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Proposed Rule

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Section 104 (a) of the Healthy, Hunger-Free Kids Act of 2010

Alternative to collecting household applications for free and reduced price meals in high poverty schools

Began July 1, 2014 in Wisconsin

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Objectives

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1. Overview of the Community Eligibility Provision (CEP)
2. How does CEP impact other programs such as Title I and SAGE/AGR that use free and reduced data?

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Benefits

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Free Meals for all Students	
Breakfast	Lunch

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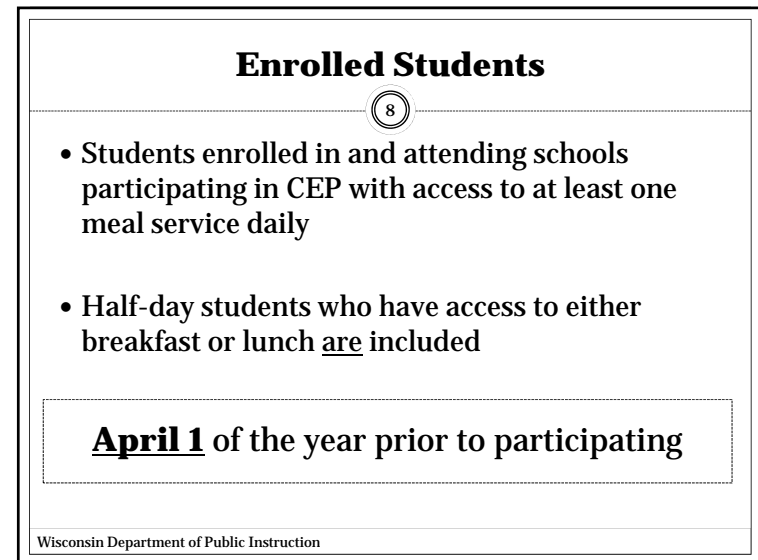
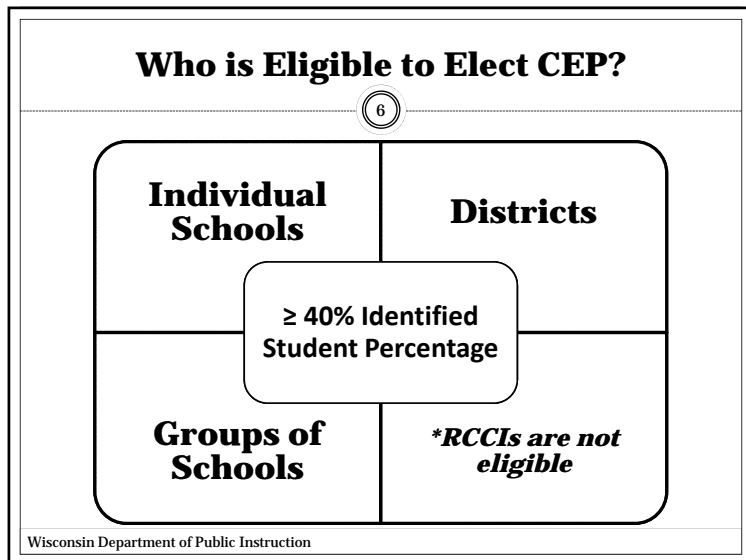
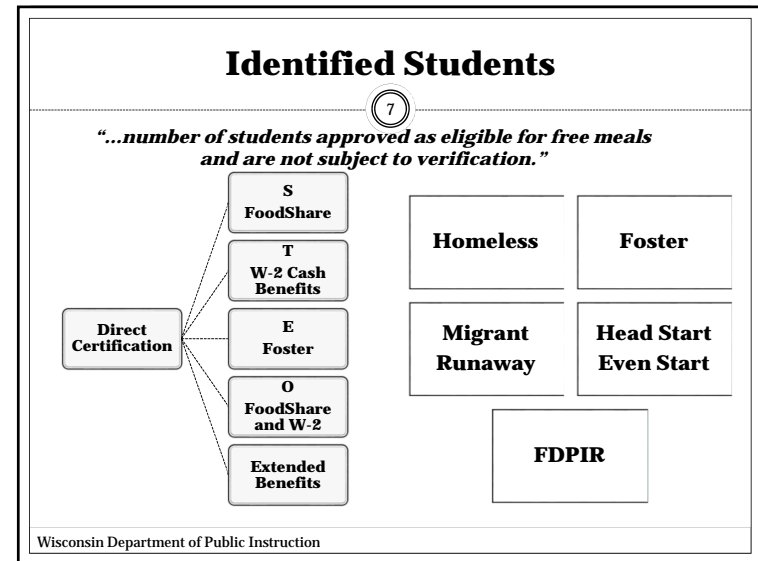
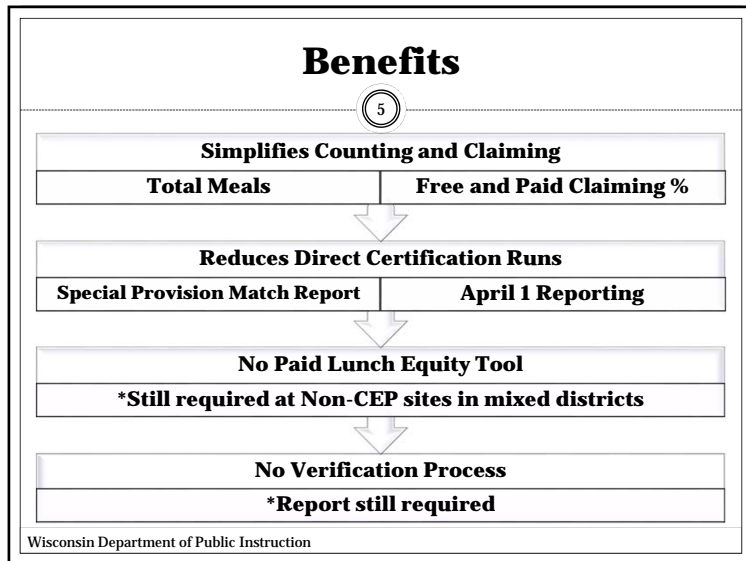
Increased Meal Participation*	
9.4%	5.2%

