



Oklahoma CEP

A look at Community Eligibility Provision findings from 2024-2025





Report Contents

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Key Findings

- The Community Eligibility Provision (CEP) is a federal program that allows schools to draw down more federal funds to feed children at no-cost in high poverty areas.
- Since 2019, the amount of Oklahoma children able to access no-cost meals via CEP has more than doubled.ⁱ
- In SY 2018-2019, the Oklahoma State Department of Education reported 117,183 students enrolled in schools that operated CEP. The latest data shows that in School Year 2024-2025, that number jumped to 277,458 students.



The expansion of CEP for Tulsa Public Schools has been instrumental in ensuring the key conditions for learning are met for all students. We firmly believe that having quality nutrition for every student is a crucial part of our overall strategy."

Dr. Ebony Johnson, Superintendent for Tulsa Public Schools



**More funding,
more meals.**



**No-cost meals
doubled.**



Enrollment soared.

- CEP makes it easier for schools to manage child nutrition programs and helps improve food quality, nutrition, and service for all students, not just those who qualify for free meals.
- Since Oklahoma opted to implement the Medicaid Direct Certification Pilot, the number of eligible schools and schools adopting CEP has increased significantly. Between SY 23-24 and SY 24-25, the number of schools operating CEP increased by over 200 percent.ⁱⁱ
- CEP in Oklahoma means nearly 40% of children can access no-cost meals, which ensures they can get the food they need to thrive and that child nutrition administrators can continue to work to provide healthy, nutritious options at school.



Better food for all.



**Medicaid boosted
access.**



**40% of kids
covered.**

Summary

High rates of child food insecurity and food-price inflation have prompted many Oklahomans to consider how they can better serve the children in their communities. In response, schools have begun exploring the viability of providing no-cost meals to all students, primarily by utilizing a federal option called the Community Eligibility Provision (CEP). This program allows schools to draw down additional federal dollars to feed all kids at no cost to the child.

Introduction

One in five Oklahoma children is considered food insecure.ⁱⁱⁱ For many of these children, school not only is a means of education, but also provides access to nutritious meals when otherwise they would go without. Under the National School Lunch Program, children from low-income families can qualify for free or reduced-price meals if they 1) fall below the income thresholds and 2) submit the forms schools utilize to certify students for free and reduced-price meals. While this program has been successful at many schools over several decades, an increasing number of schools have begun considering providing meals at no cost for all students regardless of income. There's a wealth of evidence that points to school meals helping increase student attendance, test scores, behavior, and overall well-being in the classroom.^{iv}



From March 2020 to June 2022, the federal government provided schools with the resources to feed all kids at no cost to families. After the sunset of this program, Average Daily Participation (ADP) dropped by 23.1% for breakfast and 13.2% for lunch among schools that resumed charging for meals.^v The popularity of this program among community members inspired many schools and states to implement universal feeding after the pandemic-era policy ended. School administrators saw the positive impacts of no-cost meals and wanted to continue supplying children with the vital nutrition they needed to learn. States including California, Colorado, Maine, Michigan, Minnesota, New Mexico, and Vermont have since implemented universal no-cost school meals, and the Community Eligibility Provision (CEP) has been at the center of making this policy successful.



There is no better investment than investing in the future of Oklahomans."
Shonia Hall, Child Nutrition Director at Oklahoma City Public Schools



CEP Background

The Community Eligibility Provision (CEP) is a federal program that allows high-poverty schools and districts to provide breakfast and lunch at no charge to all students. A 2022 survey conducted by the Food and Resource Action Center (FRAC) showed school districts praising how CEP simplifies school meals programs by reducing administrative paperwork; increasing school meal participation; eliminating stigma; and making it easier to implement Breakfast in the Classroom and

other innovative breakfast models.^{vi} Community eligibility is a win for everyone — administrators, students, families, and school nutrition staff.

Schools are eligible for CEP if their Identified Student Percentage (ISP) is 25% or higher. “Identified students” are children who are eligible for free school meals and are already identified by means other than an individual household school meal application, such as participation in other means-tested

programs like the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian Reservations (FDPIR), Temporary Assistance for Needy Families (TANF), and recently, Medicaid (Soonercare). The higher the ISP, the more federal funds schools can access to provide no-cost meals.

