

## MEMORANDUM

TO: Business Managers, Superintendents, Food Service Directors  
FROM: Rosie Krueger, State Director of Child Nutrition Programs  
SUBJECT: Eligibility for the Community Eligibility Provision for 2020-2021 School Year  
DATE: June 30, 2020

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The Community Eligibility Provision (CEP) is one option for schools participating in the National School Lunch Program and School Breakfast Program to serve meals at no charge to students. To begin participating in CEP, sites, groups of sites, or the entire School Food Authority (SFA) must have an Identified Student Percentage (ISP) of at least 40%. The ISP is the number of students in the school or SFA that are directly certified for free meals. Based on the April 1 – June 30, 2020 data reported on June 15, the Vermont sites and SFAs that are eligible or nearly eligible to begin participating in CEP next year are shown in the attached report. SFAs and sites that are already participating in CEP may wish to re-establish their ISP if it has increased since their first year of participation. Please note that due to COVID-19, the deadlines related to CEP have been pushed back by several months later than usual through a [nationwide waiver](#).

### **Lists of Eligible and Near Eligible Schools and SFAs**

The report is an excel documents. The first tab includes the School Food Authorities whose collective ISP for the sites in the SFA indicate that the entire SFA is eligible or nearly eligible to participate in CEP. To participate as a group, the collective ISP of the SFA must be 40% or more. The second tab includes individual sites that are eligible or nearly eligible to participate. Sites that are eligible and nearly eligible may participate individually or combine into groups within their SFA to create an eligible ISP for participation (40% or more). The report does not contain information about potential groupings of some sites with the SFA. If you are interested in creating a grouping of sites within an SFA, you may find the [FRAC CEP calculator](#) helpful. This tool will allow you to design your grouping to maximize the federal funding you will receive.

The report shows the ISPs as reported to the AOE on the CEP Report. In some case, the information reported may have been in error or may be incomplete. The report was due June 15, per USDA requirements, however new direct certification information that the SFA receives through June 30<sup>th</sup> may be used to qualify. Schools that are near eligible should take extra care to check the June direct certification list available from AOE to see if additional students were newly directly certified this month – these students may push the site or SFA into eligibility. Even if these students weren't reported on the initial CEP report, they can still be used to increase the ISP.

## The Community Eligibility Provision

The Community Eligibility Provision is an alternative method to participate in the school meals programs without the use of free & reduced price meal applications. The provision reduces the administrative burden of processing meal applications and point of sale systems needed to count meals served by free, reduced-price and paid categories. The requirements for CEP include verifying the ISP, offering both breakfast and lunch to all students at no charge, and reporting the total number of reimbursable meals served. Reimbursement is determined based on the ISP for the supervisory union/SFA or school. Reimbursement claiming percentages are established by multiplying the ISP by 1.6 to determine the number of meals claimed at the free rate of reimbursement; the remaining meals would be claimed at the paid rate of reimbursement. For example, if your SFA's ISP was 42.5%, then 68% of the meals served would be claimed at the free rate and the remaining 32% would be claimed at the paid rate. The SFA would need to identify a source on non-federal funds to cover the difference between the reimbursement and the cost for running the program. Once established, the ISP can be used for 4 years, unless a more favorable ISP occurs and the SFA wishes to re-establish their ISP. In Year 5, the SFA may re-establish their ISP, enter a grace year, or return to regular claiming. Please visit the [USDA Community Eligibility Provision Resource Center](#) for more information on CEP, including the Federal Reimbursement Estimator.

Schools and SFAs participating in CEP must continue to collect and maintain Direct Certification data regularly for reporting purposes. In addition, in order to collect information on student income for use outside of the federal child nutrition programs, participating schools will need to send home the household income form at the start of each school year instead of the free and reduced price meal application.

### To Enroll in the Community Eligibility Provision for SY 20-21

To participate, SFAs must take the following steps:

- Notify the AOE in writing by August 31, 2020 that they plan to participate in CEP. A template letter including the required information is available from AOE.
- Submit documentation to AOE showing the names of all students enrolled as of the CEP reporting date (June 15 for 2020, unless more favorable data from another date between April 1 - June 30, 2020 is chosen) and the names of all students identified as directly certified as of that date. This documentation must show that at least 40% of the enrolled students were identified as Directly Certified. The state agency will review this documentation and will request back-up documentation of the direct certification status for a sample of the students, please have this ready to provide upon request.
- Complete and submit the CEP amendment to the Free and Reduced Policy Statement.
- Do not collect applications or charge for meals. Notify households that the school is participating in CEP. You may use the sample letter to households.

For more information about the Community Eligibility Provision, please feel free to contact me at (802)-828-1589, or at [mary.krueger@vermont.gov](mailto:mary.krueger@vermont.gov).

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