

# Operating Community Eligibility Provision (CEP) in SY22-23

Illinois State Board of Education
Nutrition Department
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Roxanne Ramage, MS, RDN, SNS
rramage@isbe.net



#### What is CEP?

- 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 household eligibility applications for free and reduced price meals in high poverty Local Educational Agencies (LEAs) (or districts) and schools.
- CEP is a 4-year reimbursement option for eligible high poverty LEA's.
- CEP schools use an approved percentage for meal claiming purposes. This
  approved percentage is determined based on the number of Identified
  Students enrolled in the school.
- An LEA may participate in CEP for some or all schools in the LEA.



## **CEP Benefits**

#### Students

- Breakfast and Lunch Offered Daily to ALL Students
- No Reimbursable Meal Charges
- Meals are Healthy and Nutritious
- Ensures Students are 'Ready to Learn'
- No Overt Identification

#### Parents

- Simplification of Meal Benefit Paperwork
- No cash payment for meals

#### Schools

- Reduced School Nutrition Program
   Paperwork
- Streamlines Meal Service
- Eases implementation of Alternative Breakfast Models







## **CEP Eligibility Basics**

- Have a minimum level (40%) 'Identified Students' as of April 1 in the year prior to implementing CEP;
- Agree to serve <u>free lunches AND breakfasts</u> to all students for up to four consecutive years;
- Agree to cover with non-Federal funds any costs of providing meals at no cost to all students above amounts provided in Federal assistance;
- <u>NOT</u> collect free and reduced price household eligibility applications from households in participating schools during the period of participation in the CEP; (PUBLIC schools in Illinois will still need student socioeconomic data for SIS)
- Count total breakfasts and lunches served to students; and
- NOT be a residential child care institution (RCCI) as that term is set forth in the definition of "School" in 7 CFR 210.2.



## **CEP Notification**

- Sample notice available from ISBE.
- This is SPECIFIC to Meal Services.
- For SY22-23, if elected CEP after school began, refunds of any monies paid for reimbursable meals MUST be made to the households.

Sample Letter to Households in Schools/Districts Participating in CEP (Copy and Paste Sample Letter onto School District Letterhead)

#### Community Eligibility Provision Notification

Dear Parent or Guardian:	Date:
We are pleased to inform you that	
	( <u>insert</u> name of school(s)/district)
	ble to schools participating in the National School Lunch and Scho
Breakfast Programs called the Communit	y Eligibility Provision (CEP) for the current school year.
What does this mean for you and your cl	hildren attending the school(s) identified above?
Great news for you and your students! A	ll enrolled students of
( <u>insert</u> name of sch	nool(s)/district implementing CEP)
are eligible to receive a healthy breakfast	and lunch at school at $\underline{\text{no charge}}$ to your household each day of $\underline{\textbf{t}}$
this school year. No further action is requ	ired of you. Your child(ren) will be able to participate in these
meal programs without having to pay a fe	e or <u>submit an application</u> .
If we can be of any further assistance, ple	ease contact us at
	(insert school contact information)
Sincerely,	

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, auditape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than Enalish.

To file a program complaint of discrimination, complete the USDA Pragram Discrimination Complaint Form, (AD-3027) found online at: <a href="http://www.oscr.usda.gov/complaint.filing-cust.html">http://www.oscr.usda.gov/complaint.filing-cust.html</a>, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) fax; (202) 690-7442; or 3) email: Togram-Intake@usda.gov.

This institution is an equal opportunity provider.



## WINS -Program Application versus CEP

WINS

#### **Program Application**

- Application Completed Annually in the Spring
- Program selection details
  - NSLP
  - SBP
  - After School Snack
  - Seamless Summer Option
- July 1 June 30 approval period

# **CEP Evaluation and Application Module**

- Application Completed April
   1 June 30
- CEP Approval is for 4 consecutive school years
- July 1 June 30 approval period



