




STATE OF CONNECTICUT
STATE DEPARTMENT OF EDUCATION



TO: Superintendents of Schools

FROM: Charlene Russell-Tucker, Chief Operating Officer 

DATE: August 29, 2014

SUBJECT: Community Eligibility Provision – *A New Optional School Meals Reimbursement Initiative*

This correspondence provides notification of a new United States Department of Agriculture (USDA) school meals reimbursement option available to local educational agencies (LEAs) and schools beginning with the 2014-15 school year. This optional initiative is titled the Community Eligibility Provision (CEP). LEAs not wishing to choose the CEP option will continue to determine eligibility and seek reimbursement for free and reduced-price meals using their current processes.

Provision Summary:

The CEP is a new alternative to using household applications for determining eligibility for free and reduced-price meals for Child Nutrition Programs in high poverty LEAs and schools. In lieu of collecting individual household applications, the CEP allows LEAs and schools meeting eligibility requirements to use data from other programs and sources to determine eligibility for federal reimbursements provided by the USDA for school meals. The CEP permits eligible schools to provide meals to all students at no charge, regardless of their families' economic status.

Identified Student Percentage:

In order to qualify, LEAs and schools must have a minimum *identified student percentage* (ISP) of 40 percent or greater in their population. *Identified students* are defined as “low income children who are certified for free school meals without the use of a household application.” This refers to students directly certified for free meals through documentation provided by the following programs: Supplemental Nutrition Assistance Program (SNAP) and Temporary Family Assistance (TFA). *Identified students* also include the following: homeless children as defined under the McKinney-Vento Homeless Assistance Act; runaway and homeless youth served by programs established under the Runaway and Homeless Youth Act; foster children certified through means other than the USDA household application; children enrolled in a federally funded Head Start program, a comparable state-funded Head Start program or prekindergarten program; children enrolled in an Even Start program; and non-applicant students approved by local education officials, such as a principal, based on available information.

Connecticut State Department of Education (CSDE) [Operational Memoranda](#) numbers 19-14, 20-14, 23-14 and 39-14 which address elements of the CEP have been provided to school food service directors. Additional information and details about the CEP, including [Title I](#) and [E-Rate](#) guidance can be found at: [CSDE Community Eligibility Provision Web page](#). Food service directors at *eligible* and *potentially eligible* [LEAs](#) and [schools](#) were also notified on April 15, 2014 regarding their eligibility status. LEAs and schools that have ISP rates between 30 percent and 39.9 percent are considered by the USDA to be *potentially eligible*. Those with ISP rates of at least 40 percent are considered by the USDA to be *eligible* for CEP.

LEAs and schools must make their own eligibility determinations based on available data, as outlined above, to verify that they meet the 40 percent threshold and therefore are able to participate in the CEP option. Individual schools, groups of schools within a district, or entire districts with an ISP of at least 40 percent are eligible to participate in the CEP. ISP rates between 30 and 39.9 percent have been provided to allow schools the opportunity to further analyze their data to improve their percentages. The ISP is determined by dividing the number of *identified students* by the total student enrollment. This percentage is multiplied by a **factor of 1.6** to determine the **federal free (reimbursement) rate** for a school, a group of schools or an entire district. The remaining percentage of student meals will be reimbursed at the **federal paid (reimbursement) rate**.

For example, a group of schools with a combined ISP of 50 percent will be reimbursed at the **federal free rate** for 80 percent of its student meals ($50\% \times 1.6 = 80\%$). The remaining 20 percent of student meals will be reimbursed at the **federal paid rate** ($100\% - 80\% = 20\%$). The federal reduced-price meal category is eliminated under the CEP option. A school, group of schools or the entire district can be reimbursed at the **federal free rate** up to a maximum of 100 percent of its student population. For this to occur, the ISP would have to reach 62.5 percent ($62.5\% \times 1.6 = 100\%$). The claiming percentages established in the first year are guaranteed for a period of four school years but may be increased if the ISP rises for that school, group of schools or district.

Requirements:

The CSDE has developed the following requirements for LEAs opting to participate in the CEP for school year 2014-15. LEAs must:

- submit required documentation demonstrating their eligibility to the CSDE by **September 10, 2014**. Both the [CEP Policy Statement Addendum Sample Form](#) (CEP Application) and the [CEP Participation Worksheet](#) can be accessed under the “CEP Application” section of the CSDE CEP Web page;
- participate in both the USDA National School Lunch Program (NSLP) and School Breakfast Program (SBP) by the start of the 2014-15 school year; and
- continue reporting student-level meal eligibility data to the Public School Information System (PSIS).

