Community Eligibility Provision (CEP) Training

Child Nutrition Programs
March 2024

OKLAHOMA
Education

Community Eligibility Provision (CEP) Guidance

Community Eligibility Provision (CEP)
Planning & Implementation Guidance

USDA
United States Department of Agriculture
Food and Nutrition Service
September 2016

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What is Provision?

In an effort to reduce paperwork at the local level, Congress has incorporated into Section 11(a)(1) of the National School Lunch Act four alternative provisions to the normal requirements for annual determinations of eligibility for free and reduced-price school meals and daily meal counts by type (free, reduced price and paid meals) at the point of service

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CEP Provision Requirements

- All children *EAT* **for FREE** but are *claimed by FREE and PAID rates* **even** in BASE years

- Direct Certification must still be pulled at least **ONE** time per year

- Verification report must be completed even in the years verification is not done at the district

- **SFA must pay difference between Federal reimbursement and the cost of providing meals at no charge with non-federal funds if the operational costs are not covered by CNP Funds**

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Why do schools choose to go on CEP Provision?

- Reduction of Paperwork
  - Applications are not sent out every year

- Reduction of cost
  - Paper
  - Labor costs – approving applications

- Allows all children to *eat meals at no charge*

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What can/cannot be done on CEP Provision?

- Meal counts are still required to be taken at the point of service
  - Meal counts **do not** have to be by taken by type (i.e. free, reduced, paid)

- Must keep a modified Edit Check

- It is **HIGHLY** encouraged to continue to use a computerized point of service software system

**A child cannot be required to take a tray

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CEP Cycle

Community Eligibility (CEP) has a 4-year cycle with no extension;

- **Possible 5th year grace period if ISP falls**

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CEP Documentation & Claiming

- ***Direct Certification*** is the only information allowed to be used for CEP
- Students who are directly certified are those showing they receive a benefit from the source such as a State Agency or Tribe
  - *Documentation cannot be provided by a parent*

- Household Applications are not allowed to be taken

- Students are claimed by FREE and PAID percentages

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Eligibility

To be eligible to participate, the site, group, or district **must have an identified student percentage (ISP) of at least 25% as of April 1st** of the school year prior to implementing CEP

- ISP is the percentage enrolled students who are on the direct certification list

Rounding Rules: *No Rounding*

CEP: Pg. 24, 37

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Identifying Students

Identified Students

- Direct Certification should be pulled on or after **April 8, 2024** *(must be done in April)*
  - Suggested to pull a couple of days after the first Monday of April in case there are any glitches when the matches are to occur

- *REMINDER: Students that have an exit date before April 1 on DC list **CANNOT** count towards the number of children on the DC list for ISP*

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Enrolled Students

- Roster of all enrolled students in schools serving both NSLP and SBP

- Must have access to at least one meal service per day

- Enrollment in **April** *(should be pulled around the same time the DC list is pulled)*

- ***Any child that has dropped before April 1 cannot be counted as an enrolled student***

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Calculating Claiming Percentages on CEP

Calculating the ISP:

$$\underline{\text{Identified Students}} \; X \; 100 = ISP$$
Enrolled Students

ISP X 1.6 qualifier
- *Example*: FREE ISP 59% x 1.6 = 94.4%
                 PAID   = 5.6%

- *The same percentage is used every month when claiming for the duration of CEP*

- *Rounding for Free & Paid is normal rounding rules and for 2 digits. Example: 94.413 = 94.41*

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Calculating Claiming Percentages on CEP *under 40%*

Calculating the ISP:

$$\frac{\text{Identified Students}}{\text{Enrolled Students}} \times 100 = ISP$$

ISP X 1.6 qualifier
- *Example*: FREE ISP 37% x 1.6 = 59.2%

PAID	= 39.2%
TOTAL	*100%*

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ALLOWABLE DOCUMENTATION TO ESTABLISH BASE YEAR

Community Eligibility (CEP) Direct Certification ONLY

Information cannot come from the household

- SNAP- WAVE or DHS

- *Medicaid **FREE** ONLY - WAVE*

- TANF – WAVE or DHS

- FDPIR – Tribal Organization

- Homeless, Migrant, or Runaway – LEA

- Foster certified by DHS

- Head Start or Even Start
  - Only those children enrolled in the district

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Direct Certification – Medicaid

- Direct Certification including Medicaid **FREE** pulled from the WAVE *CAN* be used for **CEP** **and**

- Direct Certification Medicaid **Reduced** pulled from the WAVE *CANNOT* be included in the ISP for **CEP**.

- Other children living in the household with a Medicaid FREE child can be directly certified as Free

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Direct Certification – Medicaid (cont)

- The WAVE is the only acceptable Medicaid information that can be obtained by the district to approve for Medicaid benefits
  - A letter or any other documentation is unallowable

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Free/Reduced Applications

The district ***cannot*** send out applications when on CEP in a nonbase year

- If applications are distributed to households, then the district must use the information to establish a new base year, or to use that data to go back to standard counting and claiming

- ***The Economically Disadvantage form can* NEVER *be used to determine* ANY *benefit in Child Nutrition*** *(It is not a Child Nutrition form)*

CEP: Pg. 37

END OF THE CYCLE AND CHANGES

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End of the Cycle

- CEP is a four-year cycle
  - The agency will notify you when you are to reestablish a base year

- CARS will show the school site(s) base year and how many years are left in the cycle
  - *CEP Current Year Information –* View Details by site

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No Longer Wanting to Participate in CEP?

