

Implementing the Community Eligibility Provision



Health and Nutrition Services
Arizona Department of Education





Disclaimer

This training was developed by the Arizona Department of Education (ADE) Health and Nutrition Services Division (HNS). The content in this training is intended for professionals operating one or more USDA Child Nutrition Programs in Arizona under the direction of ADE. The information in this training is subject to change. Attendees are encouraged to access professional development materials directly from the training library to prevent use of outdated content.

Intended Audience

This Online Course is intended for Local Educational Agencies (LEAs) operating the National School Lunch Program (NSLP) who have applied to operate Community Eligibility Provision (CEP).

Objectives

At the end of this training, attendees should be able to:

- provide an overview of CEP;
- understand CEP operating requirements along with counting and claiming procedures;
- be aware of NSLP requirements that remain throughout the CEP operation; and
- be prepared for the potential participation increase that may occur while operating CEP.

TRAINING HOURS

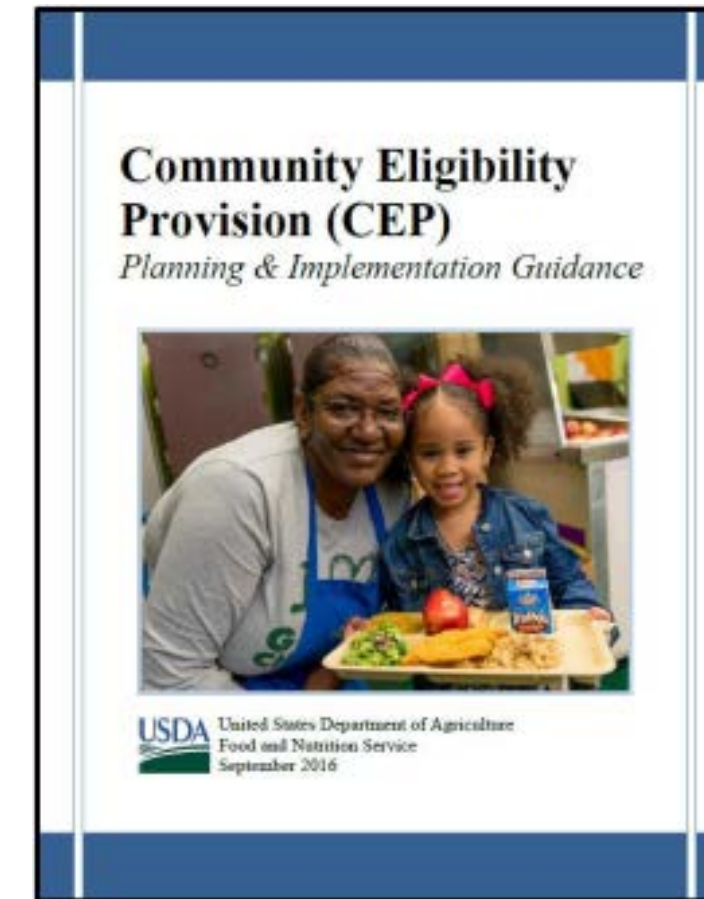
Information to include when documenting this training for Professional Standards:

Training Title: Online Course: Implementing the Community Eligibility Provision (CEP)

Key Area: 3000 - Administration

Learning Code: 3130

Length: 30 minutes



The instruction within this Online Course is based on guidance from USDA's Community Eligibility Provision (CEP) Planning & Implementation Guidance.

It is recommended to review the USDA's Community Eligibility Provision (CEP) Planning & Implementation Guidance in addition to reviewing this course for complete guidance on CEP.

Click [here](#) to access USDA's Community Eligibility Provision (CEP) Planning & Implementation Guidance.

Definitions

Identified Students

Students with access to at least one meal service through the NSLP or School Breakfast Program (SBP), and who meet at least one of the following criteria:

- Directly Certified through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Food Distribution on Indian Reservation (FDPIR) or Medicaid Free (DC-M), as well as, any enrolled extended household members
- Directly Certified Foster, Homeless, Migrant
- Certified Homeless or Migrant based on a school liaison list
- Enrollment in a Federal Head Start Program
- Certified Runaway
- Certified non-applicant approved by local officials or foster children certified by means other than an application are also included
- Foster child certified by means other than an application

Definitions

Identified Student Percentage

Identified students divided by total enrollment. This is used to determine the claiming percentage (the amount of meals that will be reimbursed at the free rate).

