Operating Community Eligibility Provision (CEP) in SY24-25

Illinois State Board of Education
Nutrition Department
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What is CEP?

- CEP is an USDA approved alternative to collecting, approving, and verifying household eligibility applications for free and reduced price eligible students in high poverty local educational agencies (LEAs) for schools participating in the National School Lunch and School Breakfast Programs.
- CEP is a 4-year reimbursement option for schools operating both the National School Lunch and School Breakfast Programs.
- 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 (25%) '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.



Overview of the CEP Identified Student %, the CEP Claiming Percentages, and Average Lunch and Breakfast Reimbursement,

based on SY24-25 Rates of Reimbursement, 60% or greater NSLP, Severe Need Breakfast

CEP Identified Student %	FREE Claiming % (* 1.6 USDA factor)		Average LUNCH Reimbursement	Average Breakfast Reimbursement
62.50%	100.00%	0.00%	\$4.58	\$2.88
55.00%	88.00%	12.00%	\$4.09	\$2.58
52.00%	83.20%	16.80%	\$3.90	\$2.46
50.00%	80.00%	20.00%	\$3.77	\$2.38
45.00%	72.00%	28.00%	\$3.45	\$2.18
40.00%	64.00%	36.00%	\$3.12	\$1.98
35.00%	56.00%	44.00%	\$2.80	\$1.78
30.00%	48.00%	52.00%	\$2.47	\$1.59
25.00%	40.00%	60.00%	\$2.15	\$1.39



CEP Notification

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	of school(s)/district) ticipating in the National School Lunch and Scho
What does this mean for you and your children attending	the school(s) identified above?
Great news for you and your students! All enrolled student	is of
(<u>insert</u> name of school(s)/district implem	nenting CEP)
are eligible to receive a healthy breakfast and lunch at scho	ol at <u>no charge</u> to your household each day of
this school year. No further action is required of you. Your	child(ren) will be able to participate in these
meal programs without having to pay a fee or submit an ap	plication.
If we can be of any further assistance, please contact us at . Sincerely,	(<u>insert</u> school contact information)

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, audiotape, 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 English.

To file a program complaint of discrimination, complete the <u>USDA Program Discrimination Complaint Form</u>, (AD-3027) found online at: http://www.ascr.usda.gov/complaint.filina_cust.html, 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 at 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: program.intake@usda.gov.

This institution is an equal opportunity provider.

- Sample notice available from ISBE, once approved.
- This is SPECIFIC to Meal Services.
- If CEP approved, ANNUALLY notify enrolled students and families.



WINS – SNP Program Application versus CEP

SNP Program Application

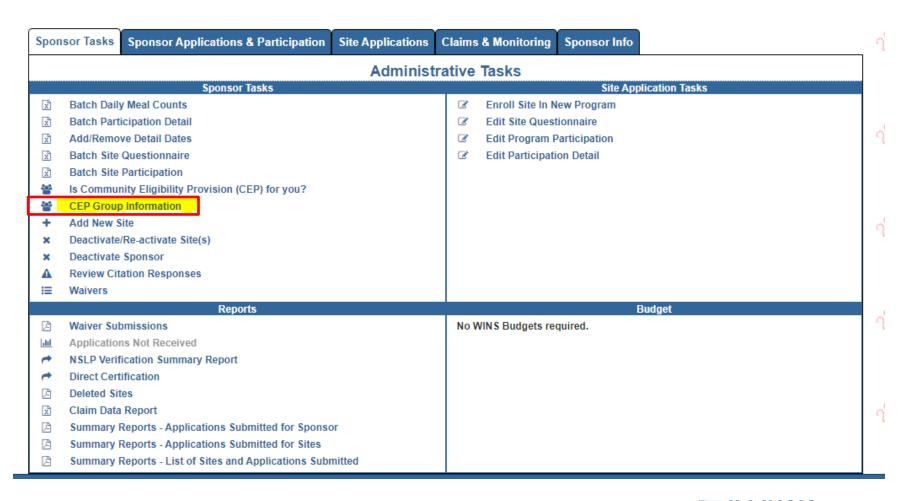
- Application Completed Annually in the Spring
- Program selection details
 - NSLP
 - SBP
 - After School Snack
 - Seamless Summer Option
- July 1 June 30 approval
 period

