



COMMONWEALTH of VIRGINIA
Department of Education

DATE: May 4, 2018
TO: Division Superintendents
FROM: Steven M. Constantino, Ed.D., Acting Superintendent of Public Instruction
SUBJECT: **Community Eligibility Provision (CEP): Application for School Year 2018-2019**

This memorandum provides information, including required documentation, for local education agencies (LEAs) to apply for one or more schools to participate in the Community Eligibility Provision (CEP) for the 2018-2019 school year. The CEP in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) allows LEAs, with a high percentage of directly certified low-income students, to provide meals at no charge to all students without collecting meal applications. School divisions that meet the eligibility criteria outlined below may apply to participate in the CEP for one or more schools, groups of schools, or divisionwide. Participation in the Community Eligibility Provision is a local decision that requires consideration of multiple factors, including the fiscal impact of this alternate provision for claiming reimbursement. The application deadline is **June 30, 2018**.

Superintendent's Memorandum 057-18, dated March 23, 2018, provided preliminary information, guidance, and the required annual notification of divisionwide eligibility for the Community Eligibility Provision. All school divisions were required to submit a CEP Site Eligibility Report, in the School Nutrition Program Web-based System (SNPWeb), by April 16, 2018. This data collection detailed the number of *identified students* directly certified as eligible to receive free meals and the school enrollment as of April 1, 2018. A school, group of schools, or school division **must have** an identified student percentage (ISP) of at least 40 percent of the students enrolled as reported in the [April 1, 2018, CEP Site Eligibility Report](#) to participate in the Community Eligibility Provision. The complete list of divisions and schools eligible, near eligible, or currently participating in CEP is in the report on the VDOE website.

Community Eligibility Provision Eligibility Requirements:

To be eligible to participate in CEP, a school division, or one or more schools, or groups of schools in the division, must:

1. Participate in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP);
2. Have an *identified student percentage* (ISP) of 40 percent or greater as of April 1, 2018, (The 40 percent threshold may be determined for an individual school, a group of schools within the school division, or for all schools collectively (divisionwide). Grouping schools allows some schools to be below the 40 percent threshold as long as the aggregate percentage of the group meets at least 40 percent);
3. Agree to provide both breakfast and lunch at no charge to all students and, if the federal reimbursement is not sufficient to cover the meal costs, the LEA agrees to cover any meal cost beyond the reimbursement rate; and
4. Submit an application to participate in CEP in SNPWeb by the June 30, 2018, deadline and receive approval from VDOE.

Community Eligibility Provision Application Process - NEW for 2018-2019:

The CEP application has transitioned from a separate Excel document to a component of the SNPWeb Application Packet for the 2018-2019 school year. The school division must submit the CEP Schedule as part of the SNPWeb Application Packet for one or more schools, groups of schools, or the entire division to participate in CEP in the new school year. All applications must be submitted in SNPWeb by the local point of contact for the school nutrition program with the authorization of the division superintendent. The Community Eligibility Provision Schedule is due by June 30, 2018, annually, along with the other required components of the CEP application listed below. Early submission is encouraged.

To submit a CEP application for 2018-2019, all of the following steps must be completed and submitted to VDOE as described:

1. Complete and submit the Community Eligibility Provision Schedule in the SNPWeb Application Packet for School Year 2018-2019. Detailed instructions on how to create and submit the CEP Schedule in SNPWeb are in [Attachment A](#) (Word) to this memo.
2. Download the CEP Addendum from [Attachment B](#) (Word) to this memo and complete the required fields. Print the completed form and obtain the signatures of the LEA SNP director and the LEA superintendent. Scan and save the form to your computer. Follow the instructions in Attachment B to submit the completed form to VDOE by uploading it to SNPWeb as an attachment in the 2018-2019 Application Packet.
3. Complete and submit the USDA CEP Federal Reimbursement Estimator, which is [Attachment C](#) (XLS) to this memo. Complete the estimator (in Excel format), save, and submit to VDOE by email. Attach the completed Excel form to an email and send to the regional VDOE SNP specialist assigned to your division.
4. Supporting Documents – Submit, via the SSWS Dropbox, the confidential list of directly certified students to document the April 1 number of identified students in the CEP Schedule for each school, group of schools, or division applying to participate in CEP. This documentation requires the detailed list(s) of student names for the enrolled students who were directly certified as eligible to receive free meals as of April 1, 2018. The list of directly certified students must be consistent with the number of identified students previously reported by the division in the SNPWeb CEP Site Eligibility List for April 1, 2018, for each school applying to participate in CEP.

Important Note: The direct certification supporting documentation is confidential. To secure the data and protect its confidentiality, it must be uploaded to the secure **Single Sign-on for Web Systems (SSWS) Dropbox** and addressed to the VDOE SNP specialist assigned to your division. This confidential documentation **must not** be sent by email or any other method, as the confidentiality and security of the information could be breached. Instructions for how to upload the confidential file to the dropbox are in [Attachment D](#) (Word) to this memo.