Non-Pricing

When an LEA provides meals to students at no cost to the household regardless of their eligibility status.

Title 1 Funds

Federal monies funded to assist schools with technical assistance, service, and support to help ensure every child has access to an excellent education.

Receiving Credit for Training Completion

ELECTRONIC SURVEY ASSESSMENT

In order to receive credit for this training and for final approval to operate CEP, LEAs are required to complete an assessment through an electronic survey.

All questions on this assessment must be completed before submitting to ADE and no more than two questions can be answered incorrectly in order to receive credit for this training.

Please locate the assessment [here](#).

- *It is recommended to complete the assessment while going through this online training. It is also recommended to use USDA's CEP Planning & Implementation Guidance for assistance.*

ELECTRONIC ASSESSMENT QUESTION INDICATOR!



This question mark icon will indicate that the content on the slide may be a question in the Electronic Survey.

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CEP Overview

SECTION 1



The History of CEP

CEP is a provision that is part of the Healthy Hunger-Free Kids Act of 2010. CEP was introduced in several states in 2011-2012 and was made available to all states in the 2014-2015 school year.

CEP allows the nation's highest-poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without the burden of collecting household applications.

This alternative saves LEAs time and money by streamlining paperwork and administrative requirements while increasing access of nutritious school meals to low-income children.



Key Differences in Operation

When an LEA participates in CEP:

- all enrolled students at participating sites receive breakfast and lunch at no charge to the household;
- school meal applications and verification activities are eliminated; and
- tracking meal counts by category of free, reduced, and paid is eliminated.

It is important to note that although CEP offers many alternative administrative and student-level perks, there are still NSLP requirements that LEAs must comply with in order to receive Federal reimbursement.

Benefits of CEP

For many schools and districts, CEP implementation has resulted in numerous improvements while providing easy access to nutritious school meals to low-income areas. These successes include:

- Increasing student participation in school meal programs
- Easing the administrative burden
- Improving program efficiency
- Eliminating stigma
- Eliminating unpaid meal balances and additional reimbursement dollars
- Improving the school learning environment



The remainder of this training will focus on implementation requirements of CEP. Please have your Electronic Assessment open and ready to complete.

Operating Procedures

SECTION 2



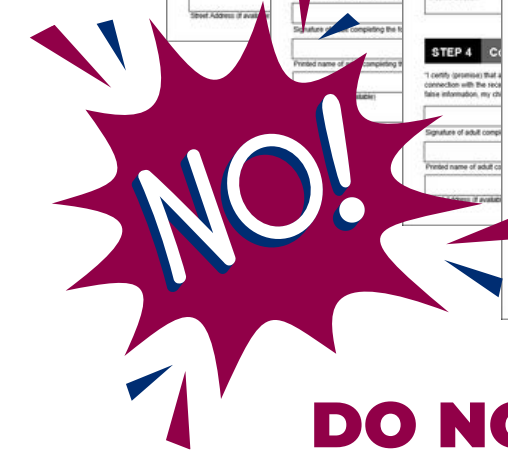
Meal Charging and Eligibility

Schools that have elected CEP will offer all enrolled students reimbursable meals at no cost to the household.

LEAs will be reimbursed based on the **total** daily meal counts and will no longer count students by free, reduced, and paid eligibility.



While an LEA or site is operating CEP, it is **prohibited** to distribute household applications to families if their child is attending a school that is operating under CEP.



DO NOT DISTRIBUTE/COLLECT HOUSEHOLD APPLICATIONS!



Meal Service

Schools participating in CEP must provide all students with access to breakfast and lunch every school day.

During meal service, schools must keep accurate meal counts and maintain a point-of-service system that ensures Federal reimbursements are claimed only once for each student who receives a **reimbursable meal**.

Schools may not claim reimbursement for additional meals served to students or meals that do not meet the meal pattern requirements.

Counting & Claiming

To meet the counting and claiming requirements while on CEP, LEAs must:

- ✓ count only the **total** meals served daily;
- ✓ **not** collect school meal applications from households; and
- ✓ use non-Federal funds to cover any operating costs that exceed Federal reimbursement, such as costs for providing meals to all students at no cost.



Point of Service (POS)

COLLECTING MEAL COUNTS

Similar to regular NSLP requirements, accurate counts of reimbursable meals served to students at each meal service must be taken on a daily basis.

