

# U.S. Department of Agriculture Community Eligibility Provision Impacts to Non-Child Nutrition Programs Regarding Poverty Data

The following Q and A addresses issues surrounding the Child Nutrition Community Eligibility Program (CEP) and its relationship with other Federal and State administered programs and the state accountability system regarding poverty data.

**What is the Community Eligibility Provision?** Community eligibility is an option available under USDAs Child Nutrition Programs that allows schools with high percentages of low-income students to provide breakfast and lunch, at no cost, to all students, without collecting poverty data from individual families. Direct certification enrollment multiplied by a factor determined by USDA is the sole basis for determining low income enrollment, for purposes of determining the amounts received by USDA for eligible meals served, in schools participating in CEP.

**What is the impact to other programs that use Child Nutrition free and reduced percentages for funding calculation purposes?** Districts electing to participate in this program need to understand how their decision impacts Title I, A, E-rate, and other state programs that use poverty data for allocation purposes. Since schools participating in CEP are no longer required to collect the free and reduced price USDA applications for income data, we are providing a survey for you to use in order to collect this data for other purposes. Without this income data, the loss of E-rate, LAP, and other state funding could be significant.

## Title I, A Allocations to Buildings

**What is the relationship between the Community Eligibility Option and Title I funding?** Federal Title I funds are currently allocated primarily based on census poverty estimates and the cost of education in each state. Participating in CEP will not affect the total amount of Title I funds that a state or district receives. However, CEP participation can affect how Title I funds are allocated to each Title I school building.

Districts typically Use Child Nutrition Programs free and reduced price meal percentages to distribute Title I, Part A funds between schools.

**What is different about how allocations are determined to individual buildings?**

Most of the previous requirements are the same:

- Schools are served in rank order by poverty percentage.
- Schools over 75% must be served first.
- Grade span grouping may only be applied after schools above 75% are served.
- Districts may stop serving schools at any point in the rank order.
- Per pupil allocations will still be based on the rank order of schools by poverty.

**How should in-district Title I school allocations be determined?** When annually determining the eligibility of a CEP school to receive Title I funds, districts must assume that the percentage of

economically disadvantaged students in the school is proportionate to the percentage of students eligible to receive meals for which that school is reimbursed by the U.S. Department of Agriculture. To calculate this percentage, the district or schools must multiply the number of students, identified by direct certification data by the statutory multiplier specified in the Healthy, Hunger Free Kids Act of 2010, and then divide that amount by the enrollment in the school. The district or school must use the CEP reimbursement percentage (Identified Students percentage \* 1.6 multiplier) for participating schools, or total enrollment, whichever is less.

**If a district or school was approved for Community Eligibility Option program participation in 2014-15, how should the data be entered into Form Package 201, Public Schools Breakdown (ranking and allocating), page 6?** Form Package 201 has been updated to accommodate direct certification poverty data used to determine Title I building allocations.

**If a district has many CEP program schools with a 100 percent reimbursement rate, can a larger per-pupil allocation be given to the school with a greater percentage of Identified Students to determine its Title I school allocations?** Yes, as long as the school district ensures that it follows Title I within-district allocation requirements. Accomplishing this will take some careful analysis on the district's part, especially for a district that has a combination of CEP participating and non-participating schools.

For example: In the case of a school district that has more than one CEP program school at the 100 percent reimbursement rate with different CEP Identified Students percentages, the district may use a higher per-pupil amount for the 100 percent school with the higher percentage of CEP Identified Students.

At the same time, however, to ensure Title I compliance, the school district must ensure that the 100 percent schools receive at least as much per pupil allocation as do CEP program participating and non-participating schools with lower poverty rates. For instance, a non-participating school with a 99 percent poverty rate could not receive more per student allocation than a participating school with a 100 percent reimbursement rate.

**If a district used a grouping of schools or the whole district as a group for Community Eligibility Option to determine U.S. Department of Agriculture claiming percentage, can this percentage be used to determine Title I school allocations?** No. The Elementary and Secondary Education Act requires a district with an enrollment of at least 1,000 students to rank schools in order of poverty to determine which schools are eligible to receive Title I funds and the amount of Title I funds eligible schools receive. Accordingly, to establish this ranking there must be a poverty percentage determined for each individual school.

