



Q&A from CEP Webinar on 6/30/2020

Link to webinar: <http://bestpractices.nokidhungry.org/webinars/taking-advantage-cep-school-year>

Can you all share link from USDA showing all these waivers/extensions?

Sure! Here is USDA's [press release](#) about waiver extensions, and waivers are all posted on USDA's COVID-19 response page: <https://www.fns.usda.gov/disaster/pandemic/covid-19>.

We expect participation to be much lower this year. Since there will not be an increase in participation, how would we make up for the funds lost if we have a low ISP?

There are more financial benefits beyond increased participation. For example, if your district suffers from high unpaid meal charges at the end of the year, CEP may be worth it. Would you serve more meals under CEP or under traditional counting and claiming? How much debt will you have to pay off at the end of the year under traditional counting and claiming? These are additional financial factors to consider.

Even though this year promises to be like no other, there are still strategies to encourage participation. Consider:

- Innovative delivery models like lunch and breakfast in the classroom will increase participation.
- Tracking daily participation to identify unpopular items and adjusting menus to ensure strong participation.
- Avoiding menu fatigue.
- Engage students: conduct taste tests, and get students excited for what will be on your menus. Include their feedback on items they do and don't like.
- Make sure that your community knows about the program and communicate to families that free meals are available to all students.
- Now that waivers have been extended for non-congregate meal service, there is an opportunity to serve meals to students who may be schooling remotely part or all of the time next year. Consider:
 - o Bus routes for students schooling at home
 - o Giving students who come to school only part of the week meals for the other days as they leave school.
 - o If you're serving meals at community distribution sites, think about transportation barriers that may prevent some families from attending and think about how you can make distribution more accessible.

Make sure that you check with your state so that your plan for serving meals to distance learners will be approved.

Where is the guidance for the no rosters or linked meals for each student for CEP? If you use a counter for CEP instead of POS, how do you ensure that you have not provided and claimed more than one lunch to a child?

See page 37 of the CEP Planning and Implementation Guide from the USDA: https://fns-prod.azureedge.net/sites/default/files/cn/SP61-2016-CEP_Guidance.pdf. As a general rule in



CEP, you only have to count and claim the total number of meals served. However, you do have to be able to prove that you are not double-counting meals or serving more than one meal per student. So although you don't have to track meals served to individual students in CEP, you do have to have a plan approved by your state agency that prevents double counting. In some instances, you may have to collect student information and pin numbers to avoid double counting. For example, if a high school has multiple grab n go carts stationed in its hallways and students are all released at the same time for lunch, your state agency might require that you collect individual student information to prevent students from receiving multiple meals from different carts. However, if you are serving meals in a more controlled environment, especially during COVID-19, you may not have to collect individual student information. For example, if you are releasing students for meal service on a staggered schedule to one point of sale, or if you are serving meals in the classroom this year, it will generally be easier to prevent against double counting, and your state agency would be more likely to approve total counts using clickers or tallies. Your state agency can help you think through plans that work for your school.

Without cashiers how do you handle adult meals at check out?

There is still a point of sale under CEP, so you cannot eliminate the point of sale for counting and claiming purposes. CEP only eliminates the need for an interaction with a pin pad, ID cards, or touch screen, etc. You still have to have someone double-checking that a reimbursable meal has been served and for counting and claiming purposes. You should be in close communication with your contact at the state agency so that they can approve your counting and claiming procedure. Generally, your contacts at your state agency can even support and give advice for how you may operate a plan because they know your schools' set-up.

Regarding adult meals specifically, in the cafeteria, adult meals would be paid for individually by participating teachers and staff – the universal free meal benefit does not extend to staff in CEP schools. However, if a school serves breakfast in the classroom and teachers are the ones serving, counting, and claiming, the program covers one meal for that staff person. Therefore, for meals in the classroom, there is not a need for cash exchange for adult meals. Again, this should all be approved by your state agency.