Serving lines must be adequately supervised to ensure that all meals claimed for reimbursement are meeting the meal pattern and are only claimed for one meal per student per meal service.

POS DURING REGULAR NSLP	POS DURING CEP
Only reimbursable meals meeting the meal pattern can be claimed for reimbursement.	Only reimbursable meals meeting the meal pattern can be claimed for reimbursement.
Meals will be counted by category of free, reduced, or paid based on each student's eligibility determination.	Only the total meals served will be counted.



Submitting Claims in CNPWeb

Claims can be submitted starting the first day after the claim month and up to 60 calendar days after the end of the claim month. In CNPWeb, SFAs operating CEP will only be prompted to enter in the total reimbursable meals served.

- When the SFA enters a claim there will only be fields available for the data that is necessary as shown in the picture to the right.
- The “Free Meals Served” field and the “Paid Meals Served” field will auto-fill when the necessary data is entered.
- CNPWeb will automatically calculate this claim data by using the site’s ISP found at the bottom of the claim.

Lunch - High Rate	
Number of Days Served:	<input type="text" value="15"/>
Free Meals Served:	1218
Reduced-Price Meals Served:	0
Paid Meals Served:	505
Total Meals Served:	<input type="text" value="1723"/>
Participants Enrolled:	<input type="text" value="146"/>

CEP Percentages	
Breakfast CEP Percentage:	44.19 %
Lunch CEP Percentage:	44.19 %



Example

CALCULATING REIMBURSEMENT

The CNPWeb will automatically calculate claims for CEP schools based on the total number of meals served.

- The percentage of total meals reimbursed at the **free** rate is determined by multiplying the ISP by 1.6.
- The remainder of the meals served are reimbursed at the **paid** rate.

Figures will be computed automatically in the CNPWeb. However, the example to the right demonstrates how these calculations are done for learning purposes.

SAMPLE SCENARIO: ABC ELEMENTARY

ABC Elementary has an ISP of 45%.

- $45\% \times 1.6 = 72\%$


This means that 72% of the meals will be reimbursed at the free rate. The remaining 28% of meals will be reimbursed at the paid rate.

Daily Edit Checks

Participation in CEP does not change the requirement to conduct edit checks. Daily Edit Checks are required to ensure that schools are not claiming more total meals than total enrolled students.

Since claims will only ask for the total meals, the Daily Edit Checks are now simplified to include only the following fields:

- Total students
- Total meals served
- Days served
- Attendance factor



Simplified Daily Edit Check Worksheet

School: _____ Enrollment: _____

Month: _____ Attendance Factor (AF): _____

☐ National School Lunch Program

☐ School Breakfast Program

BREAKFAST

Day of Month:	A	B	C	D	TOTAL COUNTS:
	Total Enrollment	AF	Total Enrollment X AF:	Total Meals Served:	
1		0.00%	0		0
2		0.00%	0		0
3		0.00%	0		0
4		0.00%	0		0
5		0.00%	0		0
6		0.00%	0		0
7		0.00%	0		0
8		0.00%	0		0
9		0.00%	0		0
10		0.00%	0		0
11		0.00%	0		0
12		0.00%	0		0
13		0.00%	0		0
14		0.00%	0		0
15		0.00%	0		0
16		0.00%	0		0
17		0.00%	0		0
18		0.00%	0		0
19		0.00%	0		0
20		0.00%	0		0
21		0.00%	0		0
22		0.00%	0		0
23		0.00%	0		0
24		0.00%	0		0
25		0.00%	0		0
26		0.00%	0		0
27		0.00%	0		0

LUNCH

Day of Month:	A	B	C	D	TOTAL COUNTS:
	Total Enrollment	AF	Total Enrollment X AF:	Total Meals Served:	
1		0.00%	0		0
2		0.00%	0		0
3		0.00%	0		0
4		0.00%	0		0
5		0.00%	0		0
6		0.00%	0		0
7		0.00%	0		0
8		0.00%	0		0
9		0.00%	0		0
10		0.00%	0		0
11		0.00%	0		0
12		0.00%	0		0
13		0.00%	0		0
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17		0.00%	0		0
18		0.00%	0		0
19		0.00%	0		0
20		0.00%	0		0
21		0.00%	0		0
22		0.00%	0		0
23		0.00%	0		0
24		0.00%	0		0
25		0.00%	0		0
26		0.00%	0		0
27		0.00%	0		0

July 2023 | Health and Nutrition Services | Arizona Department of Education | This institution is an equal opportunity provider.

