



# COMMUNITY ELIGIBILITY PROVISION (CEP)

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# What is CEP?

The Healthy, Hunger-Free Kids Act of 2010 provides an alternative that eliminates the need for household applications for free and reduced-price meals in high-poverty Districts and schools. It is referred to as the Community Eligibility Provision (CEP)

Available nationwide beginning July 1, 2014.





# CEP Benefits

- **Increases access to nutritious school meals**
  - Reduces the stigma associated with free and reduced price meals
  - Reduces chance of overt identification
- **Facilitates implementation of creative meal service models**
  - Breakfast in the classroom and grab and go kiosks
- **Reduces paperwork and administrative costs**
  - Reduces household and administrative burden



# Standard Procedure vs. CEP

- School meal programs determine eligibility through:
  - Household income applications
  - Participation in assistance program (categorical eligibility)
    - Through case number on application (e.g. Supplemental Nutrition Assistance Program (SNAP))
    - Directly certified through matching participant lists with enrollment lists



# How CEP Works

- High-poverty schools provide free breakfasts and lunches to **all** students without collecting applications
- Eligibility is determined for
  - an entire district,
  - a group of schools within a district
  - a single school within a district
- A district may have some schools that participate in CEP and others that do not.



# Who Can Participate?

- Any school district can use this provision if at least one of its schools has **40 percent** or more students certified for free meals without application (called “**Identified Students**”)
- Most schools with a 40 percent **Identified Student Percentage** (ISP) have **75 percent** or more of their students qualifying for free or reduced-price meals



# Who are “**Identified Students**”?

**Children certified for free meals without submitting a school meal application**

- Supplemental Nutrition Assistance Program (**SNAP**)
- Temporary Assistance for Needy Families Cash Assistance (**TANF**)
- Food Distribution Program on Indian Reservations (**FDPIR**)
- **Medicaid** (*in districts participating in USDA’s demonstration project*)



# Who are “**Identified Students**”?

**Children certified for free meals without submitting a school meal application**

Includes children who are certified for free meals without application because they are

- in foster care
- in Head Start
- homeless
- migrant
- runaway



# How CEP Works, cont'd

- Free claiming percentage =  
**Identified Students x 1.6 (capped at 100%)**

Example: a school with 50% Identified Students would be reimbursed at the free rate for 80% of the breakfasts and lunches it served ( $50\% \times 1.6 = 80\%$ ) and the remaining 20% would be reimbursed at the paid rate

- Participating schools are guaranteed to receive the same free claiming percentage for **4 years**



# How CEP Works, cont'd

Districts and/or schools must

- Meet a minimum level of “identified students” for free meals in the year prior to implementing Community Eligibility
- Agree to serve free breakfasts and lunches to all students
- Agree to cover with non-Federal funds any costs of providing free meals to students above the amounts provided by Federal assistance.



# How Does CEP Work?

- Free claiming percentage = Identified Student Percentage (ISP) X 1.6 multiplier
- This percentage is used to determine USDA reimbursement rates (capped at 100%)
- Note: **If the percentage of identified students in a school is 62.5% or more, the reimbursement rate would be 100%**



# What is the Function of the 1.6 Multiplier?

Provides an estimate of the percentage of students eligible for free and reduced-price meals in participating CEP schools, groups of schools or districts that is comparable to the poverty percentage that would be obtained in a non-CEP school

***NOTE: Participating schools are guaranteed to receive the same claiming percentage for 4 years.***



# Identified Student Percentage

$$\text{Identified Student \%} = \frac{\text{\# of Identified Students}}{\text{Total \# of enrolled Students with access to NSLP/SBP}} \times 100$$

The Identified Student percentage may be determined by:

- ✓ An individual participating school
- ✓ A group of participating schools in the LEA
- ✓ Entire LEA if all schools participate

*A district may have some schools that participate in CEP and others that do not.*



# Calculations

- Must be at least 40% for an individual school, the group of schools, or entire LEA if all schools participate.
- Grouping schools: Divide the total number of identified students for all grouped schools by the total enrollment for all grouped schools to determine eligibility.
- **Note:** not all schools in the group or in the LEA if electing for the entire LEA have to meet the 40% threshold.



