

# Community Eligibility Provision (CEP) in School Nutrition Programs

## Going Beyond the Basics

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*Working Together for Student Success*

# Webinar Participant Basics

- Please mute your phones or computer
- Use the chat feature to send questions
- PowerPoint will be posted as a pdf on the CEP website to share with other administrators:

<https://www.doe.in.gov/nutrition/community-eligibility-provision-cep>





# CEP - Going Beyond the Basics

## Agenda:

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





# Community Eligibility Provision (CEP)

**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 option 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

Using data on or around April 1, determine if the school(s) has a minimum of 40% “identified” students based on enrollment (not free and reduced percentage)

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 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 determining eligibility for school nutrition programs in participating CEP schools.





# CEP Requirements for Schools

Collect and maintain a count of breakfasts and lunches served to students at the point the students receive the meal (Point of Sale)







# Determining School Eligibility

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

- Directly Certified (DC) free using methods other than a free and reduced meal application. These include students who are:
- DC for free meals on the basis of their participation in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and Medicaid Free and the applicable extension of benefits to students within the same household





# Determining School Eligibility

“Identified” student categories also include:

**Homeless**

**Runaway**

**Migrant**

**Head Start**

**Ward of State  
Foster children  
(Not already  
included in DC)**



# Do Not Include in ISP:

- Any free/reduced students approved for meal benefits based on an income application
- Any students who may be called “foster” but are placed through private arrangements or who are formally adopted and are no longer wards of the state





# Determining School Eligibility

The percent of Identified Students must first be determined by participating school, but then can be used by school, 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 – the currently used factor.

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



# Determining Claiming Percentages



The 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

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

- **\*Multiplier:** (Range: 1.3 - 1.6)\* 1.6 is the current multiplier rate. 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 school counted and served 10,000 reimbursable lunch meals, 8,000 (80%) will be claimed for free reimbursement and 2,000 (20%) for paid reimbursement.



# Advantages of Grouping Schools

Schools in the same corporation may be grouped as long as the combined ISP is 40% or greater

Combining a lower ISP school with higher ones can lead to higher overall claiming percentage

Multiple groups within an SFA with different claiming percentages is allowable

All schools within corporation can be combined as one group with one claiming percentage





# Important Reminders

An Identified Student Percentage using April 1 enrollment data for each school must be determined before grouping