## **WINS: Main Dashboard**

Spon	sor Tasks	Sponsor Applications & Participation	Site Applications	Claims	s & Monitoring	Sponsor Info	c
			Administ	rative	Tasks		
		Sponsor Tasks				Site Application Tasks	
x	Batch Dail	y Meal Counts		<b>B</b>	Enroll Site In N	New Program	
x	Batch Part	ticipation Detail		<b>♂</b>	Edit Site Ques	tionnaire	
x	Add/Remo	ve Detail Dates		<b>B</b>	Edit Program I	Participation	- 6
x	Batch Site	Questionnaire		<b></b>	Edit Participat	ion Detail	
x	Batch Site	Participation					
200	ls Commu	nity Eligibility Provision (CEP) for you?					
200	CEP Group	p Information					
+	Add New 9	Site					-
×	Deactivate	P/Re-activate Site(s)					
×	Deactivate	Sponsor					
A	Review Cit	tation Responses					
≔	Waivers						
		Reports				Budget	
凸	Waiver Su	bmissions		No N	WINS Budgets re	equired.	- (
hil	Applicatio	ns Not Received					
<b>~</b>	NSLP Verif	fication Summary Report					
<b>~</b>	Direct Cert	tification					
凸	Deleted Si	tes					
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ß	Summary	Reports - Applications Submitted for Sites					
ß	Summary	Reports - List of Sites and Applications Subi	nitted				

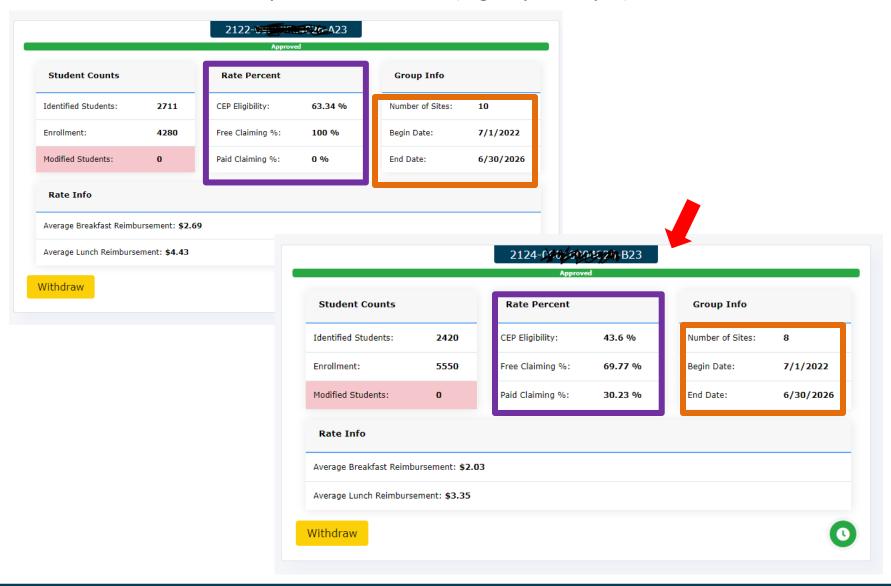


# **WINS: CEP Group Information Link**

Student Counts		Rate Percent		Group Info	
Identified Students:	115	CEP Eligibility:	40.78 %	Number of Sites:	3
Enrollment:	282	Free Claiming %:	65.25 %	Begin Date:	7/1/2022
Modified Students:	0	Paid Claiming %:	34.75 %	End Date:	6/30/2026
Rate Info					
Average Breakfast Reimb	ursement: <b>\$1.9</b>	3			
Average Lunch Reimburse	ement: <b>\$3.19</b>				



#### WINS: CEP Group Information Link (2 group example)





## WINS: CEP Group Information Link (Site Specific CEP Data)



35.09 \* 1.6 = 56.14%

Action †	SiteName 🛊	SiteNumber 🛊	Identified Students	Enrollment 🛊	Identified Students %	GroupName #	Status
0	Canal Control of the	10444	20	57	35.09	2187-03068002026-A23	Approved
0	Linear moor on high space.	10443	41	101	40.59	2187-03068002026-A23	Approved
0		10445	54	124	43.55	2187-03068002026-A23	Approved

- Site level CEP Data is used to determine % eligibility for USDA Programs such as Summer Food Service Program, Fresh Fruit and Vegetable Program, and After School Snacks, as well as Illinois State Meal Service Mandates.
- This data is also used to publish the annual eligibility data file. This is the Identified Student % times the USDA Factor of 1.6 to provide equivalent data.
  - Expect this data file in early January 2023. Prior to this, the last data available was from October 2019 (Pre-Pandemic).