Public School Information System (PSIS) Reporting

Federal law requires states and LEAs to report annually on the extent to which the subgroup of economically disadvantaged students is making progress on state assessments. Schools must also be held accountable for the performance of economically disadvantaged students. A student’s meal eligibility status (i.e., free, reduced and not eligible) in PSIS has historically served as the proxy to satisfy these school accountability requirements and for many other data reporting purposes. Therefore, the CSDE will expect LEAs and schools choosing CEP to continue reporting each student’s hypothetical eligibility for free or reduced-price meals through PSIS.

To greatly minimize the reporting burden, the following protocol is being established for all CEP LEAs and schools for the duration of their four-year CEP cycle:

- report all *identified students* as “free” in PSIS;
- for non-identified students who are returning from the previous school year, report their meal eligibility status from the prior year; and
- for non-identified students who are newly entering the district in the current school year, report their hypothetical meal eligibility per the USDA income guidelines (a sample “alternative income survey” form with income ranges that are identical to the USDA income guidelines for 2014-15 is attached with guidance for this purpose).

The CSDE is choosing this approach because the *identified students* provide a partial picture of the students in the district or school from economically disadvantaged families. Many lower income families may not participate in programs like SNAP or TFA. Therefore, relying solely on the pool of *identified students* for accountability and data reporting purposes would yield inaccurate results. Over the next few years, the CSDE will explore establishing a different indicator of poverty for all students statewide that doesn't rely on alternate income surveys.

State and Federal Grants:

As you are aware, the free and reduced-price lunch eligibility data element is used as part of the Education Cost Sharing (ECS) grant calculation, as well as with other federal grants such as Title I. For FY 2014-15, the ECS grant amounts are written into law in Public Act 14-217 and are not impacted by the change in reporting of student-based free and reduced-price lunch eligibility status. Moving forward, the CSDE is working to develop a methodology to accommodate this change without impacting state grants. The federal government has provided states with guidance on administering the change for the purpose of calculating federal grants. Districts do not have to collect income surveys for the purpose of grant calculations. When a methodology is developed and approved, it will be communicated to districts.

Financial Impact:

The USDA has developed a [CEP calculator](#) to estimate the federal reimbursement under the CEP option. In accordance with USDA regulations, if the total amount of the federal reimbursement through CEP is not sufficient to cover the cost of serving lunch and breakfast at no charge to all participating children, the LEA must identify non-USDA sources to make up the difference. Additionally, costs associated with the alternative income survey distribution, collection, and processing are not allowable Child Nutrition Program costs, and therefore the nonprofit school food service account funds cannot be used for this purpose.

The CEP provides significant benefits for students, families and districts by providing breakfast and lunch to all students every day at no cost to families. Pilot states implementing the CEP have all shown increased participation in both their breakfast and lunch programs. The CEP eliminates overt identification stigma for economically disadvantaged students and improves the nutritional status for all students. It simplifies meal counting and claiming and enables meal service to occur much more efficiently, leaving more time for children to eat.

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Informational Conference Call:

A conference call has been scheduled to address concerns and answer questions related to the CEP:

Date/Time: Wednesday, September 3, 2014, at 10:00 a.m.

Call in Number: 877-915-7817

Passcode: 51356609

Contact Information:

If you or your staff have any questions regarding food service operations and requirements for the NSLP and SBP under the CEP, please contact Allison Calhoun-White at 860-807-2008 or allison.calhoun-white@ct.gov. Questions regarding the alternative income survey should be directed to Kendra Shakir at 860-713-6896 or kendra.shakir@ct.gov. If you have questions concerning grant calculations, please contact Kevin Chambers in the Bureau of Grants Management at 860-713-6455 or kevin.chambers@ct.gov.

CRT:jdf

cc: Stefan Pryor, Commissioner

Kathy Demsey, Chief Financial Officer

John Frassinelli, Bureau Chief

Ajit Gopalakrishnan, Bureau Chief

Food Service Directors

Business Managers

Attachment

2014-15 ALTERNATIVE INCOME SURVEY
*****For Community Eligibility Provision LEAs and Schools Only*****
 (Please provide only one survey per household)