CEP Daily Edit Check Worksheet



Operating a Successful CEP Program

To run a successful program while operating CEP, it is critical that all counting and claiming procedures are followed.

If non-reimbursable meals are being counted and claimed or meals are not compliant with the meal pattern, this can result in Administrative Review findings and can lead to fiscal action.

LEAS must comply with all program requirements that remain intact throughout the CEP four-year cycle and for any extended cycle years.

LEAs operating the CEP are encouraged to connect with their assigned HNS Specialist as questions or concerns arise.







Annual CEP Requirements

SECTION 3



Annual Requirements

CEP schools are exempt from collecting/distributing household applications but they must continue to comply with all other program requirements including, but not limited to, the following:

-  **CONDUCTING CNP DIRECT CERTIFICATION**
-  **SUBMITTING ANNUAL ISP**
-  **SUMBTING THE VERIFICATION SUMMARY REPORT**
-  **MAINTAINING A NON-PROFIT FOOD SERVICE ACCOUNT**
-  **NOTIFYING HOUSEHOLDS**
-  **RETAINING RECORDS**

CNP Direct Certification

CEP schools are only required to run CNP Direct Certification one time per year on or around April 1.

This April 1 data, or data from the date of the Mid-Year Election, will be used to determine the total Identified Student count for each year.

Mid-Year Cycle Increase:

- If a CEP school finds that during the four-year cycle, or as of the date of Mid-Year Election, the April 1st ISP has increased, the LEA can elect to increase the ISP and extend the current CEP cycle.



Submitting the ISP

Based off the direct certification data found on or around April 1, the Annual ISP is required to be submitted to ADE by April 15, regardless of CEP implementation. The ISP will be submitted electronically to ADE.

Based on the reported ISP, CEP schools will have three options to consider for their next operating year:

- **Option 1:** Keep the current ISP and remain on the current CEP cycle.
- **Option 2:** Update the ISP using April 1 or Mid-Year Election figures and remain on the current CEP cycle.
- **Option 3:** Update the ISP using the April 1 or Mid-Year Election figures and begin a new four year CEP cycle.



Verification

LEAs operating CEP will no longer participate or complete verification activities.

However, step 4 of the verification process, the Verification Summary Report (VSR) is still required to be submitted annually by February 1st. The information you will be required to submit on the report includes:

- Total number of students enrolled in the sites operating CEP as of October 31.
- Total number of sites operating CEP.



Maintain a Non-Profit Food Service Account

If the Federal reimbursement received under CEP is **less than** the cost of providing meals at no cost to all students, LEAs must use **non-Federal funding sources** to cover all other operational costs.

If the Federal reimbursement received under CEP causes the LEA to have cash resources that exceed the three months average expenditures allowable limit, LEAs must submit a plan detailing how these funds will be used to improve the nonprofit school food service program

WHAT ARE NON-FEDERAL SOURCES?

Non-Federal sources include any funds other than Federal reimbursement available to the nonprofit school food service account. Some examples include, but are not limited to:

- any profits from a la carte, catering, or adult meal sales;
- cash donations; and
- in-kind contribution funds from outside sources, such as volunteer services.



Maintain a Non-Profit Food Service Account

EXCESS CASH

ADE is required to monitor the level of net cash resources in the food service fund.

These regulations require that the net cash resources, or all monies accrued/available in the nonprofit school food service account at any time, do not exceed three months' average expenditures.

If an LEA is found to have excess net cash resources, they must submit a plan detailing how the excess funds will be spent to improve the nonprofit school food service.

District-Wide or Partial District Implementation

When applying for CEP, the LEA will indicate if an individual school, a group of schools, or an entire district will be participating in the provision.

- LEAs adopting CEP district-wide will receive benefits for all schools across the district at the same combined ISP.

LEAs adopting CEP at some, but not all schools, are strongly encouraged to clearly communicate to families which schools will operate CEP, which schools will use standard counting and claiming, and why.

- This is particularly important for students whose school is going through a transition from one type of operation to another, or for those families who have children attending multiple schools in the district when one could attend a CEP school and one could attend a non-CEP school.

Notifying Households

LEAs participating in CEP should use their usual channels of communication with media and households to notify the community that school meals, both breakfast and lunch, will be available at no charge to all students enrolled at CEP schools.

