



Community Eligibility Provision

February 20, 25, and 26, 2014

Community Eligibility Provision Background

- Section 104(a) of the Healthy, Hunger-Free Kids Act of 2010 amended the Richard B. Russell National School Lunch Act to provide an alternative to collecting household eligibility applications for free and reduced price meals in high poverty Local Education Agencies (LEA's or districts) and schools.
- Eligible LEA's/schools agree to serve all students free lunches and breakfasts for four successive school years.
- Beginning the school year of 2014-15, any qualifying LEA may participate in Community Eligibility Provision with one, several, or all schools in the LEA.

Qualifying for Community Eligibility Provision

- To be eligible, the LEA, individual school, or group of schools within the School Food Authority must have an “*identified student percentage*” of at least 40 percent as of April 1.
- Based on a 4-year cycle, LEA’s and schools will qualify for each year based on the information of the previous year or the initial percentage.

Definitions

- Enrolled Students are those students enrolled and attending the schools participating in Community Eligibility Provision who have access to at least one meal service daily.
- Identified Students are determined through LEA's and schools accessing their direct certification, homeless, migrant youth, foster children, head-start, even-start, home lists, etc. to get a total identified student number.
- Identified Student Percentages will be determined by the number of identified students divided by the total number of enrolled students with access to National School Lunch and School Breakfast Programs multiplied by 100.

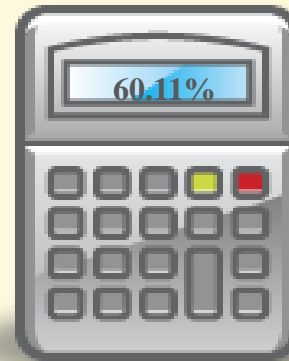
▶ Calculating Identified Student Percent

$$\begin{array}{l} \text{Identified} \\ \text{Student} \\ \text{Percent} \end{array} = \frac{\text{Identified Students}}{\text{Total Enrolled}} \times 100$$

Students with access to
National School Lunch and Breakfast Programs

Example:

$$= \frac{1872}{3114} \times 100 =$$



**You
Qualify**

▶ Claiming Percentages - Free

- The Identified Student Percentage would then be multiplied by a factor set by United States Department of Agriculture to get the Federal Reimbursement Rate in the Free category.
- The factor is currently set at 1.6, but can range from 1.3 to 1.6. LEA's who opt into Community Eligibility Provision for the 2014-15 School Year will utilize the 1.6 factor for their 4-year cycle.
- The 1.6 factor is based on an analysis that showed on average for every 10 identified students there were six more students certified as free or reduced, based on an income application.
- When multiplying by the 1.6 factor, LEA's and schools are approximating the free and reduced price percentage.

▶ Claiming Percentages – Free Example

(using same example from previous slide)

$$\begin{aligned} & 60.11 \text{ percent } (.6011) \\ & \quad \times 1.6 = \\ & .96176 = 96.176 \text{ percent} \end{aligned}$$

Claiming Percentages - Paid

- The remaining percent of total meals is then reimbursed at the Federal Paid Rate – there is no Reduced Rate.

(using same example from previous slide)

$$100 \text{ percent} - 96.176 = 3.824 \text{ percent}$$

- Meal costs in excess of the total Federal Reimbursement Rate of Paid must be covered by non-federal sources (i.e., a la carte, etc.).

▶ Second, Third, and Fourth Year

- For the second, third, and fourth years of a school's 4-year participation cycle in the Community Eligibility Provision, the school may use the initial percentage of Identified Student Percentages (first year) to determine reimbursement or they can use the Identified Student percentages as of April 1 of the preceding year, whichever is higher.
- The higher the percentage, the more meals the school will be reimbursed at the free rate.

➤ Second, Third, and Fourth Year (continued)

Examples:

- In the initial year of 2014, the Identified Student Percentage is 60.11 percent. As of April 1, 2015, the Identified Student Percentage is 58.52 percent. The school would be able to continue using the 60.11 percent as it is higher.
- In the initial year of 2014, the Identified Student Percentage is 60.11 percent. As of April 1, 2016, the Identified Student Percentage is 61.75 percent. The school would now be able to change to the 61.75 percent as it is higher.