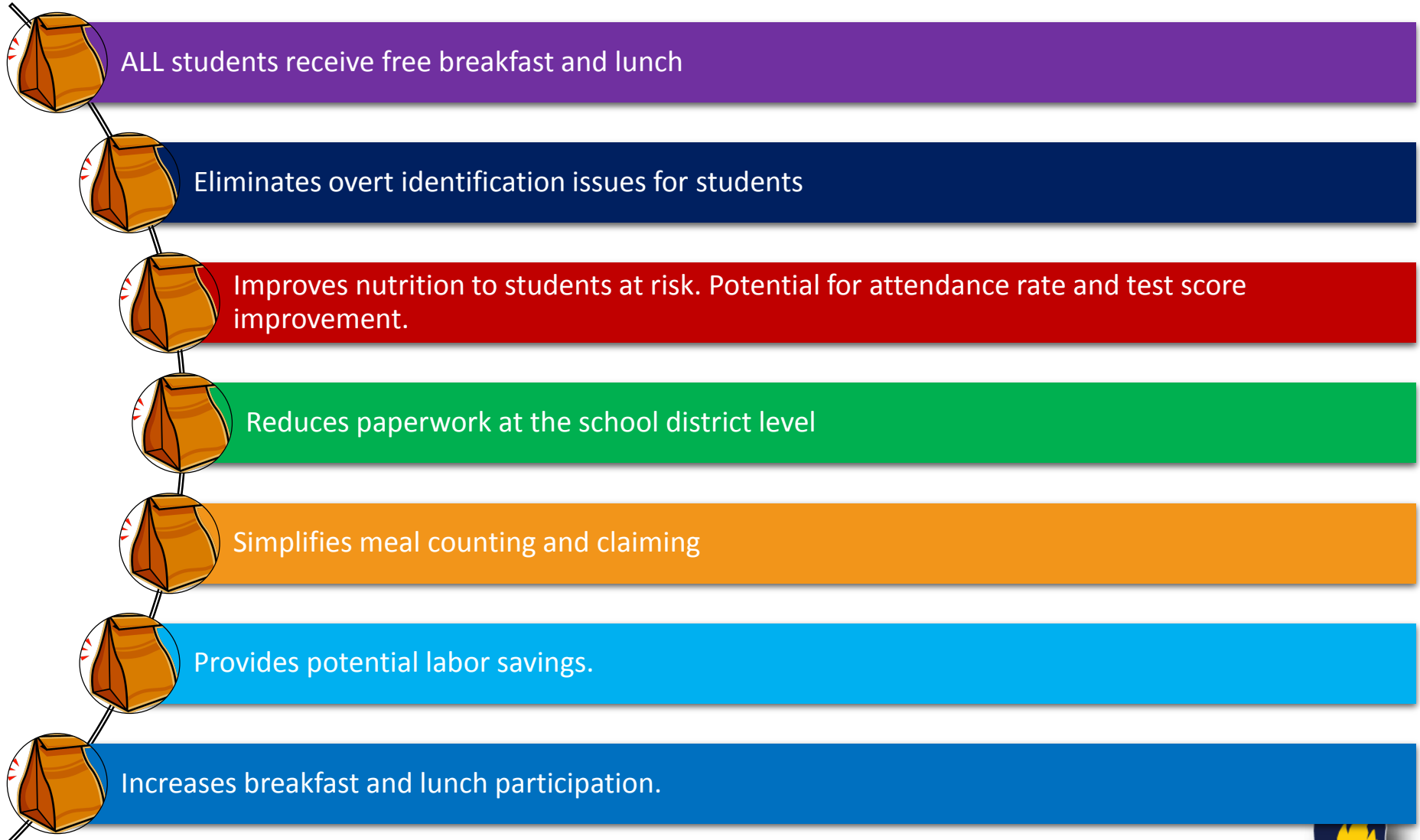
Individual School ISP will be used to determine eligibility of participation in other CN programs such as SFSP and At-Risk supports

School corporation must retain all records of ISP determinations for the duration of the claiming percentages PLUS an additional 3 years





# Advantages of CEP



# Disadvantages of CEP



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



SFA not collecting paper applications – to determine individual student economic status for textbook assistance



May be harder to collect applications for textbook assistance

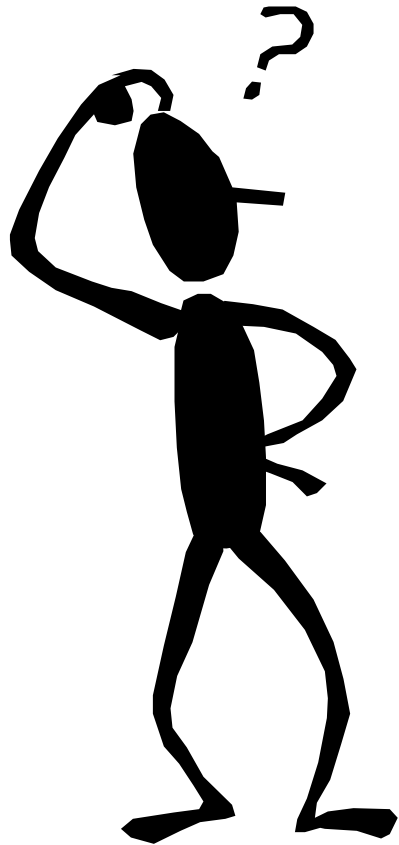


May be harder to go back to regular claiming and counting should economic conditions improve and DC percentages drop





# How does a school apply for CEP?



- First, take a look at your DC numbers

A school or group of schools must have an ISP of 40% or higher. In order to break even, the SA recommends at least a 55% ISP.

