

# Community Eligibility Provision (CEP)



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## INTRODUCTION

**Did you know that Amphitheater Public Schools can choose to serve meals at no cost to all enrolled students at selected schools?** By Participating in the Community Eligibility Provision (CEP), schools in high poverty areas can serve breakfast and lunch to students at no cost to them or the District.

**Why was CEP established?** CEP was established by The Healthy, Hunger-Free Kids Act of 2010 to improve access to free school meals in eligible schools and Local Educational Agencies (LEAs).

After consulting with the Arizona Department of Education and the Association of Arizona Food Banks (AAFB), it was reported LEAs and schools implementing CEP have experienced great success and are satisfied with the program. According to a survey completed by AAFB, out of 58 districts that adopted CEP and responded to the survey, 100% were satisfied and would recommend it to other schools. District satisfaction with CEP is apparent, when you look at the number of district participation in the program and the growth demonstrated each year (**See Table I**).

<b>School Year 2017-2018</b>	<b>127 Districts</b>
	<b>296 School Sites</b>
<b>School Year 2019-2020</b>	<b>151 Districts</b>
	<b>370 School Sites</b>

## BENEFITS OF CEP

Across Arizona and nationwide, CEP has helped schools by:

- **Increasing student participation** – CEP alleviates the need for families to submit school meal applications; therefore, eligible students who forget or fail to submit an application will still be able to eat at no cost.
- **Easing the administrative burden** – CEP schools can operate more efficiently by utilizing data collected from other Federal programs; thus, resulting in less paperwork and lower administrative costs. Families do not need to turn in free and reduced-price meal applications. In addition, schools do not need to process applications, send out low balance letters, assign eligibility status to students or conduct verification of household income.

- **Increasing student enrollment** – Some schools participating in CEP have reported an increase in student enrollment. The Director of Nutrition Services at Washington Elementary School District stated that families with students at charter schools reported leaving to attend a non-pricing school to take advantage of free meals.
- **Improving the learning environment** – By offering all students nutritious meals at no cost, CEP helps participating schools ensure their students will come to class well-nourished and ready to learn.
- **Improving program efficiency** – CEP gives food service staff more time to focus on preparing nutritious meals their students will enjoy.
- **Eliminating over identification issues** – Because all students in CEP schools have access to meals at no charge, there is no longer stigma associated with only providing free and reduced-price meals to low-income students.
- **Eliminating meal charges and unpaid meal balances** – No child at a CEP school will be denied a meal due to a negative account balance, nor will they be required to charge meals to their account which will result in financial relief for parents and families. We will be able to eliminate the alternative meal option at CEP eligible schools completely and Food Service staff will no longer have to follow up on unpaid meal charges.
- **Eliminating meal payments** – Also, meal counting and claiming will be easier and schools will no longer need to collect meal payments from students.

## **PARTICIPATION AND ELIGIBILITY**

Participating in CEP is a voluntary decision based on our district’s identified student percentages.

**Which schools are eligible?** Schools in low-income areas with an identified student percentage of at least 40% are eligible to apply. Districts may elect CEP on behalf of a single school, a group (or groups) of schools or the entire district as long as the combined identified student percentage (ISP) is greater than or equal to 40 percent (ISP ≥ 40 percent). Identified students (Directly Certified) are those certified for free school meals without the use of school meal applications.

<b>How are Directly Certified (DC) students identified?</b>	Identified students are <b>Directly Certified</b> through a data matching process if they live in households that participate in: <ul style="list-style-type: none"><li>• SNAP (Supplemental Nutritional Assistance Program)</li><li>• TANF (Temporary Assistance for Needy Families)</li></ul> <b>or are</b> <ul style="list-style-type: none"><li>• Homeless, migrant, in foster care, enrolled in Head Start</li></ul>
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## Calculating the ISP

The ISP is determined by dividing the number of identified students as of April 1 by the number of enrolled students as of April 1, and multiplying by 100.

<b>Formula</b>	$\text{ISP} = \frac{\text{Identified Students (As of April 1)}}{\text{Enrolled Students (As of April 1)}} \times 100$
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Schools/Group of Schools highlighted in green (see Table 2) currently have an identified student percentage of at least 40% and may participate as a single school or as a group of schools.