Is reimbursement available for the "bulk up your lunch" concept? Would the "meal round-up" concept only work under OVS? If that is the case, the student would need to have the option to select the entree (grain and/or meat) in order for it to be OVS.

Foodservice couldn't just offer a fruit, vegetable, and milk, correct?

Correct! The "Pick Three Free" marketing strategy only works when operating an offer-versus-serve (OVS) meal service. You cannot serve only three components of a meal and claim for reimbursement without offering all meal components. If operating OVS, the "Pick Three Free" or "Bulk Up Your Lunch" strategy is a great way to increase the participation among students who bring their lunch from home. One of the many benefits of universal free school meals is that it provides more equitable access for all students to participate, and this is a strategy that would further reduce stigma associated with participation. If all students move through the line and take 3 or more components, there is less overt identification of students who rely on school meals.



If we don't meet the 40% ISP threshold, but do have a high amount of uncollected meal charges, is there another way to implement CEP? We have been trying to implement it for a while.

The 40% eligibility threshold must be met by an individual schools or group of schools to be eligible to operate CEP. However, there is another option for universal free school meals called "Provision 2" that might make sense for you. There are no eligibility requirements under Provision 2 as there are with CEP, and also unlike CEP, you can choose to offer universal breakfast and/or lunch. Provision 2 schools still have to distribute and collect school meals applications in year 1, or the "base year," of the 4-year cycle. In this base year, Provision 2 schools serve free meals to all students but count and claim meals by fee category. In years 2-4, schools count only total meals served but receive reimbursement based on the percentage of meals served in each fee category during the base year. Learn more with our resource, [Providing Universal Free School Meals](#). Some schools that are not eligible to operate CEP but suffer from high meal charges find success operating Provision 2. These schools report that the loss to revenue they experience is less than the unpaid school meal charges they typically have to cover out of their general funds at the end of the typical school year.

Are there any instances where CEP can adversely impact Title I funding for staffing in a local district? If so, do the strategies provided by NKH or FRAC have any suggestion for those district who have already submitted their application?

CEP adoption does not impact the level of Title I funds a **district** receives, as Title I allocations to districts are determined by census poverty data alone. However, CEP adoption may impact how districts allocate Title I funds to schools **within** that district. To learn more, visit FRAC's resource, [Community Eligibility and Title I Funding](#). Many schools have been able to operate CEP with little to no difference to their Title I allocations to schools within their district. Need some individual support here? Email bestpractices@strength.org.

I missed the very beginning of this presentation. Is there a tool to help calculate the ISP?

To calculate ISP, a school must conduct direct certification. To maximize ISP, a school should check the list of data included in their state's direct certification system and compare it to the list of data below to see what the state's system is missing, and then they should seek out that missing data and conduct household matches. POS software systems can often support the extended "household" matching, where the system scans for identified students' addresses and identifies other students living in the same household who were not identified through direct certification. If your POS system does not do this, check with your software provider to see if this matching system may be available as an add-on. Many report that the financial pay-off for identifying extra students covers the cost of the product.

Students can be included in ISPs if they participate in:

- SNAP
- TANF
- FDPIR
- Medicaid*
- Live in a household with another student participating in one of the above programs

Or if they are...

- Homeless/runaway



- Migrant
- In foster care
- In Head Start/Early Head Start

Work with your district's homeless liaison and Head Start/Early Head Start Director to identify these students, if they are not included in your state's direct certification system.

**The following states use Medicaid data to determine categorical eligibility for free school meals: Illinois, Kentucky, New York, and Pennsylvania. The following states use Medicaid data to determine categorical eligibility for both free and reduced-price school meals: California, Connecticut, Florida, Indiana, Iowa, Massachusetts, Michigan, Nebraska, Nevada, Texas, Utah, Virginia, Washington, West Virginia, and Wisconsin.*

Are you going to provide a link for the CEP financial calculators from FRAC?

Sure! Here they are: <https://fraccep.org/>.