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Year 3 Addendum*

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Community Eligibility Provision Evaluation: Year 3 Addendum

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1. Introduction

Section 104(a) of the Healthy, Hunger Free Kids Act (HHFKA) of 2010 made the Community Eligibility Provision (CEP) available to Local Educational Agencies (LEAs) and schools in high poverty areas.¹ Under the CEP, families are not required to submit applications for free or reduced-price meals, and schools must provide free lunch and breakfast to all students. Schools are reimbursed for meals using a formula based on the percentage of students identified as eligible without an application (the identified student percentage, or ISP), using direct certification and other lists of eligible students.² LEAs must cover all costs of these meals in excess of Federal reimbursement with non-Federal funds. The potential benefits are to increase low-income students' access to nutritious meals, and to reduce the administrative burden of LEAs' experience with the school meals programs.

The phase-in of the CEP has followed a schedule specified by the HHFKA. The Food and Nutrition Service (FNS) initially identified 10 States with the greatest potential for covering the highest number of qualifying LEAs and schools to apply for the CEP for the first year, School Year (SY) 2011–12. FNS then selected three States (Illinois, Kentucky, and Michigan) to participate. For SY 2012–13, FNS encouraged all States to apply for the CEP, and selected four additional States³ (New York, Ohio, West Virginia, and the District of Columbia), making a total of seven participating States. FNS selected four more States to participate in the CEP for SY 2013–14 (Florida, Georgia, Maryland, and Massachusetts). The CEP will be available nationwide to all eligible LEAs and schools in SY 2014–15. Information on State lists of eligible LEAs is available on FNS' web site (<http://www.fns.usda.gov/school-meals/state-information-community-eligibility-provision>).

As mandated by the HHFKA, the CEP Evaluation examined the implementation and impacts of the new framework for providing free meals to all students in high-poverty schools. The overall purpose of the evaluation was to obtain a better understanding of:

- The acceptability of the Community Eligibility Provision to LEAs,
- The incentives and barriers for LEAs adopting the provision,
- Operational issues that State agencies encounter in administering this provision, and
- Implications and impacts of opting for this provision.

The report on the Community Eligibility Provision Evaluation (Logan et al., 2014) covered the first seven participating States and presented the methods and results to address the legislatively mandated research questions. It included descriptive information on the implementation of the CEP from the

¹ During the evaluation's planning and data collection phases, the CEP was known as the Community Eligibility Option (CEO).

² Eligibility can also be certified based on lists maintained by LEAs or other agencies that identify categorically eligible students, such as homeless, runaway and migrant youth, and foster children.

³ For ease of discussion, the term "State" in this report includes the District of Columbia (D.C.) government, which supervises all LEAs participating in the USDA school meals programs within its borders, including the D.C. Public School system, public charter schools, and non-public schools.

State and LEA perspectives, and analytic findings on the factors affecting LEA participation in the CEP and its impacts on LEAs. This Addendum contains descriptive findings on CEP eligibility and participation for all 11 States where the program has been phased in to date, and updates several of the descriptive results published in the final report.

The next section discusses the background of the CEP in the overall context of the structure of school meal administration, the mandate for an evaluation, and an overview of the evaluation design. A review of findings from the final report follows. The remainder of the chapter discusses the research objectives, scope, and organization of this Addendum.

1.1 CEP Background, Purpose and Milestones

Two school-based programs—the National School Lunch Program (NSLP) and School Breakfast Program (SBP)—are vital parts of the safety net against childhood hunger overseen by FNS. Each State administers these programs through Local Educational Agencies (LEAs)⁴ and is responsible for ensuring that the LEAs meet Federal program guidelines. Students in households with family incomes at or below 130 percent of the Federal poverty line (FPL) are eligible for free meals at school, while those in households with family incomes between 130 percent and 185 percent of FPL are eligible for reduced price meals. The NSLP and SBP provide foods that meet the government’s nutritional standards for two meals each day that school is in session.

More than 90 percent of students nationwide attend schools that offer NSLP and/or SBP. In Fiscal Year 2013, almost 31 million children participated in the NSLP, and over 13 million children participated in the SBP. Over 70 percent of lunches and 85 percent of breakfasts served in schools were for children eligible for free or reduced price (FRP) meals (USDA, 2014a, 2014b). Eligibility for FRP meals is determined through annual household applications, direct certification, and lists of eligible children. Households can apply based on income or categorical eligibility (i.e., being part of a group that is specified as eligible by law regardless of income).

Direct certification determines children’s eligibility for free meals by matching student enrollment records with administrative records from programs that make children categorically eligible for free

⁴ The Richard B. Russell National School Lunch Act (NSLA) uses two different terms to refer to the local entities that enter into agreements with State agencies to operate the school meal programs. The Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) amended the NSLA by using the term Local Educational Agency (LEA), defined for public schools in the Elementary and Secondary Education Act of 1965 (ESEA), when referring to the application, certification, and verification functions of the school meal programs. Sections of the NSLA that deal with other aspects of the programs, such as meal pattern requirements and meal-counting and claiming reimbursements, use the term School Food Authority (SFA), which current NSLP regulations define as the governing body that has the legal authority to operate the NSLP/SBP in one or more schools. The term most commonly used for the entities described as LEAs in the ESEA is school districts. While this definition applies only to public entities, State agencies also enter into agreements to operate the NSLP with charter schools, non-public schools, or other non-profit local entities such as an archdiocese running multiple non-public schools. Because the section of the HHFKA that authorizes the CEP refers to LEAs, that term is used throughout this document to refer to both public and non-public nonprofit local entities that enter into agreements with State agencies to operate the NSLP and SBP.

meals, including the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), the Food Distribution Program on Indian Reservations (FDPIR) and Medicaid (in selected States). In addition, children can be certified as eligible for free meals based on lists of other categorically eligible individuals maintained by LEAs or other agencies, including homeless, runaway and migrant youth, and foster children. Children certified for free meals by any of these means—without applications—are referred to as “identified students.”

The Child Nutrition and WIC Reauthorization Act of 2004 required States to develop a direct certification system for school-age SNAP participants by SY 2008–09. During SY 2012–13, 91 percent of LEAs participating in the NSLP directly certified some SNAP participants. Nationally, direct certification identified 89 percent of school-age SNAP participants (Moore, Conway, Kyler, and Gothro, 2013).

LEAs participating in NSLP and SBP receive Federal reimbursements for meals served to participating children. Under conventional procedures, LEAs separately count reimbursable meals served to (a) children certified for FRP meals and (b) children paying the LEA’s full price (“paid” meals). LEAs submit monthly claims for reimbursement based on meal counts and rates for free, reduced, and paid meals set by USDA, to their respective State Child Nutrition (CN) Agencies.

To reduce local-level administrative burdens that accompany completing and processing the household applications, USDA has established three provisions as alternatives to the conventional requirements for annual determinations of FRP meal eligibility. All three provisions let LEAs conduct FRP meals certification less often than annually: every two years under Provision 1, and at most every four years under Provisions 2 and 3 (as discussed below). These provisions can be used throughout the LEA or for individual schools. Under Provisions 2 and 3, LEAs offer free meals to all students and count only the total meals, then claim reimbursement using percentages or dollar amounts established in the base year when students are certified for FRP meals (USDA, 2014c). LEAs must still collect applications every four years, unless they receive an extension for an additional four years. Stopping and starting the application process can represent a challenge for families, schools, and LEAs, who may become less familiar with the application process, especially if four-year extensions have been granted (National Research Council, 2012).

1.1.1 Authorization for the CEP and Mandate for the Evaluation

Recognizing the problem of both childhood obesity and food insecurity in children, Congress passed the HHFKA in 2010. The HHFKA authorized funding and reformed policies for the USDA child nutrition programs, including NSLP and SBP, with the goal of improving the quality of and increasing access to meals offered to children. The HHFKA updated standards for nutritious meals and authorized additional funding for healthier meals. Several other program changes were designed to improve access to NSLP and SBP through program expansion and outreach, including the CEP. As part of the HHFKA, Congress further mandated that FNS conduct an evaluation (1) to understand how the CEP is implemented; (2) to describe incentives and barriers for LEA and school participation; and (3) to estimate impacts on LEAs, schools and children.

1.1.2 Purpose and Design of the CEP

Section 104(a) of the HHFKA created the CEP for LEAs and schools as an alternative to household applications for FRP meals and conventional reimbursement methods. The CEP can be used in an entire LEA (district-wide), a group of schools in an LEA, or an individual school—if the ratio of

identified students (i.e., those certified for free meals without application) to total enrollment is 40 percent or more in the year prior to adopting the CEP.⁵ This criterion is known as the “Identified Student Percentage” (ISP). LEAs and schools using the CEP must agree to serve both breakfasts and lunches free to all students, and to cover with non-Federal funds all costs of these meals in excess of Federal reimbursements. The percentage of meals reimbursed with Federal funds at the free meals rate (the “claiming percentage”) equals the ISP multiplied by a factor of 1.6, as established in the HHFKA; all other meals are served free to students but are reimbursed at the paid meals rate. The applicable ISP is for the entire LEA, the group of schools, or the individual school, depending on how the LEA chooses to implement the CEP and establish CEP eligibility for its schools.

The CEP has two potential advantages, compared to conventional reimbursement methods: (1) it can potentially increase student participation in meal programs by expanding access to free meals for all students, and (2) it can decrease household and administrative burden by not requiring regular applications to establish eligibility, and by simplifying the counting of reimbursable meals.

The CEP allows four years of reimbursement to eligible LEAs and schools with an additional four-year cycle possible if the LEA or school continues to meet the minimum ISP of 40 percent. LEAs using the CEP are encouraged, but not required, to conduct direct certification. If the LEA chooses to conduct direct certification (or if the State conducts direct certification) and the ISP increases over the course of participation, the LEA will be reimbursed at a higher claiming percentage.⁶ An LEA or school may withdraw from the CEP at any time during the four-year cycle.

1.2 Summary of Findings from the CEP Evaluation Report

1.2.1 Study Design and Data

The study design included an implementation study and an impact study in the first seven CEP States. For the implementation study, the evaluation team collected State administrative data on the characteristics of all LEAs and schools. The evaluation team updated these data for this Addendum. In addition, the evaluation team conducted the following primary data collections on CEP implementation:

- Fielded a detailed web survey on LEAs’ experiences with the CEP;
- Interviewed State Child Nutrition Agency directors and staff to obtain their perspectives on implementation successes and challenges; and
- Interviewed Title I directors in all 51 State Educational Agencies to gather data on programs using FRP meals data and how these programs might be affected by the elimination of FRP meals applications under the CEP.

⁵ Schools participating in Provision 2 or 3 may elect the CEP if (a) they are not in the base year, when direct certification must be conducted, and (b) they can provide an ISP for the year prior to the first year of the CEP.

⁶ To renew participation after the fourth year, LEAs must obtain identified student data demonstrating that they still meet the ISP requirement for the participating schools.

Three types of LEAs were of interest to the evaluation:

- 1) Participating in the CEP: LEAs with at least one participating school;
- 2) Eligible non-participating: LEAs with at least one school eligible to participate as an individual school (i.e., with a school ISP of 40 percent or more) but no participating schools; and
- 3) Near-eligible non-participating: LEAs with a district-wide ISP between 30 and 40 percent and no eligible schools.

The impact study collected and analyzed data on outcomes for matched samples of treatment (participating) and comparison (non-participating) LEAs. The two groups were matched on characteristics related to the likelihood that the LEA would take up the CEP, using propensity score matching. All analyses used regression models to control for observed differences between treatment and control groups. To estimate impacts on NSLP and SBP participation and Federal reimbursements, the evaluation team collected and analyzed State administrative data from the fall months for SY 2009–10 through 2012–13 on 285 participating LEAs and 528 matched non-participating LEAs. For other outcomes, the evaluation team conducted several data collections in a series of nested samples, including:

1. A web survey of 141 treatment and 105 comparison LEAs that collected non-Federal revenue data for SY 2009–10 through 2012–13 and qualitative data about changes in participation and operations;
2. Two data collections in a sub-sample of 52 treatment and 48 comparison LEAs,
 - a. interviews with LEA and school personnel on staffing and administrative costs, and
 - b. reviews of a sample of direct certification and FRP meals application records for the analysis of impacts on certification errors; and
3. Three more intensive data collections in a sub-sample of 27 treatment and 25 comparison LEAs (selected from the sub-sample described above):
 - a. observations of cashiers to collect data on errors identifying reimbursable meals,
 - b. review of school and LEA records to obtain data on meal claiming errors, and
 - c. self-reported data from foodservice managers in the sampled schools about foods and beverages offered for the NSLP and the SBP during a selected week.

All surveys and on-site data collection visits were conducted in the Winter and Spring of 2013.

1.2.2 Implementation Study Results

States identified, notified and recruited LEAs to participate. In turn, the LEAs learned about the CEP, made decisions about whether to implement and in which schools, and communicated with schools and the community. Some States and LEAs had already noticed increased meal participation, and according to States, LEAs were excited about the CEP. The first seven States reported that key challenges at the State level were (1) the limited time during initial implementation to understand the CEP, make decisions about participation, and implement it, and (2) understanding and addressing the implications of the CEP for educational programs that use individual student FRP meals certification data. At the LEA level, the most frequently reported barriers included financial concerns and uncertainty about the impacts of the CEP on NSLP and SBP participation. Equity issues and operational challenges (especially for LEAs with both eligible and non-eligible schools) were also

important concerns. Addressing the timing and information issues for States is a relatively straightforward problem. However, telephone interviews with all 51 State Title I directors indicated that States routinely use FRP data for multiple education-related purposes, so the lack of such data under the CEP represents a widespread challenge.

Across the first seven States, a total of 420 LEAs and 2,312 schools participated in the CEP in SY 2012–13. On average, 32 percent of eligible regular and charter LEAs, and 29 percent of eligible schools, participated in the CEP. Participation rates for eligible regular and charter LEAs ranged considerably—from 24 percent in Michigan to 65 percent in West Virginia. Based on the number of near-eligible LEAs, it appears that the potential to increase the number of eligible LEAs was small in most States; only Illinois and Ohio had more than 50 near-eligible LEAs.

Among participating LEAs eligible to participate LEA-wide, 92 percent used the CEP in all schools. Ninety-seven percent of schools in participating LEAs eligible to participate LEA-wide used the CEP, on average. On the other hand, among participating LEAs that were not eligible LEA-wide, 53 percent used the CEP at all eligible schools, and on average, 79 percent of eligible schools in all participating LEAs that were not eligible LEA-wide used the CEP. (A school is eligible for the CEP if the LEA is eligible to participate LEA-wide, or if the school has an ISP of 40 percent or more, or if the school is grouped with other schools so that the ISP for the group is 40 percent or more.)

Compared with eligible non-participating regular and charter LEAs, participating LEAs of these types had more students, on average, higher ISPs and FRP meals eligibility percentages, higher percentages of students in grades K–5, and higher percentages of students who are Black. Despite their larger average size, participating regular and charter LEAs were more often very small (with enrollments under 500 students); they also were more often urban and more often charter schools. These patterns were replicated in most (although not all) of the first seven States.

Four factors were significantly associated with CEP participation by LEAs: ISP, enrollment, State, and charter status. The odds of participation rose dramatically with each additional 10 percentage points in the ISP, especially in the steps from 40 to 70 percent. The odds of participation also increased for LEAs with larger numbers of schools. However, LEAs with below-average-size schools were more likely to participate, possibly because of differences in school-level eligibility. Although charter LEAs were more likely to participate than regular public LEAs, this finding was significant only in Ohio. The above relationships were observed after controlling for the other factors in the analytic model, so they may differ from the descriptive results (such as the participation rates by State computed without controlling for differences in LEA demographics). Evidence from State CN interviews suggests that the differences by State and charter status may reflect how the CEP was implemented; differences in school-level eligibility may also have contributed to variation in participation across LEA types.

1.2.3 Impact Study Results

As noted above, the Impact Study used a matched comparison design, and impact estimates were computed from differences in outcomes between the treatment group (participating LEAs and schools) and the comparison group (non-participating LEAs selected to be similar in likelihood of CEP take-up, and selected schools in these LEAs). Outcome data were drawn from State administrative records, a web survey, in-person interviews and other on-site data collection, with the largest samples devoted to the participation and revenue impacts.

The Impact Study applied methods recommended by Schochet (2008a, 2008b) that have since been widely applied. This method, which is one approach for dealing with the “multiple comparisons” problem, involves dividing outcomes into those that are *confirmatory* versus those that are *exploratory*. Confirmatory outcomes are those considered to be the primary indicators of program success, while exploratory outcomes provide insight into the results of the program but are not used to judge its success. The study used two confirmatory outcomes:

1. Average daily participation in the NSLP; and
2. Federal revenues per reimbursable meal.

The results for impacts on participation and revenues for NSLP and SBP are based on the strongest component of the evaluation, which uses a time-series of pre- and post-implementation data to strengthen the controls for differences in relevant characteristics between the treatment and control groups. Other impact results are based on a posttest-only comparison design and should be considered exploratory.

Judged by the confirmatory outcomes selected for the evaluation, the CEP was clearly successful: it significantly increased student participation in NSLP, and Federal reimbursements per reimbursable meal for these programs were significantly greater among the LEAs that chose to participate. Participation in the CEP also increased student participation in the SBP. The CEP’s impact on student participation in school meal programs was surprisingly consistent across programs, increasing participation by 5 to 9 percent (relative to the lunch and breakfast programs’ participation in the matched comparison schools, after controlling for differences between the two groups). The CEP’s impact on Federal reimbursements per meal was a significant increase of about 6 percent for the NSLP and 2 percent for the SBP. Total Federal revenue per student increased by 13.5 percent. On the other hand, the CEP did not appear to have an impact on any type of non-Federal revenue. Taken together, the finding of increased Federal funding and the lack of evidence that other revenues significantly declined suggest that the CEP did not have an adverse overall effect on LEA foodservice revenues, and may have produced a net gain for participating LEAs.

Turning to exploratory outcomes, the CEP requires LEAs to offer the SBP, and it was available in all schools in nearly all participating LEAs and non-participating LEAs that are likely to take up the CEP. Study data did not indicate that the CEP had an impact on availability of the SBP. After controlling for differences between groups, participating LEAs used traditional line service less often at breakfast and served breakfast in the classroom more often, as is recommended to increase SBP participation (USDA, 2013) but complicated to implement under conventional meal counting and claiming procedures. Participating LEAs were less likely to offer a choice of foods at breakfast. The reduction in choice of foods may be linked to the greater use of in-classroom breakfast.

As expected, CEP participation appeared to reduce time spent by school and LEA staff on distributing and processing applications for free or reduced-price meals, verifying income of free/reduced price students, and meal payment collections and accounting. The combined savings for these activities were 68 minutes per student per year, representing labor cost savings of about \$29 per student per year. The CEP had no impact on the staff time and costs associated with direct certification. On the other hand, the CEP appeared to increase the staff time and cost of counting and claiming reimbursable meals from less than 30 minutes per student per year to almost an hour, offsetting half of the savings in other activities. Possible reasons for this result include: increased participation in

school meal programs, and new (and sometimes more manual) meal counting and claiming procedures. It is too early to tell whether the increased time for meal counting and claiming reflects an early implementation challenge, and adaptation to the new procedures and planned automation by States might reduce this impact over time. On the other hand, the CEP could produce net savings in meal counting and claiming costs in the long run, if schools could reduce the complexity and cost of automated systems for meal counting and payments. Treatment and comparison schools did not differ in the total time and cost spent on administrative tasks overall or for any category of worker. Descriptive data from interviews and surveys suggest that, for the majority of LEAs, the CEP did not require LEAs to increase staff, the time spent on meal counting and claims was not a concern, and the CEP made it easier for LEAs to break even or at least had no impact on the foodservice bottom line.

The CEP reduced the overall rate of certification errors and had little or no impact on errors in counting meals (at the cashier level) and claiming meals for reimbursement. The CEP did not appear to affect errors in direct certification, which are rare. The CEP eliminated application processing errors that, in the comparison schools, resulted in approximately 6.6 percent of applicants having the wrong certification level (too high or too low). The CEP also eliminated procedural errors in application processing that, in the comparison schools, affected 20.2 percent of approved applicants and 16.9 percent of denied applications. Procedural errors (such as missing certification documents or incomplete applications) do not necessarily result in certification errors but indicate a lack of compliance in the process. The CEP had no significant impact on cashier error in identifying reimbursable meals, despite concerns that increased participation might lead to more error by speeding up service lines. One measure of meal claiming error was significantly higher in participating schools, but there was no impact on overall meal claiming error. The primary reason for errors in claims submitted for CEP schools to the State was that the LEA used the wrong claiming percentage, and usually the claiming percentage used was lower than the LEA was entitled to use. This problem might be readily addressed through training or through claims processing by the State (which may have corrected some or all of the detected errors in claiming percentages). The baseline levels of claiming error in the NSLP and SBP appear to be quite small, at least in the sample, so the lack of a positive impact from the CEP is not a reason for concern.

