

The Unique Shapes Of Food Insecurity:

Evaluating District Participation and Policy Implementation of the Community Eligibility Provision (CEP) Could Improve Food Access for Children Across Mississippi

BACKGROUND

Food insecurity is defined as “limited or uncertain access to adequate food or an inability to acquire acceptable foods in socially acceptable ways.”

Food insecurity is a significant public health, economic, and social issue that affects individuals, households, and communities¹. The U.S. Department of Agriculture (USDA) defines food insecurity as limited or uncertain access to adequate food or an inability to acquire acceptable foods in socially acceptable ways. The spectrum of food insecurity—from reduced food quality and variety to disrupted eating patterns and reduced food intake—is universally associated with poverty. However, the relationship between individual, household, and community food access is not solely economic. Geographic, socioeconomic, and structural factors can make it more difficult for individuals and families to consistently access healthy, affordable food. These broader economic, structural, and social barriers interact to shape food accessibility². Furthermore, the consequences of persistent food insecurity extend beyond inadequate food access. High rates of food insecurity affect child health, educational outcomes, healthcare systems, community well-being, and economic productivity^{3,4}. Understanding the relationship between nutrition policy and food insecurity may help inform nutrition assistance programs, child hunger interventions, funding allocation, public health strategies, and other policies intended to strengthen food security in underserved communities.

Approximately

25%

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experience food
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Although food insecurity affects communities throughout the United States, its burden is not distributed equally across states, regions, or populations. Mississippi has historically experienced food insecurity rates above the national average, with an average food insecurity rate of 18% compared with the national average of 14%⁵. These disparities are also observed within the state. The Mississippi Delta, where approximately one in five residents reports inadequate access to food, faces distinct barriers that influence access to nutritious foods⁶. Disparities are further reflected across age, sex, and racial groups. In Mississippi, child food insecurity rates generally exceed both state and national overall food insecurity rates, placing children at increased risk for poor nutrition, adverse developmental outcomes, lower academic performance, and poorer long-term health. With approximately 25% of Mississippi children experiencing food insecurity, school nutrition programs represent an important strategy for improving food access and supporting child health⁵. Federal school meal programs, which provide free and reduced-price meals, play an important role in reducing food insecurity; however, participation is influenced by factors such as perceived stigma, student preferences, and operational barriers that affect program efficiency and financial sustainability^{3,4}. One federal strategy designed to reduce these barriers is the Community Eligibility Provision (CEP)⁷. Mississippi provides a particularly informative setting for evaluating CEP because it combines persistently high child food insecurity, a large rural population, and substantial geographic variation in food access. Examining CEP across Mississippi may provide insight into the district participation decisions and local implementation factors that shape access to school meals.

LITERATURE REVIEW

Community Eligibility Provision (CEP)

A federal funding option within the National School Lunch and School Breakfast Programs that allows eligible schools and school districts to provide free breakfast and lunch to all enrolled students, regardless of reported household income.

The Community Eligibility Provision (CEP) is a federal funding option within the National School Lunch and School Breakfast Programs that allows eligible schools and school districts to provide free breakfast and lunch to all enrolled students, regardless of reported household income. Authorized through the Healthy, Hunger-Free Kids Act of 2010, CEP was developed to reduce barriers to school meal participation while simplifying the administration of school nutrition programs. Before CEP, schools were responsible for distributing and processing annual household meal applications to determine eligibility for free and reduced-price meals. This process required substantial administrative effort and could create barriers for eligible families because of incomplete applications, changing household circumstances, language barriers, or concerns about the stigma associated with receiving free school meals^{3,8}. CEP addressed many of these challenges by allowing eligible schools to serve meals to all enrolled students while using direct certification data to determine federal reimbursement. Eligibility is determined using a school's or district's Identified Student Percentage (ISP)—the percentage of students who are automatically eligible for free meals through participation in qualifying federal nutrition assistance programs. Federal reimbursement is then based on the ISP, allowing participating schools to provide meals to all enrolled students at no cost⁸. Since its implementation, a growing body of research has examined CEP's effects on students, schools, and school nutrition programs. Studies have consistently reported increased participation in both school breakfast and lunch programs following CEP adoption, suggesting that universal meal access is effective in increasing student participation in school meal programs.