The schools participating in CEP often see increased economies of scale on food and service costs, spending 67 cents less per lunch



served and 58 cents less per breakfast when accounting for food, labor, and administrative costs (The School Nutrition Meal Cost Study, 2021).^{vii}

Schools that operate CEP commonly see increased participation in school meals, especially school breakfast. A study on CEP from the United States Department of Agriculture (USDA)

saw that in SY 2016-2017, there was a 6.8 increase in school lunch participation, and a 12.1 percent increase in school breakfast. In Oklahoma, there has been a steady increase in schools' CEP participation rates as awareness has grown among school districts and child nutrition departments have begun exploring the viability and benefits of the program for their students.



How It Works

CEP schools are reimbursed with federal funds at a percentage of 1.6 multiplied by their ISP. The CEP multiplier is set by Congress. For federal funds to fully cover the cost of providing no-cost meals for all students, schools must have an ISP of 62.5% or higher:

62.5 percent ISP x 1.6 CEP multiplier = 100% cost of meals reimbursed by federal dollars.

While schools with ISPs at 25% or higher can operate CEP, they will likely need to seek out additional revenue sources to make up the difference:

40 percent ISP x 1.6 CEP multiplier = 64% cost of meals reimbursed by federal dollars. The remaining estimated 36% cost must be covered by alternative revenue sources, usually from within the school district itself.

Elementary school direct certification rates tend to be higher than middle and high schools, and the cost of meals is lower, so many districts will begin operating CEP at these schools to pilot the program and test viability for district-wide implementation. Districts can also group sites together, utilizing higher direct certification rates at certain sites to bring up the average ISP of a group of sites to ensure school meal coverage and reduce administrative burden across a wider number of sites.

This is the approach both Oklahoma City Public Schools (OKCPS) and Altus Public Schools took before implementing CEP district-wide. Sabina Garrett, Director of Child Nutrition at Altus Public Schools reported that they first piloted the program in 2017 at four elementary school sites.





Once they saw an uptake in school meal participation at these pilot schools and more need for the program, they expanded to additional sites. Altus' high schools were the last to be incorporated into the program. Garrett spoke about how older students can be a more challenging group to feed, and required a different approach to figure out what the high schoolers wanted to eat. However, their program saw great success, with high school breakfast participation jumping from 30 to 70 percent after implementing CEP.

Under community eligibility, schools no longer must collect and process school meal applications, which reduces administrative costs and paperwork,

allowing school nutrition staff to focus more on offering healthy, appealing meals. Moreover, offering meals at no charge to all students eliminates the stigma from the perception that school meals are only for "children from low-income families," and facilitates the implementation of breakfast after the bell service models, such as breakfast in the classroom, which further boosts participation. CEP schools still track student information using data collected during enrollment and the economically disadvantaged forms to receive certain Title I funds.