Student Name	Date of Birth	School Name	Grade

Household Size	Annual Gross Income*	Annual Gross Income*	Annual Gross Income*
<input type="checkbox"/> 1	<input type="checkbox"/> Below \$15,172	<input type="checkbox"/> \$15,172-\$21,590	<input type="checkbox"/> Above \$21,590
<input type="checkbox"/> 2	<input type="checkbox"/> Below \$20,450	<input type="checkbox"/> \$20,450-\$29,101	<input type="checkbox"/> Above \$29,101
<input type="checkbox"/> 3	<input type="checkbox"/> Below \$25,728	<input type="checkbox"/> \$25,728-\$36,612	<input type="checkbox"/> Above \$36,612
<input type="checkbox"/> 4	<input type="checkbox"/> Below \$31,006	<input type="checkbox"/> \$31,006-\$44,123	<input type="checkbox"/> Above \$44,123
<input type="checkbox"/> 5	<input type="checkbox"/> Below \$36,284	<input type="checkbox"/> \$36,284-\$51,634	<input type="checkbox"/> Above \$51,634
<input type="checkbox"/> 6	<input type="checkbox"/> Below \$41,562	<input type="checkbox"/> \$41,562-\$59,145	<input type="checkbox"/> Above \$59,145
<input type="checkbox"/> 7	<input type="checkbox"/> Below \$46,840	<input type="checkbox"/> \$46,840-\$66,656	<input type="checkbox"/> Above \$66,656
<input type="checkbox"/> 8	<input type="checkbox"/> Below \$52,118	<input type="checkbox"/> \$52,118-\$74,167	<input type="checkbox"/> Above \$74,167
<input type="checkbox"/> 9	<input type="checkbox"/> Below \$57,396	<input type="checkbox"/> \$57,396-\$81,678	<input type="checkbox"/> Above \$81,678
<input type="checkbox"/> 10	<input type="checkbox"/> Below \$62,674	<input type="checkbox"/> \$62,674-\$89,189	<input type="checkbox"/> Above \$89,189
More than 10			
_____	\$ _____		
(Enter Number)	(Enter Annual Gross Income)		

To the best of my knowledge, all information on this survey is true and all income is reported. I understand that school officials may check the information provided. This survey will not affect a child's school meal benefits; it will help the school/district measure and support student success.

Signature: _____ Print Name: _____ Date: _____

Address:

(Street)

City/Town

State

Zip

Home Phone

Work Phone

E-mail Address

By providing your email address, you may be contacted via email by the district.

*Income means income before deductions such as income taxes, Social Security taxes, insurance premiums, charitable contributions and bonds. It includes the following: 1) Monetary compensation for services, including wages, salary, commissions or fees; 2) net income from non-farm self-employment; 3) net income from farm self-employment; 4) Social Security; 5) dividends or interest on savings or bonds or income from estates or trusts; 6) net rental income; 7) public assistance or welfare payments; 8) unemployment compensation; 9) government civilian employee or military retirement, or pensions or veterans' payments; 10) private pension or annuities; 11) alimony or child support payments; 12) regular contributions from persons not living in the household; 13) net royalties; and 14) other cash income. Other cash income would include cash amounts received or withdrawn from any source including savings, investments, trust accounts and other resources. "Income" as used here does not include any income or benefits received under any Federal programs, which are excluded from consideration as income by any legislative prohibition, for example, the value of food stamps.

2014-15 ALTERNATIVE INCOME SURVEY GUIDANCE
*****For Community Eligibility Provision LEAs and Schools only*****

For a local educational agency (LEA) to use the Community Eligibility Provision (CEP) for school year 2014-15, the LEA, school or group of schools must have an identified student percentage (ISP) of 40 percent or greater as of April 1, 2014. Identified student percentage counts include only students directly certified for free meals through documentation provided by the following programs and categories:

- Supplemental Nutrition Assistance Program (SNAP) and Temporary Family Assistance (TFA);
- children as defined under the McKinney-Vento Homeless Assistance Act;
- runaway and homeless youth served by programs established under the Runaway and Homeless Youth Act;
- foster children certified through means other than the USDA household application;
- children enrolled in a federally funded Head Start program, a comparable state-funded Head Start program or prekindergarten program;
- children enrolled in an Even Start program; and
- non-applicant students approved by local education officials, such as a principal, based on available information.

However, since there are many students from lower income families who do not participate in programs like SNAP or TFA, the *identified students* provide a partial picture of the students in the district from economically disadvantaged families. To greatly minimize the reporting burden, the following protocol is being established for all CEP districts/schools for the duration of their CEP commitment.

- report all *identified students* as “free” in PSIS.
- for non-identified students who are returning from the previous school year, report their meal eligibility status from the prior year.
- for non-identified students who are newly entering the district in the current school year, report their hypothetical meal eligibility per the USDA income guidelines in through an “alternative income survey” form. Districts may customize this form to suit their needs as long as the income ranges table that are identical to the USDA income guidelines for 2014-15 are preserved. The survey data should be coded as follows in PSIS: the lowest income range as “free”, the middle income range as “reduced”, and the highest income range as “not eligible.”

Please note that funds from the food service account cannot be used to support the collection or processing of these surveys.

Suggestions for disseminating this form and improving the response rate:

- have the forms ready for schools to send home to parents;
- offer a workshop on completing the forms;
- make the form school-specific by placing it on school letterhead;
- impress upon parents the importance of filling out and returning the form;
- have forms available for distribution during open house and in packets for parents at back-to-school events;
- offer incentives to students;
- involve homeroom teachers in gathering the forms from their students;
- send forms with staff when home visits take place;
- post forms on a relevant district webpage; and/or distribute reminders via e-mails and school newsletters.

Additional information on CEP is available on the CSDE website
<http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=335336>