Benefits of Community Eligibility Provision

- All students receive a FREE breakfast and lunch.
- Increases breakfast and lunch participation.
- Improves nutrition to disadvantaged students.
- Simplifies meal counting and claiming.
- Eliminates overt identification issues for students.
- Reduces paperwork at the school district level.
- Provides potential labor savings.
- Eliminates student debt from reduced and paid meals.



Drawbacks of Community Eligibility Provision

- Absence of individual eligibility information is cited as most common barrier to electing this provision.
- Potential financial issues when less than 100 percent (62.5 percent student identifier) claiming rate. LEA's and schools can make up the difference through a la carte and other various non-federal programs.
- Unanswered/unresolved questions on how funding related to student data for free and reduced meals will be counted (Title I, e-Rate, and state funds).
- District fees.

Notification Timelines

Using data as of April 1st of each year:

- PDE will post a listing of eligibility based on Direct Certification.
- LEA's and schools can use this data alone or can compile with additional data for Supplemental Nutrition Assistance Program, homeless, migrant youth, runaway, etc. to get a greater amount of students to constitute the “identified student,” thus increasing the identified student percentage for free reimbursement.

Notification Timelines (continued)

By April 15th of each year, LEA's must supply PDE with a list of schools with (reference slides 5, 7, and 8 for calculating) :

- An Identified Student Percentage of at least 40 percent.
- An Identified Student Percentage greater than 30 percent, but less than 40 percent.
- Since we have your Direct Certification numbers, PDE may opt to waive the need for LEA's to submit these numbers.

Notification Timelines (continued)

By May 1st of each year, the state must publish a list:

- With an Identified Student Percentage of at least 40 percent of their eligibility.
- With an Identified Student Percentage greater than 30 percent but less than 40 percent of their potential future eligibility.
- Of LEA's who are currently electing CEP.

Notification Timelines (continued)

By June 30th of each year, LEA's and schools must:

- Submit documentation to PDE. This documentation must demonstrate that the LEA's/ schools met the Identified Student Percentage of 40 percent as of April 1.
- If currently choosing CEP, LEA's and schools must opt-out of the CEP by notifying PDE. This could happen within any year of the 4-year cycle.

Impact on Other Programs

- Collecting Student Data
- Distribution of Title I Funds
- E-Rate for Schools
- State Funding Formula
- Reporting Student Data

➤ Impact on Other Programs – Student Data

- How will schools obtain/track individual student socioeconomic data?
- Can federal funds be used to collect student data?
- If we can't use federal funds, how will we pay the staff that collects it?

Impact on Other Programs – Title I

- Use the Identified Student Percentage with the multiplier of each LEA, Group of Schools, or school to determine the distribution of Title I funds.
- This may cause the distribution of funds to be different than in the past. Plan to make this known to schools as soon as possible.

Impact on Other Programs – E-Rate

- Use free/reduced eligibility from the most recent year that individual student data was collected.
- This means you will use Data from the 2013-14 fiscal year as you implement CEP for the 2014-15 school year.
- Further guidance is forthcoming on how this will be collected and determined in future years.

▶ Impact on Other Programs – State Funding

Poverty data sources will be used in lieu of free/reduced eligibility data.

▶ Reporting Student Data

LEA's will use poverty data sources in lieu of free/reduced eligibility data.

In Conclusion...

- Our priority is making sure our children have access to nutritional meals everyday.
- Community Eligibility Provision is an innovative way to reach that goal.
- Together, we can open the door to reach/feed more students, thus... expanding nutrition and aiding in the development of healthy individuals for best future successes.
- We hope your LEA will implement Community Eligibility Provision in some or all buildings that qualify!



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Community Eligibility Provision (CEP)



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Agenda

- Demographics of IL
- Barriers & Solutions of CEP
- Impacts on other programs
- Resources

Demographics for IL

- Approximate number of SFA's and sites in the federal School Based Child Nutrition Programs:
 - SFA's = 1190
 - Sites = 4415
- Participation in CEP:
 - SY2011-2012
 - SFA's = 37
 - Sites = 160
 - SY2012-2013
 - SFA's = 57
 - Sites = 476
 - SY2013-2014
 - SFA's = 100
 - Sites = 696

Comparison of Traditional vs. CEP

Traditional

- Certify children for free, reduced or paid meals via:
 - Direct certification
 - Household application
 - Homeless, migrant, runaway, headstart listing
- Children eligible for reduced and paid meals must pay the reduced or paid price for meals.
- Take and maintain meal counts by free, reduced & paid category.
- Verification is required
- Have individual student socioeconomic data.