For a broad range of meal quality outcomes, there was no evidence that the CEP had a significant impact. The methods used by the study to assess meal quality emulated, to the extent practical, the methods used by FNS and State Agencies to measure compliance with the meal component standards. However, the study simplified the approach to assessing schools' compliance with meal component standards in order to reduce burden on participating schools. Therefore the research team did not have access to all of the information States use for this purpose. While the study's simplified methods allowed objective comparisons of CEP and non-CEP schools on meal components, the study results should not be interpreted as representing the same results FNS or State agencies would generate when they assess compliance with NSLP standards.

At lunch, CEP schools tended to offer more vegetables but were less likely than comparison schools to have met the (soon-to-be-required) Target 1 sodium standard. There was no evidence of impacts on meeting NSLP requirements for other food components, the calorie range requirement, or the percent of calories from saturated fat. There were no significant differences in meeting food component requirements or the Target 1 sodium standard for breakfasts offered.

The CEP appeared to have little if any impact on the number of choices offered in meal components. There were no significant differences in the number of choices offered for fruits, vegetables, grain, milk and entrées for lunches between the treatment and comparison schools, nor was there a significant difference in choices for breakfast components. For lunch, the only significant impact of the CEP was a small increase in the number of desserts offered, although the number of desserts offered was minimal and well within allowed limits. Changes in the types of food offered to serve more quickly, and shifts to breakfast in the classroom in CEP schools were reported but had no significant effect on the number of breakfast choices offered in CEP schools.

1.2.4 Summary

Summing up across all of the evaluation results, the implementation of the CEP in its first two years was successful in perhaps the two most important dimensions. First, the take-up of the CEP was widespread among eligible LEAs, despite the uncertainties about impacts on finances and operations; further, participating LEAs were both well-satisfied and likely to continue using the CEP. Second, the CEP appeared to increase NSLP and SBP participation and the associated Federal reimbursements, while not adversely affecting the financial bottom-line of foodservice operations. The CEP eliminated substantial levels of error in the processing of FRP meals applications, as well as eliminating the costs of processing and verifying these applications. For most other outcomes, including overall administrative costs, meal claiming error, and meal quality, there were little or no impacts, either positive or negative.

The results point to several key challenges for the future of the CEP. First, there is substantial skepticism about the feasibility of the CEP among eligible non-participating LEAs; wider adoption of the CEP may require some efforts to address this skepticism. Second, the need for household income data for Federal and State educational programs will continue to pose perhaps the greatest implementation challenge. Third, impact findings suggest that the LEAs experience new challenges in meal claiming under the CEP, at least during initial implementation, based on the evidence of increased administrative costs and errors. Several currently-implementing CEP States have already installed automated systems to prevent errors in the use of claiming percentages, and others indicate that they plan to do so. As this practice becomes more widespread, it would presumably eliminate the main source of claiming error observed in CEP schools. Finally, the findings on meal quality and choices provide evidence of little change in meal quality, suggesting that the participating LEAs have not reduced meal quality to contain costs but also that any resources freed up by the CEP have not led to broad improvements in meals. The only significant effects on meal quality were the positive impact on vegetables offered and the negative impact on meeting the future intermediate sodium target. Given the timing of the study, it is too early to determine whether the observed effects on meal quality are merely transient (reflecting CEP implementation, introduction of new standards, or both) or likely to be sustained. Across the multiple outcomes assessed by the impact study, the clear and positive impacts on NSLP and SBP participation and reimbursements represent the most notable results of implementing the CEP.

1.3 Objectives and Scope of this Addendum

This Addendum describes the characteristics of LEAs and schools that participated in the CEP in SY 2013–14 in the 11 States where the CEP has been offered to date. It also describes how these characteristics differ for those high-poverty LEAs and schools that did *not* take up the CEP. The Addendum updates the results presented primarily in Chapter 4 of the *Community Evaluation*

Provision Evaluation report. The findings address two research objectives posed in the Congressional mandate for the Implementation Study:

1. Estimate the number of eligible LEAs and schools that have not chosen to participate in the CEP; and
2. Describe the LEAs and schools participating in the CEP.

Chapter 2 describes the data and methods used in this Addendum. Chapter 3 presents the description of participating, eligible non-participating, and near-eligible LEAs and schools.

2. Data and Methods

2.1 Data Sources and Collection

Data for this Addendum were compiled from three sources:

1. Data provided by the 11 State child nutrition agencies participating in the CEP in SY 2013–14;
2. FNS Verification Summary Report (VSR, or FNS-742) data; and
3. National Center for Education Statistics Common Core of Data (CCD) files

2.1.1 State Data

FNS policy stipulates that ISP data as of April 1 of a given year should be used to determine CEP eligibility for the following school year. These data are not available from the VSR or other FNS administrative sources. In the Spring/Summer of 2013, State child nutrition agencies were asked to provide LEA- and school-level data on CEP eligibility and participation for the 2013–14 school year. The LEA-level data requested included: the ISP, total number of schools, number of eligible schools, and the number of participating schools. The school-level data requested included the ISP and whether the school was participating as (1) part of an eligible LEA; (2) part of a group of eligible schools or an individual school; or (3) not participating. (Similar data had been requested and received for the earlier years examined in the evaluation.) States typically provided ISP and eligibility data first and participation data later, since deadlines for LEA participation decisions were often made just prior to or even after the start of the school year.

The States provided complete data on CEP participation, but for a variety of reasons, were unable to provide all of the requested ISP data. Several States did not collect ISP data from LEAs or schools that were either near-eligible or eligible but not participating. In addition, four States provided ISP data only for regular public and charter LEAs. Exhibit 2.1 shows the percentage of LEAs and schools both for each State and overall for which State ISP data were not available. (States are grouped here and in other exhibits by the year when they first implemented the CEP: for example, Year 1 States first implemented the CEP in the first year, 2011–12.) Overall, ISP data were missing for 24 percent of LEAs and 39 percent of schools, with near-eligible LEAs and schools having the most missing ISP data (about 50 percent). Participating LEAs and schools have the least (12 and 28 percent, respectively).⁷ In particular, Georgia, Massachusetts, New York, and Ohio provided no ISP data for non-participating schools. Ohio provided ISP data only for participating LEAs, and Georgia and Massachusetts provided ISP data only for those LEAs where the ISP was 40 percent or more, and Maryland and Michigan did not provide ISP data for non-public LEAs. The extent of missing State data for the ISP, a key measure, has important analytic implications for the identification of eligible non-participating and near-eligible LEAs and schools. These ramifications are discussed in Sections 2.2 and 2.4 below.

⁷ We note that the lack of information on the eligibility of many LEAs and schools for CEP is, in itself, a finding. As noted in the evaluation's final report, access to this information is one of the significant implementation challenges for the States.

Exhibit 2.1: Percentage of LEAs and Schools with Missing State-Provided ISP Data

	LEAs				Schools			
	Near-Eligible	Eligible		Combined	Near-Eligible	Eligible		Combined
Non-Participating		Participating	Non-Participating			Participating		
Year 1 States:								
Illinois ^a	4.7	8.0	51.2	16.7	8.5	15.3	87.7	33.4
Kentucky	50.0	1.0	0.0	1.2	1.1	28.8	1.4	21.2
Michigan	2.6	8.8	0.0	6.6	14.3	14.5	0.0	12.0
Year 2 States:								
District of Columbia	0.0	8.3	0.0	1.9	0.0	35.5	0.0	16.3
New York	0.0	1.9	0.0	0.6	100.0	100.0	60.5	89.9
Ohio	100.0	100.0	19.5	76.3	100.0	100.0	0.0	73.2
West Virginia	0.0	13.3	0.0	3.6	1.1	15.4	0.0	6.3
Year 3 States:								
Florida	0.0	2.9	0.0	2.0	3.3	27.6	0.8	23.4
Georgia	100.0	37.3	16.3	46.2	100.0	100.0	3.9	76.1
Maryland	100.0	48.8	0.0	47.7	0.0	5.5	0.0	5.3
Massachusetts	100.0	37.1	0.0	59.6	100.0	100.0	100.0	100.0
All CEP States	48.8	22.4	12.1	24.3	52.8	40.0	28.1	38.8

^a For participating LEAs, Illinois provided the ISP used to establish the claiming percentage (i.e., the group ISP for school, group of schools, or entire LEA that constitutes the unit for participation in the CEP), which is sometimes, but not always, the April 2013 ISP for individual LEAs and schools used for establishing eligibility.

2.1.2 VSR Data

FNS constructs the VSR database from data submitted by the State Agencies, which compile the data from FNS-742 reports submitted by LEAs. The VSR data for each LEA include number of enrolled students, number of schools, numbers of students eligible for free or reduced-price meals under different eligibility categories, and other items. These data are based on annual official counts of students eligible for free or reduced-price meals as of the last operating day in October of a given year. FNS provided the 2010, 2011, and 2012 VSR data for the CEP States to the evaluation team. VSR data items used for the present analysis include the LEA enrollment, the percentage of students eligible for FRP meals, and the underlying components needed to compute the ISP. The present analysis relies most heavily upon the most recent VSR data (i.e., from October 2012), with two exceptions. First, CEP prior year eligibility based on available earlier years' VSR data is also reported. (The 2010 data were available for the first three CEP States, and the 2011 data were available for the first seven CEP States.) Second, as discussed in the following paragraph, pre-CEP data on the FRP percentage of students was used for LEAs participating in the CEP in SY 2012–13,

The VSR data for October 2012 are not appropriate for characterizing the percentage of students eligible for FRP meals in LEAs that participated in the CEP in SY 2012–13. These LEAs did not process applications for FRP meals, except for schools not participating in the CEP. For these LEAs, the analysis in this report used the FRP student percentage from the VSR data in the year prior to the first year the LEA participated in the CEP (e.g., 2011 data for LEAs that first used the CEP in SY 2012–13).

As noted above, many States did not provide the complete April 2013 ISP data for LEAs or schools required to determine CEP eligibility. As a proxy for the April 2013 LEA ISP, the evaluation team used a “projected” ISP computed from October 2012 VSR data, calculated by dividing the number of identified students (free meals eligible, not subject to verification) by the total LEA enrollment (excluding students enrolled in Provision 2 and 3 schools). The implications of using this projected ISP to identify the CEP eligibility of LEAs are discussed below.

2.1.3 CCD Files

The Common Core of Data, compiled by the National Center for Education Statistics, is a longitudinal database of key characteristics of LEAs and schools operated by public entities (NCES, 2014a,b). Most data elements are obtained from administrative records maintained by State Departments of Education. In addition to regular public school and charter school LEAs, the CCD includes regional education service agencies, State and Federally operated agencies, and other types of public education agencies, although data for the latter types of LEAs can be incomplete. CCD data used for the present analysis include:

- Enrollment
- Enrollment by grade level (grades K–5, 6–8, and 9–12)
- Whether Title I school (or percent Title I schools for LEAs)
- Student racial/ethnic distribution
- School type (i.e., regular, charter)

- LEA type (i.e., regular, charter, regional education service agencies, State and Federally operated agencies, other)
- Percent FRP eligible students
- Whether the LEA is in an urban area

The most recent CCD data are for the 2011–12 school year, and therefore lag the VSR data by one year, and lag the State data by one to two years depending on the item.

2.1.4 Database Construction

Exhibit 2.2 shows how the data provided by States, the VSR, and the CCD were combined to produce the statistics reported in this Addendum. For CEP participation and associated elements, such as LEAs’ and schools’ mode of establishing their claiming percentage, State-provided data represented the only data source. For determining the CEP eligibility of LEAs, State-provided ISP data were the preferred source, with projected ISPs computed from the VSR used to fill gaps. However, the ISPs for LEAs in Chapter 3 Exhibits below are all based on projected ISPs computed from the VSR. This approach was used to assure consistency of ISP data across States, although it may result in lower ISP values for LEAs that had State-provided ISPs available, as the State-provided ISP was 2.1 percentage points higher for LEAs with both State-provided and projected ISPs.⁸ LEAs had the same LEA-wide eligibility classification (i.e., an ISP of 40 percent or more) in 87 percent of LEAs with data from both sources. In 11 percent of cases, the State-provided ISP indicated that an LEA was eligible LEA-wide, but the VSR-computed ISP did not. In 2 percent of cases, the VSR-computed ISP indicated that an LEA was eligible LEA-wide, but the State-provided ISP did not.

Exhibit 2.2: Data Sources for Reported Elements

	State	VSR	CCD
CEP Participation	✓		
CEP Eligibility and ISP			
LEA	✓	✓	
School	✓		
Enrollment			
LEA		✓	
School	✓		✓
Number of Schools (in LEA)		✓	✓
Percent Students FRP Meal Eligible			
LEA		✓	✓
School	✓		✓
All Other LEA and School Characteristics			✓

The next section describes how data provided by States and extracted from the VSR data were used to identify LEAs and schools that were participating in, eligible, or near-eligible for the CEP.

⁸ State-reported ISPs based on data as of April 1 would be expected to have increased counts of identified students in LEAs that continue direct certification after October. However, the LEA enrollment could rise or fall from October to April, so the ISP could rise or fall.

2.2 Definitions of LEA and School Eligibility and Participation in the CEP

2.2.1 LEA Eligibility and Participation

This Addendum reports on three types of LEAs:

- 1) *Participating in the CEP*: LEAs with at least one participating school;
- 2) *Eligible non-participating*: LEAs with at least one school eligible to participate as an individual school (i.e., with a school ISP of 40 percent or more, or those within four years of beginning participation in the CEP) but no participating schools; and
- 3) *Near-eligible*: LEAs with a district-wide ISP between 30 and 40 percent and no individual eligible schools. This category is of interest because States are required to notify near-eligible LEAs of their status.

The universe of LEAs for the study consists of those participating in the NSLP (with or without the SBP) and present in either the State data or the VSR.

Note that an LEA's eligibility for the CEP is determined by both the current ISP of its member schools and past participation. If an LEA has any school with an ISP of 40 percent or more, the LEA is eligible to participate. In addition, participating LEAs are eligible to continue participation for four years irrespective of current ISP. Only one LEA qualified for eligibility in 2013–14 based on prior participation alone.

To identify eligible non-participating and near-eligible LEAs in accordance with the definitions above, LEA and school ISPs were required. However, as noted above, four of 11 CEP States provided no school ISP data. Exhibit 2.3 summarizes how the three groups of LEAs were identified. All States provided data on school's participation in the CEP. The operationalized definition for this Addendum therefore followed the FNS definition.

LEA eligibility could be determined based on school eligibility for most LEAs in the seven States that provided school-level ISP data. LEAs were also determined to be eligible if either the State-provided ISP or the projected ISP based on VSR data was 40 percent or higher. Applying this latter criterion, 14 LEAs were counted as eligible that had no eligible schools according to State-provided school ISP data. Thirteen of these 14 LEAs had ISPs below 40 percent, according to State-provided LEA data, whereas the projected rates were over 40 percent based on VSR data. Of the other 327 LEAs determined to be eligible based on the LEA ISP, 42 had both State-provided and projected ISPs that were 40 percent or more. The remaining LEAs had only projected ISPs (no State data).

For all LEAs neither eligible nor participating, near-eligibility was determined based on the maximum of the State-reported and projected ISPs. Near-eligible LEAs were those where this rate fell between 30 and 40 percent. (Those with ISPs at 40 percent or more were deemed eligible.)

Exhibit 2.3: Definitions of LEA Eligibility and Participation in CEP

Type of CEP Eligibility/ Participation	FNS Definition	Operationalized Definition
Participating	The LEA has at least one participating school.	The LEA has at least one participating school reported by the State Child Nutrition Agency.
Eligible non-participating	(a) The LEA has at least one eligible school (as specified by FNS, i.e., with ISP at least 40 percent) but no participating schools; or (b) The LEA participated in the previous school year (i.e., 2012–13) for 2013–14 eligibility.	(a) The LEA has at least one school with an ISP of 40 percent or higher, as of April 1, 2013 according to State-reported data; or (b) The LEA has a State-reported ISP of 40 percent or higher; or (b) The LEA has a projected ISP of 40 percent or higher; or (c) The LEA participated in 2012–13.
Near-eligible	The LEA has an ISP of 30 percent or more and no eligible schools.	The LEA is not eligible or participating and has either a State-reported or projected ISP of 30 percent or more.

2.2.2 School Eligibility and Participation

This Addendum also distinguishes between schools that are participating, eligible non-participating, and near-eligible. The participation and eligibility classification of schools generally follows the LEA classification scheme and the FNS rules, with some modifications to accommodate data limitations. As summarized in Exhibit 2.4, all schools in near-eligible LEAs were classified as near-eligible, and all schools in eligible non-participating LEAs were classified as eligible non-participating (based on the assumption that schools with ISPs below 40 percent could be combined with schools with ISPs above 40 percent). However, non-participating schools in participating LEAs were classified as eligible non-participating if either: (a) the school belonged to an LEA with an ISP of 40 percent or more (and therefore all schools in the LEA were eligible regardless of ISP); (b) the school had an ISP of 40 percent or more; or (c) the school ISP was missing. Non-participating schools in participating LEAs not meeting any of these conditions were classified as near-eligible even if their ISP was below 30 percent, because of the possibility of combinations with schools with higher ISPs to make a near-eligible group. These definitions were used to ensure consistent classifications for all States.

Exhibit 2.4: Definitions of School Eligibility and Participation in CEP

Type of CEP Eligibility/ Participation	Operationalized Definition
Participating	School is participating in the CEP.
Eligible non-participating	School is not participating in the CEP and either: (a) belongs to an eligible non-participating LEA; or (b) belongs to a participating LEA with an LEA ISP of 40 percent or more; or (c) belongs to a participating LEA and has a school ISP of 40 percent or more or a missing school ISP.
Near-eligible	School is not participating in the CEP and either: (a) belongs to a near-eligible LEA; or (b) belongs to a participating LEA and does not meet any of criteria to be classified as an eligible non-participating school.

2.3 Other Definitions of Groups of LEAs

2.3.1 Regular Public/Charter LEAs and “Other” LEAs

The results presented in this Addendum distinguish between regular public/charter LEAs and “other” LEAs. The former group consists of typical public school districts, referred to as “regular” LEAs in the CCD, and charter school organizations treated as distinct LEAs.⁹ The analysis included 1,890 regular/charter LEAs.

“Other” LEAs include non-public schools, regional education service agencies, and other schools operated by public agencies. There were 461 of these other LEAs included in the analysis. Non-public LEAs comprised about two-thirds of the total number of other LEAs (305 of 461).¹⁰ Within the universe for this Addendum, Georgia has no non-public LEAs; Illinois, Michigan, and Ohio have roughly an even split between public and non-public LEAs; Massachusetts has 68 percent non-public LEAs; Kentucky and Maryland have about 80 percent; and Florida, New York, West Virginia, and the District of Columbia have more than 90 percent non-public LEAs. These LEAs and schools were excluded from most analyses because the prevalence of missing data renders reporting unreliable. In particular, there are no CCD data for non-public LEAs and schools. Analyses (and findings) based on only regular and charter LEAs are so characterized in exhibit titles; otherwise, results are reported for all LEAs including regular, charter, and other LEAs.

2.3.2 Eligible LEA-Wide versus Partial Eligibility, Full versus Partial Participation

The Addendum also reports on LEAs that are “eligible LEA-wide.” These LEAs have an ISP of 40 percent or more (based on the State and VSR values, as discussed above); consequently, all schools in the LEA are eligible.¹¹ A distinction is also made between fully-participating and partially-participating LEAs, the former being LEAs with all schools participating in the CEP and the latter being those with less than complete participation of schools in the LEA.

2.4 Limitations

An important implication of the procedure used for determining LEA eligibility for the CEP is that the number of eligible non-participating LEAs is likely to be substantially underestimated in the four States without school ISP data (Georgia, Massachusetts, New York, and Ohio). In these States, LEAs are identified as eligible only if they have ISPs of 40 percent or more (i.e., eligible LEA-wide) or are

⁹ States differ in their administration of charter schools. Among the 11 States reported on here, Kentucky and West Virginia have no charter schools. Massachusetts, Michigan, Ohio, New York, and the District of Columbia treat them as separate LEAs. Illinois and Maryland includes charter schools within regular LEAs. Florida and Georgia have both distinct charter LEAs and well as charter schools that are part of regular LEAs.