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

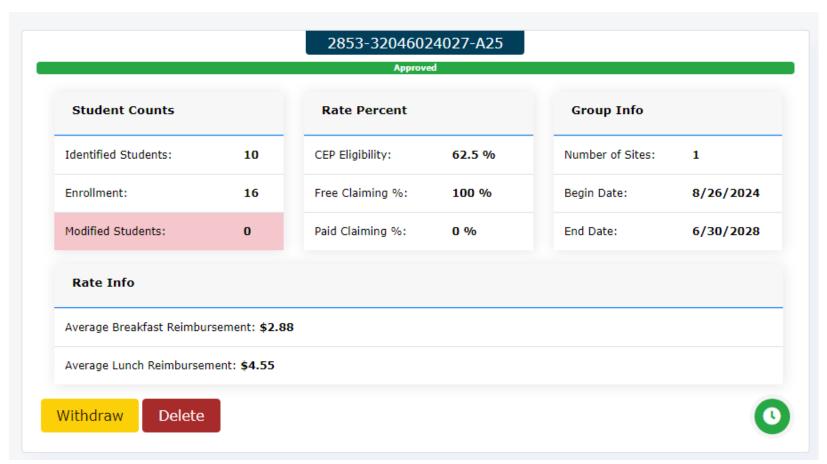


WINS: Main Dashboard



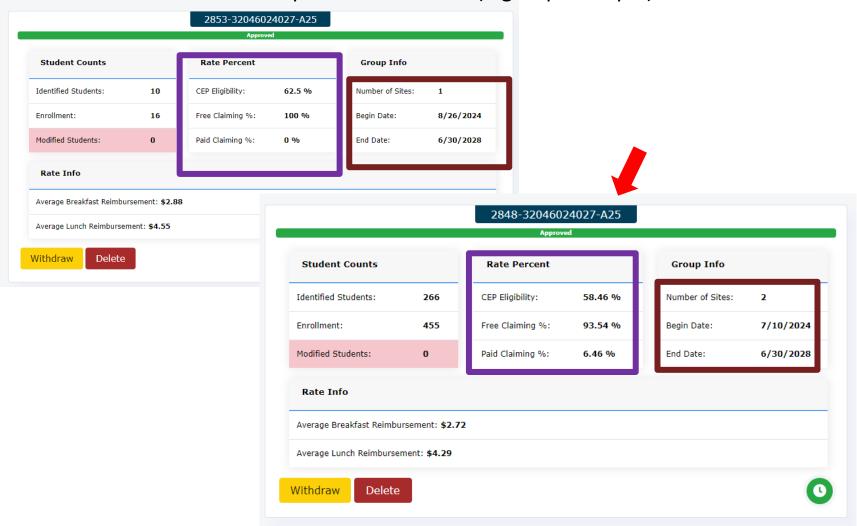


WINS: CEP Group Information Link





WINS: CEP Group Information Link (2 group example)





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



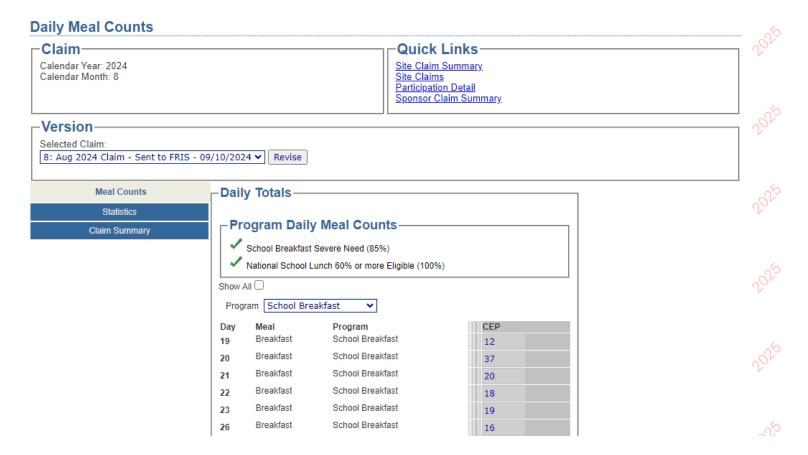
35.09 * 1.6 = 56.14%

Action †	SiteName 🛊	SiteNumber 🛊	Identified Students	Enrollment 🛊	Identified Students %	GroupName #	Status
0	Canal	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 2025.



