



Considering the Community Eligibility Provision for National School Lunch Program

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Department
of Education

Considering the Community Eligibility Provision (CEP) for NSLP

Agenda:

- Provide an Overview of the USDA Community Eligibility Provision (CEP)
- Identify Eligibility Requirements
- Things to consider
- FAQs
- Question and Answers

Considering the Community Eligibility Provision (CEP) for NSLP

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 local educational agencies (LEAs) (or districts) and schools

CEP is a four-year reimbursement Provision for eligible high poverty LEAs and schools

LEAs and schools may opt in or opt out each year

An LEA may participate in CEP for some or all schools in the LEA

CEP Requirements for Schools

As of April 1, 2015 determine the school(s) has a minimum of 40% “identified” students based on enrollment (not free and reduced count).

Agree to serve no cost lunches and no cost breakfasts to all students for up to four consecutive years in approved schools.



CEP Requirements for Schools

Agree to cover with non-federal funds any costs of providing no cost meals to all students above amounts provided in federal meal reimbursements.

Do not collect free and reduced price applications from households for the purpose of the school meal program in participating CEP schools.



CEP Requirements for Schools

Maintain a total count of breakfasts and lunches served to students at the point the students receive the meal

Residential Child Care Institutions (RCCI) are not eligible for this Provision.



Determining School Eligibility

School eligibility is based on the number of students who meet the “identified” definition.

- Certified free using methods other than a paper free and reduced meal application. These include students who are:
 - Directly certified for free meals on the basis of their participation in the Supplemental Nutrition Assistance Program (SNAP) or Ohio Works First (OWF) and the extension of benefits to students within the same household.



Determining School Eligibility

“Identified” student categories also include:

Homeless

Runaway

Migrant

Head Start

Foster children
(using court
papers to
determine
foster status)



Determining School Eligibility

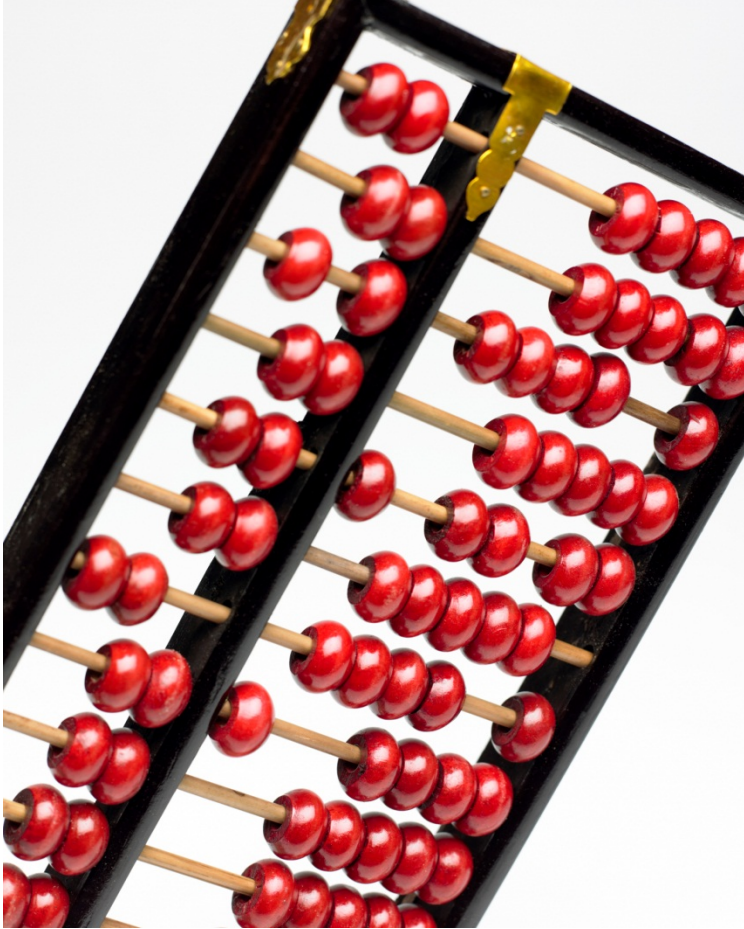
The percent of Identified Students may be determined school-by-school, by a group of schools within the LEA, or in the aggregate for an entire LEA.

$$\% \text{ Identified Students} = \frac{\# \text{ of Identified Students as of April 1} \times 100}{\text{Total Enrollment}^* \text{ as of April 1}}$$

The percent of Identified Students is then multiplied by the USDA determined factor of 1.6 for SY 2015-2016.

