

Q&A from the 4/13/21 Webinar:

Including CEP in Your Back-to-School Plans

Historically we use enrollment data as of 4/1 to determine ISPs. Has the date changed due to the pandemic?

It depends if your state opts into the [CEP deadline extensions](#) that USDA offered to states on 3/26/21. If your state does not opt in, then the date by which data must be downloaded to calculate ISPs remains 4/1. If your state *does* opt in and extends deadlines, schools can identify eligible students from data downloaded between July 1, 2020 through June 30, 2021. Check with your state agency. [[COVID-19: Child Nutrition Response #82](#)]

How does CEP affect Title I funding? And how does the Title I paperwork get done?

We have a brief resource on how CEP does (and does not) impact Title I funding, [Title I and CEP: Helpful Info for School Nutrition Staff](#). CEP does **NOT** impact the amount of Title I funding that a **district** receives (district allocations are based on Census data, which is not in any way impacted by free and reduced-price meals eligibility data). CEP **may** impact the amount of Title I funding that a school within a district receives.

In short, schools in a district are “ranked” by their poverty levels, and “served” Title I funds accordingly. Schools can be ranked using any of the following data:

- Children ages 5-17 in poverty, as counted in the most recent Census
- Students eligible for free or reduced-price school meals*
*In question 77 of SP54-2016, USDA clarifies that CEP schools may collect household income forms as a substitute for free and reduced-price meals applications, though this option increases paperwork burden and may confuse families.
- Identified students (students directly certified for free school meals) with or without a multiplier
- Students in households receiving Temporary Assistance for Needy Families (TANF)
- Students eligible for Medicaid
- *Any combination of the above*

In Burke County, GA (Donna Martin’s school district), when they adopted CEP, they changed the data by which they ranked and served Title I funds to schools, and consequently, their high school became eligible for the first time for Title I funding, which the district perceived favorably. Your school business official/financial director will determine Title I allocations.

If we are currently a CEP school for only one school. Should we or can we try to requalify for the JH/HS?

Yes! Of course! Check the updated identified student counts for all schools. Even if the MS/HS is less than 40% ISP, it may work to group the schools together to qualify. Our next webinar on the [Meals Count](#) free online CEP grouping tool will help navigate the grouping decisions. [Register for that 4/22 webinar here.](#)

How would you respond to people who are concerned about increased food waste in schools?

Students sometimes take more food than they can consume, but oftentimes, lunch periods are too short for students to be able to eat everything. There may be opportunities to speed up lines or lengthen the lunch period to allow students enough time to eat. Most importantly, consider providing meals in an “offer-versus-serve” style, where students can take 3 out of 5 meal components, and decline up to 2 that they do not want. This helps to cut down on waste.

Also, it is important to recognize that food waste is a problem in the U.S. overall. About 40% of all our food is wasted in the United States! And that’s definitely not just in schools...

How do you document the household matches?

Check with your state agency on the process. There is usually a code that you use to show that a student was identified via household extension. Remember to keep all source documentation!

Are you saying that if a student qualifies as DC in Oct, but is not on DC list in April you would count them in April?

If your state adopted the extended CEP deadlines for 2021, ISP is cumulative over the period of July 1, 2020 - June 30, 2021. If a student is identified in October, they should be included in the ISP when you apply for CEP, even if they still aren't showing up on the list in April (or June this year!). You should still keep documentation of the match, though, which should show that they were identified in October.

Do other districts still collect socioeconomic income information? How do you encourage all families to complete one?

It depends on the state! Check [FRAC's resource on state education funding policies](#) and how they interact with CEP. Some states require CEP schools to administer alternative income forms to preserve free and reduced-price meals data in determining eligibility for state education funding, but many states do not require this.

Important caveat! Alternative income forms in CEP schools must not draw any connection to the school meals program. They cannot be named "meals applications" or imply that eligibility for free meals is predicated on completing an application. We recommend "Education Benefit Form" or "Household Income Form." This helps to ensure that families complete them, as well.

Not having the income information have districts seen a drop in letter grade for campuses (accountability) after switching to CEP?

I think this is referring to your state's ESSA (Every Student Succeeds Act) plan. ESSA plans often require that schools track the academic progress of students who are "economically disadvantaged" – typically students are identified as such using free and reduced-price meals application data. If you are in a state that does not require alternative income forms to be administered in CEP schools, then your school district may use identified student data (students participating in SNAP, TANF, FDPIR, and Medicaid, if available) to identify "economically disadvantaged" students for ESSA accountability purposes. Reach out to us at bestpractices@strength.org if you need assistance with navigating this in your district.

If I am currently serving all SFSP I am not serving under CEP correct?