CEP

- Uses Identified Student numbers to determine a free claiming rate. (individual households do not apply for benefits- no apps)
 - Direct Cert (SNAP, TANF, foster, Medicaid – pilot in IL)
 - Listings – homeless, migrant, runaway, headstart
 - Extension of benefits (from DC)
- All children are provided a breakfast and a lunch at no cost.
- Take and maintain meal counts as a total number of meals served each day by meal service.
- Verification is not required.
- Do NOT have individual student socioeconomic data.

Barriers of CEP

- There are some impacts of CEP on other programs that may SEEM like a barrier.
- There are solutions to every barrier that we have encountered.
- Step 1: find the areas that may be impacted.
- Step 2: determine a solution to that impact & the audience that is impacted.
- Step 3: training – contact the staff that may be impacted, be open about all of the impacts that you find and train on the solution.

Impact on Other Programs

- Participation in CEP impacts other areas of your school.
- It is important to share this information with school administration/school board/business managers/etc, so that they are aware and can prepare for such impacts.
- Remember, that schools/districts, that operate via CEP, will NOT have a meal benefit application process, and therefore will NOT have an individual student eligibility status based on the Household Eligibility Application for NSLP.
 - For example, you will not know if Student A is eligible for Free, Reduced-Price, or Paid meal benefits.

Gathering Socioeconomic Status

- Schools participating in CEP may still need to collect individual socioeconomic status of students in CEP schools for other programs. Not for the meal programs but other programs may need individual student information.
- To assist schools in gathering this data IL has developed an Alternative Household Form that can be used for other programs.
- **IMPORTANT NOTE:** since this form is not to gather information for the meal programs, non-profit school meal account funds can not be used to print, distribute or certify the applications.

HOUSEHOLD AND INCOME FORM

(school name) is participating in the Community Eligibility Option (CEO) provision under the National School Lunch Program. Under CEO, all children in the school will receive a breakfast/lunch at no charge regardless of income or completion of this form. However, to determine eligibility for various additional state and federal program benefits that your child(ren) may qualify for, please complete, sign and return this application to (school name)

1. All Household Members

NAMES OF ALL HOUSEHOLD MEMBERS First, Middle Initial, Last	Is (Student or) School Name	Is Student and Grade	SNAP OR TANF CASE NUMBER (If any, for each household member) Skip to Part 4 if you list a SNAP or TANF case number.										Check if NO Income	Check if Foster Child	
			1	2	3	4	5	6	7	8	9	10			
			-	-	-	-	-	-	-	-	-	-	-	-	-
			-	-	-	-	-	-	-	-	-	-	-	-	-
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2. Homeless, Migrant, Runaway, or Head Start

Homeless Migrant Runaway Head Start

3. Total Household Gross Income (before deductions) You must tell us how much and how often.

A. NAMES (LIST ALL HOUSEHOLD MEMBERS WITH INCOME)	GROSS INCOME AND HOW OFTEN IT WAS RECEIVED (Example: \$100/month; \$100 twice a month; \$100 every other week; \$100/week)							
	B. Earnings From Work (Before Deductions)		C. Welfare, Child Support, Alimony		D. Pensions, Retirement, Social Security		E. Worker's Comp., Unemployment, SSI, etc. (All other income)	
	Amount	How often?	Amount	How often?	Amount	How often?	Amount	How often?
I.	\$		\$		\$		\$	
II.	\$		\$		\$		\$	
III.	\$		\$		\$		\$	
IV.	\$		\$		\$		\$	
V.	\$		\$		\$		\$	

4. Signature

Date Printed Name of Adult Household Member Signature of Adult Household Member

5. Contact Information

Work Telephone Number (include Area Code) Home Telephone Number (include Area Code) Home Address (Number, Street, City, State, Zip Code)

SCHOOL USE ONLY

INITIAL DETERMINATION Annual Income Conversion: Weekly X 62 Every 2 Weeks X 28 Twice a Month X 24 Once a Month X 12 Convert income only if different frequencies of pay are reported.

