



OKLAHOMA STATE DEPARTMENT *of* EDUCATION
OFFICE *of* CHILD NUTRITION PROGRAMS

Date: June 21, 2024
Subject: Community Eligibility Provision (CEP)

Now that we are CEP do we collect lunch applications from parents for the students in the CEP site(s)?

No, for any site(s) that is now CEP you do NOT collect lunch applications from parents. You will need to collect the Economically Disadvantaged (ED) form for any CEP site(s). The link for the ED form is <https://sde.ok.gov/state-aid> - on the right side under the heading Helpful Resources.

Not all our sites are CEP, do I collect lunch applications for the non-CEP sites?

Yes, any site(s) that is not CEP, the lunch application must be completed annually by the parent/guardian to determine a student's free/reduced-price lunch eligibility. The ED form cannot be used to determine a student's lunch eligibility.

Who should you contact with questions regarding the Economically Disadvantaged form?

Please contact State Aid at 405-521-3460 or state.aid@sde.ok.gov
Child Nutrition doesn't have anything to do with Economically Disadvantaged. The ED form cannot be used to determine lunch eligibility for students for Child Nutrition Programs.

Now that we are CEP, can my teachers eat free too?

No, just because you are CEP now doesn't mean teachers get free meals too. CEP is for the students only; teachers must still be charged the USDA minimum meal price for breakfast and lunch. If the district chooses to cover the cost of part of the meal, non-federal funds are required to cover the cost back to the Non-Profit School Food Service Account. If the school decides to cover the entire cost of the meal, then this becomes a taxable benefit and OCAS should be contacted, 405-522-0275.

I have a day care at my school, can those children eat for free under CEP also?

No, CEP does not apply to the children in the day care operated by the school. The cost of meals should be included in the tuition, or you can apply for the Child and Adult Care Food Program, if eligible, and claim those meals through that program, but meal applications will be required for that program.

Now that we are CEP do I have to complete the Annual Verification Process each October?

Not for any CEP site(s). If there are sites that are not CEP, then you would have to complete the annual verification process. All districts CEP or not are required to complete the annual verification **report** which is due in December each year.

If there are no excess Child Nutrition funds what funds must cover the cost difference of feeding all meals free and the monthly reimbursement?

Non-federal funds are required to cover the difference between feeding all meals free and the monthly claim reimbursement when excess Child Nutrition funds are not available per 7 CFR 245.9(f)(4)(vii) and & CFR 210.14(a).

Are there specific requirements for the point of service or point of sale (POS) system employed by CEP schools during meal service?

Any institution participating in the Federal school meal programs is required to take an accurate count of reimbursable meals served to students at each meal service (7 CFR 210.7(c) and 7 CFR 220.11). Serving lines must be adequately supervised to ensure that all meals claimed for reimbursement meet meal pattern requirements, and that reimbursement is only claimed for one meal per student per meal service. An accurate meal count may be achieved through a variety of methods. USDA does not require the use of any specific POS system if there is a process in place to ensure only one meal per child per day is claimed. Many school districts use POS systems which incorporate technologies such as personal identification numbers (PIN), biometrics, and other individual student identifiers such as food allergies. When implementing CEP, USDA requires school systems to maintain an accurate POS system that has a proven track record of reliability, security and that program integrity is maintained.

Are CEP schools required to conduct an edit check? If so, and the edit check is exceeded, what type of documentation is required under CEP?

Yes, participation in CEP does not change the requirement to conduct an edit check. When an edit check is exceeded, schools must maintain documentation to demonstrate why the edit check is exceeded (i.e., visiting students) or corrective action may be required. Edit check procedures are outlined at 7 CFR 210.8(a)(3)

May a student attending a CEP school be charged for a non-reimbursable meal?

Yes, if a student selects a non-reimbursable meal (i.e., the student refuses to select the components required for a reimbursable meal) the school may charge the student for the food components through à la carte sales. Alternatively, the school may allow the student to take the food at no cost. In either case, the school may not claim a non-reimbursable meal for reimbursement. It would be a good idea to let families know that only one reimbursable breakfast and/or lunch each day is free of charge.

Can school food service staff process alternate income forms if an LEA decides it is necessary to collect forms to allocate education funding?

Yes, school food service staff has expertise collecting household income forms. For CEP site(s) that collect the ED form which could be needed to allocate education funding, school food service staff may process the forms, but the cost of ED form processing may not be paid from the nonprofit school food service account and the forms may not be associated with school meals. The LEA must pay for (or reimburse the nonprofit school food service account) for the cost of processing forms.

If an LEA, group of schools, or individual school participating in CEP experiences a change to the student population, must the LEA, group of schools, or individual school recalculate the ISP?

It depends. The CEP reimbursement rate corresponds with the poverty level of the households served by participating schools. Changes to student population could indicate a change in the poverty level of the households served by the school and may require an ISP to be recalculated. If a change in student population is a possibility, we will handle this on a case-by-case basis based on CEP regulations, please reach out to the Child Nutrition Office at 405-521-3327.

Is the ISP locked in for the four-year cycle, even if it decreases?

Generally, yes. The original ISP (established from April 1 data in the school year before CEP implementation) is valid for four years, and the LEA is protected against decreases in direct certification rates. This protection is codified at 7 CFR 245.9(f). Certain changes to the student population may require the ISP to be recalculated during the four-year cycle. These will be handled on a case-by-case basis based on CEP regulations, please reach out to the Child Nutrition Office at 405-521-3327.

If the ISP **increases** during the four-year cycle, the LEA may begin a new cycle to guarantee the higher ISP for four years. This flexibility is codified at 7 CFR 245.9(f)(4)(viii). During the second, third, and fourth years of the four-year cycle, the LEA or school may select for the claiming percentage the higher of:

- The ISP reflective of the most recent April 1; or
- The ISP from the year prior to the first year of CEP implementation of the current four-year CEP cycle (the original ISP).

To begin a new four-year CEP cycle, the LEA must calculate a new ISP using identified student data from the April 1 prior to the new four-year cycle and demonstrate to the State agency the participating school(s) still meet the ISP requirement (7 CFR 245.9(f)(4)(i)). Contact the Child Nutrition Office at 405-521-3327 and your Regional Child Nutrition Program Specialist.

Do I still complete the annual Low-Income Report and how do I do that now that we are CEP?

Yes, even CEP school(s) or site(s) are required to complete the annual Low-Income Report. A Zoom call will be conducted to discuss this process, and we will be available during the reporting time to assist as well. There are also instructions for this process in the Child Nutrition Manual in CARS.

CEP and Provision cannot complete the Low-Income Report until Child Nutrition receives the October 1 numbers from Accreditation.

What do I do if a student had lunch funds in their account from last school year and we are CEP now?

The funds would need to be refunded back to the student. If the school offers ala carte options, it could remain in the students account and go toward ala carte items.

As a reminder, USDA CEP guidance and Q & A information can be found in Other Documents of CARS under the heading CEP and Provision Information. Also in that section is a CEP Letter to Households for SY 2024-25.