



Community Eligibility Provision in Tennessee

March 13, 2014

Agenda

- **What is the Community Eligibility Provision (CEP)?**
- **Participation and Eligibility Requirements**
- **Determining CEP Percentage**
- **Process for Enrolling and Implementing CEP**
- **Things to Remember**
- **Additional Resources**

What is the Community Eligibility Provision?



What is Community Eligibility Provision (CEP)?

- A universal meal plan under the National School Lunch Program (NSLP) that 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)

Why are we doing CEP in Tennessee?

- The Community Eligibility Provision has been phased in by USDA over a period of 3 years beginning July 1, 2011.
- The initial pilot year in 2011 included IL, KY, and MI.
- Currently CEP operates in 11 states, 600 LEAs, and 4,000 schools in Illinois, Kentucky, Michigan, New York, Ohio, District of Columbia, West Virginia, Florida, Georgia, Maryland, and Massachusetts
- Beginning July 1, 2014 CEP will be implemented nationwide

What are the benefits of CEP?

In a joint letter, Secretary of Education Arne Duncan and Secretary of Agriculture Thomas J. Vilsack stated the benefits as:

- Reduces USDA required administrative costs and paperwork
- More children may receive nutritious meals during the school day
- Creative meal service models are easier to implement
- Eliminates tracking and accounting student meal charges

What are the challenges of CEP?

- Information from USDA school nutrition forms is currently used in formulas to determine district allocations for:
 - Title I funding
 - IDEA funding
 - eRate funding
 - BEP funding

- This information is also used in our accountability systems to determine percentages for the subgroup Economically Disadvantaged (ED)

What are My Responsibilities as a Participant?

- Serve free meals to all students in participating schools
- Count the number of reimbursable meals served to students daily
- Cover costs of providing free meals to all students that exceed the Federal reimbursement with only non-Federal funds
- Comply with all CEP procedures as described in [Proposed Rules: National School Lunch Program and School Breakfast Program](#)

Participation and Eligibility Requirements



What are the CEP Eligibility Requirements?

An LEA, school, or schools must have a directly certified identified student percentage $\geq 40\%$ by April 1, prior to the first year of implementation

- Identified student percentage may be determined by:
 - Individual participating school
 - Group of participating schools (within an LEA)*
 - Entire LEA*

$$* \text{ **Identified Student Percentage** } = \frac{\text{Number of Identified Students}}{\text{Number of Enrolled Students}} \times 100$$

**Divide total number of identified students in individual or grouped schools by total enrollment for all individual or grouped schools to determine eligibility.
Individual schools within a group or LEA do not have to meet the 40% threshold*

Who Qualifies as Identified Students?

Low Income children that are Direct Certified

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance to Needy Families (TANF)
- Homeless, migrant, runaway
- Certified foster children

Students certified through the following programs

- Children enrolled in Head Start Program or Even Start programs

$$\text{Identified Student Percentage} = \frac{\text{Number of Identified Students}}{\text{Number of Enrolled Students}} \times 100$$

- Direct certified is not the same as FRPL eligible

Who Qualifies as Enrolled Students?

- Students who are enrolled in CEP participating schools, attend at least a portion of the day, and have access to at least one meal service daily qualify.
 - Includes half-day students who have access to either breakfast or lunch

$$\text{Identified Student Percentage} = \frac{\text{Number of Identified Students}}{\text{Number of Enrolled Students}} \times 100$$

Determining CEP Claiming Percentage



CEP Claiming Percentages

- CEP Claiming Percentage = Identified Student Percentage x 1.6
(cannot exceed 100%)
- CEP Claiming Percentage reimbursed at the Federal free rate (\$3.01)
- Remaining meals are reimbursed at the Federal paid rate (\$0.36)
- Meal costs in excess of the total Federal reimbursement must be covered through non-Federal sources

Can LEAs/Schools Update Claiming Percentages?

A new identified student percentage may be established each year.

An LEA/school may select a higher identified student percentage:

- By April 1 the year prior to the first year of operating CEP
- By April 1 the year prior but within the 4-year cycle

CEP Claiming Percentages Example

Identified student percentage = 50%

Free claiming percentage = 80% (50% X 1.6)

Paid claiming percentage = 20% (100% - 80%)

Total Daily Meals = 1,000

Number of Free meals = 800 (1,000 X 80%)

Number of Paid meals = 200 (1,000 – 800)

Updating CEP Claiming Percentages

Year 1

Identified student % = 50%

Free claiming percentage = 80% (50% X 1.6)

Paid claiming percentage = 20% (100% - 80%)

Total Daily Meals = 1,000

Number of free meals = 800 (1,000 X 80%)

Number of paid meals = 200 (1,000 - 800)

Year 2

Identified student % = 53%

Free claiming percentage = 84.8% (53% X 1.6)

Paid claiming percentage = 15.2% (100% - 84.8%)

Total Daily Meals = 1,000

Number of free meals = 848 (1,000 X 84.8%)

Number of paid meals = 152 (1,000 - 848)

Additional 960 meals per month

CEP Monthly Federal Reimbursement Calculator

- <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013a2.xls>

Districts should use the calculator to determine cost-effectiveness of implementation of CEP by school or schools within an LEA.