TOTAL INCOME \$ _____ Per: Week Every 2 Weeks Twice a Month Month Year NUMBER IN HOUSEHOLD: _____ CHANGE IN STATUS: _____ Date: _____

Free based on:
 homeless SNAP or TANF
 migrant foster child
 runaway household's income
 Head Start

Reduced based on:
 household's income

Paid—Reason:
 income too high
 incomplete application

Temporary:
 free
 reduced

Limit: _____ Limit: _____
(MAXIMUM is 45 days each)

Date Withdrawn: _____
 Date: _____

Signature of Determining Official _____

Privacy Act Statement: You do not have to give this information, but if you do not, we cannot determine your child's eligibility for additional benefits under state and federal programs. We will hold the information you provide us as private and confidential to the extent required by law. However, we will share your socioeconomic status with various state and federal programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules. Regardless, all students enrolled in Community Eligibility Option school will receive a meal at no charge.

Non-discrimination Statement: In accordance with Federal Law and U.S. Department of Education policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age or disability. To file a complaint of discrimination, write U.S. Department of Education, Office for Civil Rights, The Wanamaker Building, 100 Penn Square East, Suite 515, Philadelphia, PA 19107-3323 or call (215) 656-8541 (Voice). Individuals who are hearing impaired or have speech disabilities may contact U.S. DOE through the Federal Relay Service at (800) 877-8339, or (800) 845-8136 (Spanish). The U.S. Department of Education is an equal opportunity provider and employer.

- Sample Household & Income Form – to be used for gathering individual socioeconomic status.

http://www.isbe.net/sis/pdf/69-72_hshld_income.pdf

Title I

- The United States Department of Education has issued guidance related to Title I and CEP participating schools.
- A copy of the guidance is available online at:
<http://www.isbe.net/nutrition/PDF/usde-guidance-cep0114.pdf>

Basically, the guidance document indicates that the total amount of Title I funds will not be impacted by participation in CEP. However, there could be an impact in how those Title I funds are distributed within the district. With Title I, funds should be distributed based on the individual schools CEP percentage, therefore, if multiple schools are grouped for claiming of meals, you do NOT use that group percentage for Title I distribution, you would need to use the individual schools percentage (identified students/enrollment X 1.6) for determining distribution of those Title I funds.

E-Rate

- The universal service Schools and Libraries Program, commonly known as “E-rate,” provides discounts of up to 90 percent to help eligible schools and libraries in the United States obtain affordable telecommunications and internet access.
- Most current guidance regarding E-Rate:
<http://www.isbe.net/nutrition/pdf/usac-erate-ltr0712.pdf>
- Basically, the guidance indicates that for E-Rate in CEP schools the Free and Reduced eligibility from the year prior to participation in CEP should be used. Example: started participation in CEP for SY2013-2014, then for E-Rate you would use the F/R eligibility from SY2012-2013.

Illinois School Fee Waiver Process

- Link: http://www.isbe.net/htmls/meals_fee_waivers.htm
- Under **Illinois** law, school districts are required to waive charges for textbooks and other fees for children whose families are unable to afford them, including children eligible for the federal free lunch and breakfast program, and for any other extenuating circumstances for which the school board will waive fees as communicated in its adopted policy (e.g., reduced-price lunch or medical emergencies). [105 ILCS 5/10-20.13 and 34-21.6]
- As CEP participating schools will NOT have eligibility status by individual student, therefore there are the following options:
 - Waive all fees
 - Provide the Alternative Household Form to determine low income status

Site Participation:

- For CEP a district can determine if they want their sites to participate as individual sites, if they want to group them together (there can be as many groups as you want) or if they want to group the entire district all together as one group.
- A district can also determine if they want all or just some of their sites to be in CEP.

Site Participation – things to keep in mind

- **Grouping sites or district wide:**
 - When grouping just keep in mind that if you wish to submit increases in years 2,3,or 4 you will need to have updated Identified Student numbers and enrollment for all schools in that group.
 - Also with grouping a high eligible site with a low eligible site, it could help get your group claiming percentage higher.