CEP schools are required to submit media releases to local media and unemployment offices contemplating layoffs, along with notifying households through a parent letter at the beginning of the school year.

- A template for the Public Media Release is available on the ADE website. Since all meals are served to children at no charge, ensure appropriate changes are made to the media release such as removing meal prices per eligibility category.
- A template for the Parent Letter for Community Eligibility (CEP) is available to notify households of non-pricing for meals.

PRESS (MEDIA) RELEASE

SENT TO (NAMES OF NEWS/MEDIA OUTLETS AND MAJOR EMPLOYERS CONTEMPLATING LAYOFF)

[Make appropriate changes as applicable to reflect the programs operated]

[Local school food authority] will be participating in the [School Breakfast Program and/or National School Lunch Program]. As part of this program, [Local school food authority] will offer healthy meals every school day. Breakfast will cost [breakfast cost] and lunch will cost [lunch cost]. Your child(ren) may qualify for free or reduced-price meals. Reduced-price meals cost [reduced-price breakfast cost] for breakfast and [reduced-price lunch cost] for lunch.

Qualifications for children to receive free or reduced-price meals include: belonging to a household whose income is at or below the Federal Income Eligibility Guidelines, belonging to a household that receives public assistance, or if the child is homeless, migrant, runaway, foster, or participates in a Head Start or Even Start pre-Kindergarten program.

Household size and income criteria are used to determine eligibility for free and reduced-price benefits if the household does not receive assistance or the children are not in the other categories mentioned above. Children can get free or reduced-price meals if the household's gross income falls at or below the limits on the Federal Income Eligibility Guideline chart.

Household Size	FREE			REDUCED-PRICE		
	Yearly Income	Monthly Income	Weekly Income	Yearly Income	Monthly Income	Weekly Income
1	\$18,954	\$1,580	\$365	\$26,973	\$2,248	\$519
2	\$25,636	\$2,137	\$493	\$36,482	\$3,041	\$702
3	\$32,318	\$2,694	\$622	\$45,991	\$3,833	\$885
4	\$39,000	\$3,250	\$750	\$55,500	\$4,625	\$1,068
5	\$45,682	\$3,807	\$879	\$65,009	\$5,418	\$1,251
6	\$52,364	\$4,364	\$1,007	\$74,518	\$6,210	\$1,434
7	\$59,046	\$4,921	\$1,136	\$84,027	\$7,003	\$1,616
8	\$65,728	\$5,478	\$1,264	\$93,536	\$7,795	\$1,799

Household income of \$557, \$129, \$9,509, \$793, and \$183.

Households can fill out the application and return it to the school. The school will notify households that their children are approved for free meals. This notification is sent to all households with a letter informing households of the application process and what is required to complete the application. [insert locations where the applications are available, i.e., on the school's website].

Children in the household and the information provided on the application are used to determine eligibility and verification of data. Applications may be approved or disapproved by the school or other program officials. An application for free or reduced-price meals is approved unless it contains complete eligibility information as follows: In the operation of child feeding programs, no child will be denied participation because of race, color, national origin, age, or disability.

If a household member becomes unemployed or if the household income changes, the household must notify the school. Such changes may make the children of the household eligible for free or reduced-price meals at or below the Federal Guidelines. Contact the school for more information.

INSERT SCHOOL DISTRICT LETTERHEAD

Dear Parent/Guardian:

Children need healthy meals to learn. [Name of District] will be offering healthy meals to all students at no cost every school day in School Year 20____. Your child(ren) will receive free breakfast and lunch meals every school day without having to pay a fee or submit a household application.

Your child(ren)'s school is approved to operate [Community Eligibility Provision or Provision 2 or Provision 3]. No further action is required of you. Your child(ren) will be able to receive free meals without having to pay a fee or submit an application.

My family needs more help. Are there other programs we might apply for? To find out how to apply for Supplemental Nutrition Assistance Programs or other assistance benefits, contact your local assistance office or call 1-855-432-7587.

If you have other questions or need help, call [phone number].