**Table 2: Community Eligible Schools/School Groups and their corresponding ISP**

School Name	Identified Student Percentage (ISP)
Amphitheater High School	52.33%
Amphitheater Middle School	62.94%
Canyon Del Oro High School	12.60%
Copper Creek Elementary School	17.51%
Coronado K-8 School	21.28%
E C Nash Elementary School	64.20%
Frances Owen Holaway Elementary School	57.46%
Helen Keeling Elementary School	79.39%
Ironwood Ridge High School	5.95%
L M Prince Elementary School	79.79%
La Cima Middle School	46.80%

Lawrence W Cross Middle School	17.23%
Lulu Walker Elementary School	33.19%
Marion Donaldson Elementary School	39.77%
Mesa Verde Elementary School	17.73%
Painted Sky Elementary School	9.91%
Richard B Wilson K-8 School	8.65%
Rillito Center	25.58%
Rio Vista Elementary School	55.65%
The Innovation Academy	6.79%
Harelson Elementary School	12.42%
Group of Schools: <ul style="list-style-type: none"> <li>• Amphitheater High School</li> <li>• Amphitheater Middle School</li> <li>• Nash Elementary School</li> <li>• Holaway Elementary School</li> <li>• Keeling Elementary School</li> <li>• Prince Elementary School</li> <li>• Rillito Center</li> <li>• Rio Vista Elementary School</li> </ul>	61.8%

Based on the ISP figures above and the financial estimations reported below (See CEP Monthly Federal Reimbursement Estimator), it would benefit the District to group the following eight schools: Amphitheater High School, Amphitheater Middle School, Nash Elementary School, Holaway Elementary School, Keeling Elementary School, Rio Vista Elementary School and Rillito Center. With their combined ISP of 61.8% x 1.6 (multiplier), 98.89% of all meals served at these locations would be claimed at the free rate.

Although Rillito Center’s ISP is only 25.58%, it made sense to add the site to the group since food production, meal delivery and meal claiming emerges out of the Amphi Middle School Cafeteria. Other sites with higher

ISP's such as La Cima Middle School, Walker Elementary and Donaldson, generated higher revenues with current procedures, therefore, were left out of the group.

## CLAIMING & REIMBURSEMENT

**How does Amphitheater Public Schools currently claim meals?** Currently, the District claims meals at the following rates:

- Free
- Reduced
- Paid

Rates are dependent on information reported on free and reduced meal applications and Directly Certified student matches

**How would Amphitheater Public Schools claim meals under CEP?** The District would claim meals at the following rates:

- Free
- Paid rates

Rates are dependent on Directly Certified student matches.

<b>How is reimbursement calculated?</b>	<ul style="list-style-type: none"> <li>• The ISP is multiplied by 1.6 to determine the percentage of meals reimbursed at the federal free meal rate.</li> <li>• The remainder of meals served will be reimbursed at the federal paid meal rate.</li> </ul>
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The following table shows the difference between our current meal claiming percentage and the projected claiming percentages under CEP:

	Current Free-Red %	ISP	Multiplier	CEP % (Free)	CEP % Paid
<b>Grouping:</b> Amphitheater High School, Amphitheater Middle School, Nash Elementary School, Holaway Elementary School, Keeling Elementary School, Prince Elementary School, Rillito Center, Rio Vista Elementary School	88%	62.18	1.6	98.89%	1.11%

Using the ISP numbers and the meals claimed for the month of April (2019), we were able to estimate the level of Federal reimbursement under CEP using the USDA CEP estimator tool.



