# COMMUNITY ELIGIBILITY PROVISION (CEP)



March 2014

## **OBJECTIVES**

- Gain an Overview of the USDA's Community Eligibility Provision (CEP)
- Identify CEP Requirements
- Discuss Impact on Other Areas
- Review CEP Data Submission and Application Process
- Identify Required Documentation for Implementation



## BACKGROUND

Section 104(a) of the Healthy, Hunger Free Kids Act of 2010 amended the Richard B. Russell National School Lunch Act to provide an alternative to household eligibility applications for free and reduced price meals in high poverty CEs or schools CEP is a **four-year** reimbursement Provision for eligible high poverty CEs and schools

CEs and schools may opt in or opt out each year

A CE may participate in CEP for **some or all schools in the CE** 



# BENEFITS

- ALL students receive a free breakfast and lunch
- Eliminates overt identification issues for students
- Improves nutrition to students at risk
- Reduces paperwork at the school district level
- Simplifies meal counting and claiming





# BENEFITS

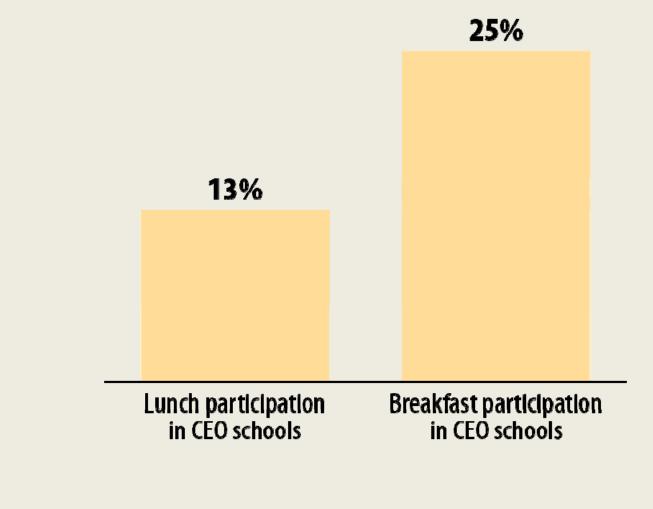
- Possible increases in breakfast and lunch participation
- Eliminates the administrative burden of collecting household applications and conducting verification
- Provides potential labor savings
- Must still submit annual Verification Data Report





#### Lunch And Breakfast Participation Increase Under Community Eligibility

Increase in participation between October 2010 and October 2012 in schools that operated under community eligibility for two years



Ch<sup>\*</sup>ld Nutrition Services

### **CEP REQUIREMENTS**

CE or school must have an "Identified Student" percentage of at least 40% as of April 1<sup>st</sup> of the school year prior to implementing CEP

CE must agree to serve free lunches AND breakfasts to all students for up to four consecutive years in approved schools



### **CEP REQUIREMENTS**

CE must NOT collect F/R applications from households in participating schools

CE must maintain a total count of breakfasts & lunches served to students at the point of service

CE must agree to cover with non-Federal funds any costs of providing free meals to all students above amounts provided in Federal assistance



#### **NON-FEDERAL SOURCES**

Any funds other than Federal reimbursement available to the nonprofit school food service account may be used to cover the costs over the reimbursement of providing a no cost breakfast and lunch to all students.

- Profits from a la carte sales
- Profits from catering
- In-kind contribution funds from outside sources, such as volunteer services or a cash donation

Child Nutrition Services

# **Identified Students:** Children who are certified for free school meals without the use of a household application.

- Students whose names appear on the downloaded Direct Certification and CE Level match lists; includes those students in the same household receiving "extended benefits"
- Students identified on letters provided by the household from the SNAP/TANF agency or agency list
- Students on homeless, runaway, migrant, Head Start, Early Head Start, and Even-Start certified lists
- Foster students who are certified free based on court ordered documents or TX-DPS Foster Care/Residential Care Placement Authorization form



**Enrolled Students:** Students who are enrolled in and attending schools who have access to at least one meal service daily.