Correct! CEP is an option for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that makes all of those meals free for all students. The Summer Food Service Program is an entirely separate program.

Is there a magic spot to find our ISP or do we as Food Service Mgrs. figure that number ourselves?

The answer is usually "it depends" because so much of whether CEP is financially viable is determined by how much a school can increase its participation, offset costs with administrative savings, decrease per-meal costs because of higher participation (economies of scale), etc.

Luckily, we have a brand new CEP calculator that will help you assess and compare revenues under standard NSLP with CEP to make this determination!

What happens if families are somewhat borderline and things improve slightly over time so when you recert, your ISP goes down?

CEP allows you to "lock in" your reimbursement rates for 4 years. If the ISP goes UP over that time, you can reset and lock in another 4 years! If the ISP goes DOWN, you still keep the same higher rate for the 4-year cycle. If the ISP is down at the end of the 4-year cycle, you will have to decide if you can still afford to continue with CEP for another 4-year cycle. If this happens, remember to use the grouping calculator [Meals](#)

[Count](#) to see if grouping schools can help increase your reimbursement rates. There is also the option to do a CEP grace year. More on that [here](#).

Is CEP better than Provision 2?

Most school nutrition departments find CEP better than Provision 2 (P2) because of the administrative savings associated with CEP that are not available to Provision 2 schools. (In the base year of P2, schools must still collect meals applications and count and claim according to fee category, despite offering meals free for all. This process determines the reimbursement rates for the remaining 3 years of the P2 cycle.) [Here is a comparison between CEP and Provision 2.](#)

However, there are some instances in which P2 may be more financially advantageous for a school or district than CEP. If a district finds that many families who are eligible for SNAP and other means-tested benefits programs are not participating, from either fear or stigma or both, they may find that their ISPs are significantly lower than their free and reduced-price meals rate. We often see this in rural areas where stigma can be higher and in communities where many families have immigration status. In these circumstances, P2 may be better financially than CEP. It's best to run the calculations to see which will work best for you. Email us at bestpractices@strength.org for support with financial analyses!

Are there arguments that work better for principals vs DOE or others in selling CEP?

It's best to get a sense of what matters most to your stakeholders, and tailor your messages accordingly. Our resource, [CEP Talking Points for School Administrators](#), has a section called, "if you hear this, say that!" which may be helpful.

Do they care most about changes to Title I funding? Remind them that Title I allocations to the district will not change because allocations to the district are based on census data, and work with your school business official to show how your district can allocate funding after switching to CEP (many districts see very little changes). Our resource, [Title I and CEP: Helpful Info for School Nutrition Staff](#) can help.

Do they care most about educational equity? Share our resource, [Promoting Educational Equity with the Community Eligibility Provision](#).

Can teachers/adults be provided with free breakfast if they are serving breakfast in the classroom? Are adult meals in the school breakfast and lunch program an allowable expense?

Adult meals cannot be claimed for federal reimbursement. If meals for adult staff who are *directly involved in the operation and administration of the school nutrition program* are provided, the cost may be supported by the non-profit school food service operation (food service staff). ([Source](#)) **Check with your state agency** to see if they consider teachers who serve breakfast in the classroom to be "adult staff directly involved in the operation and administration of the program." If not, costs must be covered entirely by other sources of funding.

Have you saved money on purchasing?

Many CEP schools find that they save money on purchasing because the increase in participation allows school nutrition staff to take advantage of economies of scale to get lower prices on the food they purchase.

Do you have resources on best practices for communicating with families? Or just ideas?

We do! If you're adopting CEP new this year, include the message that meals will be free for all in **all** back-to-school communications coming from superintendents, principals, teachers, and other key messengers. Include information in back-to-school packets, post about it on social media and the district website, do robo-calls/texts, work with local news media, etc.

If you're adopting CEP in some but not all schools in the district, be prepared with responses to parents who are wondering why their kids may be getting free meals in one school but not the other. This will come up! Equip other school administrators with the messaging, too.

Conduct SNAP outreach! This can help to increase your ISPs, and if your ISPs increase, then you can lock in a new 4-year-cycle at higher reimbursement rates. Use our [SNAP Outreach Toolkit](#) for customizable messages.

If you're doing both CEP and OVS (offer-versus-serve), consider launching a "Pick 3 Free!" initiative. The idea is that kids can pack their entrees, and grab a milk, fruit, and a vegetable at school to complete their meals. This helps to increase participation amongst students who are packing their lunches AND it helps to increase fruit and vegetable consumption among students. Many districts frame this to parents as, "Pack the entrée, we'll take care of the rest." Read more [here](#).