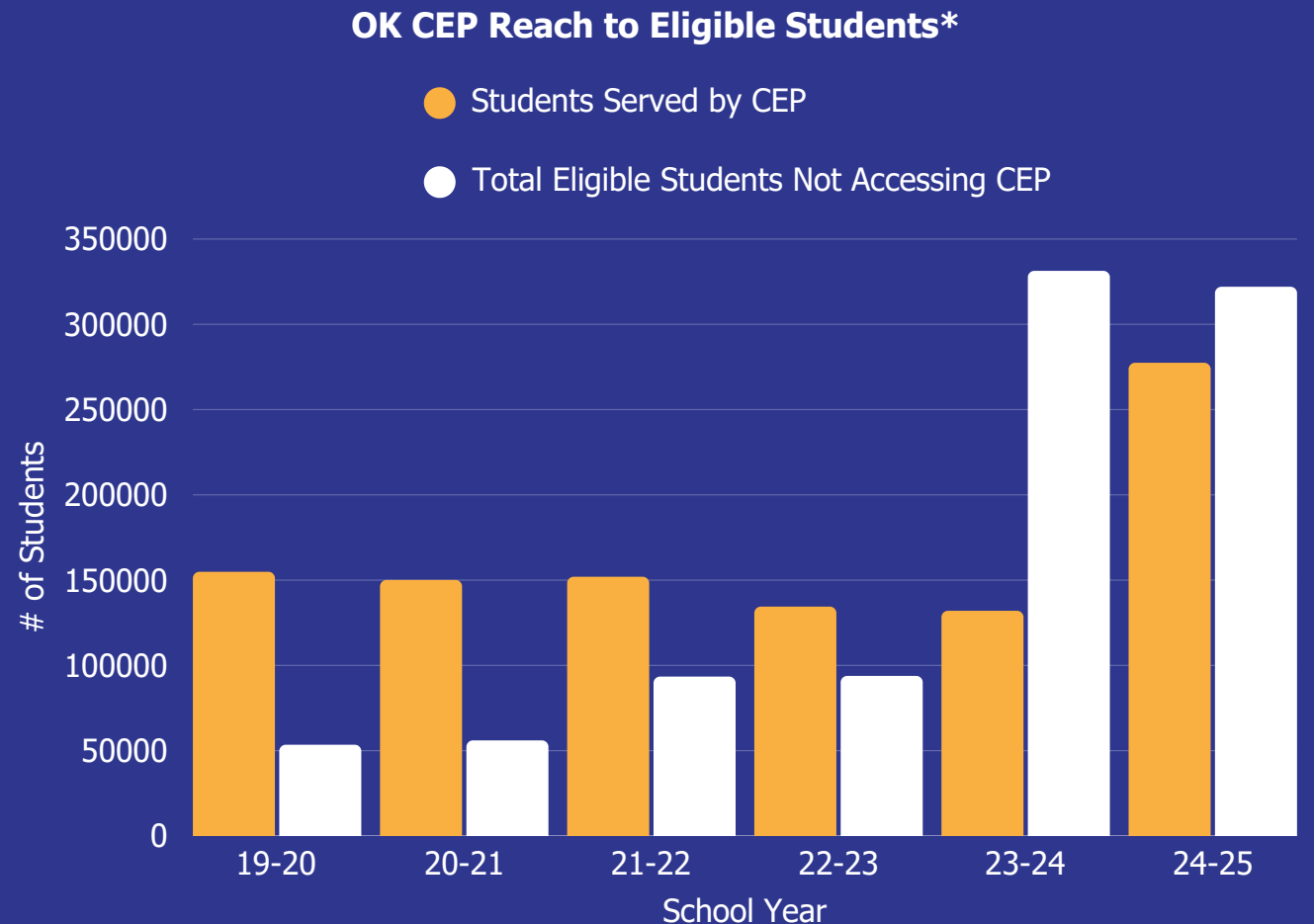


Parents would call in and say are you sure? How are you doing this? Lots of vocal appreciation. District staff applauded the program."

Sabina Garrett, Child Nutrition Director for Altus Public Schools

Landscape and Challenges

According to the Oklahoma State Department of Education, 267 districts and 849 schools were participating in CEP in Oklahoma at the end of 2024.^{ixx} That means almost 280,000 children in Oklahoma have access to no-cost school meals this year through CEP. After Oklahoma opted to participate in the Medicaid Direct Certification pilot, a program that permits students from Medicaid households to count towards that CEP identified student percentage, the state saw more than a 200% increase in CEP participation and eligibility.



Source: OSDE Community Eligibility Data

- In 2025, 256 Oklahoma school districts reported operating CEP district-wide.
- In 11 school districts, only some schools are operating CEP.
- Based on direct certification rates, 264 Oklahoma school districts are eligible to operate CEP but are not currently implementing it. That includes 786 eligible schools.

*In 2023, USDA lowered the CEP threshold from 40% to 25%, significantly increasing school eligibility in Oklahoma from SY 2022–2023 to SY 2023–2024.

Even with the progress made to simplify CEP implementation, schools still face tough choices at every step. While CEP often reduces administrative burdens and cuts costs, it also requires schools to build new systems—for meal counting, staff training, and strict compliance with federal rules. Messaging to families and students is also crucial at this stage, as it helps to not only ensure students are getting meals but also helps build community support for the programs. Both Child Nutrition Directors interviewed mentioned that partial CEP implementation can lead to some confusion on the part of families.

Families that are used to their children receiving free school meals at elementary school may not realize free meals are not offered at middle or high school. That's why strong, consistent communication with families isn't just helpful, it's essential.

For many districts running CEP, the biggest challenge isn't just feeding kids, it's making sure they can afford to. Maximizing direct certification rates to draw down federal funds was cited as the top concern for districts operating the program.