The effectiveness of the Community Eligibility Provision (CEP) depends not only on program design but also on local implementation, with community factors such as rurality, food insecurity, and administrative capacity influencing participation and outcomes, particularly in Mississippi.

Evaluating CEP requires consideration of more than student outcomes alone. Although federal legislation establishes program objectives, eligibility requirements, and reimbursement structures, implementation ultimately occurs within local contexts. Local conditions—including child food insecurity, rurality, available resources, and administrative capacity—influence both district participation decisions and the way CEP is implemented after adoption, shaping the extent to which its intended benefits are realized⁹. Together, these interacting factors influence outcomes such as school meal participation, food access, administrative efficiency, academic performance, and the financial sustainability of school nutrition programs⁴. Much of the existing literature has evaluated these outcomes to determine the extent to which CEP achieves its intended objectives. While this body of research provides important evidence regarding CEP's effectiveness, examining implementation across different community settings provides additional insight into how the policy functions in practice and why participation varies among eligible school districts. This perspective is particularly relevant in Mississippi, where persistent food insecurity, a large rural population, and geographic variation in access to nutritious food create diverse local conditions that may influence both district participation decisions and policy implementation. Existing research suggests that rural schools and districts often experience greater improvements in school meal participation, student health, and administrative efficiency than their urban and metropolitan counterparts^{9,10}. Consequently, the extent to which Mississippi children benefit from CEP depends not only on how broadly eligible schools and districts adopt the program but also on how effectively it is implemented after adoption.

Most evaluations of CEP implementation have been conducted at the national level^{3,4}. Collectively, this evidence suggests that expanding access to universal school meals has improved several aspects of child health and school nutrition programs. Schools participating in CEP have consistently reported increased participation in school breakfast and lunch programs, along with improvements in students' diet quality and academic performance^{3,4,11}. Eliminating annual household meal applications has also reduced administrative burden for schools and may lessen the social stigma associated with receiving school meals^{3,12}. In addition, one study found that CEP implementation was associated with a 5% decline in the proportion of households classified as food insecure, suggesting that the benefits of universal school meals may extend beyond participating students to support broader household food security¹³. Beyond expanding access to nutritious meals, CEP may also enhance the efficiency of school food service operations¹⁴. Increased meal participation allows fixed operational costs to be distributed across a greater number of meals, while federal reimbursement helps offset the loss of student meal payments and supports the financial sustainability of participating school nutrition programs. Collectively, these findings suggest that CEP may improve children's health and well-being through multiple pathways, including increased meal participation, reduced administrative burden, improved operational efficiency, and greater household food security^{3,4}.

The Southern region of the United States has the highest regional CEP participation rate, with

56%

of eligible schools participating^{3,15}.

Although national evidence consistently demonstrates positive outcomes associated with CEP participation has varied considerably across states and regions^{3,4}. The Southern region of the United States has the highest regional CEP participation rate, with 56% of eligible schools participating^{3,15}. In Mississippi, annual USDA notification data indicate that CEP participation has evolved in response to changes in federal eligibility requirements and program guidance¹⁶. The USDA's 2023 decision to lower the Identified Student Percentage (ISP) eligibility threshold from 40% to 25% expanded CEP eligibility by allowing schools and districts with smaller proportions of directly certified students to qualify. Although this policy change substantially increased the number of eligible schools and districts in Mississippi, participation did not increase proportionally. During the 2024–2025 school year, 52 Mississippi school districts adopted CEP, while an additional 98 districts contained schools that were eligible to participate but had not implemented the program districtwide¹⁶. Many newly eligible districts chose not to adopt CEP, while others that had long been eligible continued not to participate. These findings suggest that eligibility alone does not fully explain district participation decisions in Mississippi⁹. Instead, decisions to adopt CEP likely reflect a combination of local conditions, including administrative capacity, food service infrastructure, reimbursement adequacy, staffing, operating costs, rurality, and student enrollment^{9,12}.

