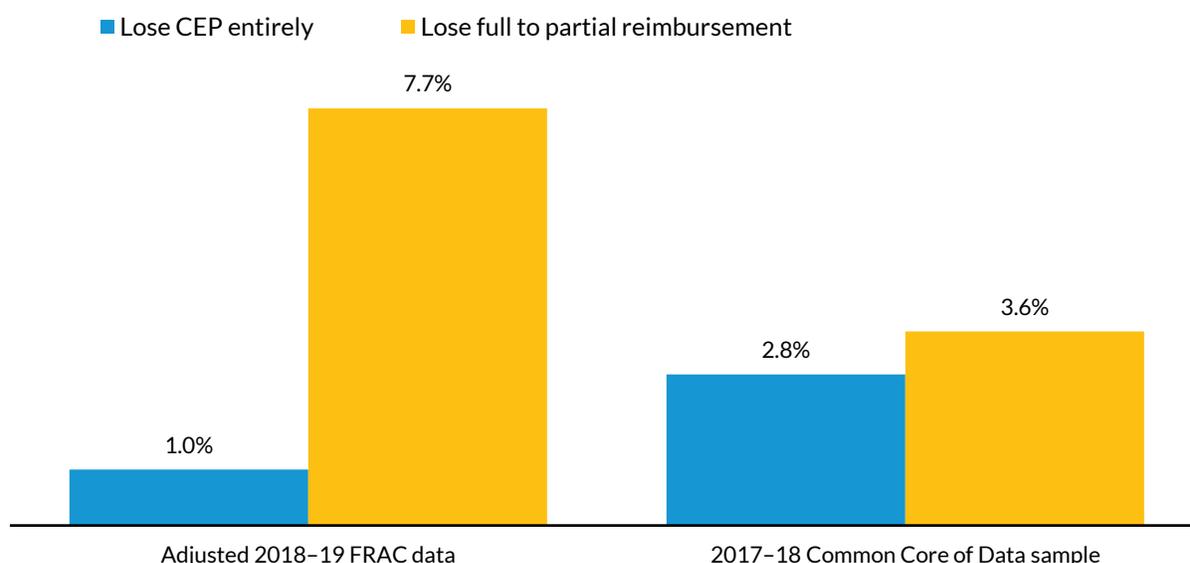
The effects of this change on school CEP status will not be immediate. CEP status is evaluated every four years, and if a school’s ISP drops below 40 percent but remains above 30 percent, it is granted a grace year (with lower partial reimbursement) before losing its status. Thus, though we predict that schools may lose CEP status, it may be a few years before students within the school actually lose their universal lunch status.

Results

We estimate that roughly 4 to 8 percent of students in CEP schools will see their school lose their full reimbursement status (fall below 62.5 percent ISP), potentially putting the school’s CEP status at risk because it will be burdened with additional costs. Another 1 to 3 percent of students in CEP schools could eventually lose universal free lunch altogether, because their school is predicted to fall below the 40 percent eligibility threshold.

Using our school-group adjusted 2018–19 FRAC data, we estimate that 7.7 percent of students in CEP schools will lose their full reimbursement status, and 1.0 percent of students will lose CEP eligibility altogether.¹⁷ When we conduct this analysis using the sample of schools that reported direct certification and CEP eligibility in the 2017–18 Common Core of Data, we find that 3.6 percent of students would lose full reimbursement and 2.8 percent would lose CEP (figure 2).

FIGURE 2
Two Estimates of the Share of Students Enrolled in Community Eligibility Provision Schools Projected to Lose Community Eligibility or Full to Partial Meal Reimbursement



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Source: Urban Institute analysis of data from Common Core of Data, available at <https://nces.ed.gov/ccd/pubschuniv.asp>, and the Food Research and Action Center database.

Notes: CEP = Community Eligibility Provision. FRAC = Food Research and Action Center.

Our analysis focuses on the 62.5 and 40 percent thresholds because these numbers represent key decision points for schools and school districts about whether to continue participating in CEP. However, a slip in ISP anywhere between 40 and 62.5 percent could potentially threaten participation in the provision. Many students in CEP schools receive universal free lunch even though their school may only be eligible for partial reimbursement. It is possible that schools may decide having the program

is not worth the increasing cost, even if the school does not cross over the 40 or 62.5 percent thresholds. Table 1 shows the share of students in CEP schools, grouped by their school's ISP before and after our projected BBCE changes. Though students at the two threshold points make up a small share of CEP students, a much larger share are enrolled in schools that will see their ISPs drop, potentially pushing their schools to abandon the universal free lunch program.