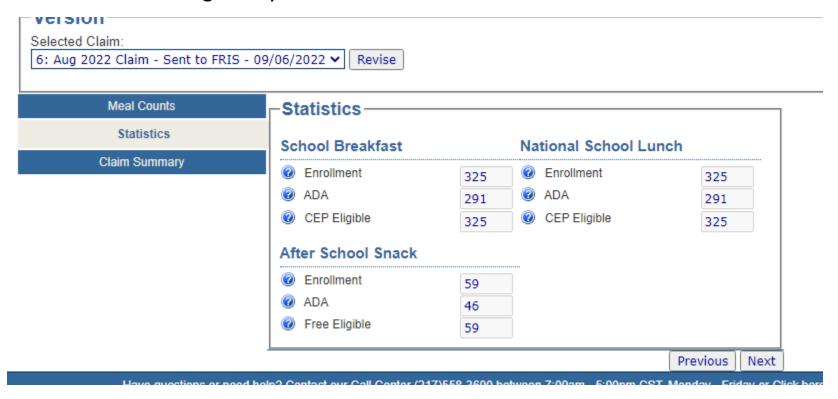
# WINS: CEP Claiming

Daily Meal Counts					
Claim  Calendar Year: 2022 Calendar Month: 8			Quick Links Site Claims Participation Detail		
-Version Selected Claim:					
New Claim					
Meal Counts	- School Bread - National Schow All	Daily Meal Count kfast Severe Need (66%) nool Lunch 60% or more in	)		
	Day Meal 1 Lunch 2 Lunch 3 Lunch 4 Lunch 5 Lunch	Program National School Lunch National School Lunch National School Lunch National School Lunch		CEP CEP CEP CEP CEP	



## **WINS: CEP Claim Statistics**

- Enrollment and CEP Eligible on the Claim is the same number.
- ADA is Average Daily Attendance.





# WINS: CEP Claim Data Summary







—Statistics



# **WINS CEP Approval Letter**



⊢ <b>A</b> '	ttachments					
	Filename	Desc.	Doc Type E	Expires	Last Update Date	_
4	ApprovalNslp_20221007_120027.pdf	Auto-Generated Approval Letter	Approval Letter		10/7/2022 12:00:33 AM	
1	ApprovalNslp_20220929_120238.pdf	Auto-Generated Approval Letter	Approval Letter		9/29/2022 12:02:42 AM	
4	CepWithdrawalNotification_20220923_014802.pdf	Auto-Generated CEP Notification	CEP Withdrawal Notice		9/23/2022 1:48:03 AM	
1	, ApprovalCep_20220923_014759.pdf	Auto-Generated CEP Notification	CEP Approval Letter		9/23/2022 1:48:01 AM	
4	ApprovalNslp_20220813_120016.pdf	Auto-Generated Approval Letter	Approval Letter		8/13/2022 12:00:23 AM	
1	ApprovalNslp_20220805_120035.pdf	Auto-Generated Approval Letter	Approval Letter		8/5/2022 12:00:37 AM	-
4.7						



# Managing CEP: Closed, New Schools



- If you have closed or new schools, generally the school district should plan to complete the CEP Application process for that next school year.
  - In some instances, we can work with schools if one school building closes, and all of the enrolled students move to a new school building, but this is rare.
  - In WINS, meals are claimed where the students are enrolled in SIS (serving school).
- Please check all CEP approvals and site listings annually for accuracy.



## **CEP and Verification**

- The verification process is NOT completed by a school that is approved as CEP, as the school did not collect and process any household eligibility applications for meal benefits.
  - The Verification Summary Report is NOT COMPLETED.
- If you are a district that has some schools that are CEP approved and some non-CEP approved schools, the verification process is conducted by the district for those NON CEP Sites.
  - Data will be reported by the district on the verification summary report.



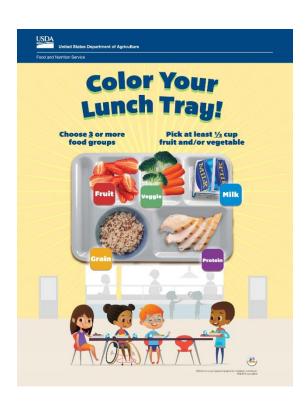
## **CEP and Direct Certification with Medicaid**

- ISBE expanded the DC Medicaid matches to include both FREE and REDUCED-PRICE eligible Medicaid matches.
  - While this data may be used to mark students as low income for SIS and other socioeconomic data, the DC Medicaid Reduced Price eligible students are NOT included in the Identified Student Numbers for CEP evaluation and application.





