

**This webinar will start at 1:30 pm.  
There is no call-in. Audio is through your computer speakers.**



**COLORADO**

Department of Education

# Community Eligibility Provision (CEP) Implementation Webinar

**CDE Office of School Nutrition – Julie Griffith**

**CDE Office of School Finance – Rebecca McRee**

**May 17, 2016**



# Housekeeping

- **There is no call in feature for this webinar. Please use your computer speakers to listen in.**
- **Use the chat box to ask questions**
- **File share in the top right corner**
  - Office of School Nutrition CEP Validation Instructions
  - Community Eligibility Provision Program Packet
  - OSN CEP Request Form
  - Syncplicity Instructions
  - This PowerPoint presentation
- **Additional questions or concerns can be emailed to Julie Griffith**
  - [griffith\\_j@cde.state.co.us](mailto:griffith_j@cde.state.co.us)
  - 303-866-6759

# Objectives

- Offer an overview of the USDA's Community Eligibility Provision (CEP)
- Describe common CEP definitions
- Explain the validation requirements for identified and enrolled students
- Describe OSN validation process
- Explain At-Risk Count and implications for CEP
- Common Questions

# What is the CEP?

- **Statutory requirement from the Healthy, Hunger-Free Kids Act of 2010**
  - Provides an alternative to household applications in the NSLP and SBP
    - No school meal applications are distributed
  - Allows schools with a high percentage of directly certified free students to serve free meals to all enrolled students
  - Eliminates burden of collecting household applications
  - District makes the decision to participate based on eligibility
  - CEP is designed to be easy for a school or district to adopt
  - Reimbursement is based on percentage of identified students

# CEP Benefits



## Students/Parents

- Enjoy free, healthy meals
- No household application is required
- No stigma attached with a free meal

## Schools

- Reduced paperwork
- Less time waiting in lines and more time eating
- No collection of unpaid meal charges

# CEP Timeline

April 1st

- Districts report CEP Data to OSN via the online system

May 1st

- OSN notifies eligible LEAs of district wide or school site eligibility for the CEP

June 30<sup>th</sup>

- LEAs can choose to implement the CEP districtwide, for a group of schools or for an individual school site
- LEAs must submit the CEP Assurance, Request Form, Public Release, Letter to Households , At-Risk Form and Policy Statement to OSN

# Definitions

## ■ *School Site*

- An educational unit of high school grade or under, **recognized as a part of the educational system in the state** and operating under public or nonprofit ownership in a single building or complex of buildings
- Any public or nonprofit private classes or preprimary grade when they are conducted in the previously mentioned schools.
- NOT INCLUDED:
  - Residential Child Care Institutions (RCCI)
  - Outside schools with vended meals



# Definitions

- ***Enrolled students***
  - Those students who are enrolled in and attending schools and who have access to at least one meal service (NSLP or SBP) daily
  - Half day students who have access to one meal service are included
  - Students who do not have access to either breakfast or lunch but attend the school would **not** be included





# Definitions

- ***Identified students***
  - Those students who are certified for free meals NOT through individual household applications (not subject to verification)
    - Supplemental Nutrition Assistance Program (SNAP); includes extended eligibility
    - Homeless/Runaway
    - Migrant
    - Foster
    - Head Start; state program with same criteria
    - Certified by school official



# Questions to Ask....

- Are there any students that were certified by a school official?
- Are these students on any of the other sources of documentation?
- Did I double count any student?
- Do I have documentation to validate every reported student?
- Are these number as of April 1<sup>st</sup>?
- Are any students no longer enrolled?



# Other Factors

- Each year of the 4-year cycle, SFAs or schools may use the ISP from the first year, or the updated ISP, whichever is higher
- SFAs choosing CEP must consider costs
  - SFA must pay the difference between serving meals at no charge and the federal reimbursement
  - Example: Revenue from a la carte sales or other revenue



# How is the Identified Student Percentage Calculated?

- *Identified student percentage (ISP)*

$$\frac{\text{\# of Identified Students}}{\text{Total Number of Enrolled Students}} \times 100$$

