

Community Eligibility

Making High-Poverty Schools Hunger Free



Building Momentum....

- Community Eligibility Provision Proposed Rule
Maggie Applebaum, FNS
- Targeting and Reaching out to school districts
Jessica Pino, Hunger Solutions New York
- Advocacy strategies to promote improvements in
Direct Certification
Charlie Kozlesky, Children's Hunger Alliance
- Q and A



Review of Proposed Rule: Eliminating Applications Through Community Eligibility

Margaret Applebaum, Division of Program Monitoring and
Operational Support, Child Nutrition Division, Food and
Nutrition Service, USDA

BACKGROUND

- ✦ Section 104a of the Healthy, Hunger-Free Kids Act of 2010
- ✦ Proposed rule published in Federal Register on November 4, 2013
- ✦ 60 day comment period – Ends Jan 3rd 2014

BACKGROUND

- ✦ Amends the regulations in § 245.9, *Special Assistance Certification and Reimbursement Alternatives*.
- ✦ Changes the name to Community Eligibility Provision (CEP)

IMPLEMENTATION

- ✦ Phased in over a period of three years in a limited number of States
- ✦ Available nationwide beginning July 1, 2014
- ✦ LEAs and schools in eleven States are currently participating:
 - + District of Columbia, Illinois, Kentucky, Michigan, New York, Ohio, West Virginia, Florida, Georgia, Maryland, and Massachusetts

DEFINITIONS

- ✦ ***Enrolled Students:*** students who are enrolled in and attending schools participating in the community eligibility provision and who have access to at least one meal service daily
- ✦ Students who do not have access to either breakfast or lunch due to the times they are attending school would not be included in the count of enrolled students.

DEFINITIONS

- ✦ ***Identified Students:*** low income children who are certified for free school meals without the use of a household application
- ✦ Students certified based on documentation of benefit receipt or categorical eligibility as described in 7 CFR part 245 (e.g. directly certified with SNAP, TANF, FDPIR, categorically eligible – migrant youth, homeless, etc)

IDENTIFIED STUDENT PERCENTAGE

$$\text{Identified Student \%} = \frac{\text{\# of Identified Students}}{\text{Total \# of enrolled students with access to NSLP/SBP}} \times 100$$

- ✦ The identified student percentage may be determined by:
 - + an individual participating school
 - + a group of participating schools in the LEA
 - + entire LEA if all schools participate

IMPLEMENTATION

- ✖ LEAs may elect CEP for all schools or for certain schools meeting the requirements beginning on or after July 1, 2014
- ✖ CEP may be implemented for one or more 4-year cycles

ELIGIBILITY CRITERIA

- ✖ Residential child care institutions may not participate in CEP
- ✖ Have an identified student percentage of at least 40% as of April 1st of the school year prior to implementing CEP
- ✖ Serve free lunches and breakfasts to all students
- ✖ Comply with the CEP procedures and requirements (to be discussed)

ELIGIBILITY AND ELECTION

- ✖ Eligible school or group of schools must have an identified student percentage of at least 40%
- ✖ Grouping schools: divide the total number of identified students for all grouped schools by the total enrollment for all grouped schools to determine eligibility
- ✖ LEAs are required to submit by June 30 to begin CEP in the school year beginning July 1

PROCEDURES - DOCUMENTATION

- ✖ LEAs intending to elect CEP for some or all schools must:
 - + Submit to the State agency documentation by June 30th of the year prior to starting CEP
 - + Ensure documentation demonstrates school or LEA meets the identified student percentage threshold as of April 1st of the prior school year

PROCEDURES - STATE AGENCY CONCURRENCE

- ✖ According to the proposed rule, the State agency must review documentation submitted by the LEA to ensure the LEA/school:
 - ✖ Meets the minimum identified student percentage
 - ✖ Participates in both the NSLP and SBP
 - ✖ Has a record of administering the meal program in accordance with program regulations