# Notification Timeline Summary

**April 15<sup>th</sup>** States obtain school level information from LEAs - ***Nutrition Services will use Direct Certification data from the CNP system.***

**May 1<sup>st</sup>** States publish lists of LEAs and schools on their websites for public notification - ***Lists will be published on Nutrition Services website.***

<http://www.education.ne.gov/NS/NSLP/CEP/CEP.html>

**May 1<sup>st</sup>** States provide link to notification lists to FNS for publication on FNS CEP website



<http://www.education.ne.gov/NS/NSLP/CEP/CEP.html>

## National School Lunch Program - NSLP

### Forms & Resource Center

#### Community Eligibility Provision

The Community Eligibility Provision (CEP) provides an alternative approach for offering school meals to local educational agencies (LEAs) and schools in low income areas, instead of collecting individual applications for free and reduced price meals.

The CEP allows schools that predominantly serve low-income children to offer free, nutritious school meals to all students through the National School Lunch and School Breakfast Programs. The CEP uses information from other programs, including the Supplemental Nutrition Assistance Program (SNAP) and the Temporary Assistance Program for Needy Families (TANF) instead of traditional paper applications.

- [Link to USDA FNS Community Eligibility Provision Resources](#)
- [CEP Brochure.pdf](#)

#### Webinars

- [CEP Part 1: Making the Most of Community Eligibility Provision](#)
- [CEP Part 2: Eliminating School Meal Applications](#)
- [CEP Part 3: Determining which schools will be Eligible to Participate in CEP](#)

[NUTRITION SERVICES](#) > [FORMS AND RESOURCE CENTER](#) > [NATIONAL SCHOOL LUNCH PROGRAM](#) > [CEP](#)



# Notification Timeline Summary

- LEAs/schools must notify the State no later than **June 30<sup>th</sup>** of the school year prior to the first year of electing CEP
- A new identified student percentage may be established each year of the four year cycle for use in the following year
- LEAs/schools may elect to stop CEP for the next year by notifying the State no later than **June 30<sup>th</sup>** of the current school year



# Things to Think About. . .

- Potential issues surrounding the absence of application data
  - Is school meal application data used to distribute other sources of funding? (Title I, Erate, State, Local, etc.)
- Anticipated level of federal reimbursement
- Non-federal resources available



# **COMMUNUNITY ELIGIBILITY PROVISION & TITLE I**



# WHAT ARE THE AREAS OF INTERSECTION BETWEEN CEP AND TITLE I?

- Several aspects of Title I require the use of poverty data at the school or individual student level
  - Within-state allocations
  - Within-district allocations
  - Equitable services for eligible nonpublic students
  - Accountability



# WITHIN STATE ALLOCATIONS

- Nebraska uses an alternate formula
  - Districts with census count  $\geq 20,000$ , allocations are calculated by USDE
  - For Districts with  $< 20,000$  census count
    - Census data and Free lunch data



# WITHIN DISTRICT ALLOCATIONS

- What if some schools are CEP and others are not?
- What effect does that have on building allocations?



# MAY A DISTRICT USE CEP DATA TO ALLOCATE TITLE I FUNDS TO ITS SCHOOLS?

- ESEA requires a District to select a poverty measure from the following options:
  - Most recent census data of poverty for children ages 5-17
  - Children eligible for free and reduced-price lunches under Richard B. Russell National School Lunch Act
  - Children in families receiving TANF
  - Children eligible to receive Medicaid
  - A composite of any of the above



- If a District selects NSLP data as its poverty measure (this what Nebraska uses) and has a Community Eligibility school, the Community Eligibility data will be part of the NSLP data that the District uses for within-district allocations.



## WHAT IF WE HAVE BOTH CEP AND NON-CEP SCHOOLS?

- The number of students directly certified is a subset of the total number of students eligible for free and reduced-price meals (thus the multiplier of 1.6)
- If a District has non-CEP schools with a poverty count based on the number of students approved for free and reduced-price meals and CEP schools with a poverty count based on Direct Certification data, the LEA must use a common poverty metric in order to rank order its schools and allocate Title I funds on an equitable basis.



