

*Timeline to a Successful Implementation
of the Community Eligibility Provision*

SNA State Conference

Crystal City

December 11th 2013

Before we get started today

2 quick notes

- ✓ Name changed to the Community Eligibility Provision (CEP)
- ✓ Available to all eligible Local Educational Agencies (LEA) nationwide on July 1, 2014



The Four Phases of Implementation

Phase 1: Get in the know

Learn everything about CEP

Phase 2: Let's talk about it

Create a communication plan to discuss absence of application data

Phase 3: Who's out there?

Gather eligibility information

Phase 4: Hey LEA's, how can we help?

Understand State Procedures and technical assistance

Implementation Timeline

Now through January

Phase 1: Get in the know

January through March

Phase 2: Let's talk about it

March through May

Phase 3: Who's out there?

May through June

Phase 4: Hey LEAs, how can we help?

Today's Speakers

Phase 1: Get in the know

Maggie Applebaum (FNS) and Zoë Neuberger (CBPP)

Phase 2: Let's talk about it

Todd Stephenson and Michael Anderson (Department of Education)

Keri Kennedy (West Virginia - Year 2 CEP State)

Phase 3: Who's out there?

Madeleine Levin (FRAC)

Phase 4: Hey LEA's, how can we help?

Brad Blunt (Kentucky - Year 1 CEP State)

Overview of CEP



What is it?

How Does it work?

When is it available?

What do I have to do?



Who can do it?

Background

- ✓ Section 104a of the Healthy, Hunger-Free Kids Act
 - ✓ Provides an alternative to household applications for free and reduced price meals
 - ✓ Offers all students free meals in high poverty LEAs and schools
- ✓ Proposed rule published in Federal Register on November 4, 2013
 - ✓ 60 day comment period - Ends Jan 3rd 2014

Implementation

- ✓ *Phased in over a period of three years in a limited number of States*
- ✓ *Available nationwide beginning July 1, 2014*
- ✓ *LEAs and schools in eleven States are currently participating:*

District of Columbia, Illinois, Kentucky, Michigan, New York, Ohio, West Virginia, Florida, Georgia, Maryland, and Massachusetts

Who's participating now?

- ✓ Across the 11 States, 574 LEAs have at least one school participating in CEP
- ✓ A total of 3,937 schools are currently participating
- ✓ DC public schools, Duval County (FL), Atlanta Public Schools (GA), City of Chicago (IL), Boston School Committee (MA), Buffalo City (NY), Detroit Public School District (MI), Cleveland City School District (OH), and Kanawha County School District (WV)

Participation Requirements

- ✓ LEAs or schools electing CEP must offer free lunches and breakfasts to all enrolled students for a cycle of 4 years
- ✓ Count total lunches and total breakfasts served to students daily
- ✓ Not collect household applications for free and reduced price meals

Eligibility Criteria

- ✓ Residential child care institutions may not participate in CEP
- ✓ LEA or school must have an identified student percentage of at least 40% as of April 1st of the school year prior to implementing CEP
- ✓ Comply with the CEP procedures

Define: Identified Students

- ✓ Low income children who are certified for free school meals without the use of a household application
- ✓ Students certified based on documentation of benefit receipt or categorical eligibility as described in 7 CFR part 245 (e.g. directly certified with SNAP, TANF, FDPIR, categorically eligible - migrant youth, homeless, etc)

Define: Enrolled Students

- ✓ *Students who are enrolled in and attending schools participating in the community eligibility provision and who have access to at least one meal service daily*
- ✓ *Students who do not have access to either breakfast or lunch due to the times they are attending school would not be included in the count of enrolled students*

Identified Student Percentage

$$\text{Identified Student \%} = \frac{\text{\# of Identified students}}{\text{Total \# of enrolled students with access to NSLP/SBP}} \times 100$$

- ✓ The identified student percentage may be determined by:
 - ✓ an individual participating school
 - ✓ a group of participating schools in the LEA
 - ✓ entire LEA if all schools participate

Identified Student Determinations

- ✓ Must be at least 40% for an individual school, the group of schools, or entire LEA if all schools participate
- ✓ Grouping schools: divide the total number of identified students for all grouped schools by the total enrollment for all grouped schools to determine eligibility
- ✓ **Note:** not all schools in the group or in the LEA if electing for the entire LEA have to meet the 40% threshold

Procedures - Documentation

- ✓ LEAs intending to elect CEP for some or all schools must:
 - ✓ Submit to the State agency documentation by June 30th of the year prior to starting CEP
 - ✓ Ensure documentation demonstrates school or LEA meets the identified student percentage threshold as of April 1st of the prior school year

State Agency Concurrence

- ✓ The State agency must review documentation submitted by the LEA to ensure the LEA/school:
 - ✓ Meets the minimum identified student percentage
 - ✓ Participates in both the NSLP and SBP
 - ✓ Has a record of administering the meal program in accordance with program regulations

CEP Claiming Percentages

- ✓ Identified student percentage multiplied by a factor of 1.6 equals the % of total meals served reimbursed at the Federal free rate
- ✓ The remaining % of total meals is reimbursed at the Federal paid rate
- ✓ Any meal costs in excess of the total Federal reimbursement must be covered through non-Federal sources

Where did the 1.6 come from?