TABLE 1
Estimated Changes in ISP Category before and after BBCE Changes, by Share of Students in Community Eligibility Provision Schools

	ISP Category after BBCE Changes						
	Below 40%	40-45%	45-50%	50-55%	55-60%	60-62.5%	62.5%+
ISP category before BBCE changes							
Below 40%	0.9%						
40-45%	0.9%	1.6%					
45-50%	0.1%	1.5%	2.8%				
50-55%		0.3%	3.1%	5.4%			
55-60%			0.7%	6.5%	12.7%		
60-62.5%			0.0%	0.6%	7.9%	5.6%	
62.5%+				0.2%	2.1%	5.4%	41.8%

Source: Urban Institute analysis of data from Food Research and Action Center database.

Notes: ISP = identified student percentage. BBCE = broad-based categorical eligibility. Grey indicates threshold changes (i.e., full to partial and loss of community eligibility).

Though these percentages may seem small, they represent hundreds of thousands of students who may be at risk of losing the benefits of universal free meals. Using our adjusted FRAC estimate, we calculate that about 1.05 million students could see their schools lose full reimbursement, potentially putting their CEP status at risk. Further, we estimate that about 142,000 students would fall below the 40 percent ISP threshold for participating in the program. We estimate that the loss of full reimbursement at CEP schools could cost more than \$167 million in funding for school lunch over the course of a school year.¹⁸

Conclusion

The USDA's initial analysis of the effect of restricting BBCE only accounts for the loss of free and reduced-price meals for those students who would lose their SNAP benefits. We identify a greater population of students who would lose access to universal free meals because of their school losing its CEP status, which provides meals to all students if enough are directly certified through social safety net programs such as SNAP. CEP is associated with a range of positive academic, behavioral, and health outcomes for students, including those who are not eligible for free meals based on their family's income. Losing eligibility for CEP, even if students maintain individual eligibility for free school meals, may result in the loss of these benefits.

Our analysis is limited by the data available. For example, because many districts group schools together to be jointly eligible for CEP, we can't predict how they would react to drops in their schools' individual or joint ISPs. However, we make several adjustments that we believe improve the robustness of our analysis. We find that more than 142,000 students could lose access to free meals, and many more could see their schools lose funding for CEP, and possibly also drop out of CEP, though the impact of these changes could be spread out over as many as five years. Though the number of schools and students affected varies by state, we estimate that states that directly certify students through Medicaid are best positioned to mitigate the impact of this rule change should it occur. Our findings suggest the omission of CEP from the original analysis understates the full scope of the impact this proposed change in SNAP eligibility rules would have on student nutrition.

Notes

- ¹ [Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program \(SNAP\)](#). 84 Fed. Reg. 35570 (Jul. 24, 2019).
- ² The explanation that follows comes from Waxman and Joo (2019), which explores the restriction of BBCE in greater depth.
- ³ States can also confer eligibility through BBCE by providing a referral to an eligible noncash program.
- ⁴ According to the most recent information from the US Department of Agriculture, 9 states retain a gross income ceiling of 130 percent of the federal poverty guidelines (FPG), 2 use a ceiling of 160 percent of FPG, 5 use a ceiling of 165 percent of FPG, 1 uses a ceiling of 175 percent of FPG, 8 use a ceiling of 185 percent of FPG, and 17 use a ceiling of 200 percent of FPG. Most states and territories have used BBCE to eliminate asset tests; only 6 (Idaho, Indiana, Maine, Michigan, Nebraska, and Texas) retain an asset test for all households.
- ⁵ "New Research Analyzes State-Level Impact of USDA Proposal to End SNAP Broad-Based Categorical Eligibility," *Mathematica*, September 5, 2019, <https://www.mathematica.org/news/new-research-analyzes-state-level-impact-of-usda-proposal-to-end-snap-broad-based-categorical>.
- ⁶ "Applying for Free and Reduced Price School Meals," US Department of Agriculture, Food and Nutrition Service, accessed October 24, 2019, <https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.
- ⁷ Percentage calculated as 982,000 divided by the total number of school-age children on SNAP in FY 2016 (13,382,000), based on numbers from page 22 of (Lauffer 2017). See "(AE62) Revision of Categorical Eligibility in SNAP - Informational Analysis," *Regulations.gov*, accessed October 24, 2019, <https://www.regulations.gov/document?D=FNS-2018-0037-16046>.
- ⁸ Qualifying programs include Temporary Assistance for Needy Families, Food Distribution Program on Indian Reservations, and, in certain pilot states, Medicaid. A special need designation can include being in foster care or experiencing homelessness.
- ⁹ We calculate this number using the number of students in CEP schools in the 2018–19 school year (Maurice et al. 2019), divided by the total number of students enrolled in public schools in the same year, from table 203.10 from the list of 2018 *Digest of Education Statistics* tables, available at https://nces.ed.gov/programs/digest/d18/tables/dt18_203.10.asp?current=yes.
- ¹⁰ "State-by-State Impact of Proposed Changes to 'Broad-Based Categorical Eligibility' in SNAP," *Mathematica*, accessed October 24, 2019, <https://www.mathematica.org/dataviz/impact-of-bbce-proposal-on-snap-caseloads>.