**Enrollment is defined as number of students with access to the NSLP and SBP enrolled in the school as of April 1, 2015.*

Determining School Eligibility



The resulting answer is the percentage of total meals served reimbursed at the Federal free rate of reimbursement. The remaining percentage of meals is claimed and reimbursed at the paid rate.

CEP Reimbursement Reiterated

Reimbursement for meals served is based on the percentage of Identified Students times a **multiplier***. The claiming percentages established for a school in the initial year are guaranteed for a period of four school years and may be increased if identified student percentages rise for that school/group of schools/district.

- ***Multiplier:** (Range: 1.3 - 1.6)* 1.6 will be used through SY 2015-2016. USDA is permitted to change the multiplier. Schools electing CEP will use the same multiplier for the entire four-year cycle.

Example

School A has 100 students with access to the NSLP/SBP programs enrolled as of April 1.

- 50 of those students are determined to be in the “Identified Student” group
- School A has an Identified Student percentage of 50%.

$50\% \times 1.6 = 80\%$
Free Reimbursement Rate,
20% Paid Reimbursement Rate.

At the end of the month, if you counted and served 10,000 reimbursable lunch meals, 8,000 (80%) will be claimed for free reimbursement and 2,000 (20%) for paid reimbursement.

CEP Participation and Agreement Form

An interested SFA must submit a CEP participation form (Word document) and a CEP participation worksheet (Excel document) to ODE for approval to be on CEP.

If approved, the claiming percentages established are guaranteed for a period of four school years

- (may increase if the percent of Identified Students increases as of April 1 of the current school year).

A CEP participating school may stop participating during the four-year cycle by notifying ODE no later than June 30 of the school year prior to when it wants to return to normal counting and claiming procedures.

Direct Certification Under CEP



CEP participating schools may wish to continue to conduct direct certification on an annual basis:

- Could result in an increase in the percent of Identified Students, increases the percent of meals claimed as FREE in subsequent CEP years.

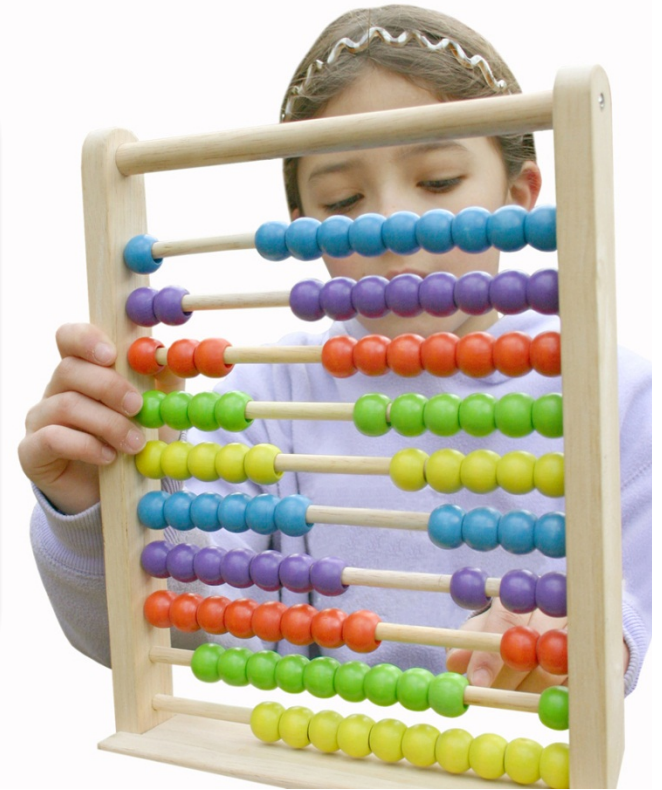
This is not required, but recommended for schools that have NOT reached the threshold of 62.5% Identified Students, which allows them to claim 100% of meals at the FREE reimbursement rate.



Schools that have already reached the threshold of 62.5% of Identified Students – it is not necessary to conduct direct certification until the end of the 4-year cycle.

Second, Third and Fourth Year Procedures

For the second, third and, fourth years of a school's participation in the CEP, the school may use the initial percentage of Identified Students used for determining reimbursement in the **First Year**, or the percentage of Identified Students as of April 1 of the next year of the cycle, whichever is higher.