- *Eligible SFAs/Schools*

- SFAs/Schools with an ISP of at least 40%

- *Work with Budget to see if the CEP will work for your district*

# How are meals claimed?

- **ISP = # of identified students/# of enrolled students x 100**
  - Multiply by a factor of 1.6
  - Result → Percentage of total meals served at the federal free rate
  - Remaining percentage of total meals is reimbursed at the federal paid rate

## **Example:**

ISP = 50% x 1.6 = 80%    80% → free                  20% → paid

400 meals x .8 = 320 claimed as free and 80 claimed as paid

250 meals x .8 = 200 claimed as free and 50 claimed as paid

# Previous CEP Data vs. Current CEP Data

- **District uses previous years CEP data**
  - OSN does NOT need to validate current years data
  - District **must** have the documentation from the first year or base year
- **District uses current years CEP data**
  - OSN **must** validate current years data and complete the validation process
  - OSN will determine if identified and enrolled numbers are correct
  - No documentation, may change the ISP and free claiming percentage
- **All new CEP districts must complete the CEP validation process**
- **Any school with changes to grade configurations must use current CEP Data**

# First Step: Requesting CEP

- 1. CEP Request Form**
- 2. Complete and submit to the OSN**
- 3. Excel Spreadsheet**
  1. Individual Site
  2. Group of Schools
  3. District
- 4. OSN will confirm the receipt**



# Next Step: State Office Validation

- LEAs and schools are required to keep documentation related to the methodology used to calculate the enrolled and identified students.
- Why? The ISP is used to calculate free claiming percentages and free meal reimbursement
- State agency is required to confirm the LEA's eligibility to participate in the CEP
- This includes a review the documentation and records from each year used to establish the ISP



# Required Documentation



## 1. Direct Certification

- All DC Lists that include name of student, date of list and signature
- All list of extended students; include name of student, DC child's status was extended from, documentation that the child lives in the same household as the DC student and signature

## 2. Head Start or state sponsored pre-kindergarten – Letter or list of children enrolled in Head Start/pre-kindergarten; must include date and signature.

## 3. Foster Child – Letter or list from the state or local welfare agency or court stating that the court has legal custody of the child along with the date of certification.

# Required Documentation

4. **Homeless/Runaway Child**– Letter or list of each child's name and the signature from the liaison McKinney Vento or Runaway and Homeless Youth Act.
5. **Migrant Child** – Letter or list with each child's name and the signature of the Migrant Education Program (MEP) official or local liaison along with date of certification.
6. **Directly Certified with School Official**
  - Application completed on behalf of the child
7. **Enrolled Students**
  - List of students names at each school site



# How does State Agency review of documentation work?

- **State agencies must review documentation submitted by the LEA to ensure that the LEA or school(s):**
  - ☑ Meet the minimum identified student percentage (40%);
  - ☑ Participate in both the NSLP and SBP; and
  - ☑ Have a record of administering the above programs in accordance with regulations.



# Validation Steps

- 1. Submit required documentation to OSN indicating the CEP districtwide, a group of schools or a school site**
  1. CEP Request Form
- 2. OSN will send the LEA the CEP Validation Instructions and CDE Syncplicity Instructions.**
  - LEA must read the instructions and gather the required documentation
- 3. LEA will submit the documentation**
- 4. OSN will validate all students or a sample depending upon the number of students**

# Common Problems

- **Data as of April 1<sup>st</sup> often is not the same as what is sent for validation; enrolled student numbers and identified student numbers**
- **School sites must follow the schools listed in the OSN online system**
  - Should match the CDE School Site code information
- **Double counting identified students**
  - Migrant lists, homeless lists
  - DC List
- **Confusion with enrolled students**
  - Must be students enrolled in and attending schools participating in the CEP and have access to at least one meal service daily

# Next Step: Complete the CEP Packet

## 1. OSN validates ISP

## 2. CEP Packet

1. General Guidance
  2. CEP Policy Statement
  3. CEP Assurance Form
  4. CEP Letter to Households
  5. CEP Public Release
  6. At-Risk Acknowledgement Form
- **LEA completes packet – Policy Statement, Assurance, Letter to Households, Public Release and At-Risk Form**
  - **OSN approves CEP**

# At-Risk Funding Overview

## Student October Count Data Submission

### ■ What is it?

- Pupil Enrollment Count Date
  - Wed., October 5, 2016

### ■ Why is it important?

- District pupil funding
- District at-risk funding
  - Free lunch count

# At-Risk Count Audit

In order to ensure accurate reporting of data fields used to determine at-risk funding, the Field Analyst Support Team conducts periodic at-risk count audits.

