



Community Eligibility Provision

Frequently Asked Questions and Answers

State Roundtable 2014

Wednesday July 16th





Key dates for notification/publication of eligibility and electing CEP

Date	Requirement
April 1	Identified student data reflective of April 1st determines eligibility to participate in CEP
April 15	<ol style="list-style-type: none"> 1. State agencies notify LEAs of district-wide eligibility 2. LEAs submit school-level eligibility information to State agency
May 1	State agencies post the LEA district-wide and school-level lists on website and States send website link to FNS
Extended to August 31 for SY 2014-15 June 30 (after SY 2014-15)	LEAs must notify their State agency of their intent to elect CEP



Data used to calculate identified student percentage (ISP)

- Identified students are those students not subject to verification
- ISPs must be reflective of April 1st
- Direct certification is not required during the 4 year cycle but encouraged to increase percentages



Can LEAs group to maximize ISP?

- LEAs are allowed to establish different groupings of schools (within the same LEA) in order to maximize their ISP
- If school group composition changes after a school year (say 2 new schools are added), a new ISP must be calculated and a new four year cycle would be started



State Agency review of documentation

- State agencies must review documentation submitted by the LEA to ensure that the LEA or school(s):
 - Meet the minimum identified student percentage (40%)
 - Participate in both the NSLP and SBP, and
 - Have a record of administering the above programs in accordance with regulations



What if LEA decides to start CEP after already collecting applications?

- *during this transition year*, the applications may be filed in another office and there will be no retroactive payments
- *In future years*, schools will elect CEP before processing applications



What happens if a school or group of schools chooses to stop CEP mid-year?

- Schools can elect to stop CEP and return to normal counting and claiming at any time, including in the middle of the school year
- State agencies required to establish a reasonable timeline (at least 30 days) for LEAs and schools stopping CEP *mid-year* to resume normal counting and claiming and to give the school time to notify families and print/disseminate/collect/process apps



How can ISP be changed throughout the 4-year cycle?

- If the LEA chooses to conduct direct certification during their 4-year CEP cycle and the ISP increases, the LEA may be reimbursed at a higher claiming percentage
- During the 2nd, 3rd, and 4th years, the LEA/school may select the higher of
 - ISP from the immediately preceding school year for their annual percentage
 - The original ISP (the percentage from the year prior to the first year of participating in CEP)
- In order to renew participation after the fourth year, the LEA must demonstrate (via identified student data) that they still meet the ISP requirement for the participating schools



What happens if a student transfers between CEP and non-CEP schools?

- When a student at a CEP school transfers to a non-CEP school and the child is not directly certified or otherwise eligible for free meals (e.g., homeless, migrant, runaway, Head Start, Even Start)
 - Transfer within LEA: new school must process a household income application within 10 days and provide free meals to the student until eligibility determination is made
 - Transfer outside LEA: new school must process a household application within 10 days and FNS encourages the new LEA to provide free meals to the student until an eligibility determination is made



How are meals for visiting students claimed?

- Non-CEP student visits a CEP school
 - Meals served to the visiting students would be included as part of the total count of meals served in the CEP school
 - Operationally easier on the CEP school, prevents overt identification, and the CEP school will be reimbursed for meals served
- CEP student visits a non-CEP school
 - FNS strongly encourages non-CEP schools to provide free meal to visiting CEP students to avoid any disruption to the child's usual meal service routine
 - Free meals to visiting CEP students should be claimed according to the claiming percentages of the CEP school
 - SFA food service account may be used to cover the value of any paid meals of visiting students



What happens if a student refuses to select a reimbursable meal?

- Non-reimbursable meals may not be claimed as reimbursable meals (like standard counting & claiming procedures)
- LEA's discretion to cover the cost of the food or charge the student a la carte prices



What if a parent insists on paying for child's meals?

- The district should explain the benefits of CEP to the parents
- Children may bring lunches from home or purchase a la carte foods, if available
- Parents that insist on paying should be encouraged to donate to the school food service



If administrative review shows errors in determining CEP eligibility?

- If State agency finds errors in ISP, the State must determine what the ISP should be, then apply the revised claiming % retroactively to all claims submitted in the current school year
- If LEA is determined ineligible for CEP, the State agency should
 - Work with LEA to return to normal counting and claiming (if not eligible for grace year). If insufficient time in current school year to resume normal counting/claiming, SA should use revised claiming % for the remainder of the school year
 - State agencies have discretion to expand fiscal action back beyond the school year in which the erroneous ISP was found
 - Provide technical assistance to LEA to ensure LEA knows how to calculate ISP
 - Examine CEP process to determine why erroneous ISP was not discovered and corrected when the LEA elected CEP



Thank you!