Example

- 🍏 Initial Identified Students (as of April 1, 2015): 57.09%
- 🍏 Identified Students (as of April 1, 2016): 59.87% (since higher)
- 🍏 Year One Rate - $0.5709 \times 1.6 = .9150$
- 🍏 Year Two Rate - $0.5987 \times 1.6 = .9579$
 - 🍏 95.79% of all meals served in Year 2 are reimbursed at the free rate
 - 🍏 4.21% of all meals served in Year 2 are reimbursed at the paid rate

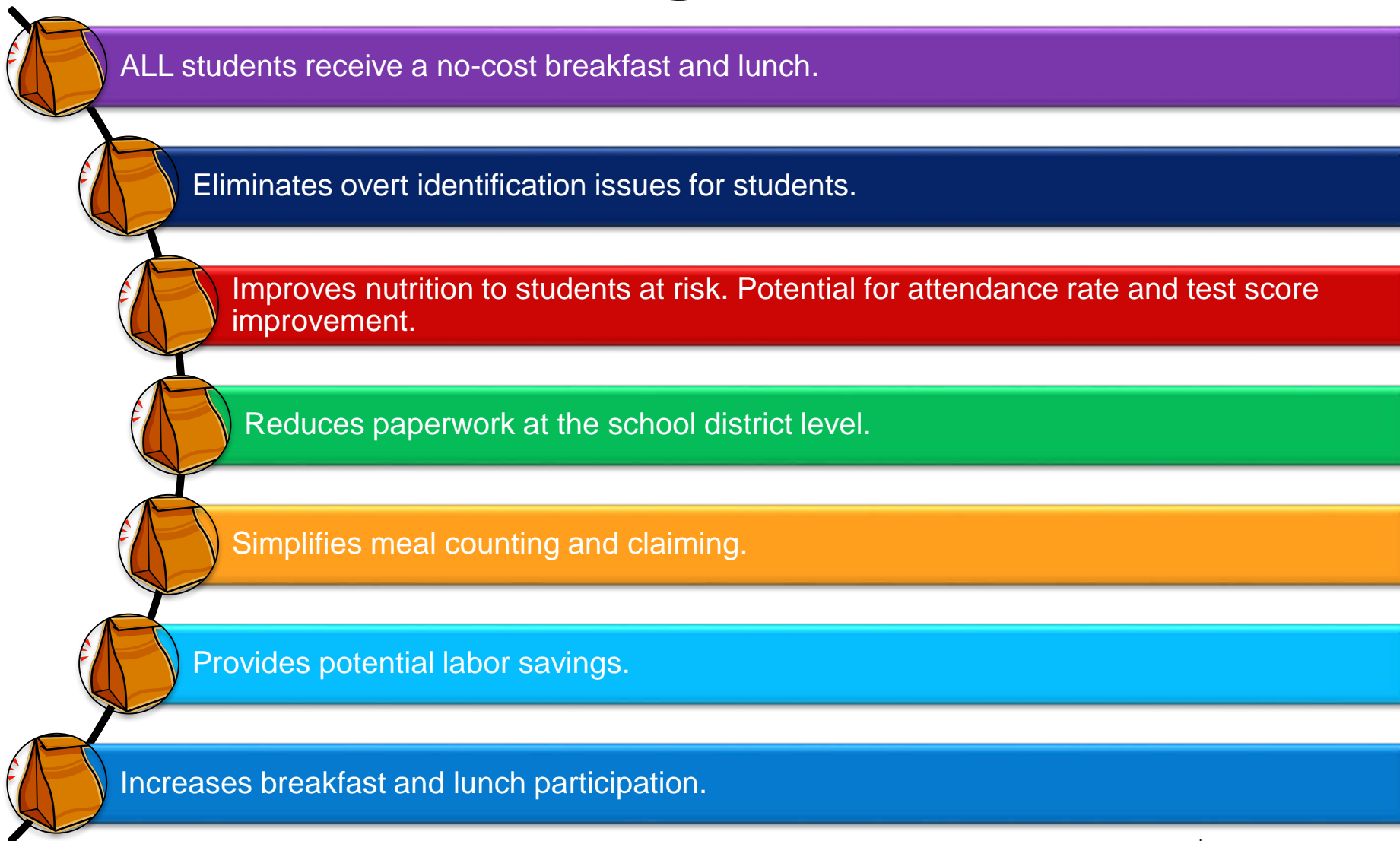
Non – Federal Funding Sources

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.