¹⁰ For comparison, the SY 2012–13 VSR data for these 11 States included 1,210 non-public LEAs. This count does not include public LEAs that are not regular or charter LEAs. Thus, the 305 LEAs that were at least near-eligible for the CEP represented approximately 25 percent of non-public LEAs in the 11 States.

¹¹ VSR data for SY 2012–13 and prior years were used to determine whether LEAs were eligible LEA-wide. If an LEA was eligible LEA-wide in a prior year it was assigned that status, even if its ISP was below 40 percent in SY 2012–13.

participating. For LEAs where school ISP data for their member schools are available, more than half of eligible non-participating LEAs (as defined for this analysis) have both State-provided and projected ISPs under 40 percent. Undercounting of eligible non-participating LEAs will, in turn, inflate the calculated CEP participation rate of eligible LEAs. If we extrapolate from the States with school ISPs to the States without school ISP data for non-participating LEAs, the latter States may have twice as many eligible non-participating LEAs as can be identified based on LEA-wide ISPs. If so, then the CEP participation rates for the latter States are overstated by 50 percent. This issue does not affect comparisons of CEP participation rates among States for LEAs that are eligible LEA-wide, which should be accurately identified in all States.

3. Take-Up of the CE Provision in SY2013–14

This chapter describes the characteristics of LEAs and schools that took up or continued to use the Community Eligibility Provision (CEP) in SY 2013–14. It also describes how these characteristics differ for other eligible and near-eligible LEAs and schools that did not take up the CEP. The first section presents numbers of LEAs, schools, and students participating in the CEP for the 2013–14 school year and reports on the growth in CEP participation over the three years it has been offered. The second section reviews the numbers of both regular public/charter and other near-eligible, eligible non-participating and participating LEAs. The third section begins with a description of the characteristics of near-eligible, eligible non-participating and participating LEAs. The third section also reviews LEA approaches to establishing their claiming percentage under the CEP, and key LEA features associated with participation. The fourth section turns to schools. It first reports on the numbers of near-eligible, eligible non-participating and participating schools. The relationship of school participation to LEA-wide eligibility is then reviewed. The chapter closes with a summary of the findings on the characteristics of near-eligible, eligible non-participating and participating schools.

3.1 Number of LEAs, Schools, and Students Participating in the CEP

Exhibit 3.1 shows the number of LEAs and schools participating in the CEP during the 2013–14 school year in each State, with States grouped by the year when they first implemented the CEP. It distinguishes between those LEAs and schools that are participating LEA-wide—that is, with all schools in the LEA participating in the CEP—and partially participating LEAs where only a subset of schools are CEP participants. All participating LEAs, both regular public/charter and other, are included.

A total of 3,999 schools in 638 LEAs participated in the CEP in 2013–14. Michigan and Ohio had the most LEAs—110 and 128, respectively—while Illinois and New York had the most schools—690 and 588.¹² Michigan and Ohio had the most participating LEAs, but not the most participating schools, because a substantial fraction of the participating LEAs in these States are charter school LEAs (as discussed in Section 3.3), and these charter school LEAs usually consist of a single school.

There were more than twice the number of LEAs participating district-wide than were partially participating—438 versus 200. However, the two types of participating LEAs had nearly the same total number of schools (about 2,000). Most States had more LEAs participating LEA-wide than partially participating. Georgia and West Virginia are the two notable exceptions; these States had substantially more LEAs participating partially than LEA-wide.

The counts of participating LEAs and schools in Exhibit 3.1 suggest that LEAs with more schools are more likely to participate partially. Further analysis (not shown) demonstrates that this is indeed the case; partially participating LEAs have 30 schools, on average, versus five for LEAs participating LEA-wide. (The average for partially participating LEAs includes participating and non-participating

¹² All statistics on schools participating in the CEP in this Addendum exclude 250 sites in New York City that appear to be programs within regular schools that may already be counted.

schools.) This phenomenon is not limited to States such as Illinois and New York where a single large partially participating LEA (Chicago and New York City, respectively) raises the average for that group, but rather is found in most States. The results are consistent with the expectation that large LEAs may be more likely to have a wide range of ISPs among their schools.

Exhibit 3.1: Number of Participating LEAs and Schools, by LEA-Wide Participation and State (SY 2013–14)

	LEA-Wide Participation		Partial Participation		Total	
	LEAs	Schools	LEAs	Schools	LEAs	Schools
Year 1 States:						
Illinois	62	201	24	489	86	690
Kentucky	39	244	27	126	66	370
Michigan	78	403	32	96	110	499
Year 2 States:						
District of Columbia	27	36	7	86	34	122
New York	82	373	8	215	90	588
Ohio	103	321	25	103	128	424
West Virginia	14	145	25	200	39	345
Year 3 States:						
Florida	16	65	17	310	33	375
Georgia	15	51	34	385	49	436
Maryland	1	1	1	5	2	6
Massachusetts	1	144	0	0	1	144
All CEP States	438	1,984	200	2,015	638	3,999

Exhibit 3.2 presents the number of students enrolled in schools participating in the CEP. An estimated 1.8 million students had access to free meals under the CEP. Illinois had the most students in CEP schools (about 330,000) while Maryland had the least (about 2,500). Ninety-seven percent of students in CEP schools were in regular public or charter LEAs. New York was the only State with a significant number of students (about 53,000) enrolled in CEP schools that were in other LEAs.¹³

Overall, students in CEP schools made up 11 percent of all students enrolled in NSLP schools in the 11 States. Although the District of Columbia had a relatively small number of students (about 42,000) enrolled in CEP schools, this represents over half of its approximately 75,000 students enrolled in schools participating in the NSLP. West Virginia and Kentucky also had substantial proportions of students in NSLP-participating schools eligible for free meals under the CEP: 40 and 21 percent, respectively.

¹³ Most of the other LEAs in New York were faith-based schools in New York City.

Exhibit 3.2: Total Enrollment and Percent of Students in Schools Participating in the CEP (SY 2013–14)

	Regular/Charter LEAs (#)	Other LEAs (#)	Total (#)	CEP Percent of All Students in NSLP Schools (%)
Year 1 States:				
Illinois	331,103	1,682	332,785	15
Kentucky	153,734	69	153,803	21
Michigan	199,147	362	199,509	12
Year 2 States:				
District of Columbia	41,622	519	42,141	56
New York	232,125	53,147	285,272	9
Ohio	168,884	2,342	171,226	9
West Virginia	114,835		114,835	40
Year 3 States:				
Florida	187,341	865	188,206	7
Georgia	258,746		258,746	15
Maryland	2,203	308	2,511	<1
Massachusetts	62,821		62,821	7
All CEP States	1,752,561	59,294	1,811,855	11

Note: Total enrollment in participating schools was estimated using school enrollment provided by State Child Nutrition agencies where available and from the CCD where State data were not available. Gaps were filled by assuming schools with missing enrollment had the average school enrollment for the LEA. Schools with imputed enrollment are 7 percent of all participating schools, and imputed enrollment is 6 percent of the total enrollment.

3.1.1 Growth in LEA Participation in the CEP Since Inception

Exhibit 3.3 shows the number of participating LEAs for the 11 CEP States over the first three years of the Provision. Participation has expanded rapidly, with the number of participating LEAs growing substantially every year in all of the Year 1 and Year 2 States except Michigan.

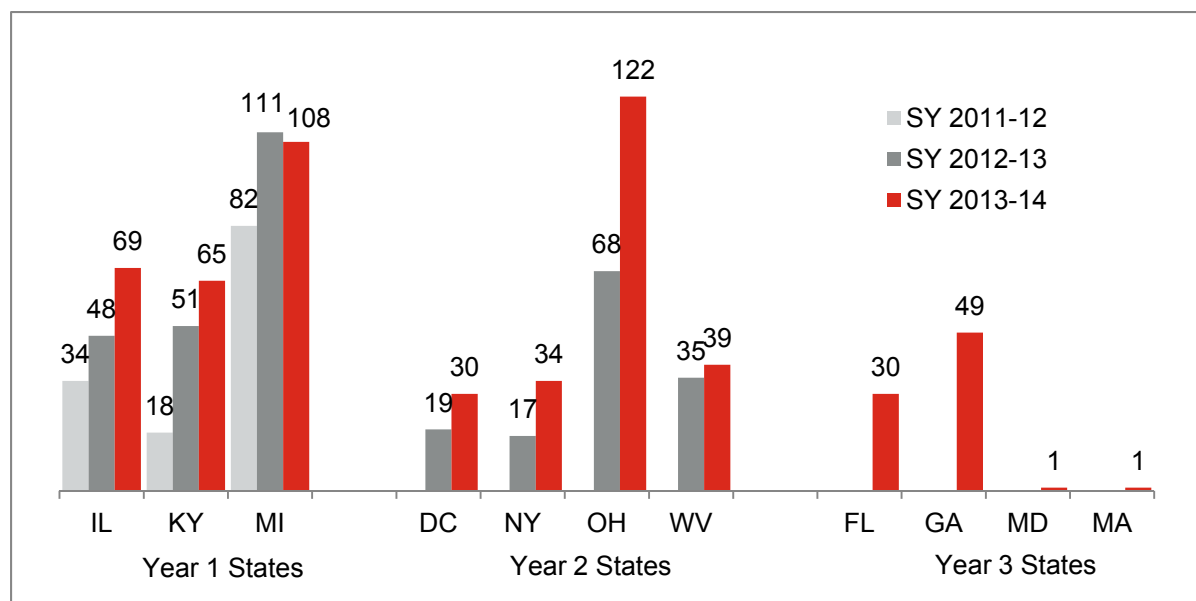
Among Year 1 States, Illinois had 34 participating LEAs in the first year the CEP was offered, 48 in the second, and 69 in the third—a growth rate of more than 40 percent each year. Kentucky nearly tripled the number of participating LEAs, from 18 to 51 between the 2011–12 and 2012–13 school years, and expanded further to include 65 participating LEAs in 2013–14. In Michigan, the number of participating LEAs rose from 82 to 111 in the first two years that the CEP was offered in the State and then slipped to 108 in the third year (as discussed below).

Year 2 States witnessed growth similar to that of Year 1 States in their first two years of offering the CEP. In New York, participation doubled from 17 to 34 LEAs in the first two years that the CEP was offered, and in Ohio participation rose 79 percent, from 68 to 122 LEAs. The growth of the CEP was modest in West Virginia, although participation started out high there with 35 percent of eligible LEAs in 2012–13.

Relatively few LEAs discontinued the CEP after starting it. A single LEA discontinued the CEP in each of four States (the District of Columbia, Illinois, Kentucky, and New York), and two LEAs discontinued the CEP in Ohio. Michigan was the only State where a significant number of LEAs discontinued the CEP; 10 LEAs dropped out after the 2011–12 school year and 9 LEAs dropped out after the 2012–13 school year. The reduction is due, in part, to consolidation and re-organization of

LEAs in Michigan, and some LEAs ceased to exist when their schools were absorbed by other LEAs (as indicated by review of State and VSR data).

Exhibit 3.3: Number of Regular and Charter LEAs Participating by Year



3.2 Numbers of Near-Eligible, Eligible Non-Participating and Participating LEAs

This section reports on the numbers of LEAs that are near-eligible, eligible non-participating, and participating in the CEP. As discussed above, for reporting purposes, LEAs are grouped in two categories: (a) regular or charter and (b) “other.” As discussed in Chapter 2, these analyses may underestimate the number of eligible non-participating LEAs (by 50 percent or more) in Georgia, Massachusetts, New York, and Ohio.

3.2.1 Regular and Charter LEAs: Numbers of Near-Eligible, Eligible Non-Participating, and Participating

Exhibit 3.4 shows the counts of near-eligible, eligible non-participating, and participating LEAs by State for the regular and charter LEAs, based on data for SY 2013–14. In the 11 States where the CEP was implemented, there were 1,890 regular and charter LEAs that were at least near-eligible.

Among the three groups of regular and charter LEAs represented in Exhibit 3.4, more than a fourth (548) were participating, more than half (1,014) were eligible but non-participating, and less than a fifth (328) were near-eligible. The overall participation rate for eligible LEAs was 35 percent.

Participation rates for eligible LEAs differed dramatically among States. Of note, New York, the District of Columbia and West Virginia—three Year 2 States—had the highest participation rates for eligible LEAs. The District of Columbia and West Virginia had participation rates of 75 percent, and

New York had a participation rate of 65 percent.¹⁴ Georgia, Kentucky, and Ohio had somewhat lower participation rates, ranging from 39 to 46 percent of eligible LEAs. Florida, Illinois, and Michigan constituted a third tier in terms of participation, with rates between 21 and 30 percent, and participation in Maryland and Massachusetts was less than 10 percent. Possible explanations for differences in participation rates are discussed later in this Addendum.

In all States, the number of LEAs that were eligible or participating outnumbered the number of near-eligible LEAs by a substantial margin, despite the likelihood of eligible LEAs being undercounted in four States. Massachusetts had the highest proportion of near-eligible LEAs—14 out of 38. In six States, fewer than one in six LEAs were near-eligible. Kentucky and Maryland had no near-eligible LEAs.

Exhibit 3.4: Regular and Charter LEAs, by CEP Status and State (SY 2013–14)

	Near-Eligible (#)	Eligible (#)			Participation Rate (% of Eligible)
		Non-Participating	Participating	Total	
Year 1 States:					
Illinois	68	162	69	299	30
Kentucky	0	102	65	167	39
Michigan	65	400	108	573	21
Year 2 States:					
District of Columbia	5	10	30	45	75
New York	21	18	34	73	65
Ohio	106	135	122	363	47
West Virginia	2	13	39	54	75
Year 3 States:					
Florida	10	73	30	113	29
Georgia	37	57	49	143	46
Maryland	0	21	1	22	5
Massachusetts	14	23	1	38	4
All CEP States	328	1,014	548	1,890	35

Participation rates may be inflated in New York, Ohio, Georgia, and Massachusetts, where the number of eligible LEAs may be underestimated due to missing ISP data for schools.

Exhibit 3.5 shows the percent of eligible LEAs that participated in the 11 CEP States over the first three years of the program. Growth in the number of participating LEAs over time was described earlier. The percentage of participating LEAs also grew substantially every year in all of the Year 1

¹⁴ Only 6 percent of all LEAs in New York had ISPs above 40 percent, according to the VSR data for SY 2011–12, much lower than other Year 1 and Year 2 States. As a result, New York had few LEAs falling into the eligible groups of LEAs in Exhibit 3.3, despite its large number of LEAs. However, direct certification in New York was reported to be highly effective, with estimates for SY 2011–12 indicating that 100 percent of school-age SNAP children were directly certified (Moore et al., 2012). The discrepancy between these statistics might be explained by high concentrations of SNAP children in a small number of large LEAs, large numbers of heterogeneous LEAs (so that identified students are dispersed across LEAs), or a combination of these characteristics. Also, the number of eligible LEAs in New York is likely to be underestimated because school-level ISP data for non-participating LEAs were not available.

and Year 2 States except Michigan, where participation declined slightly in 2013–14.¹⁵ In Illinois and Kentucky, participation rates more than doubled in the first two years of offering the CEP.

Year 2 States had high participation rates even in the first year of offering the CEP, although participation rates in two of the four Year 2 States (New York and Ohio) may be inflated. The maximum participation rate for Year 1 States in the first year of offering the CEP was 17 percent (in both Kentucky and Michigan). By contrast, the *minimum* participation rate for Year 2 States in the first year of offering the CEP was 31 percent (in Ohio). In the District of Columbia, 59 percent of eligible LEAs participated in the first year that the CEP was offered, and in West Virginia the figure was 65 percent. In their first year of offering the CEP, Year 3 States had a mix of States with relatively high (Florida and Georgia) and low (Maryland and Massachusetts) participation.

Exhibit 3.5: Regular and Charter LEAs, Percent Participating by State and Year

	Participation Rate (% of Eligible)		
	SY 2011–12	SY 2012–13	SY 2013–14
Year 1 States:			
Illinois	12	28	30
Kentucky	17	36	39
Michigan	17	23	21
Year 2 States:			
District of Columbia		59	75
New York		35	65
Ohio		31	47
West Virginia		65	75
Year 3 States:			
Florida			29
Georgia			46
Maryland			5
Massachusetts			4
All CEP States	15	31	35

For each year, eligible LEAs include those that became eligible for that year and those that participated in a prior year. Participation rates may be inflated in New York, Ohio, Georgia, and Massachusetts, where the number of eligible LEAs may be underestimated due to missing ISP data for schools.

¹⁵ The decline is partially attributable to the consolidation of Michigan LEAs, described earlier, which led to the absorption of several participating LEAs.

3.2.2 Other LEAs: Numbers of Near-Eligible, Eligible Non-Participating, and Participating

Exhibit 3.6 shows the counts of near-eligible, eligible non-participating, and participating LEAs by State for the “other LEAs.” This category includes non-public LEAs, regional education service agencies, and other non-typical public education agencies. A total of 461 other LEAs were near-eligible, eligible non-participating, or participating in the CEP.

Exhibit 3.6: Counts of Other LEAs and Participation Rate, by CEP Status and State (SY 2013–14)

	Near-Eligible (#)	Eligible (#)		Participation Rate (% of Eligible)	Total
		Non-Participating	Participating		
Year 1 States:					
Illinois	17	63	17	97	21
Kentucky	2	2	1	5	33
Michigan	13	80	2	95	2
Year 2 States:					
District of Columbia	1	2	4	7	67
New York	12	34	56	102	62
Ohio	33	32	6	71	16
West Virginia	0	2	0	2	0
Year 3 States:					
Florida	6	30	3	39	9
Georgia	0	2	0	2	0
Maryland	1	20	1	22	5
Massachusetts	7	12	0	19	0
All CEP States	92	279	90	461	24

Participation rates may be inflated in New York and Ohio, where the number of eligible LEAs may be underestimated due to missing ISP data for schools.

Sixty-one percent of other LEAs were eligible for but not participating in the CEP in SY 2013–14; the remaining 39 percent were almost evenly balanced between near-eligible and participating LEAs.¹⁶

About one-fourth of eligible other LEAs participated in the CEP, a lower rate than did regular and charter LEAs. New York contributed the largest number of participating “other” LEAs (56) in this category, followed by Illinois (17). Across the States, participation rates for eligible other LEAs varied widely, from 5 percent or less in Georgia, Maryland, Massachusetts, Michigan, and West Virginia, to over 60 percent in the District of Columbia and New York.

3.3 Characteristics of Near-Eligible, Eligible Non-Participating and Participating LEAs

This section presents selected characteristics of near-eligible, eligible non-participating, and participating LEAs and schools, focusing on the regular and charter LEAs in all 11 States. The section also reviews LEA approaches to establishing their claiming percentage under the CEP and key LEA features associated with participation.

¹⁶ These proportions are very different than those reported in the Final Report due to a large shift of LEAs from near-eligible to eligible non-participating.

3.3.1 Overall Patterns of the Characteristics of Near-Eligible, Eligible Non-Participating, and Participating LEAs

Among regular and charter LEAs in the 11 CEP States, there were large differences between participating and eligible non-participating LEAs on several characteristics, as shown in Exhibit 3.7. Compared with eligible non-participating LEAs, participating LEAs, on average, had more students (7,798 versus 5,689), more schools (14 versus 9), higher ISPs (57 versus 40 percent), and higher percentages of students approved for FRP meals (75 versus 67 percent).¹⁷ The higher ISPs of participating LEAs suggest that decisions to participate in the CEP reflect incentives in the reimbursement formula. As the ISP approaches 62.5 percent, the proportion of meals reimbursed at the free rate approaches 100 percent, and thus it becomes more financially advantageous for LEAs to implement the CEP.

Compared with eligible non-participating LEAs, participating LEAs were also more often urban (39 versus 26 percent), had more Black students (39 versus 27 percent), and were more likely to include charter schools (41 versus 35 percent). Participating LEAs had a somewhat higher percentage of students in grades K–5 (54 versus 48 percent, on average) and a lower percentage in grades 9–12. However, there was no notable difference between the two types of LEAs in the proportion of schools designated as Title I schools.

Although participating LEAs had more students than eligible non-participating LEAs, on average, this difference was driven by New York City alone. Without New York City, the average enrollment of participating LEAs was 5,598, slightly less the average of 5,689 for eligible non-participating LEAs.