- Second, contact your field specialist and other school administrators

A DC percentage of 62.5% or higher results in 100% of meals claimed at the free rate





# CEP Participation and Agreement Form

An interested SFA must submit a CEP participation form and a CEP participation worksheet (Excel document) to IDOE 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 IDOE 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.

While not required, it is recommended for schools that have NOT reached the threshold of 62.5% Identified Students, which allows them to claim 100% of meals FREE.

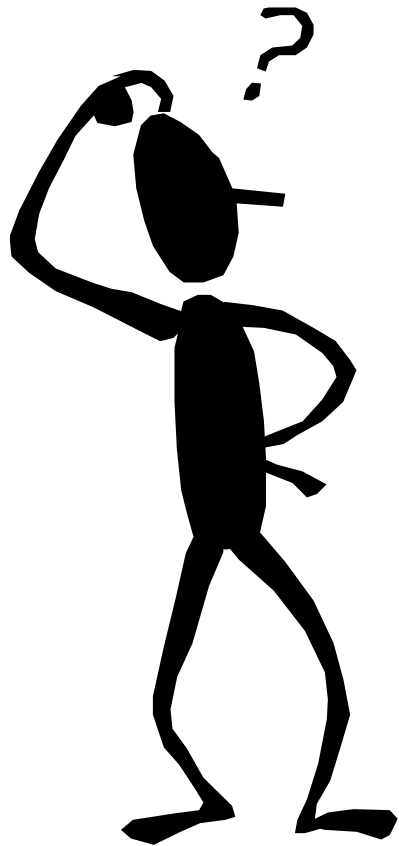


For schools that have already reached the threshold of 62.5% of Identified Students – it is not necessary to conduct direct certification until the end of the 4-year cycle unless DC data is needed for textbook assistance.





# How Does CEP Affect Free/Reduced Application Process?



The CEP program eliminates Free and Reduced Lunch applications for the purpose of the school lunch program

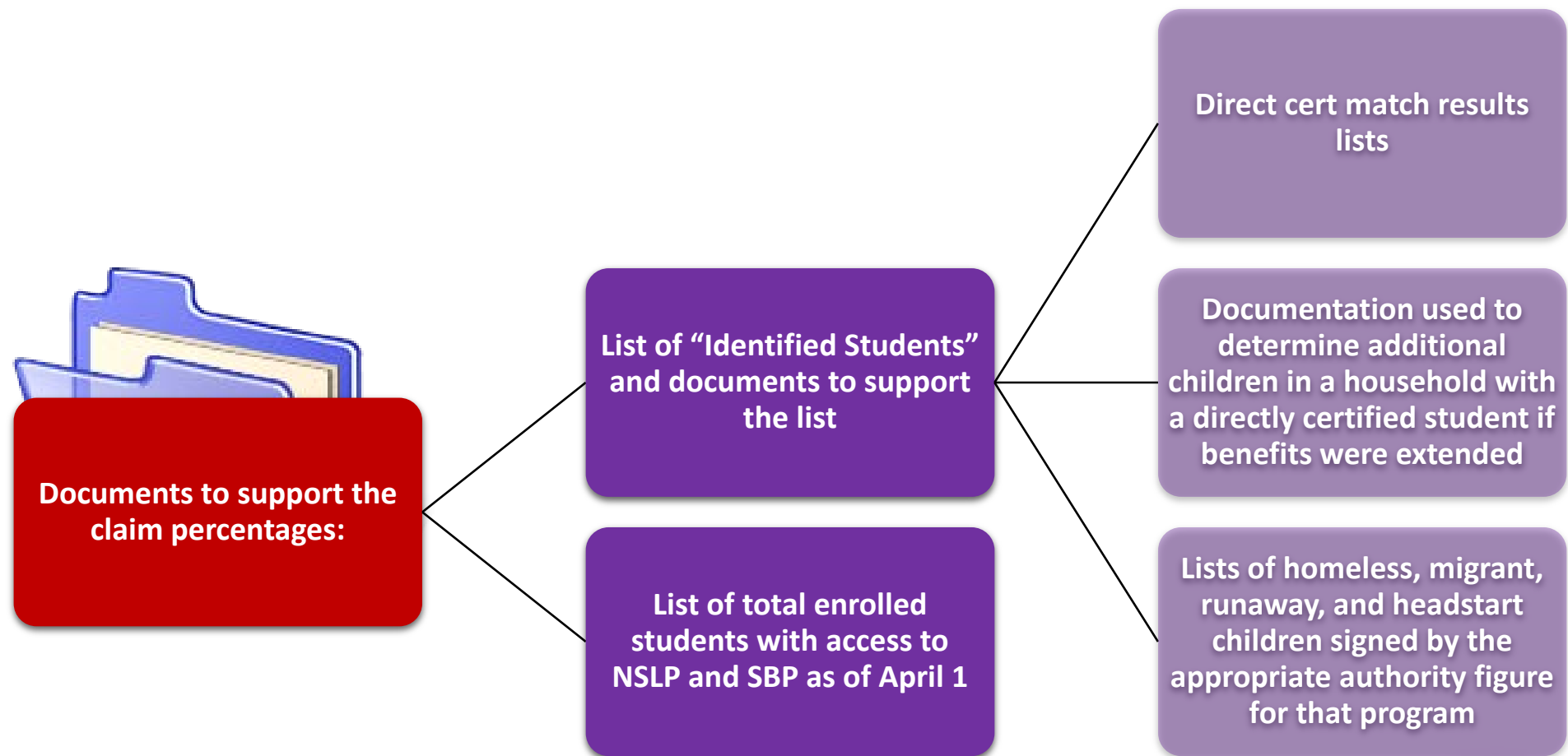
No applications = No verification!