The VDOE SNP staff will review the CEP Schedule and application packet to ensure the school/group/division meets the minimum identified student percentage; participates in both the NSLP and SBP; and, has a record of administering the USDA school nutrition programs in accordance with federal and state regulations, including maintaining an appropriate and timely financial reporting system.

School divisions should analyze the fiscal impact of implementing the Community Eligibility Provision on the local school nutrition program. Financial consideration should be based on the anticipated level of federal reimbursement and other non-federal support that may be available to pay for any meal costs in excess of the projected federal reimbursement. If the federal reimbursement received is not sufficient to cover the costs of providing breakfast and lunch to all students at no charge, non-federal funds must be used to offset the difference. School divisions should use the USDA Community Eligibility Provision Federal Reimbursement Calculator, which is Attachment C to this memorandum, to project the monthly federal CEP reimbursement that will be received. The division should also assess the current net cash resources of the school nutrition program and the projected meal costs to determine if non-federal funds will be required to support the school nutrition program in CEP schools. The source and amount of non-federal funds should be identified and budgeted to be available to support costs in excess of the federal reimbursement.

Considerations for other programs that use individual student free and reduced eligibility:

The identified student percentage, as submitted in the CEP Site Eligibility Report and used in the CEP Schedule to apply to participate, will be validated by VDOE SNP staff for each participating CEP school. Validation will be conducted, using the submitted LEA documentation, prior to final approval and before the first claim for reimbursement is filed to ensure the integrity of the data. This validated data will be used for CEP and for all other programs for which the identified student percentage is an indicator of socioeconomic status.

[Superintendent's Memorandum 104-14](#) addressed the topic of economically disadvantaged student identification for accountability purposes with SOL testing in schools using CEP when Virginia schools began to participate in the 2013-2014 school year. The Virginia Department of Education determined schools would identify only those students determined eligible by direct certification in the non-base years as economically disadvantaged for tracking SOL accountability results in CEP schools. Questions should be directed to Dr. Lynn Sodat, Director, Office of Program Administration and Accountability, at (804) 371-2934 or lynn.sodat@doe.virginia.gov ✉.

To comply with this policy and provide the required economically disadvantaged information for individual students as available, SNP staff in participating school divisions should continue to conduct direct certification for all eligible students each year, including those in CEP schools. The listing of SNAP/TANF/Medicaid eligible students provided in SNPWeb, as well as the homeless, migrant, runaway, foster child, and Head Start data from the school division liaison(s), should continue to be used to conduct direct certification. The students in CEP schools who are directly certified each year should be identified as economically disadvantaged in the division's student enrollment database, even though direct certification status will not be used by the school nutrition program to claim meals for individual students in CEP schools.

In divisions where CEP is implemented in some schools and other schools continue to collect household applications, there may be students in CEP schools who are determined free or reduced price eligible because they are a member of a household where an application was used to determine eligibility for free or reduced price meals for students attending a non-CEP school. The eligibility from the household application should be used to identify the student in the CEP school as economically disadvantaged in the student enrollment database for other purposes, such as accountability reports for SOL testing, but should not be used to determine eligibility for meals or to claim meals by category for the student who attends a CEP school.

For non-participating schools in a division that participates in CEP for some schools, any student who is determined free or reduced price eligible by either direct certification or application should be identified as economically disadvantaged in the student enrollment database. This procedure was in place for all schools prior to CEP implementation and remains the same in the non-CEP schools.

For other programs, such as the Individuals with Disabilities Education Act (IDEA Part B) and other child nutrition programs, the validated ISP times the 1.6 multiplier (the claiming percentage for meals reimbursed at the free rate) is used to determine the free and reduced price eligibility percentage for schools participating in CEP. This number aligns more closely with the free and reduced price percentage used for non-CEP schools. The annual [October 31 free and reduced price eligibility report](#) should be used for this purpose as it reports the calculated claiming percentage for all schools using the validated ISP.

If you have questions or need additional information, please contact the VDOE School Nutrition Program specialist assigned to your division, or Sandy Curwood, PhD, RDN, Director, Office of School Nutrition Programs, by email at sandra.curwood@doe.virginia.gov ✉ or by phone at (804) 225-2082.

SMC/SCC/cc

Attachments:

- A. [Instructions for the CEP Schedule in SNPWeb 2018-2019](#) (Word)

- B. [CEP Addendum to the Agreement and Instructions to Upload in SNPWeb](#) (Word)
- C. [USDA CEP Federal Reimbursement Estimator 2018-2019](#) (Word)
- D. [Instructions for Uploading a File to the SSWS Dropbox](#) (Word)

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