How Do I Know if CEP is for me?

- To assist schools evaluate the CEP versus Traditional Method, we have developed a worksheet that is available on our website:
<http://www.isbe.net/nutrition/htmls/nslp-hhfka-ceo.htm>
- The worksheet can be used to determine CEP vs. Traditional Method for individual sites, groups and/or district wide.
- **Important Note:** The worksheet only shows the difference in reimbursement amounts and does NOT identify any added value and/or savings to the school due to the certification and verification processes no longer required.

Resources:

- IL posts recorded webinars and training modules on our webpage. The webinars are generally broken down by the audience, new applicant and current CEP participant. The training modules are shorter web-based trainings by topic – How do I apply, Increasing my claiming percentage, etc.

<http://www.isbe.net/nutrition/htmls/ns1p-hhfka-ceo.htm>

Thank you!

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Other State Experiences



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(Feb. 20, 2014)

Other State Experiences



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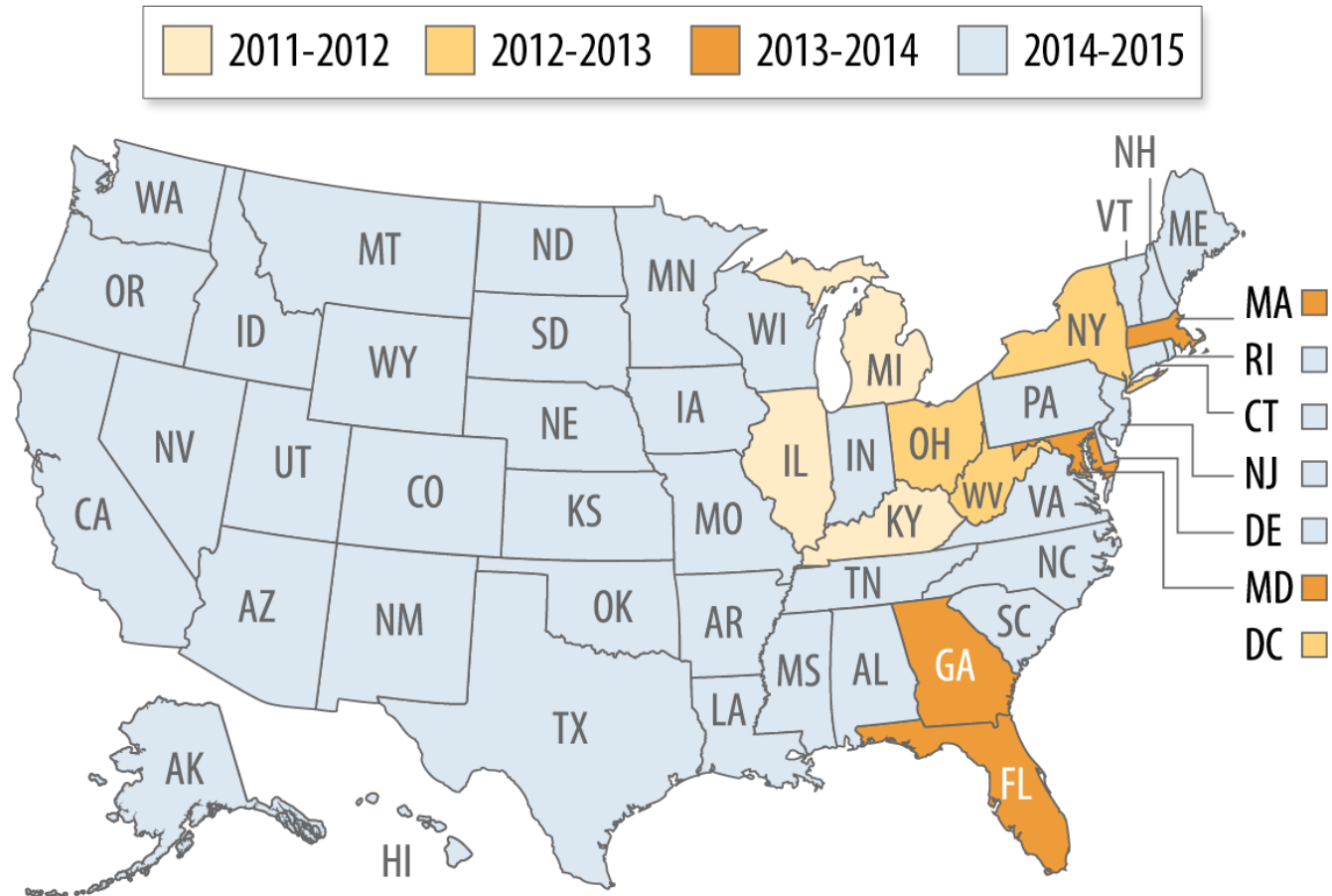
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Community Eligibility