No textbook assistance information for households not DC'd so must use textbook application





# CEP Basics: What paperwork must schools keep?



# CEP Basics: How do we Count Meals?

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

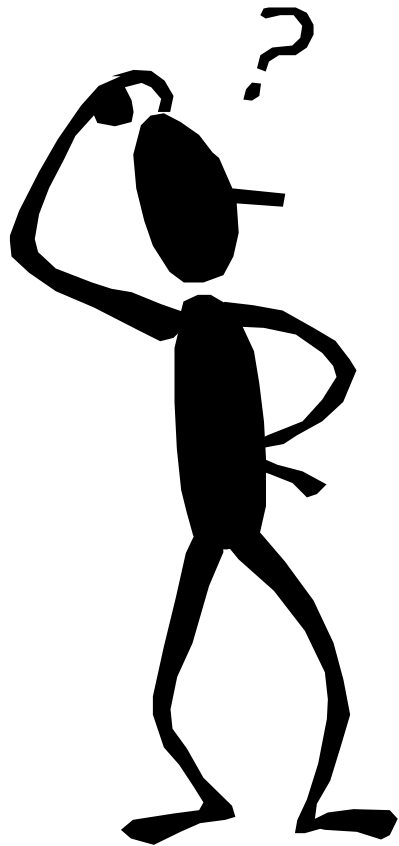
Meals must still be counted at point of service and schools are still responsible to count reimbursable meals only.

May use a “clicker” to count total reimbursable meals.

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



# What issues do SA staff see with POS counts ?



- Not ensuring that only one meal per student is claimed
- Forcing students to take a meal is not allowable – meal participation is voluntary
- Inaccurate counts with clickers
  - Staff get disrupted and miss students
- Meals must still meet meal pattern requirements
- Adults must pay for meals

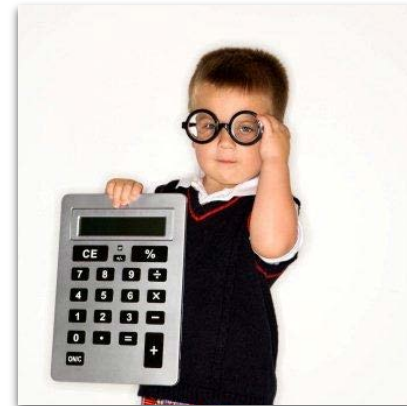


# CEP Basics: How Do We Submit a Claim?



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 enter daily total reimbursable meal counts into monthly totals by building for breakfast and lunch



# CEP Basics: Submitting Claims

The CNPweb 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 for meal counts (meal count tally sheets, monthly meal count worksheets, etc.)