## Example A: Within-District Allocations (CEP and non-CEP)

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
School	Community Eligibility School (Y/N)	Enrollment	Community Eligibility Schools: Identified Students Data <sup>1</sup>	Non-Community Eligibility Schools: Economically Disadvantaged Students Identified by Free and Reduced-Price Meals Data	1.6 Multiplier <sup>2</sup>	NSLP Count Used to Allocate Title I Funds <sup>3</sup>	Percentage of Economically Disadvantaged Students for Title I Allocations <sup>4</sup>	Per-Pupil Amount Used by LEA	Title I Allocation <sup>5</sup>
Lincoln	Y	425	400	N/A	1.6	425	100%	\$500	\$212,500
Washington	Y	500	297	N/A	1.6	475	95%	500	237,500
Adams	Y	600	350	N/A	1.6	560	93%	500	280,000
Jefferson	N	450	N/A	400	N/A	400	89%	450	180,000
Madison	N	400	N/A	200	N/A	200	50%	450	90,000
Monroe	N	500	N/A	100	N/A	100	20%	N/A	0
<b>Total</b>	N/A	2,875	N/A	N/A	N/A	2,160	75%	N/A	\$1,000,000

<sup>1</sup> The number of students may be determined once every four years for Community Eligibility schools. Moreover, the poverty data used will likely differ from other schools. For the Community Eligibility schools, the poverty data will be, for example, direct certification (Identified Students) data (e.g., SNAP or TANF) collected at least every four years times the multiplier. For other schools, the poverty data will be from household applications and direct certification data.

<sup>2</sup> The 1.6 multiplier applies only to a Community Eligibility school.

<sup>3</sup> For a Community Eligibility school, the Column 7 figure is equal to the lesser of (a) Column 4 x Column 6 or (b) Column 3. In other words, this number may not exceed the school's total enrollment. For the non-Community Eligibility schools, the Column 7 figure is equal to Column 5.

<sup>4</sup> Column 7 / Column 3.

<sup>5</sup> Column 9 x Column 7 (Note: Monroe is ineligible for Title I funds because its poverty percentage is below both the LEA's average and 35 percent.)



- Example B: Within-District Allocations (CEP and non-CEP)
  - Using Direct Certification Data Only

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7
School	Community Eligibility School (Y/N)	Enrollment	All Schools: Direct Certification Data Through SNAP <sup>1</sup>	Percentage of Economically Disadvantaged Students for Title I Allocations <sup>2</sup>	Per-Pupil Amount Used by LEA	Title I Allocation <sup>3</sup>
McKinley	Y	750	500	67%	\$500	\$250,000
Roosevelt	N	640	400	63%	500	200,000
Taft	Y	900	560	62%	500	280,000
Wilson	N	675	400	59%	450	180,000
Harding	N	500	200	40%	450	90,000
Coolidge	N	750	100	13%	N/A	0
Total	N/A	4,215	2,160	51%	N/A	\$1,000,000

<sup>1</sup>The figures in Column 4 exclude, for the purposes of Title I ranking and serving of schools, household application data for the non-Community Eligibility schools and direct certification from programs other than SNAP for all schools. (Community Eligibility schools are prohibited from collecting household applications.)

<sup>2</sup>Column 4 / Column 3.

<sup>3</sup>Column 4 x Column 6. (Note: Coolidge is ineligible for Title I funds because its poverty percentage is below both the LEA's average and 35 percent.)



## IF ALL SCHOOLS IN A DISTRICT ARE CEP, DOES IT NEED TO APPLY THE 1.6 MULTIPLIER?

- Using the multiplier would not be necessary.
- The District may rank its schools by the percentage of directly certified students in each school, even though the multiplier is used to determine USDA reimbursement amount.



# IF APPLYING THE 1.6 MULTIPLIER RESULTS IN MORE THAN ONE SCHOOL AT 100% POVERTY, MUST THE SAME PER PUPIL AMOUNT BE USED FOR EACH SCHOOL?

- If the schools have different direct certification percentages, the District *may* allocate a greater PPA for the 100 percent school with the higher percentage of directly certified students because the direct certification data indicate that the school has a higher concentration of poverty than the other 100% school(s).



## Example: Providing Different PPA for multiple buildings at 100% poverty when multiplier is applied.

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
School	Community Eligibility School (Y/N)	Enrollment	Number of Students Directly Certified	School	Number of Low-Income Students for Title I School Allocation Calculation <sup>1</sup>	Percentage of Low-Income Students for Ranking Title I Schools	Per-Pupil Amount Used by LEA	Title I Allocation
1	Y	500	400	80%	500	100%	\$750	\$375,000
2	Y	1500	1050	70%	1500	100%	\$650	\$975,000
3	N	500	10	N/A	450 <sup>2</sup>	90%	\$625	\$281,250
4	Y	500	250	50%	400	80%	\$625	\$250,000

<sup>1</sup> For a Community Eligibility school, this figure is equal to the lesser of: (a) Column 3 or (b) Column 4 multiplied by 1.6.