Making High-Poverty Schools Hunger Free



Community Eligibility Phase In

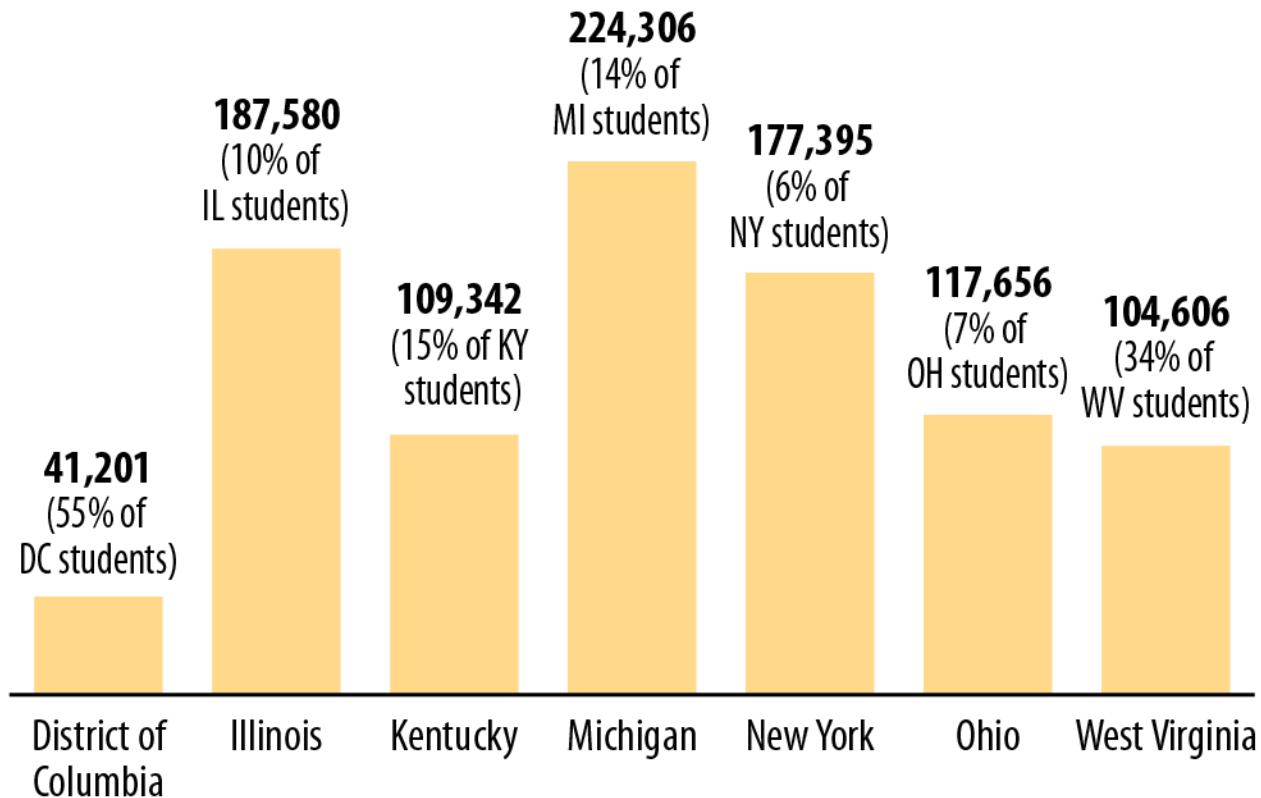


Source: USDA decisions under the Healthy, Hunger-Free Kids Act of 2010

More Than 2,200 Schools Successfully Implemented Community Eligibility During The 2012-2013 School Year