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Reduced Administrative Burden	
No <i>meal</i> applications	Increased Efficiencies

C. Logan et al. (2013). Community Eligibility Provision Final Report. Abt Associates Inc. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Project Officer: John Endahl. Available online at: www.fns.usda.gov/research-and-analysis.

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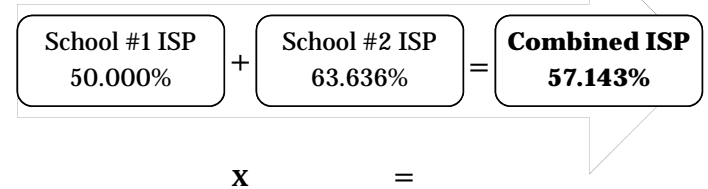
Reimbursement under CEP

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- The ISP is multiplied by a factor (1.6) to determine the percentage of total meals served that will be reimbursed at the *Federal free rate*
- The remaining percentage of total meals is reimbursed at the *Federal paid rate*
- **NO reduced rate**
- Claiming percentages are guaranteed for 4 years

CEP Claiming Example: Lambeau SD

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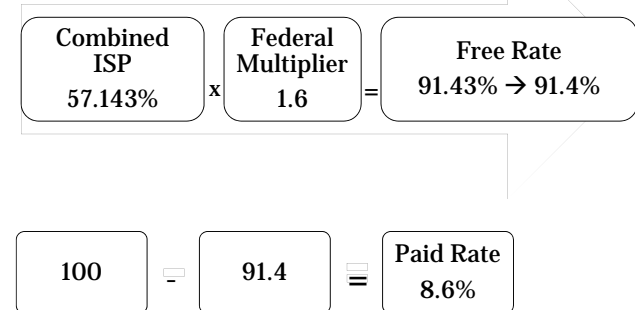
ISP Example: Lambeau School District

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	Identified Students	Enrollment	ISP
School 1	• 50	• 100	• $50/100 \times 100 = 50.000\%$
School 2	• 70	• 110	• $70/110 \times 100 = 63.636\%$

