



Title I, Part A and the Community Eligibility Provision (CEP)

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Intersection of Title I and CEP

- Overview of the Community Eligibility Provision (CEP)
- Within-district allocations
- Within-state allocations
- Equitable services to eligible private school students
- Accountability and Student Coding

March 2015: Revised USED Title I Guidance for Schools Electing CEP

- Tool to help school districts participating in CEP carry out Title I successfully
- Updates guidance first issued in January 2014
- Based primarily on questions from the field to ED since January 2014
- Available at:
 - <http://www2.ed.gov/programs/titleiparta/15-0011.doc>
 - <http://www.fns.usda.gov/updated-title-i-guidance-schools-electing-community-eligibility>



CEP Overview

Community Eligibility Provision (CEP)

- A universal meal plan under the National School Lunch Program (NSLP)
- Permits eligible LEAs and schools to provide meal service to all students at no charge, regardless of economic status
 - (Section 104a of the Healthy, Hunger-Free Kids Act)
- CEP was implemented nationwide July 1, 2014

Purpose

- The overall purpose of the CEP is to improve access to nutritious meals for students in high poverty areas by providing meals to all students “at no cost” to the students.

Participation Requirements

- An LEA, school(s), or cluster of schools must have a minimum of 40% “identified students” by April 1, prior to the first year of implementation.
- LEA must agree to provide meals to all students at no cost.
- LEA must cover costs not provided in federal meal reimbursement with NON-federal funds.
- LEA must NOT use free and reduced lunch applications (FRLP) in CEP schools.

“Identified Students”

Directly certified (DC)

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families (TANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Children living in transition/experiencing homelessness (on the LEAs liaison list)
- Head Start children
- Migrant youth
- Runaways
- Non-applicants as approved by local officials



CEP Impact on Title I: Within-district Allocations to Schools

Within-district Allocations: Rank and Serve

The LEA must use a **common poverty metric** to rank order schools and allocate Title I funds on an equitable basis.

- **Suggested metric 1:** Multiply number of students identified by DC in a CEP school by the 1.6 multiplier, then divide by the enrollment of school (provides approximation percentage of free and reduced-price meal numbers) (*DC x 1.6 multiplier*)
 - Non-CEP schools use the FRLP
- **Suggested metric 2:** Rank all schools (CEP and non-CEP) based solely on the number students directly certified through SNAP only. (*DC only*)

Within-district Allocations: Rank and Serve

- **Suggested metric 3:** Multiply number of students identified by DC in a school (CEP and non-CEP) by the 1.6 multiplier, then divide by the enrollment of school (provides approximation percentage of free and reduced-price meal numbers) (*DC x 1.6 multiplier CEP and non-CEP*)
- **Suggested metric 4 (TN):** Rank CEP schools using the number of student identified by DC plus the number of **unduplicated** students identified through the household surveys (divided by the enrollment of the school)

*Please check the latest guidance from the department or with your assigned Regional Consultant.

Within-district Allocations: Rank and Serve

- Title I ranking and serving procedures require school-level poverty data.
- Most rules regarding within-district allocations remain the SAME:
 - LEA serves schools in rank order by poverty percentage.
 - Schools over 75% must be served first.
 - Grade span grouping may only be applied after schools above 75% are served.
 - CEP and non-CEP schools may receive differentiated per pupil allocations (PPA).
 - Per pupil allocations for high poverty schools must not be less than lower poverty schools.
 - LEA may stop serving schools at any point in the rank order.

Within-district Allocations: Poverty Data

- If all schools are participating in CEP, only use DC data.
 - Choices of school-level poverty measures include school lunch data as an option.
 - CEP data are part of school lunch data.
 - ED CEP guidance on within-district allocations applies when a school district has a CEP school and uses school lunch data to rank and serve schools.
- If some schools are participating CEP, only use DC for all schools **OR** use DC data for CEP schools and an allowable alternate method for non-CEP schools.

Multiplier Impact: Child Nutrition vs. Title I

- For USDA reimbursement purposes, the “identified students” percent is multiplied by USDA factor of 1.6.
- For Title I school allocation purposes, the 1.6 is applied when some schools are CEP **AND** non-CEP schools will collect data through Free/Reduced Lunch (including federal FRLP and/or state household survey).

District Scenarios

- CEP Guidance
 - www2.ed.gov/programs/titleiparta/15-0011.doc
- CEP and non-CEP schools
 - ED Guidance Question 18
- All CEP schools
 - ED Guidance Question 19
- Grouped schools for CEP eligibility and reimbursement purposes
 - ED Guidance Question 21

Scenario: CEP & non-CEP Schools

ED Guidance Question 18

- Using multiplier for CEP schools ONLY
 - For CEP schools, multiply number of students identified by DC in a school by the 1.6 multiplier, then divide by the enrollment of school (*DC x 1.6 multiplier*)
 - Enrollment = 600
 - CEP Identified Students = 350
 - NSLP* Count = 560 (350 x 1.6)
 - Percent Economically Disadvantaged = 93% (560/600)
 - For non-CEP schools use the FRLP.

