

**Community Eligibility Provision
Frequently Asked Questions
Michigan Department of Education – School Nutrition
Programs Last Updated: December 2017**

INTRODUCTION

What is Community Eligibility Provision or CEP?

Community Eligibility Provision (CEP) is an alternative way to serve universal free breakfast and lunch to all students in high poverty Local Educational Agencies (LEAs) and schools.

This program requires schools to offer breakfast and lunch but will allow individual schools to count and claim meals without the normal free and reduced application process. Schools that participate in CEP will no longer be required to collect Free and Reduced Price School Meals Family Applications to determine student eligibility for free meals. Meals will still need to be counted at Point of Service (POS), but just total meals, not meals by eligibility category.

How can we qualify?

Any school building that has an Identified Student Percentage (ISP) of 40% or more, according to the building-level data reflective as of April 1 of a given year, will be eligible to participate in the following year. The percentage is calculated by taking all directly certified students, other household members that have been extended the eligibility, homeless, migrant, runaways, and foster children and dividing by the student enrollment (students eligible to participate in school meal programs). Districts can participate in a variety of ways: by individual school building ISP, groups of school's combined ISP, or by an entire district's combined ISP.

What are the advantages and disadvantages of CEP?

The advantages include:

- All students receive a free breakfast and lunch
- Eliminates overt identification issues for students
- Improves nutrition to students at risk
- Reduces paperwork at the school district level
- Simplifies meal counting and claiming
- Provides potential labor savings
- Increases breakfast and lunch participation

Some disadvantages are:

- Potential financial issues when less than 100% claiming rate
- Unresolved issues on funding related to the counting of students eligible for free and reduced meals (E-rate, 31a state funds, Title I)

How and when can we apply for next year?

We will notify districts in the spring each year regarding the application process. The deadline for applications will be June 30, however, MDE will consider applications at any time of the school year. These applications are available as part of the Child Nutrition Programs (CNP): School Nutrition Program Application in Michigan Electronic Grant System (MEGS+).

Do we need to apply every year?

Once an LEA or school is approved, it may participate in the program for duration of four consecutive years without having to reapply. However, if an LEA or school is not at 100% free reimbursement, it may provide to MDE for approval a new ISP each year to increase the reimbursement percentage.

What if we want to opt-out?

If approved and accepted into the CEP program, LEAs and schools may opt out in writing at any time during the year. In that case, the LEA will have 30 school days to collect the Free and Reduced Family Meal Applications from students. After 30 school days, the LEA must revert to claiming by eligibility category.

DETERMINING ELIGIBILITY

What is Identified Students?

Identified Students refers to all students that are certified for free meals by any means other than the submission of individual paper applications. This definition includes students directly certified (see below), as well as homeless on the liaison list, migrant youth, runaways, those that the local officials have extended the benefit to (see below), as well as foster children certified through means other than an application. Students who are categorically eligible based on submission of a free and reduced price application are not included (i.e., foster or DHS case number) as they must meet the criteria above.

What is direct certification?

Direct certification is the process by which students are automatically approved for free breakfast and free lunch based on an electronic match between the Michigan Student Data System (MSDS) and the Michigan Department of Human Services (DHS).

In Michigan, direct certification is completed by matching student enrollment data that Local Educational Agencies (LEAs) upload to the MSDS with Food Assistance Program (FAP) participant, certain Medicaid participants, and Foster Child data from DHS. The matching process is made available monthly to LEAs via the MSDS.

What are extended benefits?

Any child living in a household with another child who is directly certified, as designated by DHS, is automatically eligible for free breakfast and lunch through the school meals programs. The children with extended benefits are also included in the ISP counts for CEP.

What are the methods for calculating the Identified Student Percentage (ISP) for a district, Public School Academy (PSA), school, and group of schools within an LEA?

The ISP is calculated by using April 1st data and taking the total number directly certified students plus the migrant, homeless, runaway, manual additions, and foster students, (if not already included in the direct certification list) and dividing that number by the number of students with access to school lunch (in most cases, your enrollment). Districts can report the entire district, a single school, group(s) of schools or any combination of single schools and group(s) of schools. Whether it is a group or the entire district, the rate is the aggregate of the buildings.

If we are not currently eligible or our ISP is too low to be advantageous, is there anything our schools can do to raise the ISP so we can participate in the future?

Schools can improve their ISP by ensuring that all students that can be certified by direct certification are correctly identified. Any student that is listed on a Free and Reduced Price School Meals Family Application and is also on the direct certification list should be considered directly certified. In other words, use the direct certification match for the student and do not use the Free and Reduced Price School Meals Family Application for that student. Schools are required to run the direct certification list three times during the school year. MDE recommends that you manage the direct certification process more often than the requirement.

APPLICATIONS AND OTHER DOCUMENTATION

Do all local education agencies (LEAs) still need to provide free and reduced price lunch information to MDE via the Supplemental Nutrition Education characteristic in CEPI's normal collections?