Direct certification rates can fluctuate from year to year, and even a small decrease in ISP could have major financial implications for a district's child nutrition program. Many districts' child nutrition departments operate on a separate budget from the school district itself and are sustained entirely off federal dollars. In some rural or smaller districts, there may not even be a full-time nutrition director—just one person juggling menus, budgets, and food cost projections, all while trying to keep up with soaring prices.



Behind every school meal is a mountain of unseen labor: training staff, maintaining equipment, safely storing ingredients, and navigating regulations. For districts starting with CEP, getting the data right—finding every eligible child—can make the difference between a program that feeds everyone and one that can't survive.

The good news is that for many districts operating CEP the increased access to federal funds has allowed them to invest additional resources into improving school meal quality and service.

OKCPS's Director of Child Nutrition, Shonia Hall, spoke proudly about the school meal experiences they've been able to provide to children and their ability to keep up with "food trends" to make meals enjoyable for students. The dollars drawn down for this program not only go into schools, but to American farmers and producers. Programs like CEP mean schools can source more American-grown and produced foods.



We have completely taken away the [free] meal stigma...Our meals are healthy and we are preparing students so that they can learn in the classroom. Then they go back into the community and they're able to give back."

Shonia Hall, Child Nutrition Director at Oklahoma City Public Schools



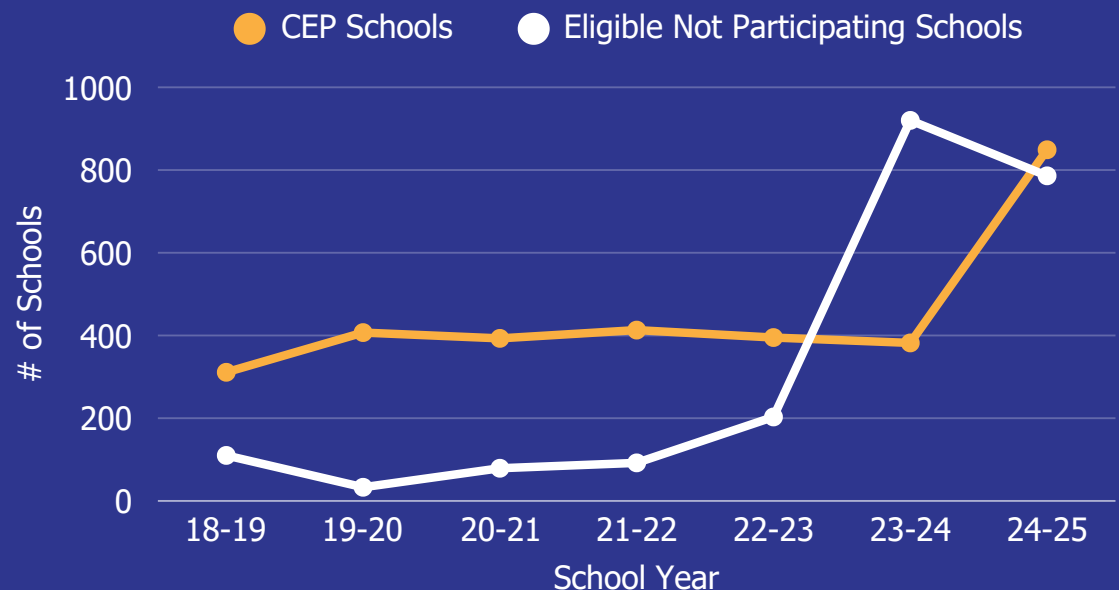
CEP: Fueling a Hunger-Free Future

While awareness of the CEP program has grown since 2019, of 509 Oklahoma school districts, there are still 246 Oklahoma school districts that are eligible but not currently participating in CEP. That means thousands of children are missing out on the stability and dignity of a guaranteed school meal, simply because their district hasn't yet taken the step.

This gap highlights a need for better education and awareness about CEP among both school and state leaders. It also points to the importance of federal policy changes that could make CEP easier to implement, allowing more districts to feed their students without red tape or financial uncertainty. Every missed opportunity to expand CEP is a missed chance to fight childhood hunger in Oklahoma.