CEP Claiming Example: Lambeau SD

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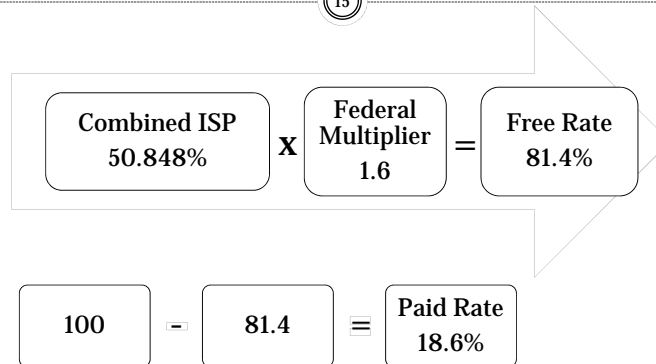
ISP Example: Liberty School District

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	Identified Students	Enrollment	ISP
School 1	• 25	• 120	• $25/120 \times 100 = 20.833\%$
School 2	• 125	• 175	• $125/175 \times 100 = 71.429\%$

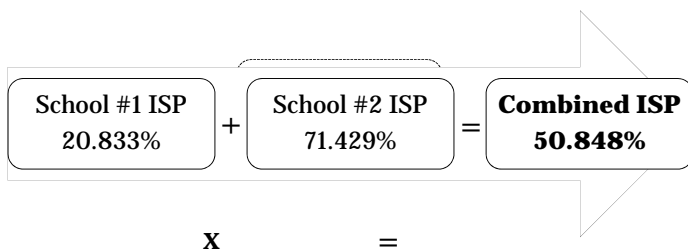
CEP Claiming Example: Liberty SD

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CEP Claiming Example: Liberty SD

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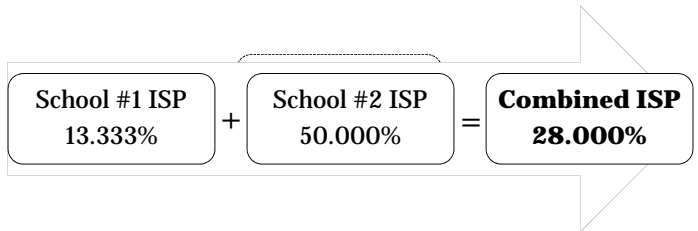
ISP Example: Tiger School District

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	Identified Students	Enrollment	ISP
School 1	• 20	• 150	• $20/150 \times 100 = 13.333\%$
School 2	• 50	• 100	• $50/100 \times 100 = 50.000\%$

CEP Claiming Example: Tiger SD

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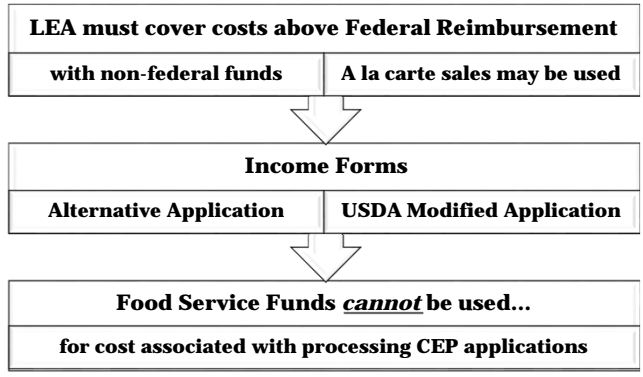


USDA Monthly Federal Reimbursement Estimator Tool

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Things to Consider...