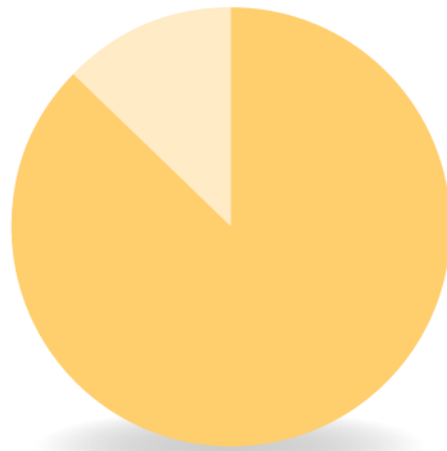
State	Number of Community Eligibility Schools
District of Columbia	122
Illinois	454
Kentucky	267
Michigan	519
New York	326
Ohio	303
West Virginia	282
Total	2,273

Nearly 1 Million Children Are Already Benefitting From Community Eligibility



Source: Center on Budget Policy and Priorities analysis of U.S. Department of Agriculture data, U.S. Department of Education data, and data collected directly from these states

Community Eligibility Helps High-Poverty Schools

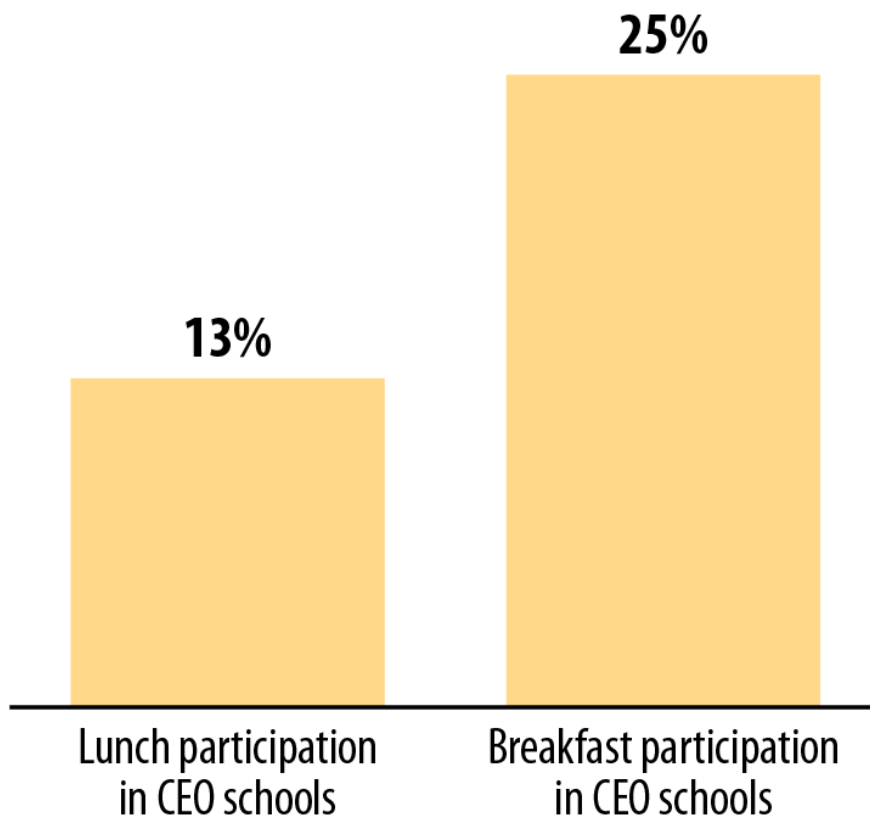


82% of students at community eligibility schools in Illinois, Kentucky, and Michigan were approved for free or reduced-price meals the prior year

Source: U.S. Department of Agriculture data and data collected directly from these states

Lunch And Breakfast Participation Increase Under Community Eligibility

Increase in participation between October 2010 and October 2012 in schools that operated under community eligibility for two years



Community Eligibility Supports Best Practices

Increased participation in school meals through community eligibility can build synergy with:

- Breakfast After the Bell – grab and go, in the classroom
- Farm to School
- Smarter Lunch Rooms
- Salad Bars
- HUSSC Schools