- ✓ Analysis showed that on average for every 10 identified students there were 6 more students certified based on an income application
- ✓ If you multiple the identified student percentage by 1.6 you are approximating the free and reduced price percentage
- ✓ On average means that some schools will be on the higher end and some on the lower but it serves as a proxy across many low income schools

CEP Claiming Percentages

Example:

Identified student % = 50%

Free claiming percentage = 80% (50% X 1.6)

Paid claiming percentage = 20% (100% - 80%)

Total meals = 1,000

Number of free meals = 800 (1,000 X 80%)

Number of paid meals = 200 (1,000 - 800)

Updating the Claiming Percentages

- ✓ A new identified student percentage may be established each year
- ✓ During the 2nd, 3rd and 4th years, the LEA/school may select the higher of the identified student percentage from:
 - ✓ the year directly prior; OR
 - ✓ the year prior to the first year of operating CEP

New Cycle

- ✓ To begin a new 4-year cycle, LEAs or schools must establish a new identified student percentage as of April 1 of the fourth year of the previous cycle
- ✓ LEAs may begin a new 4-year cycle if all eligibility criteria is met, with State agency concurrence
- ✓ LEAs/schools in year 4 with an identified student percentage of less than 40% but more than 30% may elect for an additional year (a grace year)

Annual Notification Lists

- ✓ Each year States are required to assemble lists of LEAs in the following categories:
 - ✓ Eligible district wide (identified student % at least 40%)
 - ✓ Nearly eligible district wide (identified student % greater than 30% but less than 40%)
 - ✓ Currently operating CEP district wide
 - ✓ Currently in the 4th year of CEP and eligible for a grace year (less than 40% but greater than 30%)

Annual Notification Lists

- ✓ State agencies and/or LEAs must gather lists of schools in the following categories:
 - ✓ Eligible schools (identified student % at least 40%)
 - ✓ Near eligible schools (identified student % greater than 30% but less than 40%)
 - ✓ Currently electing in 4th year and grace year eligible

Annual Notification Process

- ✓ Data collected earlier in the year for October reporting requirements may be used for notifications
- ✓ States must note that updated %'s as of April 1st are required for election
- ✓ Percentage of students enrolled that are directly certified with SNAP is permitted as a proxy

Let's define all of these percentages

- ✓ The identified student percentage is the percent of enrolled students certified for free meals without the use of a household application
- ✓ The percent of enrolled students directly certified with SNAP may be used as proxy for the identified student percentage for notifications
- ✓ The direct certification rate is the percent of SNAP eligible students directly certified for free meals (State direct certification performance benchmark measure)

Notification Publication Timeline

- ✓ April 15th - States obtain school level information
- ✓ April 15th - States provide guidance and election information
- ✓ May 1st - States publish lists of LEAs and schools on their websites for public notification
- ✓ May 1st - States provide link to notification lists to FNS for publication on FNS CEP website
- ✓ FNS will provide a format for the public notification lists

Other Child Nutrition Programs

- ✓ The CEP free claiming percentage serves as a proxy for free and reduced price certifications
- ✓ Free claiming percentage = Identified student percentage $\times 1.6$
- ✓ May be used when determining school or site eligibility for Child Nutrition Programs

Just a Few Benefits of CEP

- ✓ *Increases access to school meals for children in high poverty areas*
- ✓ *No household applications*
- ✓ *Reduced chance of overt identification*
- ✓ *Eliminates the administrative burden of verification*
- ✓ *Compared to other special provisions: no base year*

Things to Think About

- ✓ *Potential issues surrounding the absence of application data*
 - ✓ *Is school meal application data used to distribute other sources of funding? (Title I, Erate, State, Local, etc)*
- ✓ *Anticipated level of Federal reimbursement*
- ✓ *Non-Federal resources available*

You Have Homework!

Complete each phase to ensure a successful implementation of CEP in your State

Don't worry we have
RESOURCES



Phase 1: Get in the Know

Now through January

- ✓ Proposed regulation
- ✓ Issued guidance -included in the "Implementing Community Eligibility--Key Resources" binder
- ✓ Evaluation (coming soon!)
- ✓ Websites of early implementing States - screen captures included in binder
- ✓ Brochure

Phase 2: Lets Talk About It

January through March

- ✓ Department of Education Guidance (coming soon!)
- ✓ Participating in an Education Advocate Symposium next week
- ✓ Presented at the Title I State Directors Conference this past summer
- ✓ Continue to work with FCC for Erate funding
 - ✓ Interim guidance letter is in the binder

Phase 3: Who's out there?

March through May

- ✓ *Proposed regulation*
- ✓ *Notification webinar for States (coming soon!)*
- ✓ *Additional notification guidance (coming soon!)*

Phase 4: Hey LEAs, here's what you do

May through June

- ✓ CEP website (coming soon!)
- ✓ Share best practices from early implementing States
- ✓ National and Regional Office staff

Pop Quiz

At the end of year there will be a test and the results will be graded according to CEP procedures, what is the lowest possible score you can get while still getting a 100%?

62.5%