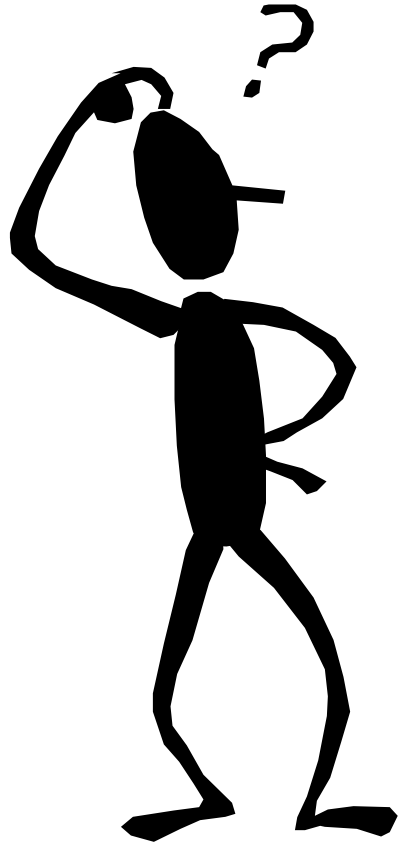
Examples of non-Federal funds:

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

Advantages of CEP



What Else Needs to be Considered?

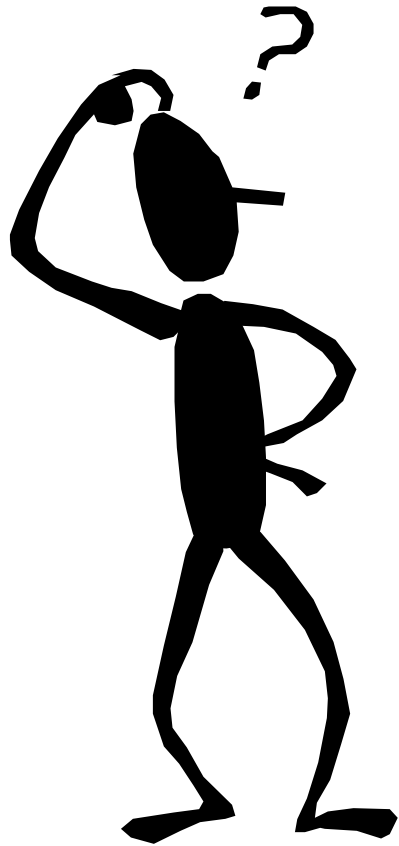


Being in the CEP program eliminates the *FRP form for the purpose of the school meal program, but an Ohio household income form for other purposes may still be needed.



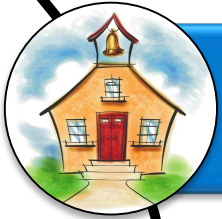
* FRP = Free and Reduced Price

What Else Needs to be Considered?



- Impact on Title I within-district distributions, state funding for economically disadvantaged students and accountability for individual economically disadvantaged students.
- **Resources on our website:**
 - Federal Programs CEP Guidance January 2014
 - Title 1 and U. S. Department of Agriculture Community Eligibility Provision

Disadvantages of CEP



Potential financial issues when less than 100% reimbursement is at the free rate



SFA not collecting paper applications – to determine individual student economic status.



School must identify other procedures to determine economic status of individual students.

What impact will CEP have on other Child Nutrition Programs?

Other Child Nutrition Programs will be able to utilize the percent of meal claimed free to determine their eligibility:

- Summer Food Service Program (SFSP)
- Fresh Fruit and Vegetable (FFVP)
- After School Snacks
- Child and Adult Care Food Program – After School at Risk Meals Program



FAQ: How do we Count Meals?

Count the total number of reimbursable meals served daily; it does not have to be by category.

Use a check sheet similar to the Summer Food Service Program daily count sheet.

Use a “clicker” to count total reimbursable meals.

Meals must still be counted at point of service and schools are still responsible to count reimbursable meals only.



FAQ: How to Submit Claims for Reimbursement?



If the district has both CEP and non-CEP schools, non-CEP schools will claim meals in the usual fashion.

For CEP schools, you will consolidate daily total reimbursable meal counts into monthly totals by building for breakfast and lunch.