While CEP is federally authorized, school districts determine whether and how to implement the program based on their resources, capacity, and local needs.

Evaluating CEP requires consideration not only of whether the policy achieves its intended objectives but also of how district participation decisions and local implementation influence those outcomes⁹. Understanding both processes is important because federal nutrition policies are ultimately experienced at the local level. Although federal legislation establishes program objectives, eligibility requirements, and reimbursement structures, school districts determine whether to adopt CEP and, once adopted, how the program is implemented within the context of their financial resources, administrative capacity, and community needs. As a result, the same policy may operate differently across districts despite having the same federal design. CEP has the potential to improve both food access and program efficiency, but its effectiveness depends not only on the policy itself but also on the local conditions that shape adoption and implementation.

These considerations are especially relevant in Mississippi, where child food insecurity rates continue to exceed the national average and many communities face persistent geographic, economic, and structural barriers that influence access to nutritious food ^{2,6,17f}. Although national studies have evaluated CEP implementation outcomes, relatively little research has examined the institutional, financial, and community factors that influence participation decisions among eligible Mississippi schools and districts. Understanding both why eligible districts choose to adopt CEP and how the policy functions after adoption may help identify opportunities to expand access to school meals while informing future nutrition policies that strengthen food access throughout the state. Examining CEP within this broader policy context provides a more comprehensive understanding of how district participation decisions and local implementation shape the policy's impact across Mississippi.

CONCLUSION

Food insecurity continues to affect children and families throughout Mississippi, making school nutrition programs an important component of efforts to improve child health and food access ⁵. The Community Eligibility Provision (CEP) was developed to reduce financial, administrative, and social barriers to school meals by allowing eligible schools and districts to provide meals to all students through a federally established reimbursement structure ⁷. National evidence demonstrates that CEP has been associated with increased school meal participation, improved diet quality, reduced household food insecurity, and greater administrative efficiency, highlighting its potential to support both educational and public health objectives ^{3,4}.

Research suggests that rural schools and districts may experience greater benefits associated with CEP than their urban and metropolitan counterparts, including larger improvements in school meal participation, child nutrition, and administrative efficiency ^{2,9,10}. At the same time, rural communities may also face operational challenges related to smaller enrollment, geographic isolation, transportation and food procurement costs, and reimbursement levels that may not fully offset program expenses ¹⁴. These findings demonstrate that CEP's effects are not experienced uniformly across schools and districts but instead vary according to local conditions and available resources. Mississippi's participation patterns provide additional context for these findings. Annual USDA notification data indicate that although changes to federal eligibility requirements expanded the number of schools and districts eligible to participate in CEP, participation did not increase proportionally. These findings suggest that eligibility alone does not fully explain district participation decisions. Instead, decisions to adopt CEP likely reflect a combination of financial sustainability, administrative capacity, local operating conditions, and other community-specific considerations that extend beyond federal eligibility requirements.

Further evidence suggests that evaluating CEP requires consideration of both district participation and policy implementation. Federal legislation establishes the program's objectives, eligibility requirements, and reimbursement structure; however, school districts determine whether to adopt CEP and, once adopted, how the program is implemented within the context of available resources, staffing capacity, financial circumstances, and community needs. Consequently, the same federal policy may function differently across otherwise eligible districts, producing variation in both participation and implementation outcomes.

Rather than viewing CEP solely as a school nutrition program, the available evidence suggests that its effectiveness depends on the interaction between federal policy design, district participation decisions, and local implementation. Although national studies have demonstrated many of the potential benefits associated with CEP, fewer have examined the institutional, financial, and operational factors that influence district participation decisions. Additional research examining administrative capacity, reimbursement adequacy, financial sustainability, and local implementation practices could improve understanding of why some eligible districts adopt CEP while others do not. Evaluating these processes together provides a more comprehensive understanding of why CEP functions differently across communities which may help inform future school nutrition policies that improve food access for children across Mississippi.



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