Differences between eligible non-participating and near-eligible LEAs were similar to those between participating and eligible non-participating LEAs. Relative to near-eligible LEAs, eligible non-participating LEAs included roughly three times more students (5,689 versus 1,797) and schools (9 versus 4). Eligible non-participating LEAs were twice as likely to be in an urban area (26 versus 13 percent) and had twice the proportion of Black students (27 versus 13 percent). They also had higher ISPs (40 versus 33 percent) and somewhat higher proportions of students eligible for FRP meals (67 versus 61 percent), and were more likely to include charter schools (35 versus 25 percent). Differences in ISPs between near-eligible and eligible LEAs are, of course, the direct result of the definition of eligibility for the CEP. The grade distribution of students was about the same in the two types of LEAs. Interestingly, eligible non-participating LEAs had a slightly lower proportion of Title I eligible schools than near-eligible LEAs (78 versus 83 percent).

The financial feasibility of CEP participation for LEAs is related to the ratio of the percentage of students eligible for FRP meals to the ISP. As discussed in Section 3.3.5 below, for LEAs with similar ISPs, the LEAs with the FRP percentage close to the ISP are more likely to find the CEP financially advantageous than the ones where the FRP percentage is much larger than the ISP. Exhibit

¹⁷ As described in Chapter 2, an LEA is eligible if it has at least one school with an ISP of 40 percent or more. Thus, eligible LEAs can have ISPs less than 40 percent. As noted in Chapter 2, for LEAs participating in SY 2012–13, the FRP data for the year prior to CEP participation were used for the analysis in this Addendum.

3.7 shows the means and medians of the ratio of the percentage of students eligible for FRP meals to the ISP for LEAs that are participating, eligible non-participating, and near-eligible.¹⁸ As a measure of central tendency, the median may be more appropriate than the mean, because the distribution of this ratio is highly skewed, especially for eligible non-participating LEAs.

As expected, participating LEAs have the lowest mean and median ratios (1.8 and 1.6, respectively) of the percentage of students eligible for FRP meals to the ISP among the three types of LEAs. Eligible non-participating LEAs had the second lowest median ratio (1.7), but they had the highest mean ratio (2.2), due to extreme values.¹⁹ The mean and median ratios for near-eligible LEAs were 1.9 and 1.8, respectively.

¹⁸ As noted above, for many participating LEAs the only students reported as FRP meal-eligible on the VSR are those directly certified. Therefore, in computing the ratio of FRP to ISP, the analysis used the percentage of FRP students and the ISP from the year prior to CEP participation for participating LEAs. If the FRP/ISP ratio for the reference year was equal to one, this was taken as an indicator of erroneous data, and the prior year's data were used, for both participating and non-participating LEAs. In addition, the ratio of FRP to ISP necessarily declines as the ISP rises and the number of identified students approaches the total number of free-eligible students.

¹⁹ The two highest ratios of the percentage of students eligible for FRP meals to the ISP were 239.0 and 58.0 for eligible non-participating LEAs, compared to 15.6 and 15.0 for participating LEAs, and 5.6 and 3.1 for near-eligible LEAs

Exhibit 3.7: Regular and Charter LEA Characteristics—All CEP States (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean	(SD)	Mean	(SD)	Mean	(SD)	Mean	(SD)
Enrollment	1,797.2	(2,819.9)	5,689.4	(21,126.2)	7,797.9	(55,238.1)	5,630.0	(33,802.4)
Enrollment 1–499 (%)	29.9		25.9		33.2		28.8	
Enrollment 500–2499 (%)	52.8		40.3		33.6		40.5	
Enrollment 2500–4999 (%)	10.7		16.5		15.7		15.2	
Enrollment 5000+ (%)	6.6		17.3		17.5		15.5	
Percentage distribution of students in grades K–12								
Percent in grades K–5	49.5	(19.5)	48.4	(20.0)	53.6	(21.3)	50.1	(20.4)
Percent in grades 6–8	25.0	(13.0)	23.8	(12.2)	23.3	(13.1)	23.9	(12.6)
Percent in grades 9–12	25.5	(20.9)	27.8	(22.8)	23.1	(20.3)	26.1	(21.9)
Number of schools	3.5	(4.2)	8.9	(24.1)	13.8	(90.2)	9.4	(52.2)
1 school (%)	35.8		28.6		33.2		31.2	
2–5 schools (%)	50.3		38.2		32.8		38.7	
6–14 schools (%)	11.0		22.3		21.6		20.1	
15+ schools (%)	2.8		10.9		12.3		9.9	
Identified Student Percentage (ISP)	33.1	(4.9)	40.0	(16.0)	56.8	(21.5)	43.7	(18.8)
Students approved for free/reduced meals (%) (FRP)	61.3	(11.9)	67.0	(19.1)	75.3	(16.3)	68.5	(17.9)
Ratio of FRP to ISP								
Mean	1.9	(0.4)	2.2	(8.1)	1.8	(1.1)	2.0	(6.0)
Median	1.8		1.7		1.6		1.7	
Any charter schools (%)	25.4		35.1		41.2		35.2	
Percent Title I schools	83.3	(32.8)	78.1	(31.0)	78.1	(32.2)	79.0	(31.7)
Urban LEA (%)	13.2		26.0		38.7		27.5	
Percent students Black	13.4	(22.5)	26.6	(33.1)	38.5	(36.4)	27.8	(33.6)
Percent students Hispanic/Latino	8.6	(14.8)	10.3	(16.5)	8.5	(14.0)	9.5	(15.5)
<i>Total LEAs</i>	328		1,014		548		1,890	
<i>Number of LEAs with VSR data</i>	318		958		536		1,812	
<i>Number of LEAs with CCD data</i>	317		978		532		1,827	

The ISP reported in this table is the projected ISP derived from October 2012 data which States reported to FNS. The projected ISP is equal to the total number of free meal-eligible students not subject to verification, divided by the total LEA enrollment from schools not operating Provision 2 or 3.

In computing the ratio of FRP to ISP, the percentage of FRP students used is drawn from the year prior to CEP participation for participating LEAs.

3.3.2 Enrollment in Near-Eligible, Eligible Non-Participating, and Participating LEAs by State

Exhibit 3.8 shows the total enrollment in the three groups of regular and charter LEAs for each State. More than 10 million students were in LEAs that were near-eligible, eligible, or participating in the CEP. Participating LEAs had about 4.2 million students. Of these, an estimated 42 percent were in schools that participated in the CEP.²⁰ Eligible non-participating LEAs had about 5.5 million students, and near-eligible LEAs had about 570,000 students.

Florida had about one-fourth of the more than 10 million students that were in LEAs that were near-eligible, eligible, or participating in the CEP, Illinois and New York each had about 14 percent, and the remaining States had 10 percent or less. New York had the most students in participating LEAs with about 1.4 million—of which about 1.2 million were in New York City. New York was followed by Florida, which had 784,000 students in participating LEAs, and Illinois, with 501,000. Maryland had the least: 22,000.

With 1.8 million students in eligible non-participating LEAs, Florida had 32 percent of students in this category of LEA. Illinois, Maryland, and Michigan each had roughly 15 percent, and the remaining States had less than 10 percent. Ohio and Georgia were the only two States with more than 100,000 students in near-eligible LEAs.

Exhibit 3.8: Total Enrollment in Regular and Charter LEAs, by CEP Status and State (SY 2013–14)

	Near-Eligible	Eligible		Total
		Non-Participating	Participating	
Year 1 States:				
Illinois	62,758	831,003	501,109	1,394,870
Kentucky		432,118	263,876	695,994
Michigan	33,394	746,832	287,281	1,067,507
Year 2 States:				
District of Columbia	2,008	6,853	60,901	69,762
New York	58,205	12,132	1,364,414	1,434,751
Ohio	201,983	228,132	185,202	615,317
West Virginia	2,253	59,015	211,992	273,260
Year 3 States:				
Florida	11,818	1,760,152	783,698	2,555,668
Georgia	161,495	374,892	440,650	977,037
Maryland	0	818,228	22,060	840,288
Massachusetts	37,602	181,072	58,478	277,152
All CEP States	571,516	5,450,429	4,179,661	10,201,606

3.3.3 State Variations in the Characteristics of Near-Eligible, Eligible Non-Participating, and Participating LEAs

Most of the differences among the three groups of LEAs hold at least roughly for individual States. Exhibit 3.9 displays, in chart form, selected State-level descriptive statistics that differ the most for the three LEA groups. (The Appendix presents the supporting data for each State individually.)

²⁰ Exhibit 3.2 shows that about 1.75 million students in regular and charter LEAs participated in the CEP.

Among the available characteristics, the most consistent differences among the three groups of LEAs were in ISPs. In 10 of the 11 States, participating LEAs had higher ISPs than eligible non-participating LEAs. Maryland was the exception, with participating LEAs having a slightly lower ISP than eligible non-participating LEAs (27.4 versus 27.6). In five States (District of Columbia, Florida, Georgia, Ohio, and West Virginia), participating LEAs' ISPs were 5–6 percentage points higher, on average, than eligible non-participating LEAs; in three States (Illinois, Kentucky, and New York), this gap was 11–12 percentage points. Participating LEAs in Massachusetts and Michigan had ISPs that were 48 and 39 percentage points higher than eligible non-participating LEAs. Eligible non-participating LEAs had ISPs that ranged from 5.9 to 20.6 percentage points higher than those of near-eligible LEAs in the same State.²¹

Participating LEAs generally had higher average enrollment than eligible non-participating LEAs. There was a particularly sharp contrast in enrollment between participating and eligible non-participating LEAs in the District of Columbia, Massachusetts, and New York, due the participation of the District of Columbia Public Schools, Boston Public Schools, and New York City Public Schools, respectively. Different patterns were observed for Kentucky, Maryland, and Ohio, where eligible non-participating LEAs had higher average enrollments than participating LEAs. Eligible non-participating LEAs, in turn, generally had higher average enrollments than near-eligible LEAs, with New York and Ohio as exceptions.

States varied considerably in the percentage of LEAs with charter schools, ranging from zero in Kentucky and West Virginia to 80 percent or more in the District of Columbia and Florida.²² In most States, however, there was no noteworthy relationship between the presence of charter schools in an LEA and CEP eligibility or participation. The two exceptions were New York and Ohio, where eligible LEAs (both participating and non-participating) were more likely to have charter schools than near-eligible LEAs. In Massachusetts, more than a fourth of both near-eligible and eligible non-participating LEAs had charters, while participating LEAs had none, owing to the fact that the single participating LEA (Boston Public Schools) had no charters within the LEA (because charter schools in Boston are independent for purposes of the school meals programs).

In all States except for Florida, the average percentage of students eligible for FRP meals was higher in eligible non-participating LEAs than in near-eligible LEAs.²³ Further, in eight out of 11 States, the average percentage of students eligible for FRP meals was greater in participating LEAs than in eligible non-participating LEAs. The exceptions were Massachusetts, New York, and Ohio.

Eligible LEAs were more often in urban areas than near-eligible LEAs in all States, but in only five of 11 States were participating LEAs more often urban than eligible non-participating LEAs. Moreover, one of these five States was Massachusetts, where the single participating LEA (Boston Public

²¹ Kentucky and Maryland have no near-eligible LEAs.

²² As discussed below, States differ in their administrative treatment of charter schools. Some treat charter schools as separate LEAs, some include them as members of regular school districts, and some do both. Exhibit 3.9 depicts the percentage of LEAs in each State with any charter schools.

²³ Readers are reminded that the FRP student percentage was based on pre-CEP data for participating LEAs.

Schools) was urban. Michigan and New York were the only two States with substantial numbers of participating LEAs that were more often urban than eligible non-participating LEAs.

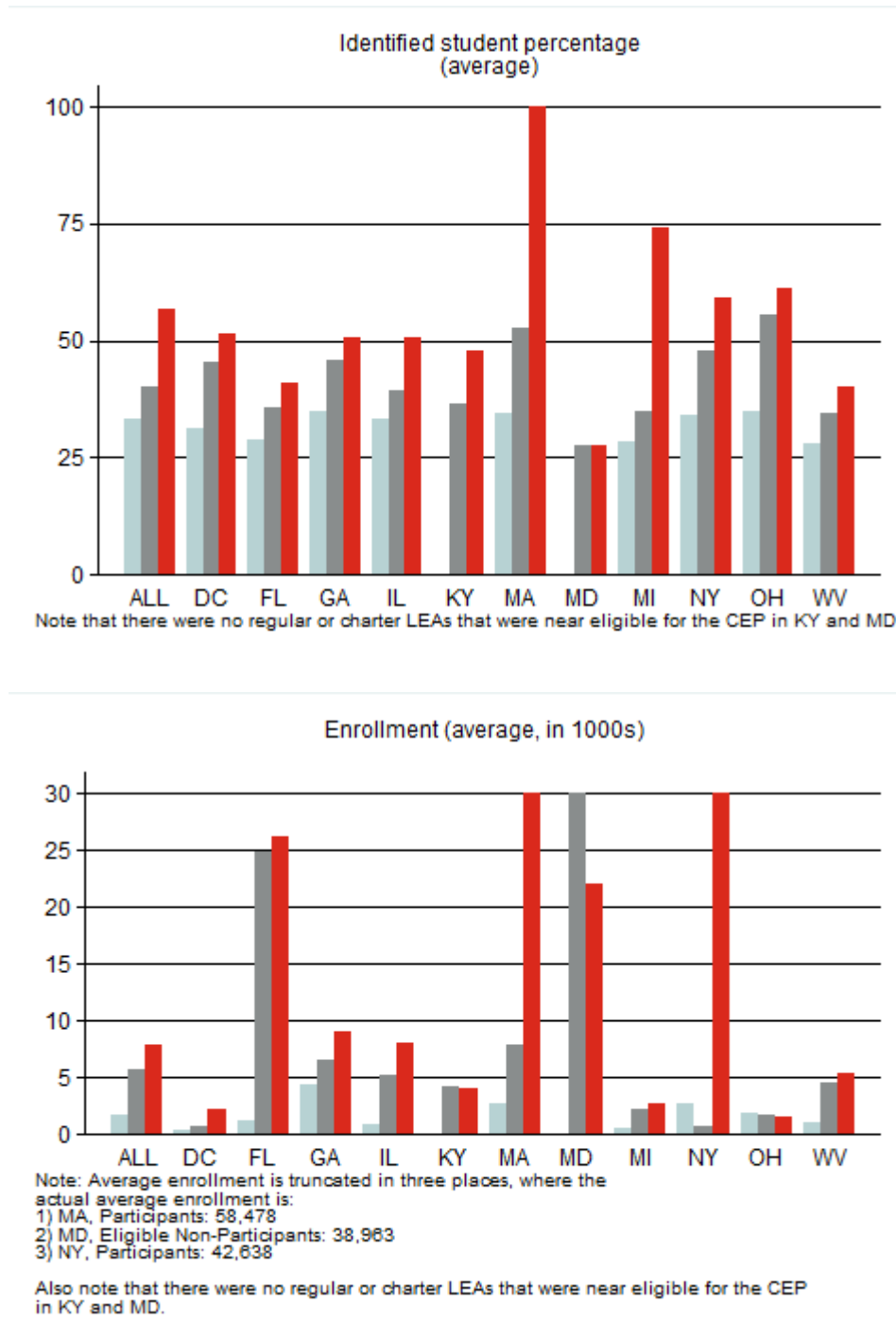
In all States, eligible LEAs had higher proportions of students who are Black than near-eligible LEAs, and in most States, participating LEAs had higher proportions of students who are Black than eligible non-participating LEAs. Illinois and Michigan had the sharpest differences between participating and eligible non-participating on this measure. On the other hand, the proportion of students who are Black was about the same or lower among participating LEAs than among eligible non-participating LEAs in the District of Columbia, Maryland, New York, and Ohio.

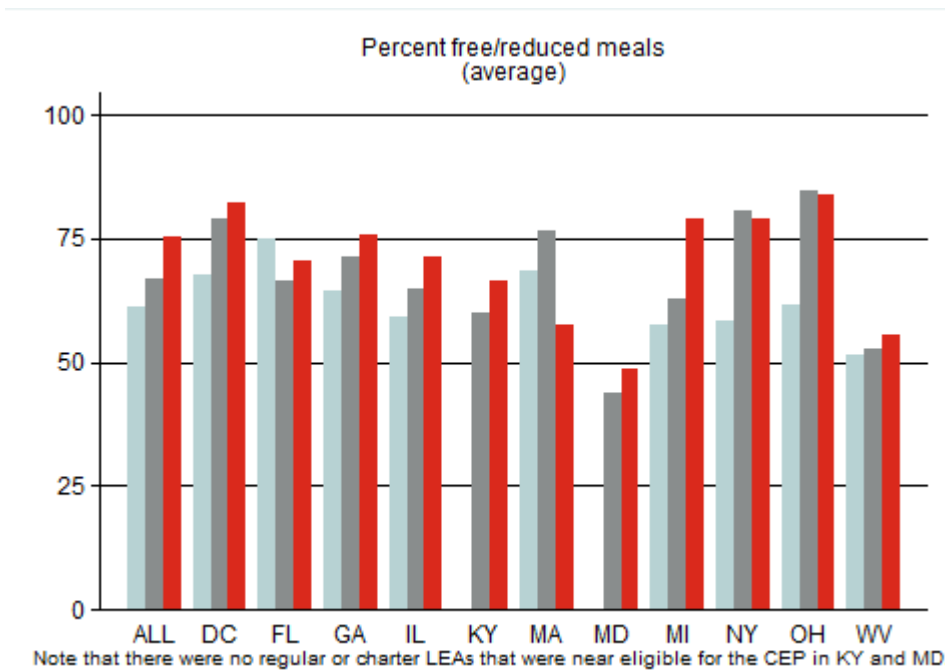
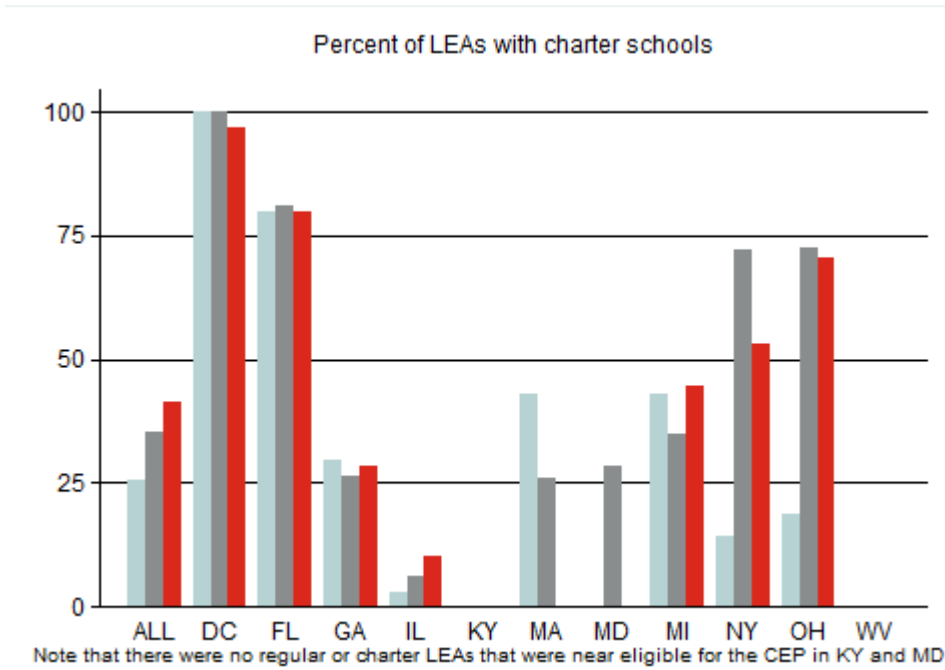
It should be noted that there were large differences in the structural characteristics of LEAs among States. (The discussion that follows is based on the combined characteristics of participating, eligible non-participating, and near-eligible LEAs, as shown in the State-level tables in the Appendix, and on additional information obtained from State LEA lists). The two critical factors are the geography of LEAs within each State and the State's treatment of charter schools. LEAs in the Southeast region, Maryland, and West Virginia are generally coextensive with counties. LEAs in the Northeast and Midwest regions tend to be smaller in area than counties.