WINS: CEP Claiming





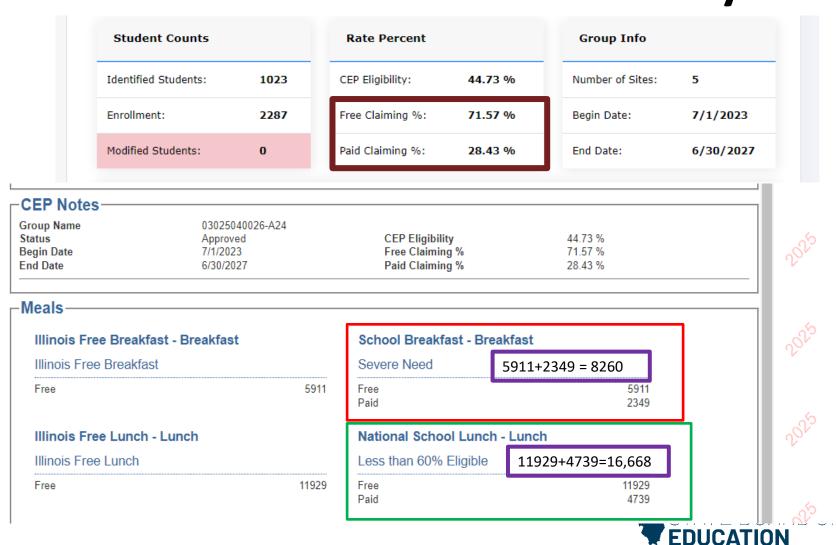
WINS: CEP Claim Statistics

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



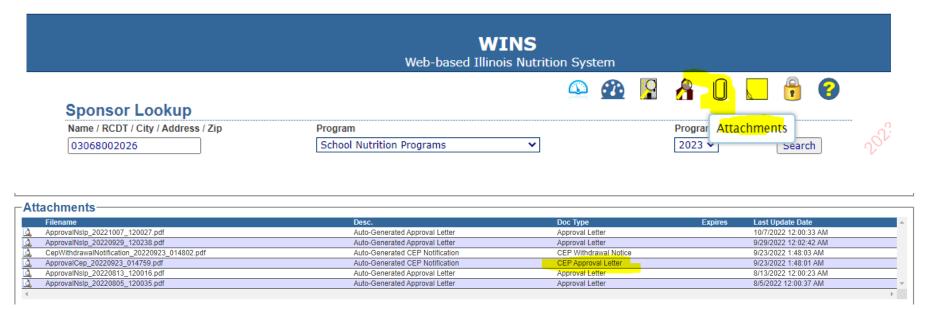


WINS: CEP Claim Data Summary



WINS CEP Approval Letter

This is found under the program year in which the CEP application was submitted. This is generally requested by auditors annually.





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.



Managing CEP: Year 2, Year 3 and Year 4 If NOT approved at 100% Claiming FREE

- EVALUATE Identified Student numbers ANNUALLY.
- If the numbers increase for the group of schools, USDA allows you to withdrawal the current group and reestablish the 4year cycle with the new claiming percentages.
- If the numbers decrease, no action is needed. The school remains at the initial base year claiming percentages.
 - You will want to monitor if the numbers decrease below 25% identified, as the schools may no longer qualify for CEP at the end of the 4-year cycle.





CEP Grace Year

- If after the 4-year CEP cycle, a CEP group has an identified student percentage (ISP) at least 15% but less than 25%, 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.