- ¹¹ We have identified the states directly certifying students using Medicaid as California, Connecticut, Florida, Illinois, Indiana, Kentucky, Massachusetts, Nebraska, Nevada, New York, Pennsylvania, Utah, Virginia, Washington, West Virginia, and Wisconsin.
- ¹² We draw on four different reports, relying on different datasets, to estimate the share of SNAP participants who also take up Medicaid. A report using data from the 2009 Survey of Income and Program Participation finds that 87 percent of SNAP households with children also take up Medicaid/CHIP (Rosenbaum and Dean 2011), but a report using American Community Survey data finds that 94 percent of SNAP households with children take up means-tested programs (Kenney et al. 2010). Using an analysis of 2014 Consumer Expenditure Interview Survey data, we estimate that about 78 percent of SNAP households with children take up Medicaid/CHIP (Foster and Rojas 2018).
- ¹³ In Nebraska, 11,791 students who were on SNAP were also found to be eligible for free meals based on a Medicaid data match in the 2016–17 school year (Hulsey et al. 2019). With 67,580 students determined eligible for SNAP, this would indicate that just 17 percent of Nebraska SNAP students matched in Medicaid data (Hulsey et al. 2019). But because districts can match locally and extend eligibility to other household members, this may be a substantial underestimate.
- ¹⁴ “State-by-State Impact of Proposed Changes to ‘Broad-Based Categorical Eligibility’ in SNAP,” Mathematica.
- ¹⁵ Using raw data alone, we would estimate that 34.0 percent of students in CEP schools will lose full-reimbursement eligibility, and 1.4 percent will lose CEP eligibility altogether. Because of grouping around the full-reimbursement threshold, we believe that this estimate broadly overstates the share of students that would be affected.
- ¹⁶ The states are Alabama, Alaska, Arkansas, Colorado, Delaware, Florida, Georgia, Hawaii, Indiana, Maryland, Missouri, Nevada, New Mexico, North Dakota, Ohio, Oklahoma, South Carolina, South Dakota, Tennessee, and West Virginia. Massachusetts and Wyoming report direct certification data but did not have information on CEP schools (Massachusetts) or did not have CEP schools (Wyoming).
- ¹⁷ Because we employ a randomized ISP, it’s always possible that we could get a “bad draw,” an over- or underestimate of the share of students affected. We run the randomization 500 times to ensure we are getting an appropriate average of the scenarios. The scenarios in our simulations range from 5.2 to 10.7 percent of students in schools losing full- to partial-reimbursement and from 0.7 to 1.7 percent of students in schools losing CEP entirely.
- ¹⁸ This estimate assumes all schools that remain eligible for CEP will continue to participate. Some schools may be unwilling or unable to continue to front the added cost, and students who are not independently eligible for free lunch would lose those meals. We can’t predict how individual schools will react, but whatever they choose, students or the schools will lose out. This analysis only accounts for the cost of lunch and underestimates the true cost that would be imposed on schools that participate in the School Breakfast Program. We calculate the daily cost of lunch service in a CEP school as its student enrollment multiplied by the federal reimbursement rate for the 2019–20 school year; see [Notice, 84 Fed. Reg. 38593 \(Aug. 7, 2019\)](#). We assume school lunch is served 180 days per year.

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