- Documentation evaluated using the same criteria outlined in the United States Department of Agriculture (USDA) Eligibility Manual for School Meals.
- Documentation must be dated on or before the pupil enrollment count date.
  - Unless carryover documentation is allowable and appropriate.



# At-Risk Count Audit Documentation

**Acceptable Documentation to Evidence Free Lunch Eligibility includes:**

- Direct Certification Lists
- Application for Free and Reduced Price School Meals
- Family Economic Data Survey
- Categorical Eligibility Determinations
  - Migrant List
  - Homeless List
  - Runaway List
  - Foster Child List

# At-Risk Count Audit Documentation

## Carryover Status

Absent current year documentation, a district may submit a student's prior year eligibility documentation to evidence free lunch eligibility if the pupil enrollment count day or alternative count day falls within the first 30 school days of the current year.

For the at-risk count audit, districts will need to be prepared to provide the carryover documentation at the time of audit to evidence free lunch eligibility.

# At-Risk Count Audit Documentation

## Documentation Retention

For the at-risk count audit, districts must retain all required documentation until audited by CDE or until five years from the certification due date (Nov. 10), whichever comes first.

CEP districts/schools must retain base year direct certification data and applications for up to 8 years in order to ensure documentation for those students identified as free lunch eligibility during the base year of that program.

# At-Risk Funding Impact on CEP

While all students attending a CEP district or school are eligible to eat for free, the district must have documentation to support a student's free lunch eligibility if reported as such in the Student October Count data submission.

# At-Risk Funding Impact on CEP

**For students reported at a CEP district or school in the Student October Count data submission, the following is true:**

*The district can report the student as free lunch eligible if it has documentation for the student evidencing free lunch eligibility at any time between, and including, the base year through the pupil enrollment count date of the current Student October Count data submission (July 1 of the base year through the pupil enrollment count date of the current school year) not to exceed the 4-year cycle.*

# At-Risk Funding Impact on CEP

- If a student withdraws from a CEP district during the 4 year cycle, the district must collect new documentation upon re-enrollment into the CEP district to determine lunch eligibility for the Student October Count data submission during the 4 year cycle.
- If a CEP district or school decides to reset its base year, then all new base year documentation must be re-collected (between July 1 and the pupil enrollment count date).
- After the base year, the district should monitor students reported at CEP districts or schools in subsequent Student October Count data submission who were NOT reported as free lunch eligible in the base year submission or subsequent submissions during the 4 year cycle.
  - The district should attempt to collect current year documentation to determine if any of these students are eligible to be reported as free lunch eligible.
- Districts cannot use funds received from the National School Lunch and School Breakfast Programs to process Family Economic Data Surveys

# At-Risk Count Audit Resources

## Field Analyst Support Team (FAST)

### At-Risk Count Webpage:

[http://www.cde.state.co.us/cdefinance/auditunit\\_atrisk\\_freeandreduced](http://www.cde.state.co.us/cdefinance/auditunit_atrisk_freeandreduced)