The following is an estimation using our current participation numbers with no anticipated participation change:

<b>Community Eligibility Provision (CEP) Monthly Federal Reimbursement Estimator</b>			
<i>Use to <b>estimate</b> the level of Federal reimbursement received under the CEP</i>			
District Name:			
<b>Step 1: Calculating the Identified Student Percentage</b>		<b>Step 2: Federal Reimbursement Rates</b>	
If grouping schools, use the grouping calculator to assist in determining 1.1 and 1.2.		Select the current reimbursement rates used for each program (without the \$0.06). The additional \$0.06 is applied in the next box	
Enter the number of identified students and enrolled students that is reflective of April 1 <sup>st</sup> in 1.1 and 1.2	<a href="#">Click to define: Identified Students</a>		
1.1) Enter the number of identified students	2,665	Lunch	Breakfast
1.2) Enter the TOTAL student enrollment	4,312	Free	2.14
Percentage of identified students = <i>**This percentage must be at least 40% to be eligible**</i>	<b>61.80%</b>	Paid	0.31
Percentage of meals reimbursed at the Federal FREE rate =	98.89%	Select "\$0.06" if the SFA is certified for the additional \$0.06.	
Percentage of meals reimbursed at the Federal PAID rate =	1.11%	\$0.06	
<b>Step 3: Monthly Meal Data</b>		<b>Estimated CEP Monthly Federal Reimbursements</b>	
Enter in the number of LUNCHES and/or BREAKFASTS served in a month in 3.1 and 3.2			
3.1) Enter the total number of LUNCHES served in a month:	61,113	Reimbursement for LUNCH =	\$203,924.41
3.2) Enter the total number of BREAKFASTS served in a month:	69,992	Reimbursement for BREAKFAST =	\$148,357.31
Total number of MEALS served in a month:	131,105	Total Reimbursement Level =	\$352,281.72
Step 4: Anticipated Participation Change due to serving all FREE meals (for example enter 2 for 2%):	<i>NLSP</i>	<i>SBP</i>	Federal Reimbursement per LUNCH =
	<b>0.00%</b>	<b>0.00%</b>	\$3.34
Total number of LUNCHES reimbursed at FREE rate =	60,433	Federal Reimbursement per BREAKFAST =	\$2.12
Total number of LUNCHES reimbursed at the PAID rate =	680	<b>Optional Comparison: Enter current monthly Federal reimbursements and student payment revenue</b>	
Total number of BREAKFASTS reimbursed at FREE rate =	69,213	LUNCH =	\$196,472.07
Total number of BREAKFASTS reimbursed at the PAID rate =	779	BREAKFAST =	\$135,744.77
<b>CEP Difference:</b>		LUNCH Difference =	<b>\$7,452.34</b>
This section displays the estimated difference between operating CEP and the current Federal reimbursements and student payments (if applicable). If the differences boxes are green then CEP will generate the same or more Federal revenue, if the box is red then current procedures generate higher Federal Revenue		BREAKFAST difference =	<b>\$12,612.54</b>
		<b>Total Difference</b>	
		<b>\$20,064.88</b>	

The following is an estimation using an anticipated participation increase of 10% for lunch and 4% for breakfast:

<b>Community Eligibility Provision (CEP) Monthly Federal Reimbursement Estimator</b>			
Use to <b>estimate</b> the level of Federal reimbursement received under the CEP			
District Name:			
<b>Step 1: Calculating the Identified Student Percentage</b>		<b>Step 2: Federal Reimbursement Rates</b>	
If grouping schools, use the grouping calculator to assist in determining 1.1 and 1.2.		Select the current reimbursement rates used for each program (without the \$0.06). The additional \$0.06 is applied in the next box	
Enter the number of identified students and enrolled students that is reflective of April 1 <sup>st</sup> in 1.1 and 1.2	<a href="#">Click to define: Identified Students</a>		
1.1) Enter the number of identified students	2,665	<b>Lunch</b>	<b>Breakfast</b>
1.2) Enter the TOTAL student enrollment	4,312	Free	Paid
Percentage of identified students = <b>**This percentage must be at least 40% to be eligible**</b>	<b>61.80%</b>	\$3.31	2.14
Percentage of meals reimbursed at the Federal FREE rate =	98.89%	0.33	0.31
Percentage of meals reimbursed at the Federal PAID rate =	1.11%	Select "\$0.06" if the SFA is certified for the additional \$0.06.	
		\$0.06	
<b>Step 3: Monthly Meal Data</b>		<b>Estimated CEP Monthly Federal Reimbursements</b>	
Enter in the number of LUNCHES and/or BREAKFASTS served in a month in 3.1 and 3.2			
3.1) Enter the total number of LUNCHES served in a month:	61,113	Reimbursement for LUNCH =	\$223,949.18
3.2) Enter the total number of BREAKFASTS served in a month:	69,992	Reimbursement for BREAKFAST =	\$154,290.75
Total number of MEALS served in a month:	131,105	Total Reimbursement Level =	\$378,239.93
Step 4: Anticipated Participation Change due to serving all FREE meals (for example enter 2 for 2%):	<b>10.00%</b>	Federal Reimbursement per LUNCH =	\$3.34
	<b>4.00%</b>	Federal Reimbursement per BREAKFAST =	\$2.12
Total number of LUNCHES reimbursed at FREE rate =	66,476	<b>Optional Comparison: Enter current monthly Federal reimbursements and student payment revenue</b>	
Total number of LUNCHES reimbursed at the PAID rate =	748	LUNCH =	\$196,472.07
Total number of BREAKFASTS reimbursed at FREE rate =	71,981	BREAKFAST =	\$135,744.77
Total number of BREAKFASTS reimbursed at the PAID rate =	811	LUNCH Difference =	\$27,477.11
<b>CEP Difference:</b> This section displays the estimated difference between operating CEP and the current Federal reimbursements and student payments (if applicable). If the differences boxes are green then CEP will generate the same or more Federal revenue, if the box is red then current procedures generate higher Federal Revenue		BREAKFAST difference =	\$18,545.98
		<b>Total Difference</b>	<b>\$46,023.09</b>

The Community Eligibility Provision (CEP) Monthly Federal Reimbursement Estimators projected CEP would provide a revenue increase between \$20,064.88 and \$46,023.09. The \$20,064.88 projection would be for the current level of participation and the \$46,023.09 would include an anticipated participation increase of 4% at breakfast and 10% at lunch. It is very likely participation will increase both at breakfast and lunch due to the serving of all free meals.

## IMPACT ON TITLE I

### Will CEP affect Title 1 funding?

Both the United States Department of Agriculture and the Arizona Department of Education have released guidance indicating CEP will not impact the total amount of Title I funding received at the district level since Title I funding is based on economic need. With partial implementation of CEP, the District would determine economic need for CEP school sites using the 1.6 multiplier. All other schools would continue to use free and reduced-price eligibility data. Additional guidance can be found by referencing ADE HNS #21-2018.

## DISTRICT FOOD SERVICE DEPARTMENT PLAN

The Food Service Department would like to partially implement CEP at Amphitheater Public Schools by designating eight school sites to the program starting the 2019/2020 School Year. The eight sites include:

- Amphitheater High School
- Amphitheater Middle School
- Nash Elementary School
- Holaway Elementary School
- Keeling Elementary School
- Prince Elementary School
- Rillito
- Rio Vista Elementary School

These are the eight sites with the highest identified student percentage (ISP) that would provide the District with a 98.89% free reimbursement rate for all meals served/claimed during the next four school years (SY 2019/2020 thru SY 2023/2024). By designating these high-needs schools for CEP, we would be able to serve free breakfast and lunch to all students enrolled at these schools without collecting school meal applications. Student accounts would no longer accumulate school meal debt and staff would be relieved from collecting payments from students for breakfast and lunch. The partial implementation of CEP would increase revenues substantially by providing an increase of monthly revenue between \$20,064.88 and \$46,023.09.

## **References**

Association of Arizona Food Banks. "The Results are In: Arizona Schools Love CEP". Survey. March-April 10, 2019.

Conner, M. and Snyder, K. Arizona Department of Education. Questions and Answers Regarding Community Eligibility Provision and Title I Funding. HNS #21-2018. October 11, 2018.

National School Lunch Program and School Breakfast Program: Eliminating Applications through Community Eligibility as Required by the Healthy, Hunger-Free Kids Act of 2010, 7 Code of Federal Regulations Part 245, Vol. 81, No. 146, 50194-50210, June 13, 2016.

The United States Department of Agriculture. "Community Eligibility Provision (CEP) Monthly Federal Reimbursement Estimator". Tool.