# **CEP and Meal Counting**



- CEP schools must obtain an accurate meal count of reimbursable meals, both breakfast and lunches daily, to submit claims for reimbursement.
- Schools implementing CEP are encouraged to utilize existing POS systems to ensure accurate meal counts as well as track adult meals and a la carte sales.
  - This ensures one meal per student per meal service.



## Meal Counting and Claiming in CEP



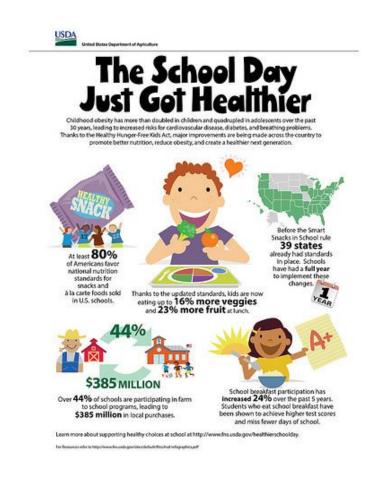
- Total Number of Reimbursable Breakfasts
- Total Number of Reimbursable Lunches
- Counted DAILY at the Point of Service

In the WINS system, when completing the CEP approved site's claim each month, the total number of meals served is entered and WINS will apply your approved claiming percentage to that number of meals.



## **CEP and A la Carte and Seconds**

- CEP allows each student to have ONE reimbursable breakfast and ONE reimbursable lunch each school day at school.
- If the student wishes to purchase additional a la carte items, those prices are set by the local school district.
- USDA Smart Snacks are applicable.





# **CEP and Special Milk Program**



- If the student is offered a reimbursable meal and declines the meal, there is NO federal reimbursement for the milk only.
- CEP school may ONLY participate in the Special Milk Program IF there is a group of students that DO NOT have access to reimbursable meals, such as ½ day students.
  - Even with ½ students, we will encourage meal services
    - Breakfast for morning students
    - Lunch for afternoon students



## **CEP Grace Year**

- If after the 4-year CEP cycle, a CEP group has an identified student percentage (ISP) at least 30% but less than 40%, that CEP group may continue participating in CEP for one grace year (a fifth year).
- Reimbursement for a CEP group in a grace year is based on the ISP on April 1 in year 4 of the current 4-year cycle.
- This impacts a small number of CEP approved sponsors. More guidance is in the USDA CEP Planning and Implementation Guidance.
- This CEP Grace Year application is completed in WINS using the CEP Module.



## Who are Enrolled Students?

- Enrolled students are students enrolled in the school applying for CEP that have access to at least one meal service at the school.
- Students who do not have access to either breakfast or lunch, or students tuitioned to other schools are NOT counted in the student enrollment numbers.
- Enrolled Pre-school students may be included if they are offered at least one meal service. (breakfast or lunch under SNP)





#### Who are Identified Students?

- Identified Students are:
  - Directly certified for free meals on the basis of their participation in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), income eligible FREE Medicaid, foster children and the extension of benefits to students within the same household.
  - Homeless
    - Certified by homeless coordinator listing
  - Runaway
    - Certified by runaway coordinator listing
  - Migrant Youth
    - Certified by the migrant coordinator listing
  - Head Start
    - Certified by the Head Start coordinator listing

Please NOTE: DC Medicaid REDUCED do NOT count as an Identified Student for CEP purposes.





## **Maximizing the Number of Identified Students**

- It is very important that all schools considering implementation of CEP maximize the number of "identified students' as of April 1 the year prior to implementation (if applying for SY23-24 = April 1, 2023).
- ISBE recommends that ALL LEAs conduct monthly direct certification.
  - USDA requires at least once annually.
- Extend FREE meal benefits to all household members of students that are directly certified.
- For household applications submitted with a SNAP or TANF number or foster child is marked on the household app — search the direct certification system for these students — if found as FREE eligible they can be counted as Identified Students.
- THIS STEP IS IMPORTANT FOR ALL SPONSOR THAT ARE NOT APPROVED TO CLAIM AT 100% FREE.