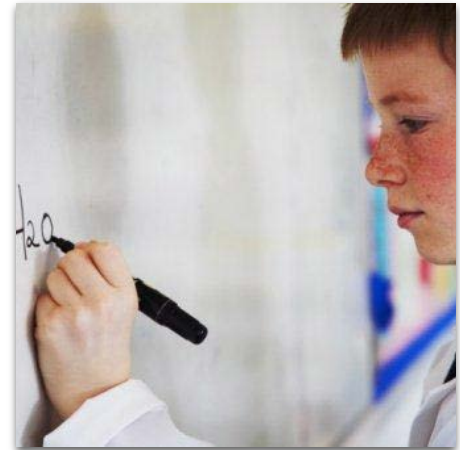


# CEP Basics: What about verification?

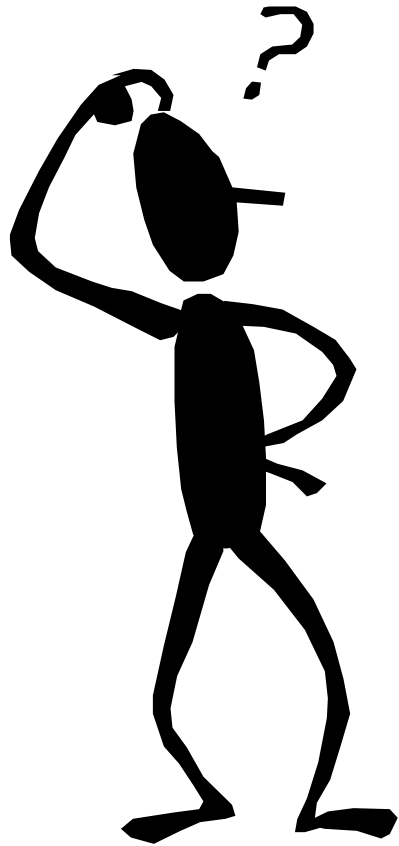


CEP schools do NOT have to do verification, but WILL fill out the CNPweb Verification Summary report yearly.

School corps having only some of their schools in CEP will have to do verification on applications selected from non-CEP school rosters.



# What issues do SA staff see with Verification?



- Erroneously including CEP school students in the verification sample
- Not following the instructions on the verification summary report
- Textbook only apps should not be included in the verification sample selection. Contact IDOE School Finance if you have questions about textbook applications.







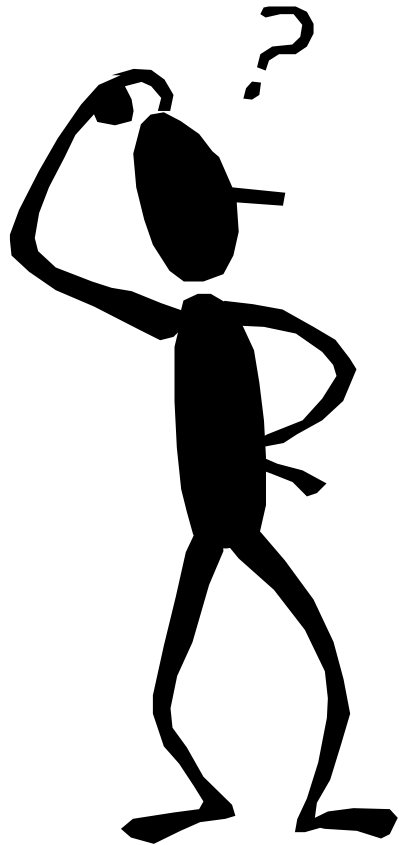
# How does CEP impact other Child Nutrition Programs?

Other Child Nutrition Programs will be able to use the ISP of individual sites to determine 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



# CEP frequently asked questions



If we are CEP corporate wide, can the food service still process textbook applications?

Yes, but the cost of processing textbook applications must be paid for out of the general fund. It is not an allowable expenditure from the food service account.