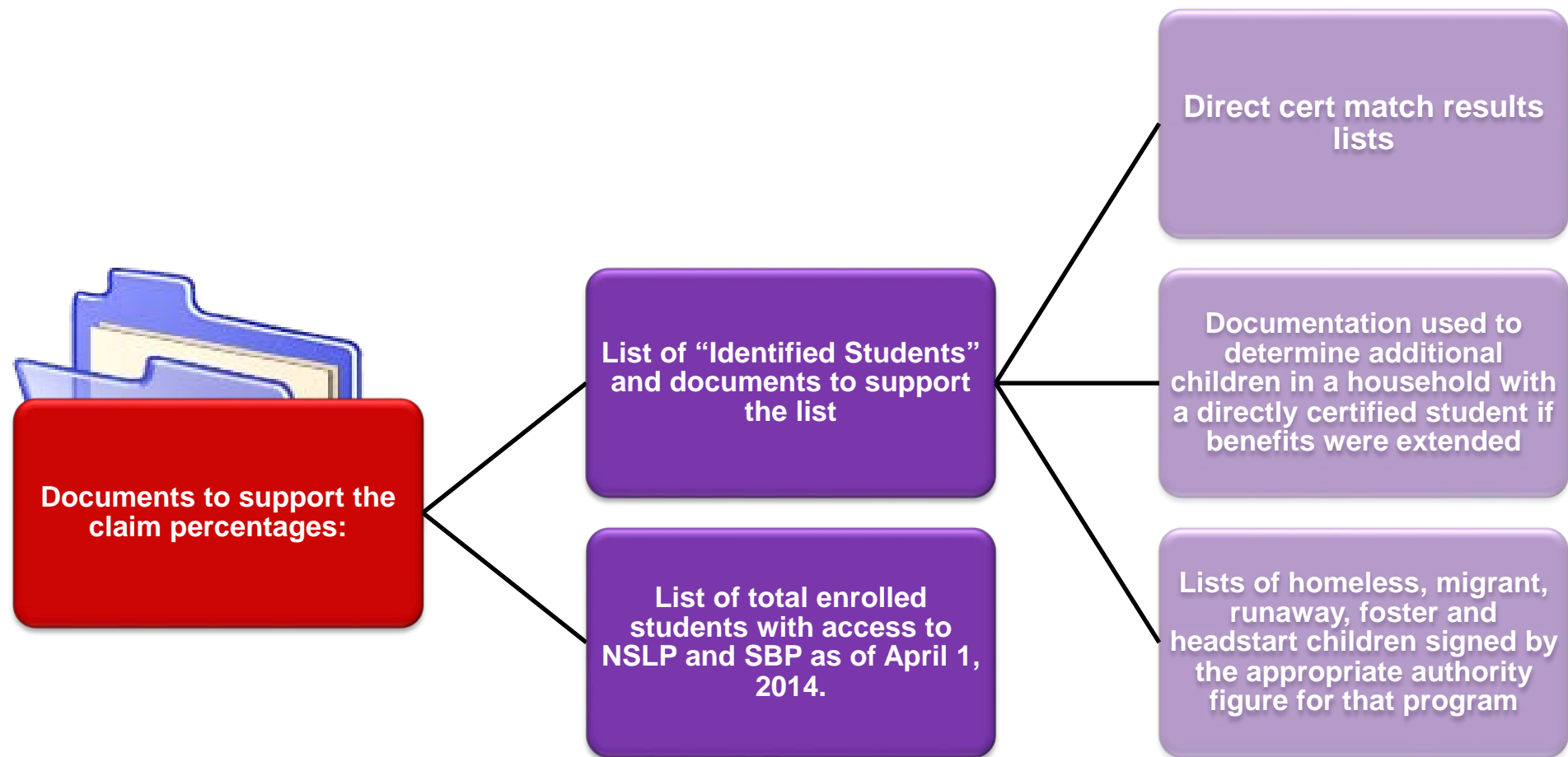


FAQ: Submitting Claims

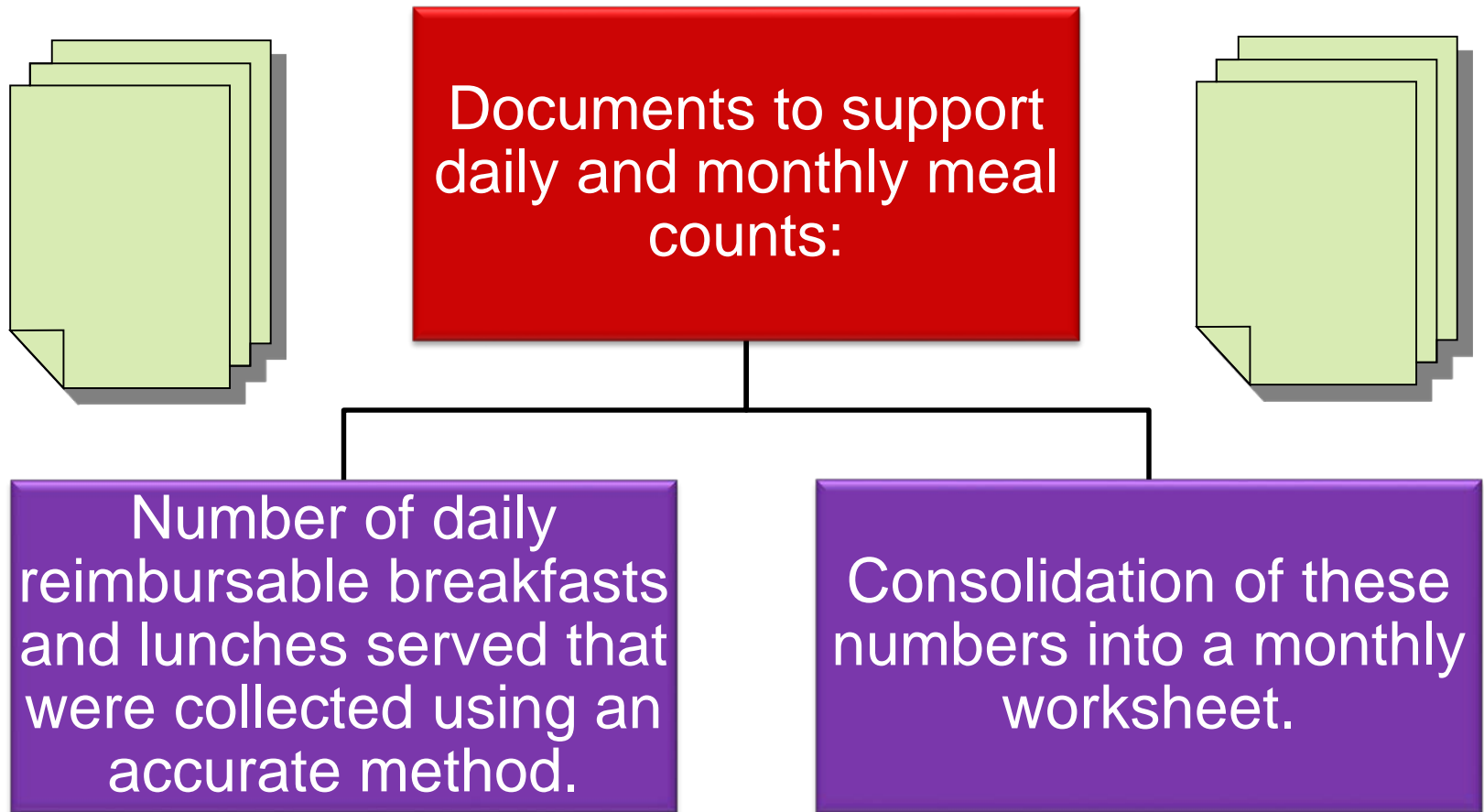
The CRRS claiming system will use your approved percentages and automatically calculate the numbers of free and paid reimbursable meals (breakfast and lunch).