Yes, in order to receive certain federal and state funds, LEAs are required to enter student eligibility data into the Supplemental Nutrition Eligibility (SNE) field, formerly called Field 31, in the MSDS.

Which LEAs need to provide the free and reduced lunch data?

Any LEA desiring to receive certain federal or state funds must enter student data into the MSDS.

What form should we use to collect the data necessary for the SNE field?

Use the [Household Information Survey](#)ⁱ along with the [Household Information Instructions](#)ⁱⁱ.

Why do LEAs participating in the CEP still have to collect and report free and reduced application data?

Various State and Federal programs still require the state to calculate and report subgroup data, and many programs use this subgroup for allocations. Because not all students receiving the benefits of CEP are actually FREE eligible, it is still necessary for LEAs participating in CEP to determine on an individual eligibility on a student by student basis.

COUNTING, CLAIMING, AND REIMBURSEMENT

If a school or LEA is participating, do any students need to identify their free or reduced price lunch status when picking up their meal?

No. LEAs are required to only count the total number of students who received a creditable breakfast or lunch at the point of service.

How will LEAs be reimbursed for meals if the calculated participation rate is less than 100%?

LEAs will be reimbursed by multiplying their ISP by the USDA authorized factor of 1.6 to determine the percentage of free meals. If the percentage is less than 100%, the remaining percentage will be reimbursed at the paid rate.

Districts with ISPs between 40 and 62.5% may be required to pay, from sources other than federal funds, the costs of serving breakfasts and lunches that are in excess of the federal assistance received, including federal cash reimbursement.

Once your application has been approved, your claiming percentages will be displayed in the CNP: School Nutrition Program Application.

OTHER FUNDING

How will participation in the CEP effect funding sources such as Title I and 31a?

For the funding issues related to free and reduced counts for non-nutrition programs, parents must complete the “Household Information Survey.” However, parents cannot be forced to complete the survey for their children to receive the benefit of free meals in the CEP program. Schools must enter appropriate information in the SNE field of the Michigan Student Data System (MSDS) as of the Fall count date. The counts obtained from this will help determine the funding levels for programs such as Title 1 allocation, 31a, E-rate among others.

Will federal (e.g., Title I) formula grant allocations be calculated differently for LEAs or schools participating in the Community Eligibility Provisions program?

The exact calculations will depend on the type and size of the LEA. The “Supplemental Nutritional Eligibility” field in MSDS is necessary in order for MDE to calculate allocations for the federal Title I and related programs. This information is also needed to complete the “rank and serve” requirements in the Title I School Selection (TISS) application. LEAs will not need additional information from parents for any students who are “directly certified” since these students will be identified in MSDS as free or reduced lunch students. For students not eligible through the direct certification process, parents or guardians must complete the Household Information Survey and return it to their LEA. This will enable the districts to identify students appropriately under the “Supplemental Nutritional Eligibility” field in MSDS. The paper documentation should be maintained by each LEA for auditing purposes.

Will state (e.g., 31a) formula grant allocations be calculated differently for LEAs or schools participating in the Community Eligibility Provisions program?

The “Supplemental Nutritional Eligibility” field in MSDS is necessary in order for MDE to calculate allocations for the state At Risk program (31a). It would not be possible to calculate this allocation without verifiable household economic information at the student level for grades K-12.

How will participation in this program affect our technology E-rate?

Recent guidance from the FCC indicates that E-rate calculations will be made based on the LEAs Identified Student Percentage (ISP) multiplied by the USDA authorized factor of 1.6.

How will the “economically disadvantaged” subgroup used for Adequate Yearly Progress (AYP), graduation rates, assessment data, and other federal reporting be calculated for LEAs or schools participating in the CEP?

The economically disadvantaged subgroup is determined by (1) direct certification, (2) categorical eligibility (homeless or migrant status), and (3) free and reduced lunch eligibility. Districts and schools participating in the CEP will need to ensure that free and reduced lunch eligibility is properly captured in the data by having parents or guardians complete the “Household Information Survey” and entering the appropriate information in the Supplemental Nutrition Eligibility characteristic in MSDS. For students not directly certified or categorically eligible, the Supplemental Nutrition Eligibility characteristic must be correctly populated in MSDS by the fall collection certification date (November 23) with an “as of” date of October 5th to be included in the economically disadvantaged subgroup.

Free and reduced lunch data are the basis for determining the economically disadvantaged subgroup. Parents or guardians must complete the “Household Information Survey” for students not directly certified or categorically eligible. LEAs must enter appropriate information under the Supplemental Nutritional Eligibility characteristic in MSDS as of the October 5th count date. The data entered by each LEA under the “Supplemental Nutritional Eligibility” characteristic in MSDS are used to identify students in this subgroup.

ⁱ https://www.michigan.gov/documents/cepi/Household_Information_Survey_MDE_OFS_388009_7.pdf

ⁱⁱ https://www.michigan.gov/documents/cepi/Household_Information_Survey_Instructions_368945_7.pdf