# CEP frequently asked questions

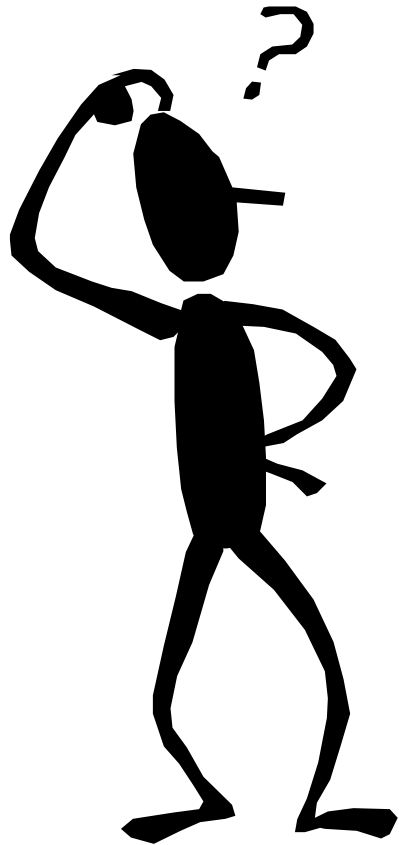
**What are the notification requirements for CEP?**

Annual notification is required for all households with students at CEP schools. A sample notification letter can be found on our CEP website:

<https://www.doe.in.gov/nutrition/community-eligibility-provision-cep>



# CEP frequently asked questions



If we provide breakfast in the classroom and make every child take a breakfast, can we use the attendance roster as our point of sale documentation?

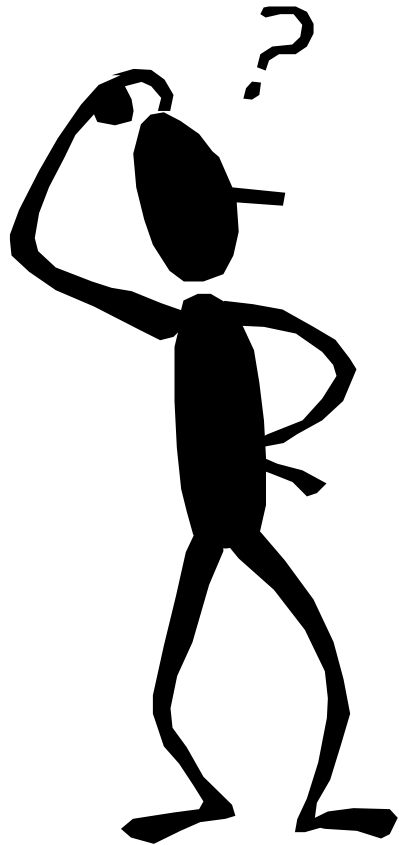
School meal participation is strictly optional. No one can force a student to take a meal. Attendance rosters can never be used as point of sale documentation.



# CEP frequently asked questions

## Will CEP increase participation?

Possibly, research shows that most CEP schools gradually increase participation about 4%, maybe higher. Of course, providing high quality, nutritious meals prepared onsite using batch cooking are always good practices for increasing overall participation.



# CEP frequently asked questions

## How do we claim visiting students?

For the most part, infrequent visiting students can be counted as CEP students. However, if you have students from a CEP school who regularly attend classes at a non-CEP school, then the claiming percentage of the CEP school should be used to calculate the number of meals claimed as paid and free at the non-CEP school. Meals must be claimed at the site where they are SERVED.