Students who do not have access to either breakfast or lunch due to the times they are attending school would not be included in the count of enrolled students



#### **DETERMINING SCHOOL ELIGIBILITY**

School eligibility is based on the number of students who meet the "identified" definition

The percentage of Identified Students may be determined schoolby-school, by a group of schools within the CE, or the aggregate for the entire CE

% Identified Students = <u># of Identified Students as of April 1</u> X 100 Total Enrollment as of April 1



#### Identified Student Percentage (ISP)

Identified Student % =

# of Identified Students Total # of Enrolled Students with access to NSLP/SBP

Example: Identified Students = 500 Total Enrollment = 1000

 $\frac{500}{1000} \times 100 = 50\%$ 



50% is the Identified Student Percentage

#### **CEP CLAIMING PERCENTAGES**

The percentage of Identified Students is then multiplied by the USDA determined factor of 1.6

Example: 50% Identified Students X 1.6 = 80%

The resulting answer, capped at 100%, equals the % of meals reimbursed at the Federal free rate

The remaining percentage (20%) is claimed and reimbursed at the paid rate.



# What identified student percent equates to 100% of the enrollment being eligible to claim meals at the free rate?

**62.5**%

 $(62.5 \times 1.6 = 100\%)$ 



#### **MEAL REIMBURSEMENTS WITH CEP**

IDENTIFIED STUDENT PERCENTAGE (ISP)	FREE CLAIMING PERCENTAGE	PAID CLAIMING PERCENTAGE
40%	64%	36%
45%	72%	28%
50%	80%	20%
60%	88%	12%
62.5%	100%	0



Other Child Nutrition programs will be able to utilize the percent of meals claimed free to determine eligibility.

- Summer Food Service Program (SFSP)
- Fresh Fruit and Vegetable Program (FFVP)
- After School Care Program
- Child and Adult Care Food Program (CACFP) At Risk



#### Title 1, Part A (Title I) of The Elementary and Secondary Education Act of 1965

The Community Eligibility Provision and Selected Requirements Under Title 1, Part A of the Elementary and Secondary Education Act of 1095, as amended

U.S. Department of Education Guidance – SP-19-2014

http://www.fns.usda.gov/nslp/policy



January 31, 2014

Schools opting to participate in the CEP will be permitted to use data from the most recent funding year in which they did not participate in the CEP to determine their level of poverty when calculating discounts on services received under the **E-rate** program.

http://www.squaremeals.org/Programs/NationalSchoolLunchProgram/Com munityEligibilityProvision.aspx



CEs/schools that participate in CEP will NOT have a meal benefit application process and therefore, will NOT have an individual student eligibility status.

For example, you will not know if Student A is eligible for free, reduced price, or paid meal benefits.



Next Steps



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#### **MAXIMIZE THE NUMBER OF IDENTIFIED STUDENTS**

- Direct Certification list
  CE level direct match list
  Extended eligible students
  Household eligibility letter/list from SNAP agency
  - Foster certified



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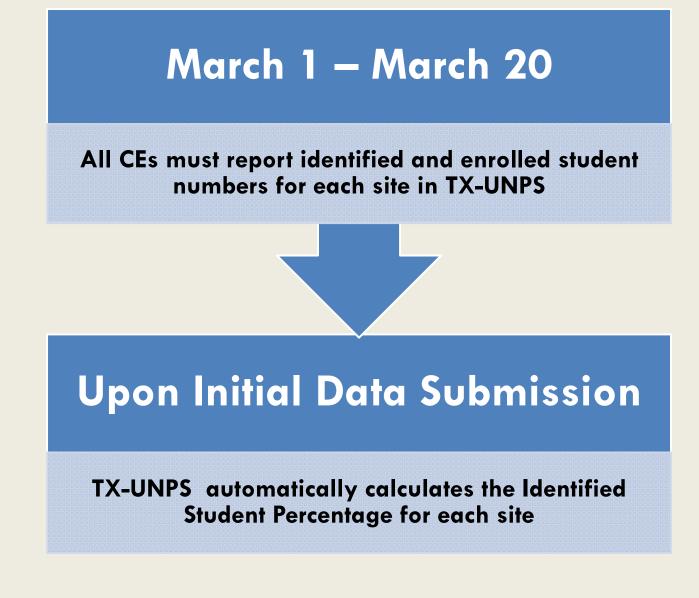
# **CE MATCH**

#### To Import a File of Student Records to Match

The "CE Import for CE Level Matches" allows the CE to upload a file. The system will search for unmatched students that are an exact match to all of the student data on the import file. The data file for upload should be prepared before beginning the process.