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Community Eligibility Provision (CEP) Monthly Federal Reimbursement Estimator			
Use to estimate the level of Federal reimbursement received under the CEP			
District Name			
Step 1: Calculating the Identified Student Percentage		Step 2: Federal Reimbursement Rates	
If grouping schools, use the grouping calculator to assist in determining 1.1 and 1.2.		Select the current reimbursement rates used for each program (without the \$0.06). The additional \$0.06 is applied in the next box.	
Enter the number of identified students and enrolled students that is reflective of April 1 st on 1.1 and 1.2	Click to define Identified Students	Free	Breakfast
1.1) Enter the number of Identified students	216	\$3.00	\$1.93
1.2) Enter the TOTAL student enrollment	345	Paid	\$0.30
Percentage of Identified students**	62.61%	Select "\$0.06" if the SFA is certified for the additional \$0.06.	
This percentage must be at least 40% to be eligible		0.20	
Percentage of meals reimbursed at the Federal FREE rate	100.0%	Select "\$0.06" if the SFA is certified for the additional \$0.06.	
Percentage of meals reimbursed at the Federal PAID rate	0.0%	0.00	
Step 3: Monthly Meal Data		Estimated CEP Monthly Federal Reimbursements	
Enter in the number of LUNCHES and/or BREAKFASTS served in a month in 3.1 and 3.2		Reimbursement for LUNCH	
3.1) Enter the total number of LUNCHES served in a month:	3,588	\$11,540.28	
3.2) Enter the total number of BREAKFASTS served in a month:	2,001	Reimbursement for BREAKFAST	
Total number of MEALS served in a month:	5,589	\$4,224.77	
		Total Reimbursement Level	
		\$15,765.05	
Step 4: Anticipated Participation Change due to serving all FREE meals (for example enter 2 for 2%)		Federal Reimbursement per LUNCH	
NEP		\$3.06	
5.20%		Federal Reimbursement per BREAKFAST	
9.40%		\$1.93	
Total number of LUNCHES reimbursed at FREE rate	3,775	Optional Comparison: Enter current monthly Federal reimbursements and student payment revenue	
Total number of LUNCHES reimbursed at the PAID rate	0	LUNCH	
Total number of BREAKFASTS reimbursed at FREE rate	2,189	\$10,418.18	
Total number of BREAKFASTS reimbursed at the PAID rate	0	BREAKFAST	
		\$5,718.18	
CEP Difference:		LUNCH Difference	
This section displays the estimated difference between operating CEP and the current Federal reimbursements and student payments (if applicable). If the differences boxes are green then CEP will generate the same or more Federal revenue, if the box is red then current procedures generate higher Federal Revenue.		-\$1,122.10	
		BREAKFAST difference	
		-\$506.59	
		Total Difference	
		-\$1,628.69	

Example DPI Grouping Tool

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**COMMUNITY ELIGIBILITY PROVISION (CEP)
 ELIGIBILITY WORKSHEET**
 P-6304 (Rev. 05-15)

Implementation of Community Eligibility Provision can be by individual school site, by group(s) or by LEA/school district. This form is to document how schools will be combined when participating in CEP. All participating schools and groupings can be listed on one form. To calculate proper reimbursement percentages, assign a school/group number so that each individual school has its own individual school number, and each group of schools share the same school/group number. Schools participating as one large group or LEA will share one school/group number. When grouping schools, list all schools within one group together.

I. DISTRICT INFORMATION

LEA Name _____ Agency Code _____

II. COMMUNITY ELIGIBILITY

Participating Sites	Identified Students		Reimbursement	
	School/ Group No.	Total No. of Identified Students	Total Enrollment <small>Only include students who have access to at least one meal per day.</small>	Federal FREE Reimbursement Rate
School A <small>List each school site individually, even if grouping with other schools</small>	1	50	125	
School B	1	66	100	
School C	1	100	120	62.610%
School D	2	124	130	
School E	2	50	150	62.500%

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CEP Contacts

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CEP Resources

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➤ School Nutrition Team Website www.dpi.wi.gov/school-nutrition

- Application Form
- USDA Monthly Reimbursement Estimator
- Frequently Asked Questions
- USDA memos on CEP

➤ FRAC (Food Research and Action Center)

<http://frac.org/community-eligibility/>

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USDA Non-Discrimination Statement

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To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
 Office of the Assistant Secretary for Civil Rights
 1400 Independence Avenue, SW
 Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program_intake@usda.gov.

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Community Eligibility Provision and Title I Funding

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Impact of CEP on Title I Funding

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- It is not the Title I Coordinator's responsibility to determine if the district will implement CEP for the school lunch and breakfast programs.
- However, the Title I Coordinator should be aware if any of the schools in the district are implementing the CEP as it will impact the data entered on the enrollment screen in the Title I Application.