# IMPACT ON OTHER PROGRAM AREAS AND GRANTS



## **CEP Participation: Impact on Other Programs**

- Participation in CEP impacts other areas of your school.
- It is important to share this information with your administration/school board/business manager, 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.
- Some Other Programs possibly impacted include:
  - Grants
  - Title I
  - E-Rate
  - Illinois School District Fees





#### **Gathering Socioeconomic Status**

- Schools participating in CEP may still need to collect individual socioeconomic status of students in CEP schools for other programs. This data is NOT needed for the meal programs but potentially for other programs.
- Socioeconomic data is REQUIRED for PUBLIC SCHOOLS To mark students as Low Income in the Student Information System!
  - Accessing direct certification system data is NOT COMPLETE, ACCURATE DATA.
  - Often, low-income families will need a determination letter from the school for other services.
- To assist schools in gathering this data an Alternative Household Form has been developed.
- Keep in mind that this form is not in anyway related to the federal meal programs, it is just a resource schools can use if they need individual student socioeconomic data.
- Funds from the non-profit school lunch account can NOT be used to fund the printing or processing of such form.





- Sample Household & Income Form – May be used locally to gather individual student socioeconomic status.
- A notification letter to household would need to be created locally.

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#### **Illinois School Fee Waiver Process**

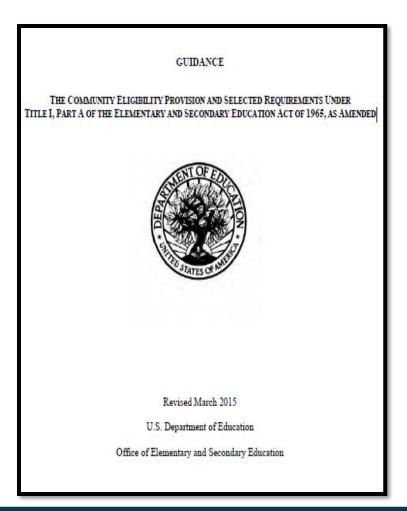
- Under Illinois law, school districts are required to waive charges for textbooks and other fees for children whose families are unable to afford them, including children eligible for the federal free lunch and breakfast program, and for any other extenuating circumstances for which the school board 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:
  - Do not assess or collect fees.
  - Collect socioeconomic data specific to the fee waiver process.



# TITLE I, PART A OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED

 The United States Department of Education has issued guidance related to Title I and CEP participating schools.

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.



#### 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.
- The new rules require school districts to determine the E-Rate discount for the entire district, rather than for individual schools, by dividing the number of students eligible for free and reduced-price meals in the district by the district's total enrollment.
  - Schools electing CEP will use their Identified Student Percentage (ISP)
    multiplied by the CEP multiplier (currently 1.6) for the purposes of
    determining the number of free and reduced-price eligible students.
- Most current guidance regarding E-Rate
  - USDA Policy Memo SP08-2015 Nov 21, 2014



## **CEP Timelines**

<u>April 1, 20XX</u>: Determine the Number of Identified Students and Enrollment. Maintain proper documentation for both the Identified Students and enrollment.

<u>April 1, 20XX</u>: Complete CEP Application via the online *CEP Evaluation and Application Module*, available in *WINS*.

June 30, 20XX: Deadline to apply to participate in CEP

June 30, 20XX: Deadline to withdrawal from CEP.









#### Websites:

- <a href="https://www.isbe.net/Pages/Guidance-for-HHFKA.aspx">https://www.isbe.net/Pages/Guidance-for-HHFKA.aspx</a>
- https://www.isbe.net/Documents/69-72 hshld\_income.pdf#search=69-72
- https://www.isbe.net/Pages/School-Fee-Waivers.aspx
- https://www.isbe.net/Documents/CEP-Quick-Reference-Guide.pdf

#### **Contact Us**



## **Nutrition Department**

**Telephone:** 800/545-7892 in Illinois only

217/782-2491

**Fax:** 217/524-6124

Email: <a href="mailto:cnp@isbe.net">cnp@isbe.net</a>

Website: <a href="www.isbe.net/nutrition">www.isbe.net/nutrition</a>

CEP Staff: Roxanne Ramage (<a href="mailto:rramage@isbe.net">rramage@isbe.net</a>)