Sincerely,

[INSERT NAME]

[INSERT TITLE]



Record Retention

All LEAs operating CEP must maintain records for the entire cycle of CEP plus an additional five years. These records include, but are not limited to:

- ✓ **ALL DIRECT CERTIFICATION LISTS**
- ✓ **EXTENDED HOUSEHOLD MEMBER DOCUMENTATION**
- ✓ **LIAISON LISTS**
- ✓ **STUDENT ENROLLMENT**
- ✓ **MEAL COUNTS**
- ✓ **DAILY EDIT CHECKS**
- ✓ **PRODUCTION RECORDS**
- ✓ **MEDIA RELEASE**
- ✓ **PARENT LETTER**

General Program Areas

Additional general program areas that **do not change** due to CEP are:

- Meal Pattern
- Professional Standards
- Local Wellness Policy
- Civil Rights Requirements
- Food Safety
- Water Availability
- School Breakfast/Summer Food Service Program Outreach
- Smart Snacks
- Monitoring
- Procurement

Title I, Accountability, and Alternate Income Applications

SECTION 4



Title 1 Funding

Title 1 funding is based on Census data for school districts that report to AzEDS and is based on either school meal applications or NCLB 1 and 2 indicators for charter schools.

A common misconception with Title 1 is that in order to receive funding, school meal applications must be collected to retain poverty-level data.



School meal applications are not required for Title 1 funding and schools will not receive less Title 1 funding because of their participation in CEP.

If the LEA currently uses school meal application data for Title 1 reporting, they will no longer be able to do so.

- If income data needs to be collected for any other program such as Title 1, it is important to use an alternate income application and not a school meal application.

Remember, the distribution of household applications is unallowable while operating CEP.

Accountability Division

While CEP does eliminate the burden of collecting school meal applications, it is important to note that the ADE Accountability Division is still in need of individual student poverty indicators.

If an LEA decides to collect individual student data through an alternate income application, the LEA must ensure that it does not in any way indicate that the application is required by USDA, and non-profit food service funds may not be used to distribute, collect, or process these applications.

Alternate Income Applications

LEAs that choose to use an alternate income application for other grants or funding while operating under CEP must:

- not use the nonprofit school food service account for distributing or certifying household applications;
- add a disclaimer that the new form is not a school meal application;
- include an explanation of why collecting the information is needed;
- ensure that all references to USDA programs are removed;
- not package the form with any school meal programs materials; and
- not have any correlation between school meals and the distributed income form.

ESEA (Title I) Income Eligibility

The Arizona Department of Education provides the following FY 2024 Income Guidelines for determining eligibility information for federal funding associated with programs funded under the Elementary and Secondary Education Act (ESEA).

Is your family at or below the current income guidelines based on the attached **ESEA (Title I) Income Eligibility Guidelines** schedule?

Indicator 1 ☐ Indicator 2 ☐ No ☐

Definition of Income: all items such as wages and salaries before any deductions, and other income, such as self employment, welfare, social security, retirement benefits unemployment compensation, worker's compensation, Aid for Dependent Children, alimony, child support, pensions, insurance or annuity payments, etc.

If your family qualifies, please complete the following information for each child:

Child's Name	Name of School	Grade

I hereby certify that all the above information is true and correct.

Parent/Guardian Signature: _____ Date: _____

These survey forms should be retained by the school or LEA and kept on file for a period of 5 years.

Arizona Department of Education Updated April 2023



Click [here](#) to access Alternate Income Applications.

CONTACT US

If you have a question or require additional assistance, please contact your assigned specialist or contact HNS.



602-542-8700



ContactHNS@azed.gov



www.azed.gov/hns





Congratulations

**You have completed the Online Course:
Online Course: Implementing the Community
Eligibility Provision (CEP)**

Information to include when documenting this
training for Professional Standards:

Training Title:
Online Course:
Implementing the
Community Eligibility
Provision (CEP)

Key Area: 3000 – Administration
Learning Code: 3130
Length: 30 Minutes



Please locate the
assessment [here](#) .

Certificate

Requesting a training certificate

Please click the button to complete a brief survey about this online training. Once the survey is complete, you will be able to print your certificate of completion from Survey Monkey.



Information to include when documenting this training for Professional Standards:

Training Title:
Online Course:
Implementing the
Community Eligibility
Provision (CEP)

Key Area: 3000 – Administration
Learning Code: 3130
Length: 30 Minutes

Please note, attendees must document the amount of training hours indicated on the training despite the amount of time it takes to complete it.





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Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-50811-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation.

The completed AD-3027 form or letter must be submitted to USDA by:

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

Fax: (833) 256-1665 or (202) 690-7442; or

Email: program.intake@usda.gov

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