



# Community Eligibility Provision and Title I, Part A

North Carolina Department of Public Instruction  
Federal Program Monitoring and Support  
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*\*Some slides used in today's presentation were provided to local Child Nutrition Directors by the NCDPI Office of Child Nutrition.*



- Overview of the Community Eligibility Provision (CEP)
- Impact on Title I school allocations
- Changes to Eligible Schools Summary Report (ESSR)
- Impact on Title I application
- Impact on equitable services for private school students
- Impact on accountability

# What is the Community Eligibility Provision?



- Section 104(a) of the Healthy, Hunger Free Kids Act of 2010 amended the 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) and schools. This alternative is a universal meal program referred to as the Community Eligibility Provision (CEP).

# What is the purpose of CEP?



The overall purpose of the CEP is to improve access to nutritious meals for students in high poverty areas by providing meals to all students “at no cost” to the students.



# When did the CEP begin?



- 2011-12 three states participated
- 2012-13 expanded to three additional states and the District of Columbia
- 2013-14 became available in four additional states
- **2014-15 available in ALL states**

# What are the requirements for eligibility?



# What are the requirements for participation?



- LEA, school(s), or cluster of schools must have a minimum of 40% “identified students” based on enrollment
- LEA must agree to provide meals to all students at no cost
- LEA must cover costs not provided in federal meal reimbursement with NON-federal funds
- LEA must NOT use household applications in CEP schools



# “Identified Students”

## Directly certified (DC)

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families (TANF)
- Food Distribution Program on Indian Reservations (FDPIR)

## Categorically eligible (CE)

- Homeless
- Migrant
- Foster (not included in DC)
- Headstart, Even Start, Other

# How will data be collected for “identified students”?



**April 1** - LEA collects identified student (directly certified and categorically eligible students) data for all schools



**April 8** –LEA submits identified student data by school to NCDPI and enters in the Child Nutrition Technology System (CNTS)



**April 15** – NCDPI notifies all LEAs of eligibility

# Advantages of CEP



ALL students receive a no-cost breakfast and lunch.



Eliminates overt identification issues for students.



Improves nutrition to students at risk. (Potential for attendance rate and test score improvement.)



Reduces paperwork at the school district level.



Simplifies meal counting and claiming.



Provides potential labor savings.



Increases breakfast and lunch participation.

# Disadvantages of CEP



Potential financial issues when less than 100% reimbursement is at the free rate.



School Food Authorities (SFAs) not collecting paper applications to determine individual student economic status.



School must identify other procedures to determine economic status of individual students.

# What are pilot states are saying about the CEP?



In Illinois, Kentucky and Michigan, breakfast participation increased 25% in one year.

In Illinois, Kentucky and Michigan, lunch participation increased 13% in one year.

“We now have students eating who never ate school meals before. We see improved nutritional status of students, potential improvement in attendance and test scores.”

“Participation in CEP has strengthened our school nutrition program financially by expanding participation and increasing revenue.”

# Determining School Eligibility

The percent of Identified Students may be determined by school, by a group of schools within the LEA, or in the aggregate for an entire LEA.

$$\% \text{ Identified Students} = \frac{\# \text{ of Identified Students as of April 1} \times 100^*}{\text{*Total Enrollment as of April 1}}$$

The percent of Identified Students is then multiplied by the USDA determined factor of 1.6 for SY 2014-2015.

*\*Enrollment is defined as number of students with access to the NSLP and SBP enrolled in the school as of April 1, 2014.*

# Aim for the “Magic Number”

Remember... 62.5 is the  
“Magic number.”

At 62.5% “identified students,” all meals are reimbursed at the Free rate.

For percentages below 62.5%, meals are reimbursed at a combination of the Free and Paid Rate.



For reimbursement purposes, “identified students” percent is multiplied by USDA factor of 1.6

For Title I school allocation purposes, the 1.6 is only applied when some schools are CEP (and cannot use household applications) and other non-CEP schools will collect data through household applications.

*We'll revisit this again later in the presentation.*



# How will CEP impact Title I?



Within-district  
allocations to  
schools

Equitable  
services to  
private school  
children

School  
accountability



Within-  
district  
allocations  
to schools

Most rules regarding within-district allocations remain the **SAME**:

- LEA serves schools in rank order by poverty percentage
- Schools over 75% must be served first
- Grade span grouping may only be applied after schools above 75% are served
- LEA may stop serving schools at any point in the rank order

# How does this impact school allotments?



## If all CEP participating:

- Schools only use DC/CE data **NEW**
- Schools are rank ordered by poverty percentage **SAME**
- Per pupil allocations for high poverty schools must not be less than lower poverty schools **SAME**
- CEP schools may receive differentiated per pupil allocations (PPAs) **SAME**

## If some schools are CEP participating:

- Schools only use DC /CE for all schools **OR** use DC/CE data for CEP schools and household applications used for non-CEP schools **NEW**
- Schools are rank ordered by poverty percentage **SAME**
- Per pupil allocations for high poverty schools must not be less than lower poverty schools **SAME**
- CEP schools and non-CEP schools may receive differentiated per pupil allocations (PPAs) **SAME**

# How will CEP impact Title I school allocations?



Within-  
district  
allocations  
to schools

1. Which schools are CEP eligible?
2. Which schools will be CEP participants?
3. How will poverty data be collected for each school in the district?

