Implications of the Community Eligibility Provision for Participating Schools and Districts

As of the 2014-15 school year, some Wisconsin schools have an alternative reimbursement option for the School Breakfast Program and National School Lunch Program: the Community Eligibility Provision (CEP). This is one of several resources supporting local education agencies (LEAs, i.e., districts) and schools that qualify and are approved to participate in CEP.

The purpose of this document is to ensure that CEP is understood locally in terms of impact on programs and other policies that rely on free and reduced-price meal eligibility. Three areas are implicated:

1. School nutrition programming

2. Data collection and reporting

3. Staff Time

# Community Eligibility and School Food and Nutrition Programming

If a school, group of schools, or the entire district participates in CEP, all students eat at no charge. There is no longer a need to use the United States Department of Agriculture (USDA) Free and Reduced Meal application to determine free and reduced-price meal eligibility in those schools. However, it is recommended to use the USDA Free and Reduced Meal application as a way to still collect income data in mixed districts (CEP and non-CEP schools). Here are additional points regarding CEP:

* To qualify for CEP, LEAs and schools are required to have at least 40 percent of students identified for free meals through a method other than a USDA School Meal Application, based on data as of April 1st of the prior school year. The 40 percent threshold to participate in CEP can be determined at the district level, by individual school, or by grouping several schools together to get the needed percentage rate. Identified Students are any students that qualify for free meals approved by the following methods:
  + Direct certification on the basis of participation in the FoodShare, Wisconsin Works (W-2) Cash Benefits, and the extension of benefits to students within the same household;
  + Foster children (foster children do not provide an extension of benefits);
  + Homeless, runaway, or migrant youth (certified by coordinator listing); or
  + Head Start participants (certified by Head Start coordinator listing).
* Participating schools must offer both breakfast and lunch for all students in CEP buildings at no charge.

LEAs will be reimbursed at a federal free category rate using the ratio of Identified Students to enrolled students (who have access to one meal service daily), multiplied by the USDA multiplier factor (currently 1.6). The multiplier factor is intended to estimate the number of free and reduced price meals that would have been served if applications were collected. The difference between the free claiming percentage and 100 percent represents the paid claiming percentage. There are no reduced price meals in CEP.

# Community Eligibility and Data Collection/Reporting

The provision of free meals to more students is good policy. However, while CEP impacts the ability of districts and schools to “know” which students are economically disadvantaged, it does not eliminate the need (referenced by the examples below) to collect student-level economic status information. To that end, DPI has developed an alternate process that should provide the district with the ability to identify which students are in the economically disadvantaged subgroups in CEP buildings. The list of programs or processes impacted by CEP includes, but is not limited to:

* Any School and District Report Card measure that uses the economically disadvantaged subgroup
* Title I – within-district targeting
* SAGE/AGR funding allocations
* Sparsity Aids, High Poverty Aids, and E-RATE
* WISEdash and EdFacts reporting
* Loan forgiveness for teachers
* Wisconsin School Day Milk Program

DPI requires that CEP schools use a Household Income Form or the USDA Free and Reduced Price Meal Application with additional CEP language, to identify students who *would* qualify as economically disadvantaged that are not already identified on the Direct Certification list. DPI is not using the 1.6 multiplier for purposes outside of school lunch and breakfast programs and E-RATE because the multiplier does not provide the student-level data necessary for other programs. DPI has created a [sample Household Income Form](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/alternate-household-income-form.docx) that can be provided at registration or by other locally-determined means. It is simpler than the USDA School Meal Application in order to minimize what data are collected and simplify the collection of socio-economic data. The same income guidelines will be used, so students should still be identified as economically disadvantaged or not, though through CEP, all students will receive free meals. For LEAs that include both CEP and non-CEP schools, the use of one application is allowable. DPI has updated the USDA Free and Reduced Price School Meals application to include language for CEP and can be distributed district wide in both CEP and non-CEP schools.

DPI will still require CEP schools and districts to identify in their student information system those students that are considered economically disadvantaged. This subgroup is determined by using all students on the Direct Certification list, plus any additional students that submit a Household Income Form and qualify. This combined list of economic status can be used for all of the purposes previously supported by the Free/Reduced Price Lunch list.

# Community Eligibility, Staff Time, and Funding Sources

Any staff time spent developing, disbursing, or processing Household Income Forms or the USDA Free and Reduced Price School Meal applications that only include CEP students in schools and districts approved to participate in CEP may not be paid from the non-profit school food service account. The Federal Register says, “Any LEA seeking to obtain socio-economic data from students would be required to develop, conduct and fund this effort totally separate from and not under the auspices of the National School Lunch Program and School Breakfast Program. Because costs associated with obtaining the socio-economic data would not be allowable program costs, nonprofit school food service account funds could not be used for this purpose.”

Food service staff and non-food service staff may be trained to collect economic status data, funded outside of the non-profit food service account.