<sup>2</sup> Poverty data are based on household applications and direct certification data.



# IF GROUPING SCHOOLS, DOES EACH SCHOOL IN A GROUP HAVE THE SAME POVERTY PERCENTAGE FOR TITLE I RANKING AND ALLOCATION PURPOSES?

- For districts having an enrollment  $\geq 1000$  students, the District must use the CEP data, either alone or multiplied by the 1.6 multiplier, for each individual school for Title I ranking and allocation purposes.



# WHEN WILL CEP DATA BE USED FOR DETERMINING TITLE I ALLOCATIONS?

- Since Title I uses data from January 1 thru July 1 of the previous school year, CEP data would not be used for determining allocations until the 2015-16 school year (Data from 2014-15)



## MAY A DISTRICT USE “OLDER” DATA FOR DETERMINING TITLE I BUILDING ELIGIBILITY?

- No. A District must allocate Title I funds based on data from the most recent school year. (e.g., for 2014-15 allocations, the data would be from the 2013-14 school year)



# EQUITABLE SERVICES FOR NONPUBLIC

- Is a District's collection of poverty data on nonpublic students affected by CEP data?
  - Possibly. A District must identify the method it will use to determine the number of nonpublic school children from low-income families who reside in eligible attendance centers.
    - Same poverty measure used by public school
    - Comparable poverty data from a survey of nonpublic school families
    - Comparable data from a different source
    - Applying the low-income percentage of each participating public school attendance area to the number of nonpublic school students who reside in each area



# IF THE NOPUBLIC IS A CEP SCHOOL, DOES EVERY CHILD IN THE SCHOOL AUTOMATICALLY GENERATE TITLE I FUNDS FOR EQUITABLE SERVICES?

- No. Only those students who reside in a participating public school attendance center would generate funds with which a District would provide equitable services.
- If a District counts only directly certified students in participating public school attendance areas for Title I allocations to public schools, then only directly certified students in a CEP Nonpublic school who reside in those areas would generate funds for equitable services.



# IF A DISTRICT INCLUDES A CEP SCHOOL FOR PURPOSES OF NSLP, MUST THE LEA USE NSLP DATA FOR TITLE I PURPOSES?

- No, however CEP represents a means to both increase child nutrition and reduce burden at the LEA, school, and household levels.



# HOW OFTEN ARE DIRECT CERTIFICATION DATA AVAILABLE?

- At least annually
- Districts with schools not operating a special provision are required to run direct certification with SNAP at least three times per year



# HOW DOES COMMUNITY ELIGIBILITY AFFECT TITLE I ACCOUNTABILITY?

- For some reporting and accountability requirements, NDE and/or the District must have data on individual economically disadvantaged students.
  - AYP progress by subgroup
  - Needs Improvement: Public School Choice and Supplemental Educational Services



# POVERTY DATA

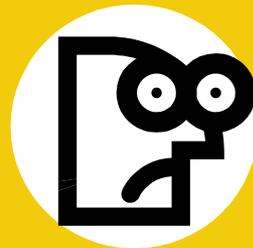
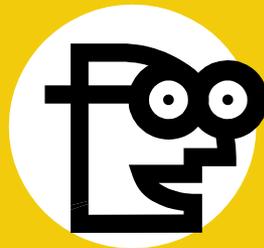
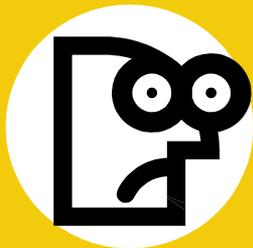
NDE is considering the following

- Uniform use of only CEP eligible (direct certification, homeless, migrant, Head Start) counts
- Uniform use of CEP eligible counts (as above) PLUS the 1.6 multiplier.
- Use the CEP eligible counts (as above) for CEP approved schools and districts AND use NSSRS free and reduced lunch data for all non CEP schools and districts



# FOR NFORMATION

- NDE CEP website
  - <http://www.education.ne.gov/ns/NSLP/CEP/CEP.html>
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**It's QUESTION TIME !!**