CEP Evaluation Worksheet

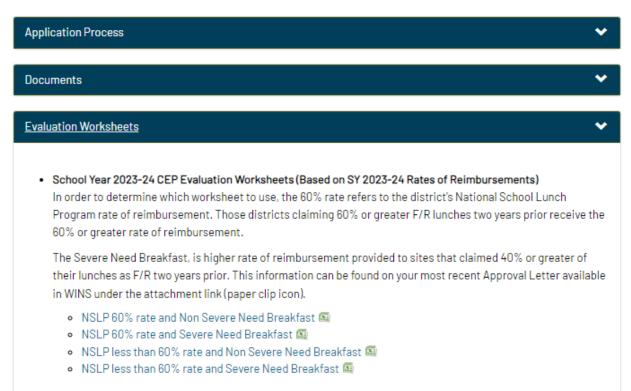
- To assist schools in evaluating the CEP versus Traditional Method, we have developed worksheets that are available.
- The worksheet can be used to determine if CEP or traditional participation in the meal programs will provide a greater amount of reimbursement.
- Important Note: The worksheet only 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. Also, assumes all revenue from reduced price and paid students is collected.



NUTRITION

COMMUNITY ELIGIBILITY PROVISION (CEP)

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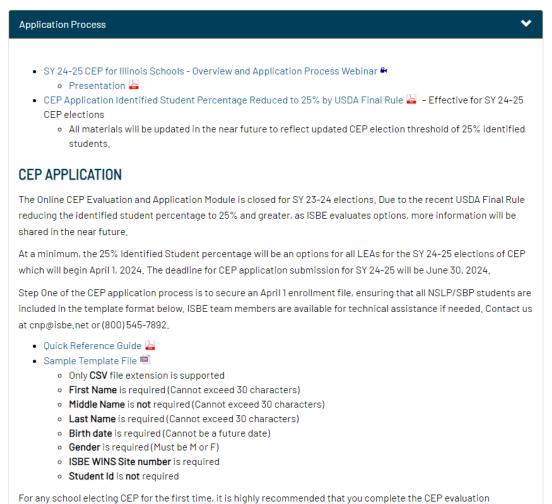


Updates to SY24-25 Rates of Reimbursement will be posted by end of October 2024

https://www.isbe.net/cep



CEP Application and Evaluation



worksheets below to ensure that election to CEP is financially feasible for your school/district,



CEP and Verification





Districtwide CEP

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.

Partial CEP District

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.



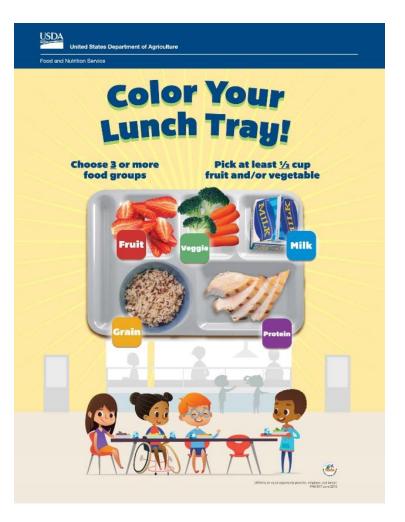
CEP and Direct Certification with Medicaid

- 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.
 - Also serves as a best practice to have data regarding what students received reimbursable meals at school daily.



Meal Counting and Claiming in CEP



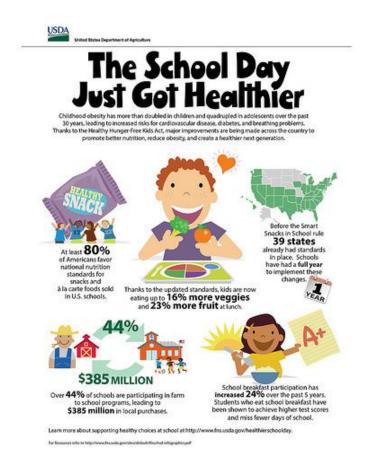
- Total Number of Reimbursable Breakfasts
- Total Number of Reimbursable Lunches
- Counted DAILY at the Point of Service

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 at school each school day.
- 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





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 SY25-26 = April 1, 2025).
- 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





What is Summer EBT?