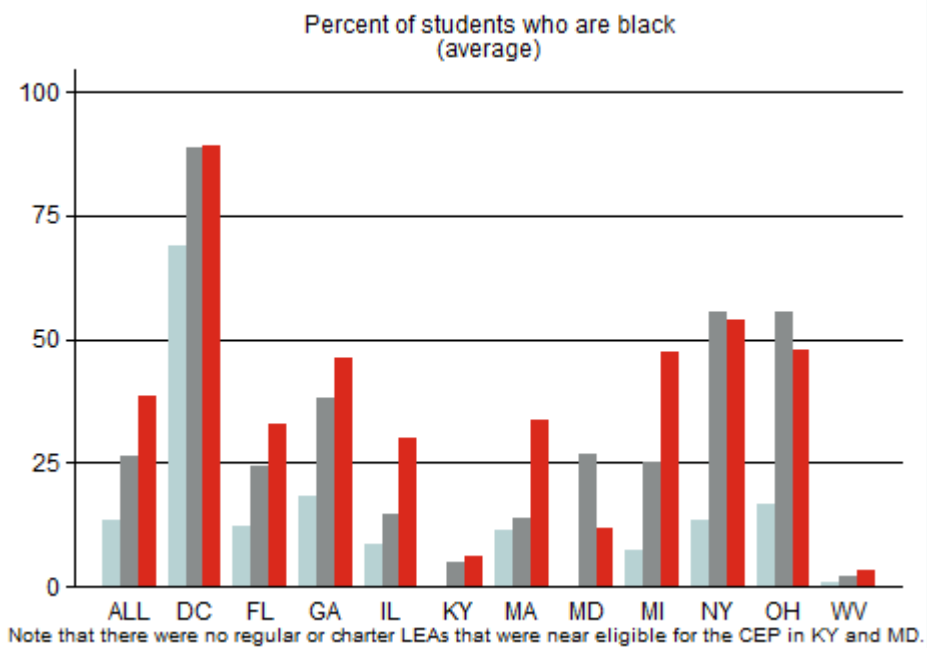
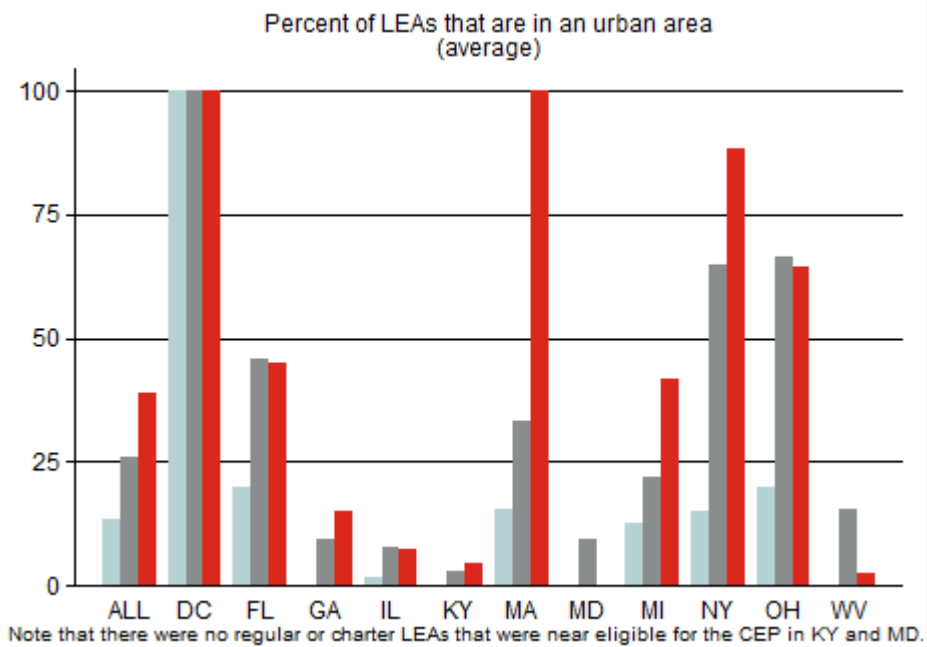
In Kentucky, Maryland, and West Virginia, LEAs aligned with counties, and there were no charter LEAs. As a consequence, these States had few small LEAs consisting of a single school or less than 500 enrolled students. Florida and Georgia were similar to Kentucky, Maryland, and West Virginia in having regular LEAs correspond to counties. Florida and Georgia differed in their treatment of charter schools, however, insofar as some charters, but not all, were part of charter LEAs

Other States had large numbers of very small LEAs consisting of a single school or less than 500 enrolled students, while Kentucky and West Virginia (both with county-based LEAs) had almost none. Florida, Michigan, Ohio, New York, and the District of Columbia all had considerable numbers of charter LEAs, which made up a large proportion of their LEAs with very small enrollments. New York had large fractions of both small (less than 2,500 students) and large (more than 5,000 students) LEAs, with few in between. Illinois had many small LEAs—77 percent with fewer than 2,500 students and 23 percent consisting of a single school—and no all-charter LEAs, although some of its LEAs included charter schools. The District of Columbia was unique among the seven CEP States insofar as it comprised one large regular LEA with 122 schools and 34 charter school LEAs, most consisting of a single school.

Exhibit 3.9: Characteristics of Near-Eligible, Eligible Non-Participating, and Participating Regular and Charter LEAs, by State (SY 2013–14)







■ Near Eligible ■ Eligible Non-Participating ■ Participating

3.3.4 LEA Approaches to Claiming Percentages

Schools can establish claiming percentages for the CEP individually, as part of a group, or on an LEA-wide basis, depending on the ISPs of the LEAs' schools. How schools qualify for the CEP has implications for how the LEAs operate the CEP. If the LEAs establish an LEA-wide CEP claiming percentage, then they can operate all schools under the same rules, including those regarding FRP meals applications and claims for reimbursement. On the other hand, establishing claiming percentages on the basis of individual schools or groups of schools means that the LEAs claim meals differently for CEP schools and non-CEP schools, as well as (potentially) among CEP schools. Moreover, in these LEAs, there is an important distinction between students who get free meals automatically at CEP schools and those who must be certified for FRP meals or pay at non-CEP schools, and LEAs must have procedures to deal with students who transfer between CEP and non-CEP schools.

Exhibit 3.10, below, presents the distribution of regular LEAs by their mode of establishing claiming percentages for the CEP in each State.²⁴ The large majority of participating LEAs—69 percent—established claiming percentages on an LEA-wide basis; the proportion of LEAs doing so ranged from 31 percent in Georgia to 100 percent in Massachusetts (with a single participating LEA). Twenty-two percent of LEAs established their claiming percentage on a group basis, 8 percent established their claiming percentage on an individual school basis, and 1 percent used a combination of group and individual school bases. Single-school LEAs participating in the CEP appear in Exhibit 3.10 as establishing their claiming percentage on an LEA-wide basis.

Georgia was the only State where the majority (61 percent) of participating LEAs established their claiming percentage on a group basis; in Maryland, exactly half (one of two) of participating LEAs did so. About one-third of participating LEAs in Florida, Kentucky and West Virginia established claiming percentages for the CEP on a group basis; in other States, the percentage of participating LEAs that established a claiming percentage on this basis was 20 percent or less. Florida and West Virginia had the highest percentages of LEAs that established their claiming percentage on an individual school basis: 18 and 23 percent, respectively. Between 6 and 13 percent of LEAs in the District of Columbia, Georgia, Illinois, Kentucky, and Michigan did so. A few (8) participating LEAs established claiming percentages through a combination of grouped and individual schools.

²⁴ The categories of claiming percentage method are very closely related to whether an LEA is participating in the CEP with some or all of its schools. Nearly all LEAs that participate in the CEP fully (in all schools) establish a claiming percentage on an LEA-wide basis. (In the seven States with suitable data, 95 percent of LEAs participating in all schools used an LEA-wide claiming percentage.) Similarly, nearly all LEAs that partially participate in the CEP establish their claiming percentage on a group or individual basis. (The best estimate from available data is 91 percent.) About 40 percent of LEAs that establish their claiming percentage on an individual school basis have more than one participating school, and 4 percent of LEAs that reportedly establish their claiming percentage on a group basis have only one participating school (according to State data, which may be subject to error on this point).

Exhibit 3.10: Percentage of Participating LEAs by Mode of Establishing Claiming Percentage (SY 2013–14)

	Mode of Establishing Claiming Percentage				Total Participating LEAs #
	Entire LEA	Group	Individual	Group and Individual	
	%	%	%	%	
Year 1 States:					
Illinois	72	13	13	2	86
Kentucky	59	32	9	0	66
Michigan	71	16	12	1	110
Year 2 States:					
District of Columbia	79	12	9	0	34
New York	91	7	1	1	90
Ohio	80	20	0	0	128
West Virginia	36	36	23	5	39
Year 3 States:					
Florida	48	30	18	3	33
Georgia	31	61	6	2	49
Maryland	50	50	0	0	2
Massachusetts	100	0	0	0	1
All CEP States	69	22	8	1	
Total LEAs	438	140	52	8	638

3.3.5 Variations in CEP Participation Associated with LEA-Wide Eligibility, Percentages of Students Eligible for Free and Reduced-Price Meals, and ISP

One factor in an LEA's decision to participate may be whether the LEA is eligible to participate on an LEA-wide or group/individual school basis,²⁵ Participating LEAs must alter a number of administrative procedures associated with counting and claiming Federal reimbursements for school meals. If they do not participate on an LEA-wide basis, they must follow two sets of procedures—one for CEP and one for non-CEP schools. Likewise, the LEA must continue to collect and process FRP meal applications for students in non-CEP schools if they do not participate on an LEA-wide basis. As a consequence, partially participating LEAs may not realize savings in administrative costs or complexity.

The data presented in Exhibit 3.11 show that, in SY 2013–14, LEAs were indeed more likely to participate if eligible LEA-wide. Across most States, participation rates were higher—sometimes by a factor of two or more—in LEAs that were eligible LEA-wide versus those that were not. New York and Ohio appeared to be very different, but the results for these States should be discounted due to

²⁵ The CEP evaluation report (Logan et al., 2014) noted that the second most popular potential change endorsed by eligible non-participating LEAs was to make the CEP available LEA-wide regardless of individual schools' ISPs.

data limitations.²⁶ The other two exceptions to greater participation among LEAs eligible LEA-wide are Georgia, where there was equality in participation rates for the two types of LEAs, and Maryland, which had only two participating LEAs. Among LEAs eligible to participate in all schools, those that did so (fully participating) outnumbered those that participated partially by three to one. States varied in the proportion of LEAs participating LEA-wide among those eligible LEA-wide, from a very substantial majority in the District of Columbia and New York, to one-third in Georgia (15 percent LEA-wide versus 30 percent partially participating).

Exhibit 3.11: LEA Participation Rate, by LEA-Wide Eligibility and State (SY 2013–14)

	Participation Rate (% of Eligible)			Not Eligible LEA-Wide
	Eligible LEA-Wide			
	Fully Participating	Partially Participating	Total Participating	
Year 1 States:				
Illinois	26	8	34	15
Kentucky	32	16	48	15
Michigan	20	7	26	3
Year 2 States:				
District of Columbia	60	16	76	0
New York	59	4	63	100
Ohio	35	8	43	100
West Virginia	41	38	79	60
Year 3 States:				
Florida	17	9	26	20
Georgia	15	30	45	45
Maryland	4	0	4	6
Massachusetts	3	0	3	
All CEP States	29	10	39	14

Participation rates for LEAs not eligible LEA-wide may be inflated in New York and Ohio, where the number of eligible LEAs may be underestimated due to missing ISP data for schools.

Participating LEAs had a higher percentage of students certified for FRP meals compared to eligible non-participating LEAs. As shown in Exhibit 3.12, the CEP participation rate increased with the FRP student percentage, for both eligible LEAs and schools. For LEAs, the participation rate rises from 19 percent among LEAs with less than 51 percent FRP students to 47 percent for those with over 80 percent. For schools, participation also rises in tandem with greater percent FRP-certified students, from 4 percent participation among eligible schools with less than 51 percent FRP-certified students to 36 percent in eligible schools with more than 80 percent FRP-certified students.

²⁶ For New York and Ohio, data on school-level ISPs were not available. These data would enable calculation of whether an LEA is eligible in a portion of schools. Hence, the only means of identifying LEAs not eligible LEA-wide as eligible is by whether they are participating, and the “participation rate” for such LEAs is 100 percent by definition.

Exhibit 3.12: CEP Participation Rate for Eligible Regular and Charter LEAs and Schools, by Percentage of Students Certified for Free or Reduced-Price (FRP) Meals (SY 2013–14)

Percent FRP Students	Percent of LEAs Participating	Percent of Schools Participating
<51	19	4
51–60	28	17
61–70	32	24
71–80	42	29
>80	47	36
All LEAs and schools	35	22

Percent FRP students based on pre-CEP VSR data for LEAs and 2011–12 CCD data for schools.

Exhibit 3.13 shows the distribution of projected ISPs (based on October 2012 VSR data) for LEAs by their CEP eligibility and participation in the 2013–14 school year. As expected, all near-eligible LEAs had ISPs below 40 percent. Both eligible non-participating and participating LEAs can be found across the spectrum of ISP levels. Not all participating LEAs had ISPs above 40 percent, because participation requires only one eligible school in the LEA. However, eligible non-participating LEAs tend to have lower ISPs than participating LEAs. The majority of eligible non-participating LEAs (68 percent) have ISPs below 50 percent, while the majority of participating LEAs (59 percent) have ISPs above this level.

Exhibit 3.13 also shows the participation rate of eligible LEAs at various LEA-wide ISP levels. Roughly 10–13 percent of LEAs with an ISP below 30 percent participate. For LEAs with ISPs between 30–50 percent, participation rises to 26–28 percent. For LEAs with ISPs above 50 percent, participation is 47–55 percent. Thus, higher ISPs up to a threshold of about 50 percent appear to be associated with greater participation. Participation appears to level off, however, with further increases in the ISP above 50 percent.

Exhibit 3.13: Percentage Distribution of LEAs by ISP Range, CEP Eligibility, and Participation—All CEP States (SY 2013–14)

ISP	Percentage of LEAs, by ISP			Participation Rate (% of Eligible), by ISP
	Near-Eligible	Eligible Non-Participating	Participating	
<20	1	8	2	10
20–39	8	12	4	13
30–39	85	18	14	28
40–49	0	25	18	26
50–59	0	11	20	47
60–69	0	6	15	55
>70	0	12	24	49
ISP missing	5	7	4	22
All ISPs	100	100	100	33
Number of LEAs	420	1,293	638	

The ISP reported in this table is the projected ISP derived from October 2012 VSR data which States reported to FNS. The projected ISP is equal to the total number of free eligible students not subject to verification, divided by the total LEA enrollment from schools not operating Provision 2 or 3. Some near-eligible LEAs are reported having ISPs of less than 30 percent because near-eligibility status was determined using a combination of VSR and State data, but only ISPs based on the former are shown.

Exhibit 3.14 combines data on the percent FRP-certified students and the ISP to examine the relationship between participation and the ratio of these two quantities.²⁷ The exhibit shows the distribution of the ratio of the FRP student percentage to the ISP for participating, eligible non-participating, and all eligible LEAs. Schools participating in the CEP are reimbursed at the free-meals rate for a percentage of meals served equal to the ISP times a multiplier of 1.6, plus the paid-meals rate times the rest of meals served. Consequently, higher values of the ratio of the percent FRP-certified students to the ISP may indicate that the LEA would get more revenue under conventional meal claiming than under the CEP.

In the typical participating LEA, the FRP student percentage was 1.6 times the ISP (as indicated by the median shown above in Exhibit 3.7), while for eligible non-participating LEAs this ratio was 1.7. As shown in Exhibit 3.14, both eligible non-participating and participating LEAs can be found across all levels of the ratio, but the distribution of this ratio was quite different for these two groups. Participating LEAs are more concentrated in the lower ranges, with 54 percent of participating LEAs having ratios below 1.6. For comparison, only 42 percent of eligible non-participating LEAs had ratios below this level.

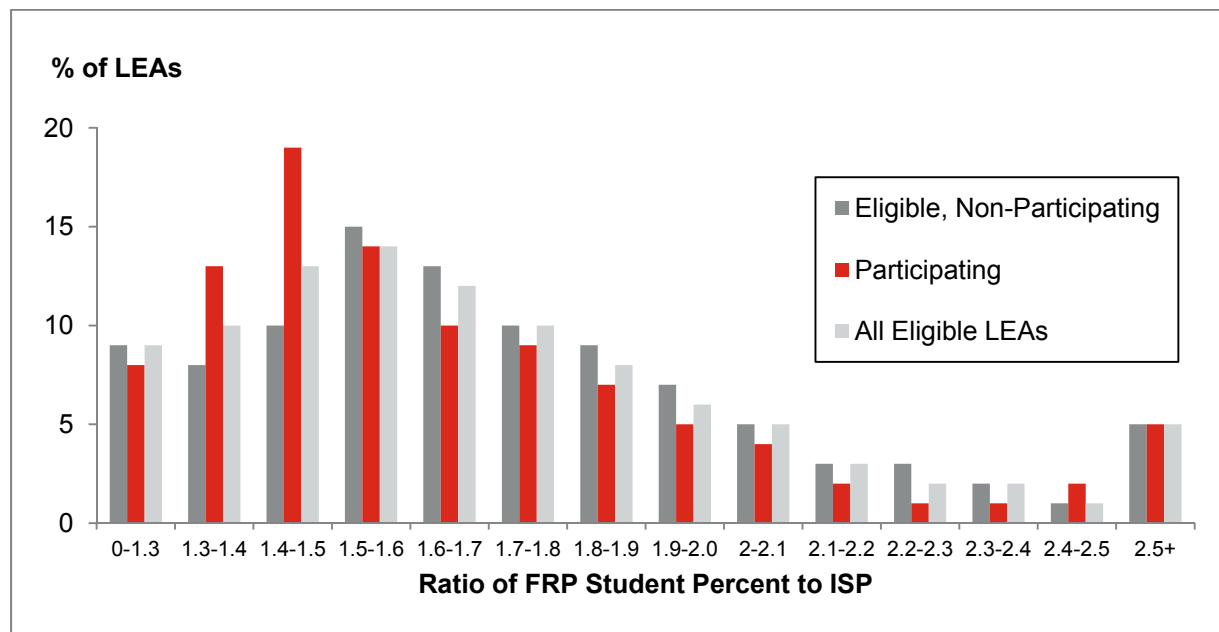
For participating schools and LEAs that no longer collect FRP meal applications or an alternative family income form, the free meals rate claiming percentage—which is equal to the CEP multiplier times the ISP—may be used to estimate the FRP student percentage for programs that use this statistic when identifying high-poverty schools and allocating funds among schools (e.g., Title I). In this context, the programs assume that if, for example, a school has an ISP of 40 percent, the FRP student percentage would be 64 percent if the school took applications for FRP meals. This may be a consideration for LEAs in deciding whether to take up the CEP, because the calculated FRP student percentage would be used in lieu of the actual if the LEA no longer collected and processed applications for FRP meals or an alternative family income data form.

The difference between an LEA's ratio of FRP student percentage to ISP and the CEP multiplier (1.6) is a measure of the consistency between the estimated FRP percentage (under Title I and other program rules for participating LEAs that do not collect family income forms) and the actual (pre-CEP) percentage. Exhibit 3.14 shows that about 24 percent of participating LEAs had calculated FRP student percentages within 10 percentage points of the actual (because the ratio of FRP to ISP is between 1.5 and 1.7), and 52 percent have a calculated FRP student percentage within 20 percentage points of the actual. At the extremes, for about 8 percent of participating LEAs, the calculated FRP student percentage exceeds the actual by 23 percent or more, and in 5 percent of participating LEAs,

²⁷ In computing this ratio, the percentage FRP and the ISP were drawn from VSR data for the same year. As noted above, many participating LEAs followed FNS guidance in reporting only directly certified students as FRP eligible on the VSR for SY 2012–13, resulting in an FRP to ISP ratio equal to one. Where this occurred, FRP and ISP data were drawn from the prior year's VSR data, and the process was repeated if the prior year also had the FRP percentage equal to the ISP. For non-participating LEAs, if the FRP to ISP ratio was equal to one for SY 2012–13, the prior year's data were used for the ratio, but the FRP percentage and ISP used in other tables were still taken from SY 2012–13.

the calculated FRP student percentage falls short of the actual by 36 percent or more.²⁸ Among all eligible LEAs, 46 percent had an FRP/ISP ratio less than 1.6.

Exhibit 3.14: Distribution of Eligible Non-Participating, Participating, and All Eligible Regular and Charter LEAs by Ratio of FRP Student Percentage to ISP (SY 2013–14)



3.4 Numbers and Characteristics of Near-Eligible, Eligible Non-Participating and Participating Schools

3.4.1 Numbers of Near-Eligible, Eligible Non-Participating and Participating Schools

To complement the LEA-level description in the preceding sections, this section first presents the numbers of near-eligible, eligible non-participating, and participating schools in the 11 CEP States and then considers the similarities and differences of these three types of schools. (See Chapter 2 for definitions of these types of schools.) The discussion focuses on regular schools (i.e., those in public school districts) and charter schools for which either the States or the Common Core reported data,²⁹ data for other schools were insufficient for analysis.

