

Q & A: Students Transferring from Special Provision Option Schools

Special Provision Schools, such as Community Eligibility Provision (CEP) and Provision 2 (P2), serve all students free meals, regardless of individual meal eligibility status. Since school year (SY) 2016-17, Local Educational Agencies (LEAs) have been required to provide up to 30 operating days (or until a new eligibility determination is made, whichever comes first) of free, reimbursable meals to students who transfer from a CEP or P2 school to a standard counting and claiming school within the same LEA.

Starting July 1, 2019, LEAs are required to provide free meals to students who transfer from a Provision school to a non-Provision school in a different LEA. The School Nutrition Team (SNT) has encouraged LEAs to implement this practice since SY 2016-17 to ensure these children do not experience a gap in school meal access and do not accrue negative balances.

Memo: [SP52-2016](http://www.fns.usda.gov/sites/default/files/cn/SP52_2016os.pdf) (www.fns.usda.gov/sites/default/files/cn/SP52_2016os.pdf)

Q1. Who does this apply to?

A1. All School Food Authorities (SFAs) operating the USDA School Nutrition Programs.

Q2. What is the effective date of eligibility for the student(s) transferring from a CEP school to non-CEP school?

A2. Thirty operating days begin the first day the student attends class at the new school. This may occur at any time during the school year. The new LEA may claim these meals at the free rate during this time period.

SNT is interpreting the guidance memo SP52-2016 as allowing SFAs to backdate the CEP students' eligibility to when they enroll in the school. The SFA must provide up to 30 operating days of free meals or until a new meal eligibility is determined. However, the backdating is only allowed for students transferring from a CEP school to a non-CEP school within the same LEA or to a different LEA. Backdating does not pertain to extension of benefits or other eligibility determination.

Q3. Who is responsible for communicating that a student is transferring from a CEP or P2 school?

A3. CEP and P2 LEAs are encouraged to initiate communication about continuation of benefits with the household and the new school. The CEP or P2 school should include documentation in the transferring student's file forwarded to the Determining Official at the new school. The new school can validate eligibility from the former CEP LEA by obtaining a copy of the current school year *Wisconsin Schools and Districts Participating in Community Eligibility Provision* list and highlighting the former school's name. This list is updated annually and is available on the [SNT CEP](#)

[webpage](https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision) (dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision). For a list of P2 schools, contact the SNT office.

Q4. How should the SFA handle the annual rollover for students (between school years) from a CEP school moving up to the next grade in a non-CEP school within the same LEA (ex: 5th grader leaving CEP elementary school and going to the non-CEP middle school)?

A4. Work with your software provider to ensure the carryover period process is occurring and students are provided up to 30 operating days of free meals (or until a new meal eligibility is determined).

Q5. How should the SFA determine eligibility during the 30 operating day carryover period for a CEP student transferring to a non-CEP school before the school year or mid-year?

A5. First, run Direct Certification (DC). Be sure the list includes the transferring student's name. If the student matches as an S, T, O, M, E, G or Z code, the new individual meal eligibility is effective the date DC was run. An N code or failure to match to DC is not considered a new meal eligibility determination and the 30 operating day carryover period continues.

If the student receives a reduced price eligibility (Z code) or does not match (N code), ensure the household receives current Free and Reduced Meal Application information.

If the household submits a meal application and is approved at Free or Reduced status, the eligibility start date is the date the Determining Official approves the meal application.

If the meal application is denied, the student is changed to Paid status effective the date the application was denied - disqualifying the student for free meals the rest of the carryover period.

Q6. What happens if the household submits an application at the end of the carryover period?

A6. The 30 operating days is intended to be the time it takes the household to submit the application and for the school to process the new status. For example, if the household submits an application on day 29, but the school does not process the application until day 33, the meals are only free through the 30th operating day. On days 31-33, the student reverts to Paid status, and the meal should be claimed as paid.

Q7. Where can additional resources on Special Provision transfer and carryover period be found?

A7. There are additional resources on the [CEP webpage](https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision) under the Monitoring and Claiming heading (<https://dpi.wi.gov/school-nutrition/special-provision-options/community-eligibility-provision>). There is a flow chart to help explain the requirements of transferring students. Additionally, there is a template letter intended to communicate transfers within the same LEA. However, this document may be modified to meet the needs of different situations, including transfers between LEAs.

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