**If an LEA chooses to group Community Eligibility schools to determine the reimbursement rate from USDA, does each school in a group then have the same poverty percentage for Title I ranking and allocation purposes?** No. Schools may be grouped to determine the USDA reimbursement rate. Under section 1113 of the ESEA, however, an LEA with an enrollment of at least 1,000 students must rank schools individually for ranking and allocation purposes. Thus, if an LEA groups schools in order for them to be eligible for Community Eligibility or to maximize Community Eligibility

reimbursement, the LEA must still use the Community Eligibility data, multiplied by the 1.6 multiplier, for each individual school for Title I ranking and allocation purposes.

**If an LEA has traditionally established a cutoff above which Title I-eligible schools are served, does the LEA have any options if the use of Community Eligibility data increases the number of schools above the cutoff?** Yes. An LEA can raise its cutoff point. For example, if an LEA's policy was to serve all schools above 60 percent poverty, the LEA could choose to serve schools above a higher poverty percentage (e.g., 67 percent).

**May a private school that participates in the NSLP or School Breakfast Program elect Community Eligibility?** Yes, if the private school meets the eligibility criteria for Community Eligibility.

**If a private school is a Community Eligibility school, does every child in the private school automatically generate Title I funds for equitable services?** No. Title I funds are generated to provide equitable services to eligible private school students on the basis of private school students from low-income families who reside in participating public school attendance areas and not on the basis of all students in a private school. Accordingly, even if a private school is a CEP school and all students in the school qualify for free meals, only those students who reside in a participating public school attendance area would generate funds with which an LEA would provide equitable services. If an LEA counts only directly certified students in participating public school attendance areas for Title I allocations to public schools, then only directly certified students in a Community Eligibility private school who reside in those areas would generate funds for equitable services.

## State Funded Programs

**Can we use the multiplier similar to Title I, A for reporting economically disadvantaged percentages for state funded programs?** No, you will still need to use data from each individual family to determine the percentage of children eligible for free/reduced priced meals for eligibility in state funded programs.

**How do we obtain this information without having USDA free/reduced priced meals applications?** We are providing a "Household Income Survey" for you to send to families with children enrolled in a CEP participating school. See next section for Q and A's related to this form.

**What state-funded programs will be impacted by CEP?** Learning Assistance Program, National Board Bonus, K-3 High Poverty Funding, State Funded Full Day Kindergarten.

**Does this poverty data need to be reported in CEDARS similar to prior years?** Yes, poverty data by individual students needs to be reported in CEDARS.

## Household Income Survey

**What is the purpose of the Household Income Survey?** Although family income data is not collected through the free and reduced price meals application form in CEP schools, this data needs to be collected in another way in order to determine percentages of economically disadvantaged students for state funded programs that still require this information for funding purposes.

**How is data collected to determine if a student meets the economically disadvantaged criteria if a school is not collecting household free and reduced price meal applications in a given school year?** This data will be collected by providing the Household Income Survey to all families with at least one child that is enrolled in a school participating in CEP.

**Can we require a family to complete this form?** No, but individual district's may provide incentives for completing the forms, but cannot indicate they are required by USDA or ED.

**How can we encourage families to turn in the survey?** The template letter to families that we have provided for your use is worded in a way to encourage families to complete it because it brings benefits to the school and their child.

## E-rate Funding Impact

**What poverty data should I use to report to USAC for determining discounts on services received under the E-rate program?** Pending further guidance, schools utilizing the CEP may use the NSLP eligibility data regarding participation in the NSLP for the most recent funding year in which such schools did not participate in the CEP.

## Accountability System and Other Reporting Impact

**What source will be used to post poverty data to Report Card and for accountability reporting (i.e., State Board Achievement Index, AYP, etc.)?** The data as it is reported in CEDARS will be used to calculate percentages for the poverty subgroup for any federal report, data on Report Card, AYP and the State Board Achievement Index. This means that any student identified as qualifying for free or reduced meals through the direct certification process, through the economic survey, or by being served in a program (i.e., migrant, homeless, head start, etc.) must be reported in CEDARS in the Student Attributes and Programs File (I) to indicate they are eligible for free/reduced meals.

**How do I report the students as eligible for free/reduced price meals in CEDARS?** This is done by coding the student record with a code of 19 – Free/Reduced Meals Participation/Eligibility in Element I06 – Attribute or Program Code and the pertinent code in Element I10 – Qualification Code.

The CEDARS manual can be found here: <http://www.k12.wa.us/CEDARS/Manuals.aspx>

A list of valid qualification codes can be found here: <http://www.k12.wa.us/CEDARS/pubdocs/2014-15CEDARSDataManualAppendices.pdf>, in Appendix X.