Income Verification For Title I

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Even in CEP schools, socio-economic data is needed for programs like Title I Accountability and AGR/SAGE. CEP schools may use:

- An alternate household income form
- OR
- The modified school lunch form

Impact of CEP on Title I Funding

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- CEP does NOT impact district level allocations.
- CEP may impact school level allocations.



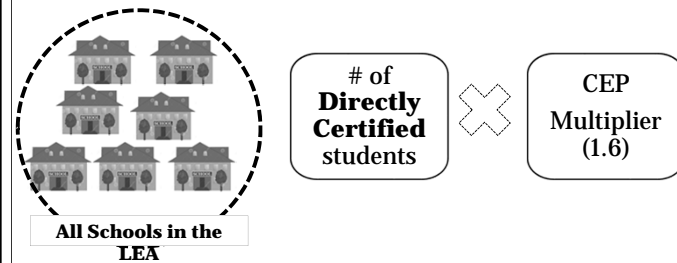
Common Poverty Metric Options

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- LEAs must use a **common poverty metric** to determine the number of low income students for school level allocation amounts.
- These common poverty metric options may only be used for ranking schools to determine school level allocations.
- The same metric must be used for comparability reporting.

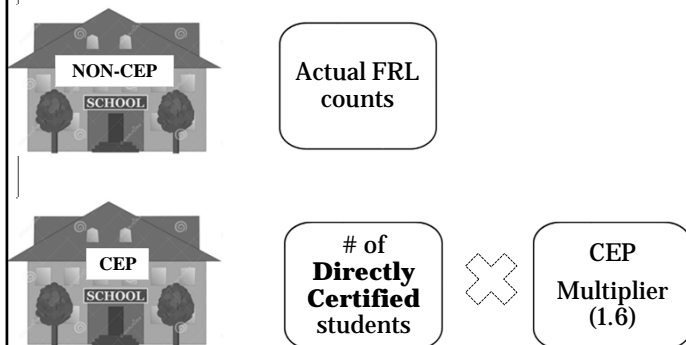
2) DC data ✕ the CEP Multiplier for all schools in the LEA

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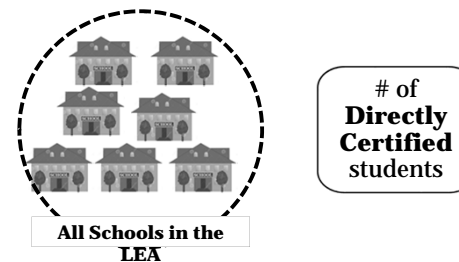
1) Use actual FRL counts for Non-CEP schools and Directly Certified (DC) data ✕ the CEP Multiplier for CEP schools

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3) Use only DC data for all schools in the LEA

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4) Use the FRL counts for Non-CEP schools and DC data plus alternative income verification form data for CEP schools

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Actual FRL counts



of **Directly Certified** students



Alternative Household Income Form data

Title I Application

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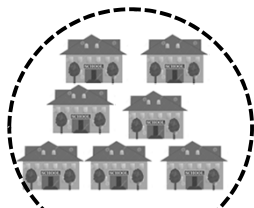


Once the number of low income students has been determined for each school, the number should be entered into the "Low Income Pupils: Public" column.

National School Lunch Act		W2	Medicaid	Census	Composite
School					
Grade Span	Public Enrollment	Low Income Pupils: Public			
PK-02	502	22			
PK-04	513	241			
PK-04	513	163			
PK-04	513	475			
PK-04	541	450			
Total Schools: 7		3,782	1,653		

5) Use the alternative income verification form for all schools in the LEA

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All Schools in the LEA

of **Directly Certified** students



Alternative Household Income Form data

This option is only available to LEAs implementing CEP in every school.

Title I Application

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Utilizing the CEP multiplier may result in a low income pupil number that exceeds the school's enrollment. In this case, LEAs must cap the low income pupil number at enrollment.

Considerations when Selecting a Common Poverty Metric

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- Select an option to meet student needs.
- Any school over 75% poverty (regardless of grade span) must be served.

Outside Program Contacts

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Title 1

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CEP and Private School Equitable Participation

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- Private schools are eligible to participate in CEP if they otherwise meet the USDA's eligibility requirements.
- LEAs will need to learn if any of the private schools participating in their Title I programming also participates in CEP.