



To: National School Lunch Program Sponsors

From: Brigitte Hires, Administrator, Office of Nutrition

Date: April 14, 2025

Re: Community Eligibility Provision (CEP) Audit of the Enrollment, Identified Student Percentage (ISP), and Claiming Percentages

Introduction

The Community Eligibility Provision is 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. To be eligible for CEP, an individual school, group of schools or LEA must meet or exceed the established minimum identified student percentage (ISP) of 25% in the school year prior to implementing CEP.

An LEA may elect this provision for all schools, a group of schools, or an individual school. Participating schools must offer no cost breakfasts and lunches for the length of their CEP cycle, not to exceed four successive years, to all children attending participating schools and receive meal reimbursement based on claiming percentages. Claiming percentages are calculated for the first year of operation to determine eligibility for program participation and reestablished during the base year, typically every four years the program is in operation.

This memorandum provides guidance on the process the Ohio Department of Education and Workforce (the Department) will use in determining enrollment, identified student percentage (ISP), claiming percentage accuracy.

Calculating the Identified Student Percentage (ISP)

The ISP is calculated by dividing the number of identified students by the total number of actively enrolled students as of April 1, multiplied by 100 to identify the ISP for each building. An ISP of 25 percent qualifies a school as eligible for CEP participation. The ISP multiplied by 1.6 equals the percentage of meals that are reimbursed at the free reimbursement rates. The remaining percentage is reimbursed at the paid reimbursement rate.

- Identified students are students actively enrolled on April 1 with access to the meal programs **AND** certified eligible for free meal benefits based on at least one of the following:
 - Students identified free on the Direct Certification list as receiving Supplemental Nutrition Assistance Program (SNAP), Ohio Works First (OWF, Ohio's version of Temporary Assistance for Needy Families (TANF)), or Medicaid Free;
 - Students that free direct certification benefits were household extended;

- Students meeting the criteria and certified by the school liaison for homeless, migrant, runaway, or head start status;
- Ward of the court foster students of which the school has **documentation for the current year** to verify foster placement and the child is in custody of the state or foster agency.
 - Although schools might not collect documentation annually regarding foster student status, foster students may only be included for CEP calculations if the school has current year documentation on file.
 - Kinship placements are not considered foster in the federal school meal regulations and cannot be included.
- **Note: Students qualified as Medicaid Reduced are not included in the calculation nor are children who are categorically eligible during the school year but withdraw from the school prior to April 1.**
- Enrolled students are students that are actively enrolled on April 1 in a school and have access to at least one meal per day with the NSLP or SBP.
- ISP and claiming percentage calculation example:
 - 50 identified students divided by 100 enrolled students equals 50 percent ISP.
 - 50 percent ISP multiplied by 1.6 equals 80 percent free claiming percentage.
 - 80 percent of the total meals are reimbursed at the free rate. 20 percent of the meals are reimbursed at the paid rate to equal 100 percent of the meal reimbursement.

As part of the application process, schools with less than a 40 percent ISP must complete and submit to the Office of Nutrition the CEP Estimator Tool to demonstrate understanding of calculating the ISP and associated reimbursement. The CEP Estimator Tool is available in the [Claims Reimbursement and Reporting System \(CRRS\)](#), in the Applications menu choose the Download Form section and on the Department [Community Eligibility Provision](#) webpage.

Audit Process

While the decision to elect CEP rests with an LEA, the Department is responsible for ensuring program integrity and eligibility to participate. An LEA that intends to operate CEP for the following year as a new participant or as a returning participant establishes a new base year and will be audited.

For the Department to complete the audit, the LEA must submit all documentation no later than June 30 prior to the school year implementing CEP. As previously stated, documentation must be reflective of students actively enrolled and categorically free meal eligible as of April 1 of the school year prior to CEP implementation. Documentation must include the following:

- List of students actively enrolled on April 1 that have access to the school meals program (or within one week of April 1 if this date falls on a weekend);
- Direct certification reports (students receiving Supplemental Nutrition Assistance Program (SNAP), Ohio Works First (OWF, Ohio's version of Temporary Assistance for Needy Families (TANF), Medicaid Free);

- Current school year foster care court or child welfare agency documents;
- Certified list of homeless, migrant, runaway and head start students. The homeless, migrant and/or runaway liaison for the school must provide a list of students that meet the specified criteria as of April 1. For head start a signed and dated list from teacher or administrator.

The Department will conduct the audit to confirm that the LEA meets or exceeds the 25% ISP, participates in the National School Lunch Program and School Breakfast Program, and has a record of administering the meal program in accordance with program regulations as indicated by the most recent administrative review. Differences in ISP and resulting claiming percentages from the school's originally submitted counts to the audit confirmed counts may result in claim revisions.

Second Review Process

An LEA may request a second review if they feel that the CEP audit results are inaccurate. A request for a second review must be submitted to the Department within fifteen (15) calendar days of the notification of the results of the first review. The Department will then evaluate the request, and if accepted, will conduct a second review within thirty (30) calendar days of receipt. No submission of additional documentation will be permitted once the second review is complete. The results of the second review are final and may not be appealed.

This institution is an equal opportunity provider.