²⁸ These quantities are calculated as follows. Percent error = $[(1.6 * ISP - \%FRP) / \%FRP]$. In 8 percent of participating LEAs, $\%FRP/ISP \leq 1.3$. Substituting into the equation: Percent error ≥ 0.23 . Likewise, in 5 percent of participating LEAs, $\%FRP/ISP \geq 2.5$. Substituting into the equation: Percent error ≤ -0.36 .

²⁹ The number of schools reported in Section 3.4 is limited by the number of schools for which school-level data are available from either the States or the Common Core of Data. This limitation creates discrepancies between the LEA-level data and the school-level data. For instance, while the State of Massachusetts reported that 144 schools in Boston participated in the CEP (see, for instance, Exhibit 3.1), school-level data were only available in the Common Core for 135 of these schools.

As shown in Exhibit 3.15, the 11 CEP States comprised a total of 19,328 regular public or charter schools that were at least near-eligible to participate in the CEP. Slightly more than 70 percent of these (13,758) were eligible non-participating, about 20 percent (3,800) participated, and the rest (1,770) were near-eligible (Exhibit 3.15). While Michigan had the most eligible LEAs, Florida had the most eligible schools—4,012. This occurred because Florida’s eligible LEAs were much larger: about 40 schools per LEA compared to about 5 in Michigan. The District of Columbia had the fewest participating and eligible non-participating schools (223), followed by Massachusetts, with 459. Ohio had the most near-eligible schools both absolutely (445) and as a proportion of schools that were at least near-eligible (29 percent).

On average, across the 11 CEP States, slightly more than one-fifth of the 17,558 eligible schools in regular and charter LEAs participated in the CEP. It was earlier shown (Exhibit 3.5) that the District of Columbia and West Virginia had the highest participation rates for regular and charter LEAs. Exhibit 3.15 shows that they also had the highest participation rates for schools—52 and 54 percent, respectively. Maryland had the lowest school participation rate, at 0.3 percent, and Florida had the second lowest school participation rate (9 percent, much lower than the 29 percent participation rate for eligible LEAs).

Exhibit 3.15: Number of Regular and Charter Schools and Participation Rate, by CEP Status and State (SY 2013–14)

	Near-Eligible (#)	Eligible (#)		Total (#)	Participation Rate (% of Eligible)
		Non-Participating	Participating		
Year 1 States:					
Illinois	173	1,435	659	2,267	31
Kentucky	85	1,163	369	1,617	24
Michigan	163	2,101	497	2,761	19
Year 2 States:					
District of Columbia	6	106	117	229	52
New York	103	1,593	469	2,165	23
Ohio	445	659	409	1,513	38
West Virginia	90	292	345	727	54
Year 3 States:					
Florida	328	3,653	359	4,340	9
Georgia	275	1,009	436	1,720	30
Maryland	36	1,423	5	1,464	<1
Massachusetts	66	324	135	525	29
All CEP States	1,770	13,758	3,800	19,328	22

Note: Since non-participating schools in participating LEAs are treated as eligible if they are missing a school ISP, the participation rate may be artificially low in New York, Ohio, and Georgia. However, the count of schools in eligible non-participating LEAs maybe understated due to sparse ISP data in New York, Ohio, Georgia, and Massachusetts.

3.4.2 Variations in School Participation Associated LEA-Wide Eligibility

Exhibit 3.16 presents the proportion of eligible schools that used the CEP in participating LEAs. This table distinguishes between those LEAs that were eligible to participate LEA-wide—those for which the ISP for the LEA was at least 40 percent—and those LEAs within which only some schools were eligible to participate. Either type of LEA could choose to participate with a subset of eligible schools, provided that the school or group of schools had an average ISP of at least 40 percent.

The percentage of eligible schools that used the CEP was substantially higher in LEAs where all schools were eligible to participate. Among participating LEAs eligible to participate LEA-wide, 84 percent of schools used the CEP, on average, and the average proportion of schools that used the CEP ranged from 70 percent in Florida to 100 percent in Maryland and Massachusetts.

Participating LEAs that were not eligible LEA-wide used the CEP in a smaller proportion of eligible schools than the participating LEAs eligible LEA-wide. Among participating LEAs that were not eligible LEA-wide, 63 percent of eligible schools used the CEP. This proportion ranged from 29 percent in Kentucky to 94 percent in Illinois.

Exhibit 3.16: Percent of Eligible Schools Participating in CEP in Participating LEAs, by LEA Eligibility Status and State (SY 2013–14)

Average Percent Eligible Schools Participating	Percent of Eligible Schools Participating		
	Eligible LEA-Wide	Not Eligible LEA-Wide	All Participating LEAs
Year 1 States:			
Illinois	84	94	86
Kentucky	73	29	69
Michigan	80	60	78
Year 2 States:			
District of Columbia	82	NA	82
New York	96	51	95
Ohio	90	72	90
West Virginia	73	72	73
Year 3 States:			
Florida	70	33	61
Georgia	79	54	77
Maryland	100	33	67
Massachusetts	100	NA	100
All CEP States	84	63	82
Number of LEAs	578	60	638

Note: There were no participating LEAs that were not eligible LEA-wide in the District of Columbia or Massachusetts.

3.4.3 Characteristics of Near-Eligible, Eligible Non-Participating, and Participating Regular and Charter Schools

The participation patterns found for LEAs were generally replicated at the school level, although differences between participating and eligible non-participating schools were larger, most likely because only subsets of schools in some participating LEAs implemented the CEP, and these participating subsets of schools may have certain distinguishing characteristics.

As shown in Exhibit 3.17, participating schools had much higher ISPs, FRP percentages, and percentages of Black students than near-eligible and eligible non-participating schools. Participating schools had an average ISP of 61 percent, compared to 39 percent for eligible non-participating

schools and 27 percent for near-eligible schools.³⁰ Differences in FRP percentages followed a similar pattern: 78 percent for participating schools, 60 percent for eligible non-participating schools and 52 percent for near-eligible schools. Forty-three percent of students in participating schools were Black, and 58 percent were Black or Hispanic. By comparison, 28 percent of students in eligible non-participating schools were Black and 48 percent were Black or Hispanic. The corresponding figures for near-eligible schools are 12 and 22 percent.

Participating schools were also more likely to be Title I schools and to have “other” or non-standard grade spans (that is, not K–5, 6–8, or 9–12) than eligible non-participating or near-eligible schools. Eighty percent of participating schools are Title I, compared to under 65 percent for eligible non-participating or near-eligible schools. These proportions for Title I schools stand in contrast to those for LEAs, where participating and eligible non-participating LEAs had the same proportion of Title I schools, and near-eligible LEAs had somewhat more Title I schools than either participating and eligible non-participating LEAs.

³⁰ To be eligible to participate, an LEA must have at least one school with an ISP of 40 percent or more. All schools in eligible non-participating LEAs were classified as eligible non-participating schools, because schools with ISPs below 40 percent could be combined in groups with schools with ISPs greater than 40 percent.

Exhibit 3.17: School Characteristics in Regular and Charter LEAs—All CEP States (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean	(SD)	Mean	(SD)	Mean	(SD)	Mean	(SD)
Enrollment	582.1	(405.1)	576.0	(476.6)	474.6	(298.2)	556.2	(441.6)
ISP	27.1	(9.4)	38.5	(20.5)	60.8	(15.2)	42.9	(21.4)
Students free/reduced lunch (%)	52.3	(19.6)	60.3	(25.4)	78.4	(15.9)	63.2	(24.6)
Grade span								
K–5 (%)	46.6		45.4		49.6		46.3	
6–8 (%)	19.8		15.9		12.0		15.5	
9–12 (%)	19.3		18.9		12.6		17.8	
Other (%)	14.4		19.8		25.9		20.4	
Title I schools (%)	63.7		62.4		80.0		65.9	
Charter schools (%)	6.3		7.1		7.0		7.0	
Percent students Black	12.2	(17.9)	28.3	(29.9)	43.0	(36.4)	29.7	(31.5)
Percent students Hispanic/Latino	10.2	(15.1)	19.7	(23.6)	14.7	(22.8)	17.8	(23.0)
Total number of schools	1,770		13,758		3,800		19,328	
<i>Number of schools with CCD data</i>	1,725		13,370		3,547		18,642	

The total number of schools refers to the total number of schools for which school-level data are available from either States or Common Core of Data.

The ISP reported in this table is based on April 2013 data submitted by the States.

The number of eligible non-participating schools includes 556 schools with missing ISPs in participating LEAs that are not eligible LEA-wide.

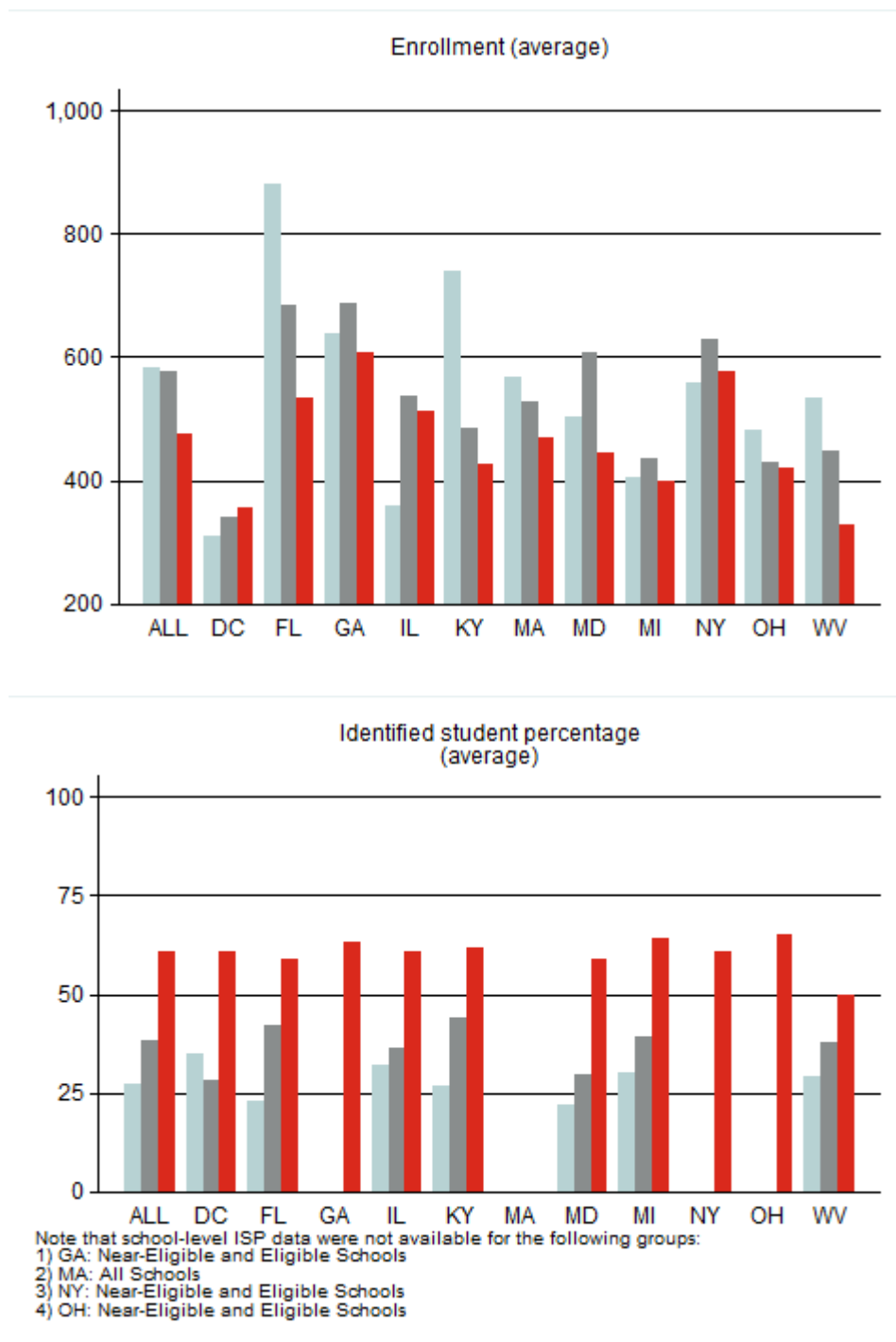
Exhibit 3.18 illustrates variations among States in school enrollments, ISPs, and percent Black students for participating, eligible non-participating, and near-eligible schools. (Statistics corresponding to those in Exhibit 3.18 are reported for individual States in Exhibits A.2.1–A.2.11.) In eight of 11 CEP States, participating schools had smaller average enrollments than eligible non-participating, and near-eligible schools. The exceptions were the District of Columbia, Illinois, and New York, where near-eligible schools had the smallest enrollments. Georgia had the largest average enrollments for participating and eligible non-participating schools (606 and 687 students, respectively), while Florida had the largest average enrollment for near-eligible schools (881 students). West Virginia had the smallest average enrollment for participating schools (329 students), and the District of Columbia had the smallest average enrollments for eligible non-participating and near-eligible schools (340 and 310 students, respectively).

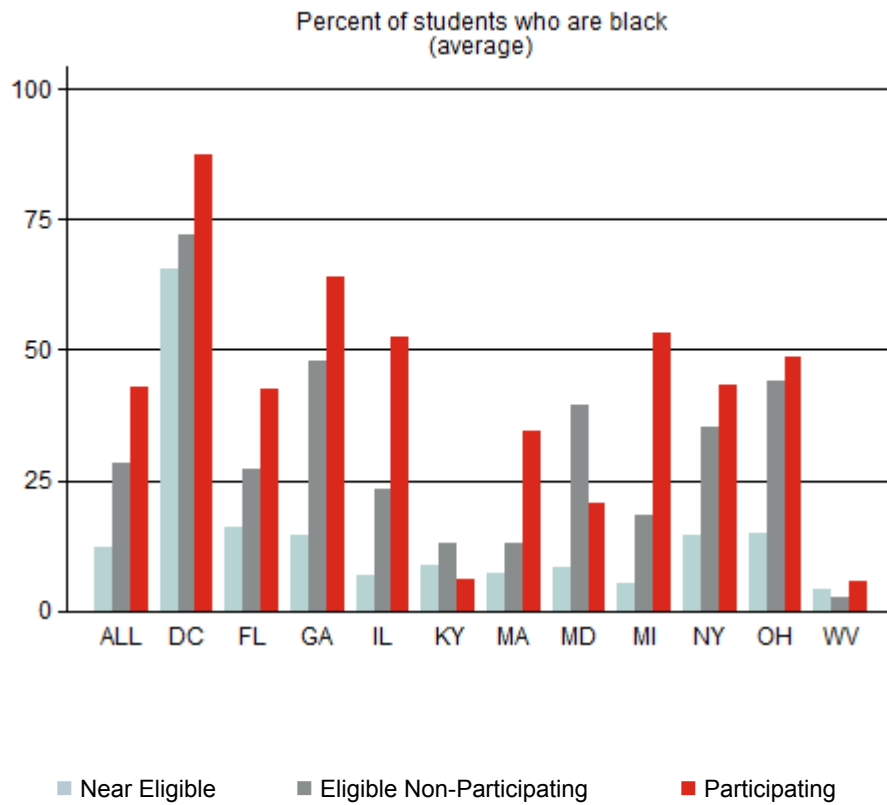
Across States, the average participating school ISP ranged from 50 percent in West Virginia to 65 percent in Ohio. West Virginia’s average participating school ISP of 50 percent was substantially lower than in other States. Florida had the next lowest participating school ISP at 59 percent. For most States, average school ISP fell between 59–65 percent.

In the seven States with complete school ISP data, participating schools consistently had higher ISPs than eligible non-participating and near-eligible schools. West Virginia—which had the lowest average participating school ISP—also had the smallest gap (12 percentage points) between the average ISPs of participating schools and eligible non-participating schools. The difference between the average ISPs of eligible non-participating schools and near-eligible schools ranged from 7 percentage points for the District of Columbia to 19 percentage points for Florida.

In nine of 11 CEP States, participating schools had the highest average percentage of Black students, and near-eligible schools had the lowest. Kentucky, Maryland, and West Virginia were the exceptions. Two of these States—Kentucky and West Virginia—had relatively low percentages of Black students overall. In Kentucky, eligible non-participating schools had the highest percentages of Black students, and participating schools had the lowest. In Maryland, eligible non-participating schools also had the highest percentages of Black students, but near-eligible schools had the lowest. In West Virginia, participating schools had the highest percentages of Black students, while eligible non-participating schools had the lowest.

Exhibit 3.18: Characteristics of Near-Eligible, Eligible Non-Participating, and Participating Schools in Regular and Charter LEAs, by State (SY 2013–14)





3.5 Summary

The 2013–14 school year was the third year of the phase-in period for the CEP, which was operating in the District of Columbia and 10 States (Florida, Georgia, Illinois, Kentucky, Maryland, Massachusetts, Michigan, New York, Ohio, and West Virginia). The CEP will be available to eligible LEAs in all States for the 2014–15 school year. This Addendum updates the results presented in the *Community Eligibility Provision Evaluation* report (primarily in Chapter 4) by describing the characteristics of LEAs and schools that first took up and/or continued to implement the CEP in 2013–14. It also describes how these characteristics differ from those of other high-poverty LEAs and schools that did not take up the CEP. The descriptive analysis in this chapter addresses two research objectives posed in the Congressional mandate for the Implementation Study:

1. Estimate the number of eligible LEAs and schools that have not chosen to participate in the CEP; and
2. Describe the LEAs and schools participating in the CEP.

The key results for these objectives are summarized in this section, beginning with the characteristics of participating LEAs, then proceeding to broader information on all eligible and near-eligible LEAs, followed by comparisons of participating and non-participating LEAs, and ending with the characteristics of participating schools.

3.5.1 Characteristics of Participating LEAs

Participation in the CEP has expanded rapidly over its three year history; the number of participating LEAs has grown substantially every year in most States that have offered the CEP for more than one year. A total of 3,999 schools in 638 LEAs participated in the CEP in 2013–14. In 438 of the participating LEAs, all schools participated. An estimated 1.8 million students had access to free meals under the CEP. Further, a negligible number (six) LEAs ended their participation in the CEP (one LEA in the District of Columbia, Illinois, Kentucky, and New York, and two LEAs in Ohio exited CEP participation). Although three times that number (19 LEAs) that participated in prior years did not participate in 2013–14 in Michigan, the primary driver was district consolidation rather than withdrawal from the CEP.

The overall CEP participation rate was 35 percent for eligible regular and charter LEAs (as defined in Chapter 2). The District of Columbia and West Virginia had participation rates of 75 percent, and New York had a participation rate of 65 percent. Georgia, Kentucky, and Ohio had somewhat lower participation rates, ranging from 39 to 46 percent. Florida, Illinois, and Michigan constituted a third tier in terms of LEA participation, with rates between 21 and 30 percent, and less than 10 percent participated in Maryland and Massachusetts.³¹

An important choice for LEAs is whether they participate in the CEP LEA-wide, in groups of schools, or in individual schools. This choice is operationalized by the type of claiming percentage

³¹ As noted in the detailed presentation, the number of eligible LEAs is likely underestimated by as much as 50 percent in Georgia, Massachusetts, New York, and Ohio, because these States did not provide ISP data for schools, and so partially eligible non-participating LEAs could not be identified.

used. Most participating LEAs—69 percent—established their claiming percentage on an LEA-wide basis. Twenty-two percent of LEAs established their claiming percentage on a group basis, 8 percent established their claiming percentage on an individual school basis, and 1 percent used a combination of group and school percentages.

3.5.2 Numbers of Eligible and Near-Eligible LEAs

In the 11 CEP States, a total of 1,890 regular and charter LEAs were identified as eligible or near-eligible to participate in the CEP, based on available LEA and school-level ISPs. More than a fourth (548) were participating, more than half (1,014) were eligible but non-participating, and less than a fifth (328) were near-eligible. In addition, a total of 90 other LEAs³² participated in the CEP, 279 were eligible non-participating, and 92 were near-eligible in the 2013–14 school year.

More than 10 million students were in regular and charter LEAs that were near-eligible, eligible, or participating in the CEP. Participating regular and charter LEAs represented about 4.2 million enrolled students. Of these, an estimated 42 percent (1.8 million) were in schools that participated in the CEP. Eligible non-participating LEAs comprised about 5.5 million students, and near-eligible LEAs comprised about 570,000 students (based on data for regular and charter LEAs).

3.5.3 Comparison of Participating, Eligible Non-Participating, and Near-Eligible LEAs

Compared with eligible non-participating LEAs, participating LEAs, on average, had more students, more schools, and higher ISPs and percentages of students eligible for FRP meals (based on data for regular and charter LEAs). However, the difference in enrollment was due entirely to the participation of New York City public schools—absent that single LEA, the difference between participating and eligible non-participating LEAs was negligible. Participating LEAs were also more often urban, had more Black students, were more likely to include charter schools, and had a somewhat higher percentage of students in grades K–5 and a lower percentage in grades 9–12.