Other School Nutrition Programs

The CEP free claiming percentage may be used when determining school or site eligibility for other School Nutrition Programs such as:

- Fresh Fruit and Vegetable Program
- Afterschool Snacks
- Seamless Summer Option

Process for Enrolling and Implementing CEP



What is the Process and Requirements for LEAs?

LEAs intending to elect CEP for some or all schools must:

- Demonstrate school or schools meets eligibility by **April 1** by using the school nutrition March claiming numbers
- Notify the TDOE school nutrition division of intent to enroll and submit documentation by **June 30**
- Maintain at the school or LEA level all required documentation of CEP eligibility for review and monitoring purposes

Will Schools be required to collect socioeconomic data?

In TN, data gathered from Free and Reduced Priced Lunch (FRPL) applications are used for Title I, IDEA, BEP and eRate funding. In order to maintain the current level of funding in our LEAs, both CEP and non-CEP schools will be required to collect data.

- Non-CEP schools will continue to collect information using the FRPL form

Some changes to current practice

- CEP schools will **collect information on a simplified state form**
(School nutrition staff may be utilized if partially locally funded)
- **Uploading collected data through EIS** will be required for both CEP and Non-CEP schools

Must LEAs/Schools Renew CEP Data Annually?

- Once enrolled in the program, the cycle is 4 years
 - There is no need to recalculate eligibility

- TDOE will post lists annually on the department website:
 - Eligible LEAs/schools
 - Nearly eligible LEAs/schools (31-39%)

- To begin a new cycle, LEAs or schools establish a most current identified student percentage by April 1 of the fourth year

Can an LEA/School Discontinue Participation in CEP?

- To cease community eligibility for the following year, notify the TDOE School Nutrition division by June 30
 - For example, an LEA wanting to discontinue participation for the 2015-16 SY must notify the department by June 30, 2015.

Things to Remember



Remember.....

- CEP provides a means to feed all kids for free, especially for LEAs/schools in high poverty areas
- You can enroll a school, groups of schools or an entire district
- Each school is responsible for covering the difference between federally reimbursed meals and total meals served
- You will still have to collect the state income form for funding
- You can discontinue participation in CEP at the end of any school year
- Offering the CEP option to LEAs is a federal requirement
- Participation by schools and districts is optional

Next Steps

Key Dates	Action	Responsible
March 31	Update direct certification data	LEA
May 1	Publish list of eligible districts and schools	TDOE
May 30	Submit LEA claim for reimbursement	LEA
June 30	Declare intent to use CEP for upcoming school year and submit required paperwork	LEA

CEP presentations at Regional Meetings

Dates	Event	Location
April 7-8	e-Plan Workshops (East)	Lenoir City
April 10-11	e-Plan Workshops (West)	Dyersburg
April 15-16	e-Plan Workshops (Middle)	Trevecca University
April 23-24	School Nutrition Road Show (West)	Jackson
April 28-29	School Nutrition Road Show (Middle)	Nashville
April 30–May 2	Fiscal Workshop (Middle)	Fall Creek Falls SP
May 1-2	School Nutrition Road Show (East)	Knoxville
May 5-7	Fiscal Workshop (East)	Pigeon Forge
May 13-14	Fiscal Workshop (West)	Jackson

Additional Resources

The Healthy, Hunger-Free Kids Act of 2010

www.gpo.gov/fdsys/pkg/PLAW-111publ296/pdf/PLAW-111publ296.pdf

USDA – Community Eligibility Provision

<http://www.fns.usda.gov/school-meals/community-eligibility-provision>

- Proposed Rule: National School Lunch Program and School Breakfast Program - Eliminating Applications Through Community Eligibility as Required by the Healthy, Hunger-Free Kids Act of 2010
- Department of Education Title 1 Guidance
- Community Eligibility Provision Presentation
- Community Eligibility Provision: Guidance and Q&As
- Community Eligibility Provision Evaluation

Contact Information

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