*National School Lunch Program

Scenario: CEP & non-CEP Schools

ED Guidance Question 18

- Using the multiplier for ALL schools (added March 2015)
 - For both CEP and non-CEP schools, multiply the number of students identified by district certification in a school by 1.6 and divide by the enrollment in the school.
 - The calculation for non-CEP schools would be done the same way as for CEP schools (see previous slide).

Scenario: CEP & non-CEP Schools

ED Guidance Question 18

- Direct Certification
 - Rank all schools (CEP and non-CEP) solely on the basis of the percentage of students directly certified through SNAP (or another direct certification measure available for all schools).
 - Enrollment = 750
 - Direct Certification = 500
 - Percent Economically Disadvantaged = 67% (500/750)

*School must meet the 40% ED rate to be eligible for services through Title I allocations. There is not an equivalent when an LEA chooses not to use the multiplier.

Scenario: All CEP Schools

ED Guidance Question 19

- An LEA may have all CEP schools.
- If so, the LEA may rank its schools by the percentage of directly certified students in each school, even though the multiplier is used to determine the USDA reimbursement amount.
 - All schools receiving Title funds must meet the 40% poverty threshold.

Scenario: Grouped Schools for CEP

ED Guidance Question 21

- An LEA may group schools to determine CEP eligibility and reimbursement.
- An LEA with an enrollment of at least 1,000 students must rank schools individually to determine Title I eligibility and allocations.
- An LEA therefore would need to use data specific to each school for Title I purposes.

In Summary...

All schools CEP participating:

- LEA must use DC data
 - LEA may choose to use the multiplier

In Summary...

Some schools CEP participating:

- LEA uses DC data in all schools;
- LEA uses DC data x1.6 multiplier in all schools; or
- LEA uses DC data x1.6 multiplier in CEP schools and non-CEP schools will collect data through Free/Reduced Lunch
- LEA uses DC data and unduplicated count of household survey in CEP schools and non-CEP schools will collect data through Free/Reduced Lunch.

Circumstances that May Occur

Multiple Schools at 100 Percent Poverty

ED Guidance Question 20

- Application of the 1.6 multiplier may result in more than one school with a 100 percent poverty rate.
- Among those schools an LEA may allocate a greater per-pupil amount to the school with a higher direct certification percentage.

Circumstances that May Occur

CEP Schools above School District Cutoff

ED Guidance Question 22

- Application of the 1.6 multiplier may result in more schools above LEA-established cutoff for allocating Title I funds.
- LEA options include:
 - raising cutoff; or
 - using another permissible poverty measure or composite of permissible measures

Circumstances that May Occur

Timing of CEP and non-CEP Data

ED Guidance Question 24

- LEA may collect household applications from non-CEP schools at a different time than it identifies students in CEP schools (April 1).
- LEA options include:
 - use data from the same school year;
 - access direct certification data for non-CEP schools on April 1 to use with household applications; or
 - for Title I only, access direct certification data for CEP schools at the same time as accessing this information and collecting household applications for non-CEP schools.

Local Survey

ED Guidance Questions 23 & 24 (added March 2015)

- January 2014 guidance include information on LEAs using a local survey to help implement Title I.
- March 2015 update adds a discussion on when LEAs may use Title I funds to pay for the local survey.



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CEP Impact on Title I: Within-state Allocations

State Census Poverty Count

ED Guidance Questions 31 & 32 (Q31 modified March 2015)

- Need for a state to derive a Census poverty count using alternate poverty data for “special LEAs”
 - School lunch data, include CEP data, may be used to derive Census poverty count
 - Use of multiplier generally not needed for this purpose
- School lunch data are a data element in the methods approved by ED for those states that use alternative poverty data for “small LEAs” (under 20,000 total population).



**Equitable Services to
Eligible
Private School Students**

Generation of Funds

- Title I funds are generated to provide equitable services to eligible private school students based on the number of private school students from low-income families who reside in participating public school attendance areas and not on the basis of all students in a private school.
- Even if a private school is a CEP school, and all students in the school are from low-income families, only those students who reside in a participating public school attendance area would generate funds for Title I services.

Poverty Data Collection

- For the purposes of Title I, Part A, it is an LEA's responsibility to identify the method it will use to determine the number of private school children from low-income families who reside in participating public school attendance areas.
- As part of the process for identifying a method, the LEA must consult with and consider the view of private school officials.

Poverty Data Collection Methods

- Use the same poverty measure as used by the LEA to count public school students (e.g., NSLP data)
- Use comparable poverty data from a survey of private school families and extrapolating the results from a representative sample if complete actual data is unavailable
- Use comparable poverty data from a different source
- Apply the low-income percentage of each participating public school attendance area to the number of private school students who reside in each area (i.e., proportionality)
- Use an equated method of low income correlated with the measure of low income used to count public school students

CEP Private School & non-CEP Public School

- If a private school participates in CEP and an LEA uses NSLP data to allocate Title I funds to public schools, but has no public CEP schools, the LEA would most likely calculate equitable services funding by multiplying the number of directly certified students who live in a participating public school attendance area and are enrolled in the private school by the 1.6 multiplier.