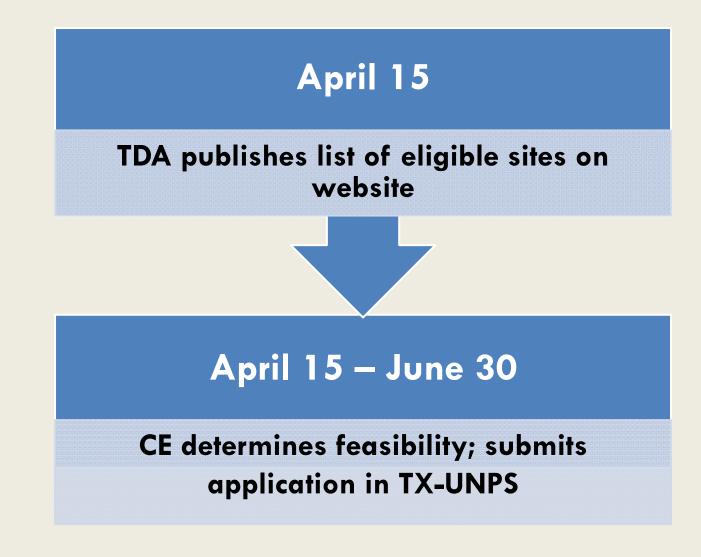


School Nutrition Programs Direct Certification and Direct Verification (DCDV) Supplemental Manual





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# **SITE GROUPING**

- Entire CE add all identified students for all sites and divide by total of enrollment for all sites
- Numbers are not averaged
- Numbers are not rounded



# **SITE GROUPING**

Maximize by grouping:

- Qualify a potentially-eligible site with an eligible site
  - Site A 285/800 = 35% ISP
  - Site B 750/1,000 = 65% ISP

Results: 1,035/1,800 = 57.50% ISP

57.50% ISP X 1.6 = 92% of meals claimed free for both sites when grouped



# **SITE GROUPING**

Maximize by grouping:

Site with >100% claiming percentage When a site has greater than 62.5% ISP then group with another site so as not to exceed 100% of meals reimbursed at free rate.



# **APPLICATION REVIEW**

TDA must review the CEs' submission to ensure the CE/Group/School:

Meet the minimum identified student percentage

- Participates in both the NSLP and SBP
- Has a record of administering the meal program in accordance with program regulations



# **REQUIRED DOCUMENTATION**

Supporting Claim Percentages  List of "Identified Students" and supporting documentation

 List of total enrolled students with access to SBP/NSLP as of April 1, 2014

- DC and CE match lists
- Extended eligible names tied to name on DC list
- Homeless/Runaway, Migrant, Head Start, Early Head Start, Even Start certified lists and Foster certified documents



# **COUNTING & CLAIMING**

- Only total number of reimbursable meals served daily
- Only one meal per student counted at breakfast and lunch at the point of service
- Continue to use computer system to prevent second meals
- May use a check sheet similar to the Summer Food Service Program



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# **REQUIRED DOCUMENTATION**

Documents to support daily and monthly meal counts

> Number of daily reimbursable breakfasts and lunches served and counted using an accurate method

> Consolidation of meal counts into a monthly worksheet



# **IMPLEMENTATION DECISIONS**

#### Financial Viability

- Ensure accurate meal cost information is available
- Build Relationships
  - School board, superintendent, principals; communicate impact on LEA

#### Publicity

- Communicate benefits of CEP for students and community



# **TDA/USDA RESOURCES**

ARM Section 5 "Special Provision Options"

TDA - CEP Frequently Asked Questions

#### CEP Federal Reimbursement Estimator Worksheet

http://www.squaremeals.org/Programs/Natio nalSchoolLunchProgram/CommunityEligibility Provision.aspx



## **COMMUNITY ELIGIBILITY PROVISION**

#### **Updating the Claiming Percentages**

- A new identified student percentage may be established each year
- Second, 3<sup>rd</sup>, and 4<sup>th</sup> years, the CE/school may select the higher of the identified student percentage from
  - the original year's data, or
  - establish a new percent using the most recent April 1 data



## **COMMUNITY ELIGIBILITY RESOURCES**

#### **Brief: An Amazing New Option for Schools**

<u>http://frac.org/pdf/community\_eligibility\_amazing\_new\_option\_sc</u> <u>hools.pdf</u>

#### Community Eligibility: A Powerful Tool in the Fight Against Child Hunger <u>http://frac.org/pdf/community\_eligibility\_report\_summary\_2013.</u> <u>pdf</u>

#### Links to Key USDA and State Materials

http://frac.org/community-eligibility/



## **COMMUNITY ELIGIBILITY RESOURCES**

#### **Region 4 Child Nutrition Services**

http://www.esc4.net/default.aspx?name=nutrition.reference

#### **TDA Food and Nutrition**

<u>http://www.squaremeals.org/Programs/NationalSchoolLunchPr</u> <u>ogram/CommunityEligibilityProvision.aspx</u>





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