# 1. Which schools are CEP eligible?



Within-  
district  
allocations  
to schools

Eligibility is determined for an entire LEA, a group of schools within an LEA, or a single school within an LEA. The percentage of “identified students” must be at least 40% of enrollment.

***REMEMBER: “Identified students” are DC or CE.***

## 2. Which schools will participate in CEP?



Within-  
district  
allocations  
to schools

Once the LEA determines which school or group of schools are eligible, the LEA decides which eligible schools will participate.

***REMEMBER: CEP participating schools no longer collect household applications.***

### 3. How will poverty data be collected?



Within-  
district  
allocations  
to schools

If all schools participate in the CEP, data collection will be DC and CE only.

If some schools participate and others do not, data may be collected:

- DC/CE for all schools **OR**
- DC/CE only for CEP participating schools

## All Schools CEP Participating

- Use DC/CE data for all schools

**AND**

- No longer use household applications in any school

## Some Schools CEP Participating

- Use DC/CE data for all schools

**OR**

- Use DC/CE in CEP participating schools and household applications in non-CEP participating schools





# Let's revisit how the 1.6 factor impacts Child Nutrition vs. Title I...



For USDA reimbursement purposes, “identified students” percent is multiplied by USDA factor of 1.6.

For Title I school allocation purposes, the 1.6 is only applied when some schools are CEP AND non-CEP schools will collect data through household applications.

# How does this impact the Eligible Schools Summary Report (ESSR) data?



Within-district allocations to schools

- Option 1: Yes - LEA decides that ALL schools are CEP OR LEA decides to use only DC/CE data, LEA will NOT apply 1.6 multiplier
- Option 2: No - LEA has both CEP and non-CEP schools, AND LEA decides to use household applications for non-CEP schools, must apply 1.6 multiplier to CEP schools

LEA chooses to use DC/CE for both CEP and non-CEP schools.



**YES**

Factor of 1.6 is not applied to any school.



School Name	Charter School	Grade Span	Direct Certification Data Only	Community Eligibility School	Total Enrollment	Total Identified Students	Multiplier	# Low-Income Children	% Low-Income Children	School Served	Eligibility – Program Model
Blue Ridge Elem	N	K-5	Y	N	432	N/A	N/A	221	51.16%	Y	SW-SW
Ashe County Middle	N	6-8	Y	Y	543	N/A	N/A	205	37.75%	Y	TAS-TAS
Ashe County High	N	9-12	Y	Y	315	N/A	N/A	100	31.75%	N	Not Title I

LEA chooses to use DC/CE for CEP and household applications in non-CEP schools



**NO**

Factor of 1.6 applied to all CEP participating schools



School Name	Charter School	Grade Span	Direct Certification Data Only	Community Eligibility School	Total Enrollment	Total Identified Students	Multiplier	# Low-Income Children	% Low-Income Children	School Served	Eligibility – Program Model
River Bend Elem	N	K-5	N	Y	800	400	1.6	640	80%	Y	SW-SW
Adams Elem	N	K-5	N	Y	754	548	1.6	754	100%	Y	SW-SW
Apex Elem	N	K-5	N	N	656	N/A	N/A	221	33.69%	N	Not Title I

# In summary...

All schools CEP  
participating

- LEA must use DC/CE data
- LEA clicks YES button in ESSR

Some schools  
CEP and some  
non-CEP

- LEA uses DC/CE data in all schools
- LEA clicks YES button in ESSR

Some schools  
CEP and some  
non-CEP

- LEA must use DC/CE in CEP schools, but uses household applications in non-CEP schools
- LEA clicks NO button in ESSR

# How will CEP impact the Title I application?



Within-district allocations to schools

- ESSR data will still populate the Comprehensive Continuous Improvement Plan (CCIP)
- CCIP Building Eligibility data fields will look the same
- Per pupil allocations (PPA) will still be based on the rank order of schools by poverty percentage
- District may differentiate PPA for CEP participating schools



Equitable  
services to  
private  
school  
children

For 2014-15,  
there are no  
private schools  
in NC eligible for  
CEP.



# How will CEP impact Title I?



## School Accountability

To meet reporting and accountability requirements, an SEA or LEA must have data on individual economically disadvantage students (i.e., ED subgroup).

# How will CEP impact Title I?



## School Accountability

Under current ESEA Flexibility, NC is not required to meet school improvement requirements under SEC 1116 (e.g., supplemental services, public school choice, etc.).

# How will CEP impact Title I?



## School Accountability

NCDPI is currently reviewing options offered by USED for the disaggregation of assessment data by the ED subgroup for reporting and accountability. More information will be provided once available.

# Questions