As universal feeding and CEP have gained popularity among child nutrition administrators, more school leadership teams are considering the program. Several Oklahoma school administrators have noted their appreciation for the state child nutrition department's support in answering their questions and supporting the implementation process. Public awareness and advocacy on the importance of nutrition to student success has also been a major factor in the increasing popularity of school meals programs. When surveyed, nearly 70% of Oklahomans said that access to no cost, nutritious school meals should be expanded.^{xi}

OK CEP School Participation and Eligibility Over Time*



*In 2023, USDA lowered the CEP threshold from 40% to 25%, significantly increasing school eligibility in Oklahoma from SY 2022–2023 to SY 2023–2024.

Source: OSDE Community Eligibility Data

With this increased awareness remains a need for education on the program. Some state leaders balk at the cost of universal feeding programs in other states, claim that federal funds feeding children come with conditions, or disparage school meal quality. The National School Lunch Program has existed since 1946, and CEP has been an option since 2014. Feeding children in school should never be a political debate, it's a moral responsibility. School meal standards are set by the USDA and require schools to adhere to specific nutritional and caloric standards. Expanded school meals access means kids are eating healthier. A 2021 study from Tufts on dietary trends found that schools are now the single healthiest place Americans are eating.^{xii}

That same research warns of the harm faced by children who miss out on school meals, especially in low-income families, where time, money, and access to nutritious food are limited. For many kids, the lunch they get at school is the most balanced meal they'll eat all day.

Yet misconceptions persist, some believe child nutrition departments are flush with funds. In reality, these teams work under intense financial pressure, striving to remain self-sustaining while feeding hundreds or thousands of children daily. Programs like CEP aren't just about reaching more students; they help nutrition teams serve higher-quality, more diverse meals and run more efficient programs. It's not complicated: investing in healthy, hunger-free children is investing in a stronger, more successful future for all of us.



There have also been calls for our federal leadership to increase the CEP multiplier from 1.6 to 2.5 to help more schools get 100% of their CEP meal costs covered. This would mean that schools with a 40% or higher ISP could provide meals at no cost to all students and be fully reimbursed by federal funds. This would make the program more economically viable for many schools and districts and would reduce the financial burden on implementing districts.

An increased CEP multiplier could also make a statewide universal free meals model more viable, assuming the state maximizes CEP participation.

Enhancing cooperation between state agencies and finding innovative ways to track and maximize direct certification rates is another way to promote easier CEP implementation. The Breakfast After the Bell (BATB) model is a school meal policy that complements CEP well.

Implementing BATB can help increase a school's direct certification rate by incentivizing more students to eat school breakfast. Schools can also work with community partners to do SNAP outreach which can also facilitate additional access to food resources and increased direct certification rates.





Currently, there is a pressing need to protect and defend Oklahoma schools' access to CEP. This year, House Budget Committee Chair Jodey Arrington (R-TX) has proposed \$12 billion in cuts to school meals programs for the 2025 budget reconciliation. The proposals would substantially decrease the number of schools eligible for the Community Eligibility Provision (CEP) and make it harder for eligible families to apply for free or reduced-price school meals at non-CEP schools.

Combined, these proposals would reduce students' access to school meals and raise families' grocery bills, while imposing unnecessary and burdensome paperwork requirements on schools in Oklahoma. This would result in 311 schools and 105 school districts no longer being able to offer no-cost meals via CEP. Approximately 102,194 children would lose access to no-cost meals as a result of this policy. At this time, it is crucial for advocates to contact Oklahoma's Congress members to emphasize the value and need for this program in our state.



It's all in, the [school] district has to sit down and have the hard conversations, do [CEP] smartly, to get this done and support the community. Don't be afraid to ask questions and communicate with the state. It's gonna be different for every district."

Sabina Garrett, Child Nutrition Director for Altus Public Schools

Conclusion

The Community Eligibility Provision is a program that has transformed the way we can feed kids in schools. Due to the hard work and dedication of child nutrition experts, Oklahoma is feeding a record number of children in school at no cost. School meals are no different from school supplies: they are foundational to student success.

Interested in CEP or wondering if your community school or district operates the program?

Reach out to your school leaders or Hunger Free Oklahoma to see if your school can feed kids at no cost. Also reach out to your state representatives to let them know that some schools need more support to take full advantage of millions in federal funding to feed low-income Oklahoma children. With a little extra support, we can ensure that no child goes hungry at school. There is no investment more worthy than feeding children.