- The State Agency needs to be aware of the change

- The district **MUST** start:
  - Collecting the Family-Size and Income applications
  - Eligibility determinations must be made
  - Meals must be counted and claimed by type (free, reduced, and paid) at the point of service

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No Longer Wanting to Participate in Provision/CEP?

The School/District can decide to go back to standard counting and claiming procedures at any time during the school year

- The district MUST allow a minimum of 30 days to notify families and to get household applications

CEP: Pg. 26

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CEP Population Change

Changes to student population could indicate a change in the poverty level of the households served by the school. **It may require an ISP to be recalculated *WITHIN* the 4-year cycles**

- *Example*: District-wide or group approval – school site(s) close
- No changes need to be made in mid-school year, but it would have to occur before the next school year

What to do if ISP needs to be recalculated:
- Re-establish a NEW BASE year
- Go back to standard counting and claiming

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4ᵗʰ Year Cycle in CEP

- The ISP for the **NEW** 4-year cycle must be established using the most recent April data

- ***Grace Year -*** If in the 4ᵗʰ year the ISP is under 25% but over 15% as if April 1, the school may continue to participate for a 5ᵗʰ year at the **LOWER** ISP ***NOT the original (year 1) ISP*** (below 25% and over 15%)

CEP: Pg. 25

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Re-Establishing a BASE Year

- A school or site can re-establish a new base year at any point in time during the cycle

- It can be done before the 4-year cycle has ended

CEP: Pg. 38

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ADDITIONAL INFORMATION

Base Year Records

- The district **must** maintain source documentation used to establish the base year or ISO during the entire duration of operating in CEP, and for *THREE* years *AFTER* submission of the final claim for reimbursement for the last fiscal year of the CEP or Provision period

- When a specialist comes to the district, they will ask to see base year documentation

- **If the documentation cannot be found, the district can no longer continue provision and MUST establish a new base year**

CEP: Pg. 24

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Point of Service

- *The Point of Service is the point in when a child receives a reimbursable meal*

- Point of Service **IS NOT**:
  - Counting Trays
  - Using attendance records
  - Counts in the classroom

It is *HIGHLY* encouraged to continue using a computerized software POS system

Children **CANNOT** be forced to take a tray

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Things to Consider

- All children eat at no charge; **however, students are still claimed by *Free and Paid***

- ***The local money the school or district received from Reduced and Paid children will no longer be received***

- *The district may have to pay back*
  - The SFA must pay difference between Federal reimbursement and the cost of providing meals at no charge with non-federal funds if operational costs are not covered by CNP Funds

CEP: Pg. 50

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Things to Consider (cont.)

A school considering Provision must evaluate whether the savings in administrative costs associated with reducing application burdens and simplifying meal counting and claiming procedures under Provision ***offset the costs of providing meals to all children at no charge***

Allowable Non-Federal Funds

- Any portion of State revenue matching funds that exceeds the minimum requirements established in 7 CFR Part 210.17

- Profits from a la carte

- Cash donations

- In-king contributions funds from outside sources, such as volunteer services

CEP: Pg. 34

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Transferring Students

Transferring within the same LEA

- CEP site to a non-Provision site within the same district, the receiving LEA must provide free meals to the transfer student for up to 30 operating days or until new eligibility is made, whichever comes first

CEP: Pg. 41 & SP-52-16

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Transferring Students (cont)

Transferring between Districts

- If a student transfers from a CEP school to a non-Provision school in a different LEA, the receiving LEA must provide free meals to the transfer student for up to 30 operating days or until new eligibility is made, whichever comes first

- **The district the student came from should provide a letter stating the child was in a Provision school**

CEP: Pg. 41 & SP-52-16

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HOW TO APPLY

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How to Apply for Provision

- **Community Eligibility (CEP):**
  - CEP paper application deadline is **June 30th**
  - CEP is can be done by site, group, or district-wide

Contact Alicia Young at Alicia.Young@sde.ok.gov and/or your Regional Program Specialist

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Community Eligibility Approval

- Your Program Specialist will verify the children on the ***direct certification and the rosters*** for the site, group, or district approval

- Documentation will be validated as soon as the school as soon as the April enrollment and Direct Certification data is pulled and sent to your Specialist

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Resources

- **USDA Community Eligibility Provision (CEP) Planning & Implementation Guidance**

- **Child Nutrition Manual: Compliance Section**

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Other Documents in CARS

https://cnp.sde.ok.gov/oknslp/PrintDocuments.aspx

Welcome to Oklahoma CNP On-Line.   7/10/2023, 12:30:37 PM

Child Nutrition Programs - Application System

Claims
Program

Apply for Participation
CACFP Centers
Existing User Log-On
Family Day Care Homes
Food Buying Guide
Calculator
Home
NSLP
Privacy Statement
Rates/Eligibility Scales
Other Documents
School Nutrition Assoc.
State Department
Education
Summer Food
USDA CACFP Site

Fiscal Year   2024

Memos and Other Documents

2023-2024 DOCUMENTS
- 2024 Disclosure of Free and Reduce Information Agreement INTERACTIVE
- 2024 Eligibility Scale
- 2024 Free & Reduced Application INTERACTIVE (USDA)
- 2024 Free & Reduced Household Application
- 2024 Free and Reduced Application INTERACTIVE
- 2024 Free and Reduced Application INTERACTIVE.
- 2024 Free and Reduced Application packet.
- 2024 Household Application Spanish INTERACTIVE
- 2024 Letter to Household INTERACTIVE
- 2024 Letter to Household- Spanish INTERACTIVE

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YouTube Link

https://youtu.be/6N6 QyJn4Hkw

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QUESTIONS or COMMENTS?
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THANK YOU!

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