- Summer EBT is a NEW federal nutrition program that provides a grocery benefit during the summer months to families with children eligible for free or reduced-price school meals.
- The Consolidated Appropriations Act, 2023 (P.L 117-328) authorized this permanent, nationwide Program beginning in 2024.
- Summer EBT is designed to reduce childhood hunger.
- Beginning in summer 2024, Illinois will participate in this new nationwide permanent Summer EBT program.
- Eligible children will receive a one-time benefit of \$120 (2024-dollar amount) per summer on an EBT card to purchase food.



CEP and Summer EBT

- Under the program requirements established by the United States Department of Agriculture (USDA) for Summer EBT, schools approved under the Community Eligibility Provision (CEP) require students who are not directly certified or categorically eligible, that wish to receive Summer EBT benefits, to reside in a household that is at or below the NSLP income threshold for reduced price meal benefits. (185% of the federal poverty level) AND complete a Summer EBT application.
- Summer EBT is being implemented is DIFFERENT than how
 Pandemic EBT (P-EBT) operated during the public health emergency.
 - Not all students enrolled in a CEP approved school are Summer EBT eligible.
- More information about Summer EBT 2025 will be released to schools, once known.



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.



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2. Homeless, Migrant, Runaway, or Head Start		
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3. Total Household Gross income (before deductions) You must tell us how much and how often.		
A. GROSS INCOME AND HOW OFTEN IT WAS RECEIVED (Example: \$100/month; \$100 fivide a month; \$100/week; \$100/week) NAMES		
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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 feder 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 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 is as a students enrolled in Community Eligibility Option school will receive a meal at no charge.		
Head Start Signeture of Determining Official Desc. 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 feder 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 to help them excelled the pitter programs, auditors for program wedvers, and law enforcement officials bethe free through the pitter benefits for violations of program.	ce, color, nations East, Suite 515	

- Sample Household & Income Form (ISBE 69-72)
 May be used locally to gather individual student socioeconomic status.
- A notification letter to household would need to be created locally.



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.

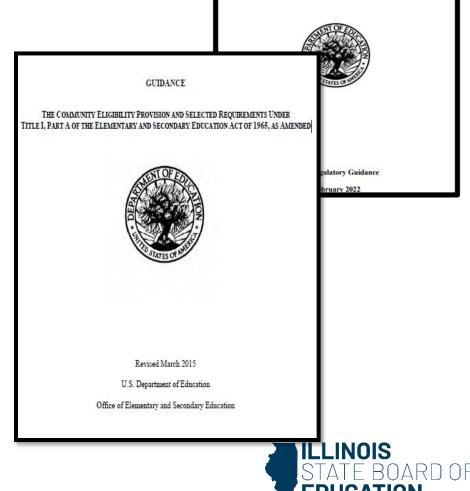


TITLE I, PART A OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED

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

For questions specific to Title I, please consult your Title I consultant.

https://www.isbe.net/Documents
/pc reg asmt.pdf



WITHIN-DISTRICT ALLOCATIONS

UNDER TITLE I, PART A OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965.

AS AMENDED

E-Rate



- The Universal Service Schools and Libraries Program, commonly known as "E-rate," provides discounts to help eligible schools and libraries in the United States obtain affordable telecommunications and internet access.
- Please access the WINS CEP approval letter, via the paperclip icon, for documentation for E-rate auditors. (Slide 15)
- Most current guidance regarding E-Rate
 - USDA Policy Memo SP08-2015 Nov 21, 2014
 - https://www.isbe.net/Documents/usac-erate-ltr.pdf



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*.

<u>June 30, 20XX</u>: Deadline to apply to participate in CEP

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





Annual CEP Checklist

- Offer Healthy, Delicious Reimbursable Meals every day at school!
- Conduct Direct Certification
- Notify Families of CEP Status for meal benefits (beginning of school year)
- ☐ Identify 'low income' eligible students via alternate household form/process (*Public Schools)
- ☐ If CEP is NOT approved at 100% FREE, evaluate identified student numbers (April 1 June 30)
- Monitor end of your CEP cycle, and complete CEP application, when required.
- Market School Meals (NSLP, SBP) to all enrolled students.
- Market Summer Meal options to children in the area.







Websites:

- https://www.isbe.net/Pages/Guidance-for-HHFKA.aspx
- 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



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