Differences between eligible non-participating and near-eligible LEAs were similar to those between participating and eligible non-participating LEAs. The patterns found for LEAs were generally replicated at the school level, although school-level differences between participating and eligible non-participating schools were more pronounced.

3.5.4 School Participation in the CEP

The 11 CEP States comprised a total of 19,328 regular public or charter schools that were eligible or at least near-eligible to participate in the CEP. Slightly more than 70 percent of these (13,758) were eligible non-participating, about 20 percent (3,800) participated, and the rest (1,770) were near-eligible. Among participating LEAs that were eligible to participate LEA-wide, 84 percent of schools used the CEP, while 63 percent of schools used the CEP among participating LEAs that were not eligible LEA-wide. As with LEAs, participating schools had higher ISPs, FRP percentages, and percentages of students who are Black than eligible non-participating schools. Participating schools were also more likely to be Title I schools and to have non-standard grade spans (i.e., not K–5, 6–8, or 9–12).

³² The category of “other” LEAs includes non-public LEAs, regional education service agencies, and other non-typical public education agencies.

Nearly the same percentages of charter schools were found among participating, eligible non-participating, and near-eligible schools. This is distinct from the LEA-level prevalence of LEAs with charter schools, where participating LEAs were more likely to include charter schools than eligible non-participating LEAs, which, in turn, were more likely to include charter schools than near-eligible LEAs

The average ISP for eligible non-participating schools was about 39 percent, and more than half of the eligible non-participating schools for which there were ISP data had ISPs less than 40 percent. This stems from the fact that all schools in eligible non-participating LEAs were classified as eligible non-participating schools, because these schools could potentially be combined with other schools with higher ISPs in the same LEA to form groups of eligible schools. (About 7 percent of participating schools also had ISPs less than 40 percent.) Among schools with an ISP of 40 percent or higher, the average eligible non-participating school ISP was 53 percent, and the average participating school ISP was 63 percent.

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Appendix: LEA and School Characteristics by State

Exhibit A.1.1: Regular and Charter LEA and School Characteristics—District of Columbia (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean (SD)		Mean (SD)		Mean (SD)		Mean (SD)	
LEA Variables								
Enrollment	401.6	(356.3)	685.3	(869.2)	2,175.0	(7,967.4)	1,622.4	(6,447.7)
Enrollment 1–499 (%)	60.0		70.0		53.6		58.1	
Enrollment 500–2499 (%)	40.0		20.0		39.3		34.9	
Enrollment 2500–4999 (%)	0.0		10.0		3.6		4.7	
Enrollment 5000+ (%)	0.0		0.0		3.6		2.3	
Percentage distribution of students in grades K–12								
Percent in grades K–5	37.3	(47.8)	54.9	(39.2)	51.2	(41.6)	50.6	(40.8)
Percent in grades 6–8	54.4	(45.9)	21.4	(19.7)	14.9	(13.3)	20.6	(22.7)
Percent in grades 9–12	8.3	(9.6)	23.7	(35.4)	33.9	(42.7)	28.8	(39.1)
Number of schools	1.4	(0.5)	2.1	(2.8)	6.2	(22.0)	4.7	(17.8)
1 school (%)	60.0		70.0		57.1		60.5	
2–5 schools (%)	40.0		20.0		28.6		27.9	
6–14 schools (%)	0.0		10.0		10.7		9.3	
15+ schools (%)	0.0		0.0		3.6		2.3	
Identified Student Percentage (ISP)	31.3	(2.7)	45.4	(6.3)	51.3	(10.4)	47.6	(11.0)
Students free/reduced lunch (%) (FRP)	67.8	(13.2)	79.1	(12.4)	82.3	(13.0)	79.9	(13.4)
Ratio of FRP to ISP								
Mean	2.2	(0.3)	1.9	(0.4)	2.0	(0.7)	2.0	(0.6)
Median	2.2		1.8		1.8		1.8	
Any charter schools (%)	100.0		100.0		96.7		97.8	
Percent Title I schools	80.0	(44.7)	85.0	(33.7)	82.6	(32.2)	82.9	(33.2)
Urban LEA (%)	100.0		100.0		100.0		100.0	
Percent students Black	68.7	(21.2)	88.5	(29.4)	89.0	(20.0)	86.5	(22.9)
Percent students Hispanic/Latino	18.4	(10.7)	10.3	(26.9)	8.7	(17.7)	10.2	(19.3)
<i>Total LEAs</i>	5		10		28		43	
<i>Number of LEAs with VSR data</i>	5		10		28		43	
<i>Number of LEAs with CCD data</i>								
School Variables								
Enrollment	310.2	(208.5)	339.7	(251.0)	355.4	(175.8)	347.7	(209.6)
ISP	34.9	(3.3)	28.4	(16.6)	60.7	(11.8)	48.5	(20.6)
Students free/reduced lunch (%)	64.3	(14.6)	58.2	(26.9)	69.5	(16.5)	64.8	(21.8)
Grade span								
K–5 (%)	33.3		39.4		49.6		44.4	
6–8 (%)	33.3		13.5		8.7		11.6	
9–12 (%)	0.0		18.3		13.9		15.6	
Other (%)	33.3		28.8		27.8		28.4	
Title I schools (%)	83.3		50.0		94.8		73.8	
Charter schools (%)	100.0		43.3		34.8		40.4	
Percent students Black	65.6	(20.5)	71.9	(30.6)	87.2	(21.6)	80.3	(26.7)
Percent students Hispanic/Latino	20.6	(11.0)	11.5	(18.4)	10.6	(19.3)	11.3	(18.7)
Total number of schools	6		106		117		229	
<i>Number of schools with CCD data</i>	6		104		115		225	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data).

Exhibit A.1.2: Regular and Charter LEA and School Characteristics—Florida (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean	(SD)	Mean	(SD)	Mean	(SD)	Mean	(SD)
LEA Variables								
Enrollment	1,181.8	(2,084.4)	24,790.9	(53,924.1)	26,123.3	(43,685.5)	23,024.0	(49,009.4)
Enrollment 1–499 (%)	60.0		21.1		26.7		26.1	
Enrollment 500–2499 (%)	30.0		22.5		13.3		20.7	
Enrollment 2500–4999 (%)	0.0		9.9		13.3		9.9	
Enrollment 5000+ (%)	10.0		46.5		46.7		43.2	
Percentage distribution of students in grades K–12								
Percent in grades K–5	53.5	(38.1)	49.7	(22.4)	52.4	(22.1)	50.8	(23.9)
Percent in grades 6–8	28.2	(32.0)	30.4	(22.5)	22.5	(16.6)	28.1	(22.2)
Percent in grades 9–12	18.3	(31.6)	19.9	(15.7)	25.1	(18.1)	21.1	(18.2)
Number of schools								
1 school (%)	50.0	(4.3)	19.7	(61.6)	23.3	(56.1)	23.4	(57.7)
2–5 schools (%)	40.0		23.9		16.7		23.4	
6–14 schools (%)	0.0		15.5		23.3		16.2	
15+ schools (%)	10.0		40.8		36.7		36.9	
Identified Student Percentage (ISP)	29.0	(11.7)	35.6	(16.7)	41.0	(14.2)	36.5	(15.9)
Students free/reduced lunch (%) (FRP)	75.0	(18.1)	66.6	(19.1)	70.4	(17.0)	68.4	(18.5)
Ratio of FRP to ISP								
Mean	2.3	(0.5)	2.3	(2.0)	2.0	(1.1)	2.2	(1.7)
Median	2.3		1.8		1.7		1.8	
Any charter schools (%)	80.0		80.8		80.0		80.5	
Percent Title I schools	77.1	(24.9)	71.1	(25.2)	70.2	(21.0)	71.4	(24.0)
Urban LEA (%)	20.0		45.7		44.8		43.1	
Percent students Black	12.3	(10.0)	24.2	(22.8)	32.9	(24.9)	25.4	(23.1)
Percent students Hispanic/Latino	40.9	(40.5)	27.8	(24.9)	17.9	(19.1)	26.4	(25.8)
<i>Total LEAs</i>	10		73		30		113	
<i>Number of LEAs with VSR data</i>	10		71		30		111	
<i>Number of LEAs with CCD data</i>	10		70		29		109	
School Variables								
Enrollment	881.4	(549.9)	684.9	(578.0)	534.5	(274.1)	686.9	(559.1)
ISP	23.0	(10.9)	42.1	(20.5)	58.6	(13.1)	42.0	(20.7)
Students free/reduced lunch (%)	41.2	(18.2)	58.7	(26.3)	79.5	(12.1)	59.2	(26.0)
Grade span								
K–5 (%)	45.2		42.7		70.4		45.2	
6–8 (%)	16.8		14.1		10.8		14.0	
9–12 (%)	21.5		14.6		5.4		14.3	
Other (%)	16.5		28.6		13.4		26.5	
Title I schools (%)	58.6		64.0		96.3		66.3	
Charter schools (%)	10.9		13.4		6.0		12.6	
Percent students Black	16.0	(14.5)	27.1	(25.7)	42.5	(29.5)	27.7	(26.0)
Percent students Hispanic/Latino	14.6	(16.6)	27.9	(24.0)	16.9	(17.5)	25.8	(23.4)
Total number of schools	328		3,653		359		4,340	
<i>Number of schools with CCD data</i>	321		3,550		351		4,222	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data).

Exhibit A.1.3: Regular and Charter LEA and School Characteristics—Georgia (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean (SD)		Mean (SD)		Mean (SD)		Mean (SD)	
LEA Variables								
Enrollment	4,364.7	(4,553.7)	6,577.1	(12,677.4)	8,992.9	(17,528.4)	6,832.4	(13,255.9)
Enrollment 1–499 (%)	10.8		8.8		6.1		8.4	
Enrollment 500–2499 (%)	32.4		29.8		36.7		32.9	
Enrollment 2500–4999 (%)	35.1		29.8		28.6		30.8	
Enrollment 5000+ (%)	21.6		31.6		28.6		28.0	
Percentage distribution of students in grades K–12								
Percent in grades K–5	45.5	(8.7)	47.5	(8.7)	48.7	(2.5)	47.5	(7.2)
Percent in grades 6–8	26.7	(13.7)	23.1	(3.7)	23.6	(1.3)	24.1	(7.1)
Percent in grades 9–12	27.9	(5.5)	29.4	(11.8)	27.7	(2.0)	28.4	(8.1)
Number of schools	6.8	(6.5)	9.4	(14.7)	13.1	(23.6)	10.0	(17.0)
1 school (%)	16.2		8.8		10.2		11.2	
2–5 schools (%)	48.6		50.9		51.0		50.3	
6–14 schools (%)	18.9		22.8		24.5		22.4	
15+ schools (%)	16.2		17.5		14.3		16.1	
Identified Student Percentage (ISP)	34.8	(3.0)	45.7	(11.6)	50.8	(9.1)	44.4	(11.0)
Students free/reduced lunch (%) (FRP)	64.5	(8.5)	71.4	(11.1)	75.8	(8.8)	71.1	(10.6)
Ratio of FRP to ISP								
Mean	1.9	(0.2)	1.6	(0.3)	1.5	(0.2)	1.7	(0.3)
Median	1.8		1.6		1.4		1.6	
Any charter schools (%)	29.7		26.3		28.6		28.0	
Percent Title I schools	0.0	(0.0)	0.0	(0.0)	0.0	(0.0)	0.0	(0.0)
Urban LEA (%)	0.0		9.3		14.9		9.0	
Percent students Black	18.1	(20.1)	38.1	(22.6)	46.3	(23.2)	36.3	(24.6)
Percent students Hispanic/Latino	8.1	(7.9)	6.9	(6.1)	8.0	(8.1)	7.6	(7.2)
<i>Total LEAs</i>	37		57		49		143	
<i>Number of LEAs with VSR data</i>	37		57		49		143	
<i>Number of LEAs with CCD data</i>	32		54		47		133	
School Variables								
Enrollment	639.2	(322.3)	687.3	(374.8)	606.1	(292.2)	656.5	(346.5)
ISP					63.2	(14.1)	63.2	(14.1)
Students free/reduced lunch (%)	63.2	(12.6)	65.8	(23.9)	82.2	(12.9)	70.0	(21.2)
Grade span								
K–5 (%)	51.9		48.4		58.1		51.5	
6–8 (%)	21.1		18.8		21.3		19.8	
9–12 (%)	16.2		18.6		14.0		17.0	
Other (%)	10.9		14.2		6.6		11.7	
Title I schools (%)	0.0		0.0		0.0		0.0	
Charter schools (%)	3.4		6.8		2.6		5.1	
Percent students Black	14.5	(18.0)	47.7	(31.5)	64.1	(28.1)	46.8	(32.9)
Percent students Hispanic/Latino	11.1	(13.0)	9.1	(12.7)	8.4	(10.4)	9.2	(12.2)
Total number of schools	275		1,009		436		1,720	
<i>Number of schools with CCD data</i>	266		948		422		1,636	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data). Note also that Georgia could not report school ISPs for non-participating schools and that non-participating schools in participating LEAs are treated as eligible even if they are missing a school ISP.

Exhibit A.1.4: Regular and Charter LEA and School Characteristics—Illinois (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean	(SD)	Mean	(SD)	Mean	(SD)	Mean	(SD)
LEA Variables								
Enrollment	922.9	(1,004.3)	5,161.5	(24,891.6)	8,082.4	(47,849.5)	4,793.4	(28,802.4)
Enrollment 1–499 (%)	41.2		23.0		35.5		29.9	
Enrollment 500–2499 (%)	54.4		44.7		43.5		46.7	
Enrollment 2500–4999 (%)	2.9		13.0		9.7		10.0	
Enrollment 5000+ (%)	1.5		19.3		11.3		13.4	
Percentage distribution of students in grades K–12								
Percent in grades K–5	53.9	(17.0)	50.9	(16.5)	57.1	(10.8)	53.0	(15.6)
Percent in grades 6–8	27.7	(9.4)	25.8	(8.9)	28.4	(5.7)	26.8	(8.4)
Percent in grades 9–12	18.4	(25.8)	23.2	(25.0)	14.5	(15.4)	20.1	(23.5)
Number of schools								
1 school (%)	38.2	(1.4)	13.7	(7.4)	19.4	(73.7)	20.6	(34.5)
2–5 schools (%)	60.3		55.3		58.1		57.0	
6–14 schools (%)	1.5		23.0		14.5		16.2	
15+ schools (%)	0.0		8.1		8.1		6.2	
Identified Student Percentage (ISP)	33.2	(2.7)	39.2	(13.5)	50.5	(20.0)	40.2	(14.8)
Students free/reduced lunch (%) (FRP)	59.0	(11.0)	64.8	(19.2)	71.2	(17.7)	64.9	(17.7)
Ratio of FRP to ISP								
Mean	1.8	(0.3)	1.7	(0.4)	1.9	(1.0)	1.8	(0.6)
Median	1.7		1.6		1.7		1.7	
Any charter schools (%)	3.0		6.2		10.1		6.4	
Percent Title I schools	95.2	(18.4)	90.5	(17.0)	95.8	(10.3)	92.8	(16.2)
Urban LEA (%)	1.5		7.6		7.5		6.2	
Percent students Black	8.4	(16.8)	14.8	(22.4)	29.9	(34.6)	16.8	(25.8)
Percent students Hispanic/Latino	10.4	(16.1)	16.4	(21.0)	11.9	(19.4)	14.0	(19.8)
<i>Total LEAs</i>	68		162		69		299	
<i>Number of LEAs with VSR data</i>	68		161		62		291	
<i>Number of LEAs with CCD data</i>	65		157		67		289	
School Variables								
Enrollment	359.1	(253.9)	536.3	(559.7)	512.3	(365.7)	515.5	(494.0)
ISP	31.9	(4.8)	36.6	(22.5)	60.8	(19.4)	37.3	(21.9)
Students free/reduced lunch (%)	53.8	(13.7)	60.7	(25.0)	87.9	(14.1)	68.0	(25.1)
Grade span								
K–5 (%)	37.6		50.2		29.6		43.4	
6–8 (%)	25.3		14.9		10.8		14.6	
9–12 (%)	21.8		15.0		10.4		14.2	
Other (%)	15.3		19.8		49.2		27.8	
Title I schools (%)	95.9		75.7		97.9		83.6	
Charter schools (%)	0.0		2.7		1.9		2.3	
Percent students Black	7.0	(15.8)	23.4	(29.6)	52.6	(40.7)	30.6	(35.6)
Percent students Hispanic/Latino	13.4	(20.5)	24.7	(27.3)	27.3	(36.1)	24.5	(29.8)
Total number of schools	173		1,435		659		2,267	
<i>Number of schools with CCD data</i>	170		1,405		628		2,203	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data).

Exhibit A.1.5: Regular and Charter LEA and School Characteristics—Kentucky (SY 2013–14)

	Near Eligible	Eligible Non-Participating	Participating	Combined
	Mean (SD)	Mean (SD)	Mean (SD)	Mean (SD)
LEA Variables				
Enrollment		4,236.5 (10,421.4)	4,059.6 (5,359.1)	4,167.6 (8,784.0)
Enrollment 1–499 (%)		5.9	3.1	4.8
Enrollment 500–2499 (%)		48.0	43.1	46.1
Enrollment 2500–4999 (%)		29.4	36.9	32.3
Enrollment 5000+ (%)		16.7	16.9	16.8
Percentage distribution of students in grades K–12				
Percent in grades K–5		46.8 (4.5)	47.8 (3.9)	47.2 (4.3)
Percent in grades 6–8		23.4 (1.4)	23.0 (1.4)	23.2 (1.4)
Percent in grades 9–12		29.8 (4.7)	29.3 (4.5)	29.6 (4.6)
Number of schools				
1 school (%)		11.8	1.5	7.8
2–5 schools (%)		45.1	40.0	43.1
6–14 schools (%)		35.3	47.7	40.1
15+ schools (%)		7.8	10.8	9.0
Identified Student Percentage (ISP)		36.5 (11.0)	48.0 (16.7)	41.0 (14.6)
Students free/reduced lunch (%) (FRP)		60.0 (15.1)	66.6 (13.0)	62.6 (14.6)
Ratio of FRP to ISP				
Mean		1.7 (0.3)	1.8 (0.6)	1.7 (0.5)
Median		1.6	1.6	1.6
Any charter schools (%)		0.0	0.0	0.0
Percent Title I schools		76.5 (19.4)	78.9 (15.4)	77.5 (18.0)
Urban LEA (%)		2.9	4.6	3.6
Percent students Black		4.7 (6.4)	6.3 (10.2)	5.3 (8.1)
Percent students Hispanic/Latino		3.3 (2.8)	3.0 (3.9)	3.1 (3.3)
Total LEAs	0	102	65	167
Number of LEAs with VSR data	0	102	65	167
Number of LEAs with CCD data	0	102	65	167
School Variables				
Enrollment	739.5 (411.1)	483.7 (345.5)	427.2 (218.8)	484.6 (330.4)
ISP	26.9 (8.7)	44.0 (17.1)	61.6 (12.4)	47.9 (18.2)
Students free/reduced lunch (%)	38.5 (12.1)	55.1 (20.9)	69.6 (11.7)	57.7 (20.2)
Grade span				
K–5 (%)	48.1	42.4	53.7	45.2
6–8 (%)	27.2	15.3	11.4	15.1
9–12 (%)	24.7	27.2	12.6	23.9
Other (%)	0.0	15.1	22.3	15.9
Title I schools (%)	63.0	63.8	92.7	70.1
Charter schools (%)	0.0	0.0	0.0	0.0
Percent students Black	8.6 (9.2)	12.8 (17.5)	6.0 (11.4)	10.9 (16.1)
Percent students Hispanic/Latino	4.8 (3.9)	4.8 (7.0)	2.7 (4.5)	4.3 (6.4)
Total number of schools	85	1,163	369	1,617
Number of schools with CCD data	81	1,128	341	1,550

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data).

