Community Eligibility Provision Webinar February 4, 2014

Questions and Answers

Q: How do we access all of the informational resources for Community Eligibility Provision?

A: The resources are available on the Child Nutrition Services Website at:

Eventually, USDA will have a website also. There are many resources available on other state websites such as Kentucky, Illinois and Michigan. Food Research and Action Center (FRAC) has done quite a bit of research on CEP and has an abundance of resources available for you.

Q: We are currently in our last year of Provision 2. Can we use our current claiming percentages as our identified student percentage and convert to CEP?

A: All LEAs will need to determine the identified student percentage as of April 1, 2014 to participate in CEP. Provision 2 schools haven't collected eligibility data since their base year so eligibility has changed. Your Provision 2 claiming percentages are based on participation and CEP is based on identified student percentage. These are very different.

Q: Could you clarify how to calculate claiming percentages again?

A: Identified Student Percentage x 1.6 = Free Claiming Percentage. For the paid claiming percentage:

100 – free claiming percentage = paid claiming percentage. For example:

62.5 % (ISP) x 1.6 = 100% free claiming percentage. In this example, all meals are claimed as free.

Q: On what date in the school year are we supposed to conduct these calculations?

A: Regarding calculation of the identified student percentage, the percentage must be established using the number of identified students and total students enrolled with access to the NSLP or SBP on April 1st.

Q: When does CEP go into effect?

A: CEP begins in school year 2014-15.

Q: What is the downside of CEP?

A: Failure to carefully evaluate if CEP makes sense for your schools. Knowing meal costs and the amount of Federal reimbursement at the site level is important. Factor in the loss of Federal reimbursement in the reduced price category as well as the amount of revenue generated from reduced price co-pay and for paid meals is essential. Also consider the potential impact of increased participation on food storage, staffing, etc.

Q: How does not collecting F/R meal applications affect our Federal allocations such as Title 1?

A: CEP schools no longer have individual student eligibility data. The Department of Education has identified some alternatives for calculating the poverty level so that funds can be distributed to schools. For these alternatives see the Department of Education Guidance on Title 1 Funding and CEP on the Child Nutrition Services website at http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/ProgramApp.aspx.

Q: Does the district need to operate the Head Start program in order to count these students in the identified student percentage?

A: The Head Start students must be enrolled in the district and have access to meals. Additionally, the meals served to the Head Start students must be claimed under the National School Lunch Program.

Q: Can CEP schools offer a la carte?

A: Yes, CEP schools can still offer a la carte.

Q: Are siblings included in the individual student percentage if one sibling is found on the direct certification list.

A: Yes, if one student in the household is on the direct certification list and categorical eligibility has been extended to other students in the household, these students are part of the individual student percentage. Good documentation must be kept on file to show how these students were determined eligible.

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Q: How would the state revenue be counted?

A: The state co-pay for reduced price meals (.30 cents for breakfast k-12 and .40 cents for lunch K-3) would not be paid because there are no reduced price meals in CEP. We will provide information about the state supplement for free and reduced price breakfasts at the follow on webinar.

Q: How is e-rate paid?

A: Please see the letter posted to the Child Nutrition Services webpage at http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/ProgramApp.aspx . We will follow this guidance until we receive an update.

Q: If a student is at Running Start or an out of district skills center during breakfast and lunch, can they be counted in the identified student percentage?

A: No, although these students may be enrolled in the district, they do not have access to meals.

Q: For the Federal Estimator tool, when calculating meal costs, do we include labor, supplies, etc.?

A: The Federal Estimator tool does not provide instructions for what should be included in meal costs however if the goal of the calculator is to ensure costs are covered in CEP, it's recommended that meal costs include labor and supplies.

Q: Is it true that once you participate in CEP, you must continue for 4 years?

A: An LEA, school or group of schools may discontinue CEP at the end of the year any time during the 4 years and revert to standard meal counting and claiming. The LEA must notify Child Nutrition Services by June 30th if they plan to revert to standard meal counting and claiming which involves collecting meal applications.

Q: What happens at the end of the four year cycle?

A: At the end of the four year cycle the LEA may choose to continue CEP or revert to standard meal counting and claiming. The LEA will need to reevaluate the identified student percentage to see if schools still qualify and adjust claiming percentages. The multiplier may change and schools would use the new multiplier for the next years.

Q: If all students eat for free, who is paying the paid rate?

A: The district will receive the Federal reimbursement for free meals and paid meals according to the established claiming percentages. There will be no local revenue for paid meals because meals must be served to all student at no cost.

Q: Is the meal tracking process similar to Provision 2?

A: A by name meal count is not required. Adequate records to show the number of meals served each day at each site is required. Rosters may only be destroyed according to records retention schedules. LEAs may continue to use their POS systems.

Q: At the point of service, is there a need to count students by name?

A: No, there is no requirement to count students by name.

Q: How does it work for sharing F/R eligibility information for other programs like half day kindergarten and other district programs?

A: Since F/R price applications are not collected, the district may choose an alternate method such as the Family Economic Survey. Distribution of the Family Economic Survey and determining eligibility must be completed by a department other than food services. This would not be an allowable expense from the non-profit food service account.

Q: Could F/R price applications still be collected to share eligibility status with other programs or, must the family economic survey be used?

A: No, the LEA must not collect free and reduced price meal applications. This is part of the agreement to operate CEP. F/R applications are for the determining eligibility for meals and could not be used to share eligibility status with other programs in CEP.

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- Q: If meals do not need to be counted by student name, what is the recommended method for counting students?
- A: A meal tally roster could be used similar to the roster for area eligible snacks. The expectation is that there would be record of daily meal counts on file and that these files are kept according to record retention schedules. Child Nutrition Services will develop a prototype meal count roster.
- Q: Could you explain the numbers in the lower right hand corner of the Federal Estimator tool?
- A: There are two boxes in the lower right hand corner of the Federal Estimator Tool. One is titled Estimated Monthly Federal Reimbursement and represents the estimated amount of reimbursement the district/school might receive based on the projected claiming percentages. You could compare this to your current reimbursement. The second box is titled, Estimated Monthly Amount of Non-Federal Reimbursement needed represents a rough estimate of the funds needed to cover program costs. Non-Federal funds would be required if Federal reimbursement from projected claiming percentages does NOT cover your program costs. Negative number = program costs are covered. Positive number = Non-Federal funds will be needed.
- Q: Are reduced price students counted as directly certified in the identified student percentage?
- A: No, reduced price students cannot be counted as directly certified. Reduced price students are never figured into the identified student percentage.
- Q: Will reimbursement for breakfast be reimbursed at the regular rate or the severe need rate?
- A: CEP schools will be reimbursed at their usual reimbursement rates for severe need breakfast. If a school that is regular breakfast combines with a school that is severe need breakfast to maximize claiming percentages, the regular breakfast rate school will be reimbursed at the regular rate.
- Q: If you are working with a food service management company, does this require a contract amendment?
- A: Child Nutrition Services will provide the answer to this question in the follow on webinar.
- Q: Can we use the revenue from adult meals to cover the costs?
- A: No, the revenue from adult meals cannot be used to cover costs.
- Q: Can we use the revenue from a la carte sales to cover the costs?
- A: Current guidance allows LEAs to use a la carte sales as non-Federal funding for CEP.

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