Be sure to maintain proper documentation (meal count/ tally sheets, monthly meal count worksheets, etc.)

FAQ: What paperwork are we required to keep?



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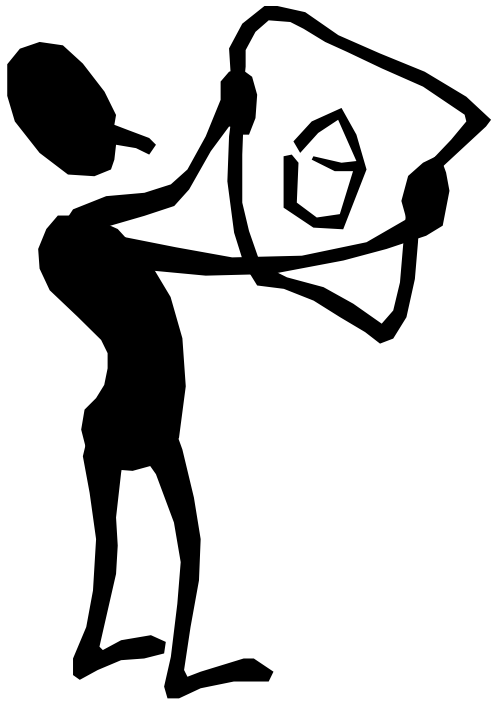


CEP AUDITS WILL OCCUR

FAQ: What paperwork are we required to keep for the CEP audit?