Contact Us

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Terms and Definitions

Community Eligibility Provision (CEP): A National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal service option that allows schools and local educational agencies (LEAs) in high poverty areas to offer meals at no cost to all enrolled students without collecting household applications.

Food and Nutrition Service (FNS): The agency of the USDA that administers the federal food assistance programs. These programs, which serve one in six Americans, represent our Nation's commitment to the principle that no one in this country should fear hunger or experience want. They provide a federal safety net to people in need.

Identified Student Percentage (ISP): "Identified students" are students who are certified for free meals without a household application, such as students identified as participating in SNAP, FDPIR, or Medicaid. The "identified student percentage" (ISP) is calculated by dividing the total number of identified students by the total number of enrolled students.

Medicaid Direct Certification Pilot: A demonstration project that permits states to use Medicaid data files to identify children eligible to receive free or reduced price meals without need of application.

National School Lunch Program (NSLP) and School Breakfast Program (SBP): Provides nutritionally balanced, low-cost or free meals to children each school day. The program was established under the National School Lunch Act, signed by President Harry Truman in 1946.

Oklahoma State Department of Education (OSDE): The state education agency of the State of Oklahoma that is charged with determining the policies and directing the administration and supervision of the public school system of Oklahoma. OSDE oversees the state child nutrition programs.

United States Department of Agriculture (USDA): The federal agency that oversees food, agriculture, natural resources, rural development, nutrition, and related issues. The USDA's main functions include managing farm policy, regulating food safety and quality, overseeing food labeling, and managing federal nutrition programs.

Sources

ⁱ Community Eligibility Proxy for Districts and Sites. (2019). Oklahoma State Department of Education. <https://oklahoma.gov/education/services/child-nutrition/documents.html>

ⁱⁱ Community Eligibility Proxy for Districts and Sites. (2025). Oklahoma State Department of Education. <https://oklahoma.gov/education/services/child-nutrition/documents.html>

ⁱⁱⁱ Rabbitt, M. P., Reed-Jones, M., Hales, L. J., & Burke, M. P. (2024). Household food security in the United States in 2023 (Report No. ERR-337). U.S. Department of Agriculture, Economic Research Service. <https://doi.org/10.32747/2024.8583175.ers>

^{iv} School Meal Statistics. School Nutrition Association (2024). <https://schoolnutrition.org/about-school-meals/school-meal-statistics/#benefits>

^v 2023 School Nutrition Trends Report. School Nutrition Association (2023). <https://schoolnutrition.org/wp-content/uploads/2023/01/2023-School-Nutrition-Trends-Report.pdf>

^{vi} Pérez, A. & FitzSimons, C. (2023). Community Eligibility: The Key to Hunger-Free Schools. Food and Resource Action Center. <https://frac.org/cep-report-2023>

^{vii} Long, M. W., Marple, K., & Andreyeva, T. (2021). Universal Free Meals Associated with Lower Meal Costs While Maintaining Nutritional Quality. *Nutrients*, 13(2), 670. <https://doi.org/10.3390/nu13020670>

^{viii} Murdoch, J., Nasar, H., Wallace-Williams, D., Vachon, M., Enver, A., Logan, C. W., Shivji, A., & Villarreal, M. (2022). USDA Community Eligibility Provision Characteristics Study (Contract No. AG-3198-C-15-0017). U.S. Depart of Agriculture, Food and Nutrition Service. <https://www.fns.usda.gov/research/cn/cep-characteristics-study-sy-2016-17>

^{ix} Community Eligibility Proxy for Districts and Sites. (2023). Oklahoma State Department of Education. <https://oklahoma.gov/education/services/child-nutrition/documents.html>

^x Community Eligibility Proxy for Districts and Sites. (2024). Oklahoma State Department of Education. <https://oklahoma.gov/education/services/child-nutrition/documents.html>

^{xi} Hunger Free Oklahoma Issues Study. (2021). Evolve Research.

^{xii} Jenkins, A. L. (2021). "Study Finds Americans Eat food of Mostly Poor Nutritional Quality – Except at School". TuftsNow. <https://now.tufts.edu/2021/04/12/study-finds-americans-eat-food-mostly-poor-nutritional-quality-except-school>