### Contact Information:

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- 303-866-6805

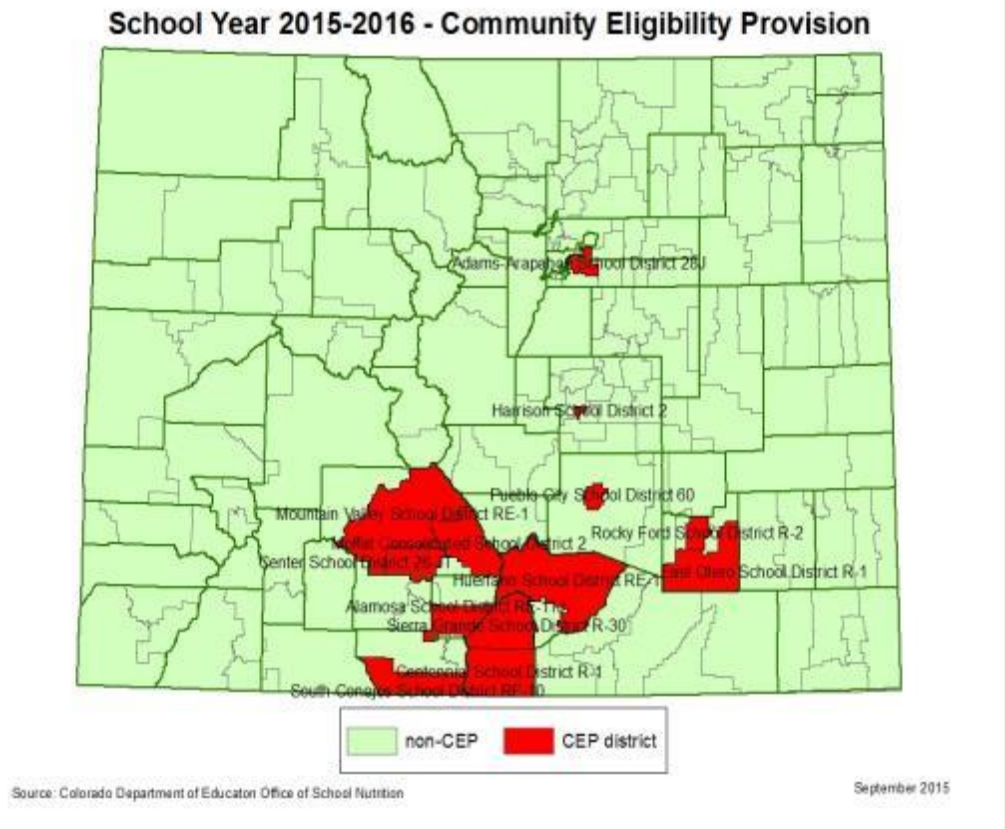
# Colorado's Success with CEP

## ■ Colorado SY 2014-15

- 8 SFAs participated
  - 6 districtwide
  - 1 group of schools
  - 1 individual school site

## ■ Colorado SY 2015-16

- 14 SFAs participated
  - 9 district wide
  - 4 group of schools
  - 1 individual school site





# Increased Participation

- **How does that add up to more revenue?**
  - General increased revenue due to and higher meal counts
  - USDA foods reimbursement is based on meal counts
  - State match is based on meal counts



# How can we group school sites to maximize the ISP?



- LEAs are allowed to establish different groupings of schools (within the same LEA) in order to maximize their ISP.
- If school group composition changes after a school year (say 2 new schools are added), a new ISP must be calculated and a new four year cycle would be started.

# What happens if a school/group of schools chooses to stop CEP mid-year?

- Schools can elect to stop the CEP and return to normal counting and claiming at any time, including in the middle of the school year
- State agencies are required to establish a reasonable timeline (at least 30 days) for LEAs and schools stopping CEP mid-year to resume normal counting and claiming and to give the school time to notify families and process applications.



# How are meals for visiting students claimed?

## Non-CEP student visits a CEP school

- Meals served to the visiting students would be included as part of the total count of meals served in the CEP school.
- Operationally easier on the CEP school, prevents overt identification, and the CEP school will be reimbursed for meals served.

## CEP student visits a non-CEP school

- FNS strongly encourages non-CEP schools to provide free meal to visiting CEP students to avoid any disruption to the child's usual meal service routine
- Free meals to visiting CEP students should be claimed according to the claiming percentages of the CEP school.
- SFA food service account may be used to cover the value of any paid meals of visiting students

# What if a parent insists on paying for a child's meal?

- The district should explain the benefits of CEP to the parents.
- Children may bring lunches from home or purchase a la carte foods, if available.
- Parents that insist on paying should be encouraged to donate to the school food service.



# What happens if a student refuses to select a reimbursable meal?

- Non-reimbursable meals may not be claimed as reimbursable meals (like standard counting & claiming procedures)
- Districts discretion to cover the cost of the food or charge the student a la carte prices



# What if a school participating in CEP changes?

- **Changes in student population such as an addition of a grade, removal of a grade or if school sites are combined, require recalculation of the ISP.**
  - Same for district wide or individual school sites
  - If one school in a district wide CEP changes; the entire ISP will need to be recalculated and the new ISP used the following school year
- **A new base year will need to be used the following school year if this occurs during the school year or in the summer**



# Questions/Feedback