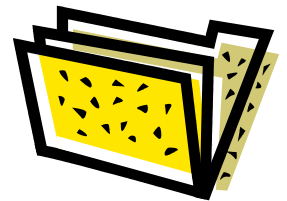
- ❖ Paper work required to support the claim percentages (this documentation is subject to audit):
- ❖ List of students “Identified Students” and paperwork used to identify the students
 - ❖ Direct cert match results lists
 - ❖ Documentation used to determine additional children in a household with a directly certified student if benefits were extended
 - ❖ Lists of homeless, migrant, runaway, and headstart children signed by the appropriate authority figure for that program
 - ❖ Court documentation for foster children dated within the 2014-2015 school year
- ❖ List of total enrolled students with access to NSLP and SBP as of April 1, 2015.

FAQ: Required Paperwork



All other school meal program paperwork still applies; i.e., production records, safety plans, health department inspections, local wellness policies, etc.

Invoices to support the number of meals served.



FAQ: Do we have to do verification?



CEP schools do NOT have to do verification, but WILL fill out the CRRS Verification Summary report yearly.

Districts having only some of their schools in CEP will have to do verification on their schools not operating under CEP.



Period of enrollment for CEP

- April 1, 2015 to August 31, 2015 close of business
- Call 800-808-6325 for more information or
- Send Participation form and eligibility worksheet to:

Brigette.Hires@education.ohio.gov

Summary

To be eligible a school/cluster of schools or School District must have a minimum of 40% students that meet the “identified” student definition

Schools participating in CEP must provide no cost breakfasts and lunches to **all** children.



Summary

The School Meals program may no longer collect school meal forms from the households.

The School Meals Director must work with administrators and school board to determine the pros and cons of participating in CEP



Summary



Participation in CEP
could affect other
funding streams.

Individual student
economic status must
be determined by
other means.

Improved nutritional
status of students,
potential improvement
in attendance and test
scores.

Increase in number of
breakfast and lunches
served daily.

CEP Resources on the ODE CNS website

[Home](#) > [Other Resources](#) > [Food and Nutrition](#) > [Resources and Tools for Food and Nutrition](#) > [Community Eligibility Provision](#)

QUICK LINKS

- » [Child and Adult Care Food Program \(CACFP\)](#)
- » [Commodity Allocation Tracking System \(CATS\)](#)
- » [Ohio United States Department of Agriculture Foods Program](#)
- » [National School Lunch and Breakfast](#)
- » [Resources and Tools for Food and Nutrition](#)
 - [Data for Free and Reduced Price Meal Eligibility](#)
 - [6 Cents Certification/New Meal Pattern Resources](#)
 - [Child Nutrition Reauthorization 2010](#)
 - [Fresh Fruit and Vegetable](#)

Community Eligibility Provision

Community Eligibility is a provision that helps schools and districts in high poverty communities meet eligibility to serve no-cost lunches and breakfasts to all their students. Interested schools and districts must apply for Community Eligibility through the Ohio Department of Education, Office for Child Nutrition. Call 1-800-808-6325 to ask questions.

School food authorities interested in participating in the Community Eligibility Provision or CEP (formerly Community Eligibility Option or CEO) for one or more schools must complete the participation form and eligibility worksheet (below) and submit them to the Office for Child Nutrition by August 31, 2014. Forms may be faxed to 614-752-7613.

- » [CEP Fact Sheet](#) 
- » [CEP Participation Form](#) 
- » [CEP Eligibility Worksheet](#) 
- » [SP 21-2014 \(v.2\) Community Eligibility Provision: Guidance and Q&As - Revised](#) 
- » [February 25, 2014 USDA and USDOE Community Eligibility Provision Letter](#) 
- » [Community Eligibility Provision Implementation 2015 Presentation](#) 
- » [Community Eligibility Provision Implementation 2015 March 26, 2014 youtube](#)

Questions and Answers



Contact Information



Ohio Department of Education

25 South Front Street

Columbus, OH 43215

Telephone: (800) 808-6325

Website: www.education.ohio.gov