Feedback From Community Eligibility Schools

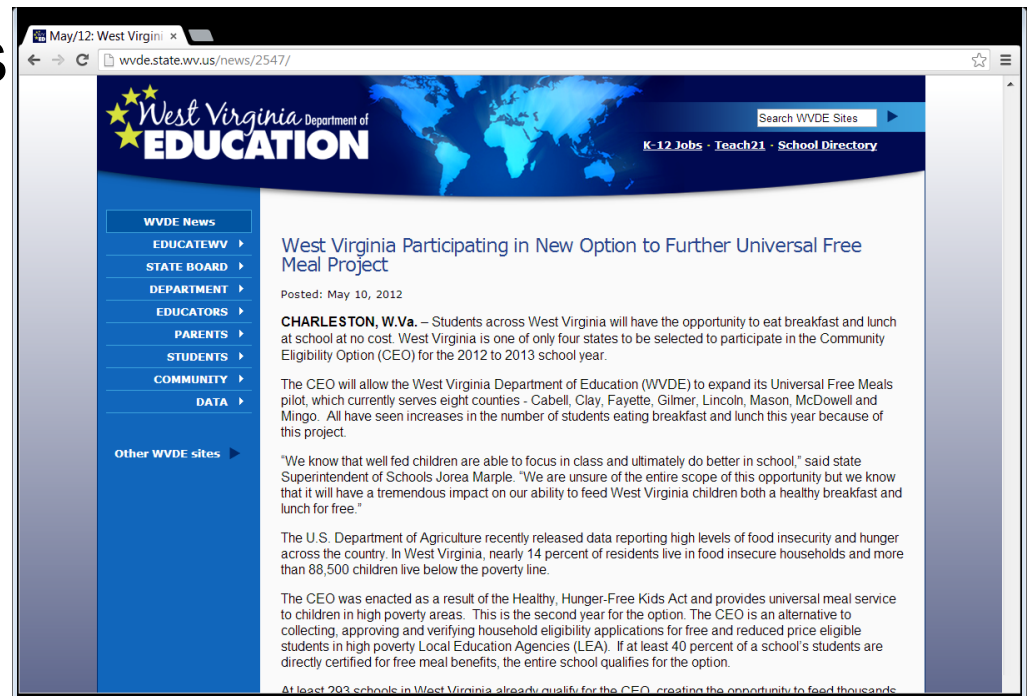
- All school districts that implemented the option the first year and were surveyed by FRAC would recommend community eligibility to high poverty schools like their own
- School districts report positive feedback from parents and school staff
- Increased ability to feed more students
- Some districts report an increase in revenue



Getting the Word Out

Inform the Community – School Boards, Parents, and Media

- Model letters to parents
- News releases
- Newsletters
- List serves



Grouping

- Individual school, group, mix, or whole LEA
- Any criteria—ex: neighborhood, elementary, ISP
- You can be very strategic with ISPs by grouping schools that have ISPs over 62.5% with lower schools
- For example, the DC Public Schools grouped 84 schools to achieve a free claiming percentage of 99.75; 39 of those schools would have had a lower free claiming percentage if they had participated individually

Key Messages

- Community eligibility benefits both students and the school nutrition programs
 - Eliminating fees reduces stigma and ensures access to two healthy meals each day for low-income students who really need them so that they are fueled up and ready to learn
 - Eliminating applications reduces paperwork for families and schools
 - Increasing meal participation improves the overall financial viability of school nutrition programs

Community Eligibility Resources

Joint FRAC /CBPP MATERIALS

- *Community Eligibility: Making High-Poverty Schools Hunger Free*
- Report Summary - A Powerful Tool in the Fight Against Child Hunger
- A Guide to Implementing Community Eligibility
- Power Point Presentation
- Sample op-ed

OTHER MATERIALS

- Links to State web pages and materials
- Fact Sheets and Issue Briefs
- Sample School Board presentation

Materials Now Available at <http://frac.org/community-eligibility/>

Contacts – Division of Food and Nutrition

We will post the webinar chat questions on PEARS, Download Forms in the near future.

Should you have additional questions/comments regarding Community Eligibility Provision, please contact:

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Thank You!