CEP Private School & CEP Public Schools

- If a private school participates in CEP and the LEA uses NSLP data to allocate Title I funds to public schools, with some or all public schools participating in CEP, the method for calculating funding for equitable services in the private school would vary depending upon the specific method used to allocate funds to public schools.



Accountability and Student Coding

Accountability

ED Guidance Questions 33 & 34 (Q34 modified March 2015)

- Data for economically disadvantaged students are necessary to meet some reporting and accountability requirements.
- For most LEAs, school lunch data, including CEP data, may be the best source to identify economically disadvantaged students.

Accountability

- Because CEP schools are likely to have high poverty levels, a state may deem all students in these schools as economically disadvantaged for reporting and accountability purposes.
- A state may choose to include only identified students in the economically disadvantaged subgroup.
- If survey data are available, a state may use those data to identify students in the economically disadvantaged subgroup.

Differentiating Lunch and ED Status

USDA prohibits CEP schools from accepting FRPL applications. The inability to collect economically disadvantaged (ED) data using the application means:

Free/Reduced Lunch status ~~≠~~ ED status

- All students attending a CEP school receive lunch at no cost regardless of income; so
- There is no connection between receiving a free meal and household income; *because*
- Receiving a free lunch is no longer an indication of poverty or a condition of economic status.

Defining the Economically Disadvantaged Subgroup for Accountability

- For accountability purposes in 2015-16, only students who are **directly certified** will be considered part of the Economically Disadvantaged (ED) subgroup.
- A “directly certified” student is any student eligible to receive free lunch without an application, regardless of the district or school CEP status.

ED Subgroup for Accountability

Student classifications "J", "H", "I", and "U" will be used to define the ED subgroup for Accountability.

Classification	Description	2015-16 ED Accountability Subgroup (Y/N)	2015-16 Poverty Definition for Finance and Other Purposes (Y/N)
X	Free Lunch	N	Y
Y	Reduced Lunch	N	Y
3	CEP Eligible	N	Y
J	Direct Certification	Y	Y
H	Homeless	Y	Y
I	Migrant	Y	Y
U	Runaway	Y	Y
L	Pre-K EconDis	N	Y
E	Headstart Fund	N	Y

ED Subgroup for Finance & Other Purposes

Student classifications will be used to define the ED subgroup for Finance and Other Purposes

Classification	Description	2015-16 ED Accountability Subgroup (Y/N)	2015-16 Poverty Definition for Finance and Other Purposes (Y/N)
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J	Direct Certification	Y	Y
H	Homeless	Y	Y
I	Migrant	Y	Y
U	Runaway	Y	Y
L	Pre-K EconDis	N	Y
E	Headstart Fund	N	Y

Remember Lunch Status ≠ ED Status

Do I still need to use codes “X”, “Y” and “3”?

- **YES**, remember, these codes are used for various reasons and still provide necessary data.
- “X” and “Y” are relevant codes for school nutrition for funding (meal reimbursements), etc.
- “3” is still relevant for state funding as there is currently no change to the BEP definition for “at-risk” students.
 - Incremental at-risk funding based on students being “**eligible**” for free or reduced lunch.
 - The household survey uses the same income eligibility guidelines.

“Identified Students”

Directly certified (DC)

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families (TANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Children living in transition/experiencing homelessness (on the LEAs liaison list)
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Student Coding

- If students are coded incorrectly **OR** not at all, this affects FUNDING and ACCOUNTABILITY!
- A student can be classified using multiple codes.
 - A student may be in a CEP eligible school and be migrant. The student would have multiple student classifications and would be coded as “3” AND “I” in the LEA student information system.



Resources

Resources

- USDA FNS: [“Community Eligibility Provision: Guidance and Q&As”](#) (memo SP45-2015) (Updated September 2015)
- ED: [“Guidance: The CEP and Selected Requirements under Title I, Part A”](#) (March 2015)
- FCC: Updated [guidance letter](#) on E-Rate for CEP participants (November 21, 2014)
- USDA: [Proposed rule](#) on CEP (November 4, 2013)
- Memo: [Defining Economically Disadvantaged Subgroup Accountability](#) (July 22, 2015)
- Memo: [New Student Classification Code “J”](#)
- FAQ: [Defining the Economically Disadvantaged \(ED\) Subgroup for Accountability](#)

Questions





Department of
Education

Districts and schools in Tennessee will exemplify excellence and equity such that all students are equipped with the knowledge and skills to successfully embark on their chosen path in life.

Excellence | Optimism | Judgment | Courage | Teamwork

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Citizens and agencies are encouraged to report fraud, waste, or abuse in State and Local government.

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1-800-232-5454

Notifications can also be submitted electronically at:

<http://www.comptroller.tn.gov/hotline>