Exhibit A.1.6: Regular and Charter LEA and School Characteristics—Maryland (SY 2013–14)

	Near Eligible	Eligible Non-Participating	Participating	Combined
	Mean (SD)	Mean (SD)	Mean (SD)	Mean (SD)
LEA Variables		38,963.2 (43,976.6)	22,060.0	38,194.9 (43,067.8)
Enrollment		0.0	0.0	0.0
Enrollment 1–499 (%)		4.8	0.0	4.5
Enrollment 500–2499 (%)		14.3	0.0	13.6
Enrollment 2500–4999 (%)		81.0	100.0	81.8
Enrollment 5000+ (%)				
Percentage distribution of students in grades K–12		46.1 (2.1)	46.2	46.1 (2.1)
Percent in grades K–5		22.3 (0.7)	23.2	22.4 (0.7)
Percent in grades 6–8		31.5 (1.7)	30.7	31.5 (1.6)
Percent in grades 9–12		64.7 (69.6)	46.0	63.9 (68.0)
Number of schools		0.0	0.0	0.0
1 school (%)		0.0	0.0	0.0
2–5 schools (%)		28.6	0.0	27.3
6–14 schools (%)		71.4	100.0	72.7
15+ schools (%)		27.6 (15.2)	27.4	27.6 (14.9)
Identified Student Percentage (ISP)		43.9 (18.5)	48.7	44.1 (18.1)
Students free/reduced lunch (%) (FRP)				
Ratio of FRP to ISP		1.7 (0.4)	1.8	1.7 (0.3)
Mean		1.6	1.8	1.6
Median		28.6	0.0	27.3
Any charter schools (%)		27.3 (18.4)	12.8	26.6 (18.3)
Percent Title I schools		9.5	0.0	9.1
Urban LEA (%)		26.9 (21.0)	11.9	26.2 (20.8)
Percent students Black		7.9 (6.0)	5.8	7.8 (5.8)
Percent students Hispanic/Latino	0	21	1	22
<i>Total LEAs</i>	0	21	1	22
<i>Number of LEAs with VSR data</i>	0	21	1	22
<i>Number of LEAs with CCD data</i>				
School Variables	504.0 (317.8)	606.2 (400.8)	445.7 (201.7)	603.3 (398.8)
Enrollment	21.9 (8.3)	29.4 (21.6)	59.0 (10.1)	29.4 (21.5)
ISP	41.6 (13.9)	46.9 (28.4)	82.7 (9.5)	46.9 (28.1)
Students free/reduced lunch (%)				
Grade span	54.3	55.6	100.0	55.7
K–5 (%)	17.1	16.1	0.0	16.1
6–8 (%)	22.9	16.5	0.0	16.6
9–12 (%)	5.7	11.7	0.0	11.6
Other (%)	0.0	25.6	100.0	25.2
Title I schools (%)	0.0	3.7	0.0	3.6
Charter schools (%)	8.5 (7.9)	39.4 (33.1)	20.7 (2.3)	38.6 (33.0)
Percent students Black	4.7 (3.0)	11.8 (14.9)	6.5 (2.8)	11.6 (14.7)
Percent students Hispanic/Latino	36	1,423	5	1,464
Total number of schools	35	1,381	3	1,419
<i>Number of schools with CCD data</i>				

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data).

Exhibit A.1.7: Regular and Charter LEA and School Characteristics—Massachusetts (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean (SD)		Mean (SD)		Mean (SD)		Mean (SD)	
LEA Variables								
Enrollment	2,685.9	(2,776.6)	7,872.7	(8,183.1)	58,478.0		7,293.5	(11,026.0)
Enrollment 1–499 (%)	21.4		26.1		0.0		23.7	
Enrollment 500–2499 (%)	42.9		13.0		0.0		23.7	
Enrollment 2500–4999 (%)	7.1		8.7		0.0		7.9	
Enrollment 5000+ (%)	28.6		52.2		100.0		44.7	
Percentage distribution of students in grades K–12								
Percent in grades K–5	45.2	(23.4)	53.7	(20.4)	47.1		50.4	(21.4)
Percent in grades 6–8	26.2	(16.1)	19.7	(8.5)	21.3		22.2	(12.0)
Percent in grades 9–12	28.6	(24.0)	26.6	(19.8)	31.5		27.5	(20.9)
Number of schools	5.4	(5.0)	16.4	(17.3)	140.0		15.6	(25.4)
1 school (%)	28.6		26.1		0.0		26.3	
2–5 schools (%)	35.7		4.3		0.0		15.8	
6–14 schools (%)	35.7		26.1		0.0		28.9	
15+ schools (%)	0.0		43.5		100.0		28.9	
Identified Student Percentage (ISP)	34.6	(3.6)	52.5	(9.5)	100.0		47.2	(14.5)
Students free/reduced lunch (%) (FRP)	68.5	(16.6)	76.4	(10.4)	57.7		73.0	(13.5)
Ratio of FRP to ISP								
Mean	2.0	(0.4)	1.5	(0.3)	0.6		1.6	(0.5)
Median	2.0		1.5		0.6		1.6	
Any charter schools (%)	42.9		26.1		0.0		31.6	
Percent Title I schools	80.5	(19.9)	79.2	(25.6)	82.2		79.8	(22.9)
Urban LEA (%)	15.4		33.3		100.0		28.6	
Percent students Black	11.5	(11.7)	13.9	(16.4)	33.7		13.6	(14.8)
Percent students Hispanic/Latino	24.0	(18.1)	42.8	(25.8)	43.0		35.8	(24.3)
<i>Total LEAs</i>	14		23		1		38	
<i>Number of LEAs with VSR data</i>	14		23		1		38	
<i>Number of LEAs with CCD data</i>	13		21		1		35	
School Variables								
Enrollment	567.4	(405.6)	528.2	(415.9)	470.3	(336.1)	519.9	(397.9)
ISP								
Students free/reduced lunch (%)	54.3	(18.6)	74.8	(16.3)	70.5	(13.9)	71.1	(17.5)
Grade span								
K–5 (%)	50.0		59.0		44.4		54.1	
6–8 (%)	18.2		17.3		8.9		15.2	
9–12 (%)	15.2		13.3		22.2		15.8	
Other (%)	16.7		10.5		24.4		14.9	
Title I schools (%)	69.7		82.7		82.2		81.0	
Charter schools (%)	7.6		1.2		0.0		1.7	
Percent students Black	7.1	(7.7)	13.1	(13.3)	34.6	(18.5)	17.3	(17.1)
Percent students Hispanic/Latino	19.5	(15.2)	43.6	(25.8)	44.4	(17.8)	40.6	(24.3)
Total number of schools	66		324		135		525	
<i>Number of schools with CCD data</i>	66		324		135		525	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data). Since Massachusetts did not report school-level data, the figures in this table derive exclusively from the CCD. The only participating LEA in Massachusetts was Boston Public Schools, which elected to adopt the CEP in all schools. However, the total number of participating schools

reported in this table is based on the number of schools in Boston Public for which the Common Core reports school-level data. This number (135) is fewer than the total number of schools in Boston Public reported by the State (144).

Exhibit A.1.8: Regular and Charter LEA and School Characteristics—Michigan (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean (SD)		Mean (SD)		Mean (SD)		Mean (SD)	
LEA Variables								
Enrollment	607.2	(478.7)	2,152.3	(3,002.9)	2,684.9	(7,198.8)	2,097.3	(4,158.7)
Enrollment 1–499 (%)	49.1		21.3		34.6		27.1	
Enrollment 500–2499 (%)	50.9		52.4		43.9		50.5	
Enrollment 2500–4999 (%)	0.0		18.2		10.3		14.5	
Enrollment 5000+ (%)	0.0		8.1		11.2		7.9	
Percentage distribution of students in grades K–12								
Percent in grades K–5	53.7	(20.6)	44.6	(19.0)	54.5	(18.6)	47.6	(19.6)
Percent in grades 6–8	23.0	(8.9)	22.7	(9.0)	22.3	(8.2)	22.7	(8.8)
Percent in grades 9–12	23.4	(19.9)	32.7	(22.4)	23.2	(19.4)	29.8	(22.0)
Number of schools								
1 school (%)	65.5		27.7		40.2		34.4	
2–5 schools (%)	34.5		43.5		34.6		40.7	
6–14 schools (%)	0.0		25.4		17.8		21.0	
15+ schools (%)	0.0		3.5		7.5		3.9	
Identified Student Percentage (ISP)								
Students free/reduced lunch (%) (FRP)	57.7	(9.6)	62.9	(18.8)	78.9	(16.4)	65.7	(18.8)
Ratio of FRP to ISP								
Mean	2.1	(0.6)	3.1	(13.4)	1.8	(0.5)	2.7	(11.2)
Median	1.9		1.8		1.6		1.8	
Any charter schools (%)								
Percent Title I schools	93.2	(18.5)	83.2	(24.7)	88.2	(16.9)	85.4	(22.9)
Urban LEA (%)	12.5		21.7		41.7		24.5	
Percent students Black	7.5	(16.6)	25.2	(35.5)	47.3	(40.1)	27.5	(36.6)
Percent students Hispanic/Latino	5.1	(8.1)	6.6	(10.9)	6.9	(10.8)	6.5	(10.6)
<i>Total LEAs</i>								
<i>Number of LEAs with VSR data</i>	55		347		107		509	
<i>Number of LEAs with CCD data</i>	64		382		108		554	
School Variables								
Enrollment	406.5	(317.5)	437.2	(325.8)	398.8	(256.5)	428.0	(313.7)
ISP	30.1	(7.7)	39.2	(17.9)	64.3	(16.0)	43.7	(20.0)
Students free/reduced lunch (%)	49.2	(13.7)	57.3	(20.2)	81.0	(12.9)	61.3	(21.1)
Grade span								
K–5 (%)	35.6		45.0		43.8		44.2	
6–8 (%)	14.4		16.0		11.2		15.1	
9–12 (%)	19.4		23.9		20.0		22.9	
Other (%)	30.6		15.1		25.1		17.8	
Title I schools (%)								
Charter schools (%)	19.4		8.1		12.6		9.6	
Percent students Black	5.3	(14.0)	18.5	(28.6)	53.2	(37.0)	24.3	(33.0)
Percent students Hispanic/Latino	4.2	(5.9)	6.6	(10.4)	11.8	(18.4)	7.5	(12.3)
Total number of schools								
<i>Number of schools with CCD data</i>	160		2,035		497		2,761	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data).

Exhibit A.1.9: Regular and Charter LEA and School Characteristics—New York (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean	(SD)	Mean	(SD)	Mean	(SD)	Mean	(SD)
LEA Variables								
Enrollment	2,771.7	(5,415.6)	674.0	(634.9)	42,637.9	(208,584.8)	20,207.8	(140,340.5)
Enrollment 1–499 (%)	23.8		61.1		34.4		38.0	
Enrollment 500–2499 (%)	57.1		38.9		18.8		35.2	
Enrollment 2500–4999 (%)	14.3		0.0		6.3		7.0	
Enrollment 5000+ (%)	4.8		0.0		40.6		19.7	
Percentage distribution of students in grades K–12								
Percent in grades K–5	48.4	(13.8)	52.3	(35.6)	62.3	(24.1)	56.0	(25.4)
Percent in grades 6–8	23.4	(8.7)	21.4	(24.8)	22.3	(16.9)	22.4	(17.1)
Percent in grades 9–12	28.3	(7.3)	26.2	(38.8)	15.3	(14.5)	21.6	(22.0)
Number of schools								
1 school (%)	33.3		72.2		37.5		45.1	
2–5 schools (%)	38.1		22.2		15.6		23.9	
6–14 schools (%)	23.8		5.6		25.0		19.7	
15+ schools (%)	4.8		0.0		21.9		11.3	
Identified Student Percentage (ISP)								
Students free/reduced lunch (%) (FRP)	58.3	(9.1)	80.7	(11.8)	78.8	(13.7)	73.2	(15.3)
Ratio of FRP to ISP								
Mean	1.7	(0.2)	1.7	(0.3)	2.5	(3.5)	2.1	(2.3)
Median	1.7		1.7		1.5		1.6	
Any charter schools (%)								
Percent Title I schools	96.8	(7.6)	94.1	(24.3)	86.7	(32.3)	91.3	(25.8)
Urban LEA (%)	15.0		64.7		88.2		62.0	
Percent students Black	13.4	(18.7)	55.6	(36.1)	53.9	(24.4)	42.5	(31.9)
Percent students Hispanic/Latino	14.4	(16.7)	20.7	(22.6)	21.8	(16.8)	19.4	(18.3)
<i>Total LEAs</i>								
	21		18		34		73	
<i>Number of LEAs with VSR data</i>								
	21		18		32		71	
<i>Number of LEAs with CCD data</i>								
	20		17		34		71	
School Variables								
Enrollment	559.2	(266.7)	627.8	(525.3)	577.1	(333.3)	615.5	(487.1)
ISP					60.7	(19.5)	60.7	(19.5)
Students free/reduced lunch (%)	62.7	(16.3)	73.8	(21.7)	79.7	(13.9)	74.3	(20.6)
Grade span								
K–5 (%)	47.6		39.7		50.6		42.0	
6–8 (%)	10.7		18.9		9.3		16.8	
9–12 (%)	15.5		24.7		12.7		22.1	
Other (%)	26.2		16.8		27.4		19.1	
Title I schools (%)								
Charter schools (%)	96.1		92.8		87.3		92.0	
Charter schools (%)	1.9		0.8		8.5		2.2	
Percent students Black	14.5	(13.4)	35.0	(28.5)	43.3	(25.8)	35.5	(28.1)
Percent students Hispanic/Latino	29.5	(24.8)	40.3	(25.9)	25.0	(20.9)	37.1	(25.7)
Total number of schools								
	103		1,593		469		2,165	
<i>Number of schools with CCD data</i>								
	103		1,585		354		2,042	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data). Note also that New York could not report school ISPs for non-participating schools and that non-participating schools in participating LEAs are treated as eligible even if they are missing a school ISP.

Exhibit A.1.10: Regular and Charter LEA and School Characteristics—Ohio (SY 2013–14)

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean	(SD)	Mean	(SD)	Mean	(SD)	Mean	(SD)
LEA Variables								
Enrollment	1,905.5	(2,283.4)	1,689.9	(5,595.5)	1,518.0	(4,469.1)	1,695.1	(4,449.9)
Enrollment 1–499 (%)	17.9		64.4		65.6		51.2	
Enrollment 500–2499 (%)	62.3		23.0		22.1		34.2	
Enrollment 2500–4999 (%)	14.2		7.4		5.7		8.8	
Enrollment 5000+ (%)	5.7		5.2		6.6		5.8	
Percentage distribution of students in grades K–12								
Percent in grades K–5	46.5	(18.6)	56.1	(29.5)	56.8	(31.1)	53.4	(27.6)
Percent in grades 6–8	22.9	(10.6)	22.9	(19.0)	23.7	(22.5)	23.1	(18.2)
Percent in grades 9–12	30.6	(20.1)	21.1	(31.5)	19.4	(27.2)	23.4	(27.4)
Number of schools								
1 school (%)	25.5	(3.6)	73.3	(11.5)	67.2	(9.9)	57.3	(9.2)
2–5 schools (%)	57.5		17.0		22.1		30.6	
6–14 schools (%)	16.0		6.7		5.7		9.1	
15+ schools (%)	0.9		3.0		4.9		3.0	
Identified Student Percentage (ISP)								
Students free/reduced lunch (%) (FRP)	61.7	(12.3)	84.6	(13.5)	84.0	(13.8)	77.7	(16.8)
Ratio of FRP to ISP								
Mean	1.8	(0.3)	1.6	(0.3)	1.6	(0.5)	1.6	(0.4)
Median	1.7		1.5		1.5		1.6	
Any charter schools (%)								
Percent Title I schools	94.3	(14.1)	93.1	(23.0)	96.7	(14.6)	94.6	(18.1)
Urban LEA (%)								
Percent students Black	16.7	(27.6)	55.4	(34.9)	47.9	(36.5)	41.2	(37.2)
Percent students Hispanic/Latino	3.4	(5.7)	5.7	(9.2)	7.6	(13.5)	5.6	(10.1)
<i>Total LEAs</i>								
Number of LEAs with VSR data	106		135		122		363	
Number of LEAs with CCD data	106		131		113		350	
School Variables								
Enrollment	481.4	(287.5)	429.7	(266.4)	421.3	(251.2)	443.0	(270.0)
ISP								
Students free/reduced lunch (%)	56.7	(24.4)	68.5	(29.7)	80.0	(19.9)	68.1	(27.2)
Grade span								
K–5 (%)	50.5		39.4		38.5		42.5	
6–8 (%)	21.7		14.4		9.8		15.3	
9–12 (%)	19.2		16.1		13.7		16.4	
Other (%)	8.6		30.2		38.0		25.8	
Title I schools (%)								
Charter schools (%)	4.7		15.6		19.5		13.4	
Percent students Black	14.7	(23.8)	44.0	(34.1)	48.7	(34.8)	36.5	(34.7)
Percent students Hispanic/Latino	4.1	(6.9)	5.4	(7.9)	7.9	(13.2)	5.7	(9.5)
Total number of schools								
Number of schools with CCD data	445		659		409		1,513	
Number of schools with CCD data	428		620		379		1,427	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data). Note also that Ohio could not report school ISPs for non-participating schools and that non-participating schools in participating LEAs are treated as eligible even if they are missing a school ISP.

**Exhibit A.1.11: Regular and Charter LEA and School Characteristics—West Virginia
(SY 2013–14)**

	Near Eligible		Eligible Non-Participating		Participating		Combined	
	Mean	(SD)	Mean	(SD)	Mean	(SD)	Mean	(SD)
LEA Variables								
Enrollment	1,126.5	(132.2)	4,539.6	(4,109.5)	5,435.7	(5,329.1)	5,060.4	(4,994.0)
Enrollment 1–499 (%)	0.0		0.0		0.0		0.0	
Enrollment 500–2499 (%)	100.0		46.2		30.8		37.0	
Enrollment 2500–4999 (%)	0.0		30.8		38.5		35.2	
Enrollment 5000+ (%)	0.0		23.1		30.8		27.8	
Percentage distribution of students in grades K–12								
Percent in grades K–5	41.3	(2.3)	45.3	(1.6)	46.2	(1.9)	45.8	(2.0)
Percent in grades 6–8	25.1	(0.0)	23.7	(0.6)	23.3	(1.0)	23.5	(1.0)
Percent in grades 9–12	33.6	(2.3)	31.0	(1.5)	30.4	(1.7)	30.7	(1.7)
Number of schools								
1 school (%)	0.0	(0.0)	0.0	(8.2)	0.0	(11.7)	0.0	(10.9)
2–5 schools (%)	100.0		30.8		17.9		24.1	
6–14 schools (%)	0.0		46.2		51.3		48.1	
15+ schools (%)	0.0		23.1		30.8		27.8	
Identified Student Percentage (ISP)								
Students free/reduced lunch (%) (FRP)	27.9	(0.6)	34.6	(5.3)	40.2	(16.6)	38.4	(14.7)
Ratio of FRP to ISP								
Mean	1.8	(0.1)	1.5	(0.2)	1.5	(0.1)	1.5	(0.1)
Median	1.8		1.5		1.5		1.5	
Any charter schools (%)								
Percent Title I schools	0.0		0.0		0.0		0.0	
Urban LEA (%)	53.3	(18.9)	50.8	(18.6)	55.1	(16.4)	54.0	(16.8)
Percent students Black	0.0		15.4		2.6		5.6	
Percent students Hispanic/Latino	0.7	(0.3)	1.9	(1.2)	3.1	(3.7)	2.7	(3.2)
<i>Total LEAs</i>	0.8	(0.8)	0.9	(1.0)	0.8	(1.2)	0.8	(1.1)
<i>Number of LEAs with VSR data</i>	2		13		39		54	
<i>Number of LEAs with CCD data</i>	2		13		39		54	
School Variables								
Enrollment	534.2	(373.3)	447.5	(295.3)	328.9	(198.1)	398.8	(274.0)
ISP	29.4	(6.1)	37.9	(12.9)	49.7	(12.0)	42.7	(13.9)
Students free/reduced lunch (%)	44.0	(8.0)	52.3	(13.7)	63.1	(12.9)	56.7	(14.5)
Grade span								
K–5 (%)								
6–8 (%)	46.1		41.4		70.9		56.0	
9–12 (%)	21.3		19.7		12.8		16.6	
Other (%)	19.1		18.3		7.0		13.0	
Title I schools (%)	13.5		20.7		9.3		14.4	
Charter schools (%)	24.7		32.8		67.4		48.3	
Percent students Black	0.0		0.0		0.0		0.0	
Percent students Hispanic/Latino	4.2	(4.9)	2.7	(4.3)	5.6	(10.0)	4.4	(7.9)
Total number of schools	2.3	(2.6)	0.9	(2.3)	0.9	(2.1)	1.1	(2.3)
<i>Number of schools with CCD data</i>	90		292		345		727	
	89		290		344		723	

Notes: The total number of schools refers to the total number of schools for which school-level data was reported (either by the State or by the Common Core of Data).