# CEP frequently asked questions

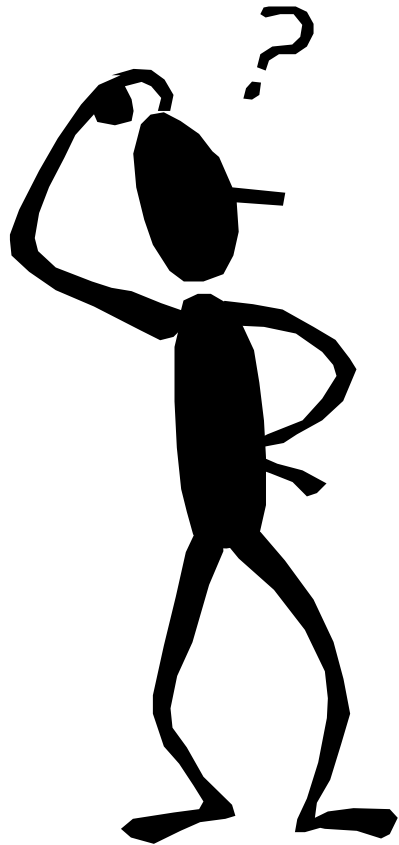
Can we toss all our CEP documents once we have an administrative review?

No! All documents supporting CEP claiming percentages must be kept through the entire claiming period (4 years for most SFAs) AND an additional 3 years beyond the submission of the final claim for reimbursement. For most SFAs this will be a minimum of 7 years. Enrollment rosters, DC runs, DC printouts, student record data all must be retained.





# CEP frequently asked questions



**We are not yet at 62.5% ISP = 100% free claiming. How do we increase our ISP?**

It is important for schools not yet at 62.5% ISP to continue to run DC, do DC look up on newly enrolled students, look up any applications with a FS or TANF number that are not showing up on DC, and ensuring that DC eligibility is being extended to others in the household, where applicable.



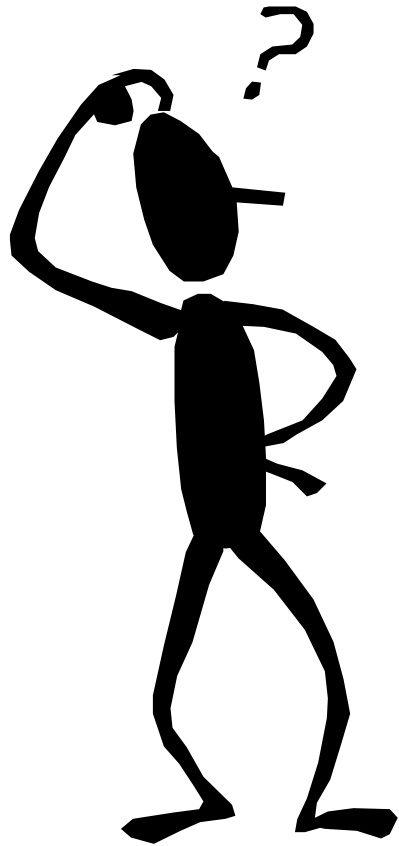
# CEP frequently asked questions

**What are the options at the end of the 4 year CEP period?**

Schools/school corporations nearing the end of a 4 year claiming period may use April 1 data of the 4<sup>th</sup> year to reapply for a new 4 year claiming cycle, go back to regular claiming and counting, or as a last resort apply for a grace year, if DC levels have decreased substantially (less than 40%) and officials need an additional year to determine what to do.



# CEP frequently asked questions



**Do adults at CEP schools get free meals too?**

CEP claiming is for students only. Adults must be charged the paid adult meal price as approved in CNPweb. If administrators want to pay for a portion or all of the adult meals using nonfood service funds, that is allowable, but detailed recordkeeping is a must.



# School & Summer Monitoring Staff

## Monitoring Team:

Jennifer Ress-Henry, Southwestern Indiana

Margie Fisher, Southeastern Indiana

Melissa Corum, Central and West Central Indiana

Claudia Garner, Central and East Central Indiana

Jacqueline Eory Peczkowski, Central Indiana

Gretchen Huntzer, Central Indiana

Rebecca Dooley, North Central Indiana

Mike Downey, Northwestern Indiana

Beth Flesher, Northeastern Indiana

Tina Skinner, SFSP Specialist



# Child Nutrition Administrative Review Mission Statement

The **PRIORITY** of the State Agency and School Food Authority should always be to ensure that all students have equal access to and can receive a nutritionally-balanced, reimbursable meal, including offerings of full components as required in the USDA meal pattern.



# Additional Questions?



# For More Information Contact:

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