PROCEDURES - MEALS AND APPLICATIONS

- ✖ LEAs or schools electing CEP must offer free lunches and breakfasts to all enrolled students for a cycle of 4 years
- ✖ Count total lunches and total breakfasts served to students daily
- ✖ Not collect household applications for free and reduced price meals

PROCEDURES – CLAIMING PERCENTAGES

- ✖ Identified student percentage multiplied by a factor of 1.6 equals the % of total meals served reimbursed at the Federal free rate
- ✖ The remaining % of total meals is reimbursed at the Federal paid rate
- ✖ Any meal costs in excess of the total Federal reimbursement must be covered through non-Federal sources

PROCEDURES – UPDATING CLAIMING PERCENTAGES

- ✖ A new identified student percentage may be established each year
- ✖ During the 2nd, 3rd and 4th years, the LEA/school may select the higher of the identified student percentage from:
 - + the year directly prior; OR
 - + the year prior to the first year of operating CEP
- ✖ LEAs/schools in year 4 with an identified student percentage of less than 40% but more than 30% may elect for an additional year (a grace year)

PROCEDURES – NEW CYCLE

- ✖ To begin a new 4-year cycle, LEAs or schools must establish a new identified student percentage as of April 1 of the fourth year of the previous cycle
- ✖ LEAs may begin a new 4-year cycle if all eligibility criteria is met, with State agency concurrence

IDENTIFICATION OF SCHOOLS

- ✦ State agencies and/or LEAs must gather lists of schools in the following categories:
 - + Eligible schools (identified student % at least 40%)
 - + Near eligible schools (identified student % greater than 30% but less than 40%)
 - + Schools currently electing in 4th year and grace year eligible (less than 40% but greater than 30%)

STATE AGENCY NOTIFICATIONS

- ✦ Each year States are required to assemble lists of LEAs in the following categories:
 - + Eligible district wide (identified student % at least 40%)
 - + Nearly eligible district wide (identified student % greater than 30% but less than 40%)
 - + Currently operating CEP district wide
 - + Currently in the 4th year of CEP and eligible for a grace year

NOTIFICATION PUBLICATION TIMELINE

- ✦ April 15th – States obtain school level information
- ✦ April 15th – States provide guidance and election information
- ✦ May 1st – States publish lists of LEAs and schools on their websites for public notification
- ✦ May 1st – States provide link to notification lists to FNS for publication on FNS CEP website
- ✦ List must be in a format prescribed by FNS

ANNUAL NOTIFICATION PROCESS

- ✦ Percentage of students enrolled that are directly certified with SNAP is permitted as a proxy
- ✦ Data collected earlier in the year for October reporting requirements may be used for notifications
- ✦ States must note that updated %'s as of April 1st are required for LEAs interested in CEP

OTHER USES OF THE FREE CLAIMING PERCENTAGES

- ✦ The CEP free claiming percentage serves as a proxy for free and reduced price certifications (ISP X 1.6)
- ✦ May be used when determining school or site eligibility for Child Nutrition Programs

POLICY STATEMENT REQUIREMENTS

- ✦ Amend to include list of all schools participating in CEP
- ✦ For each school the following must be included:
 - + The initial school year of implementing the special assistance provision
 - + The school years the cycle is expected to remain in effect
 - + The school year the special assistance provision must be reconsidered
 - + Certification that the school(s) meet the criteria for participating

RECORDKEEPING

- ✖ LEAs must retain implementation records for participating schools that include:
 - + Data used to calculate identified student percentage
 - + Annual selection of identified student percentage
 - + Total number of breakfasts and lunches served daily
 - + Records of any non-Federal sources use to cover excess meal costs
 - + School-level notification lists provided to State agency

RETURNING TO STANDARD PROCEDURES

- ✖ LEAs or school(s) may return to standard counting any claiming any time during the school year.
- ✖ Prior to change and no later than June 30th the LEA must:
 - + Notify State agency and for guidance and approval
 - + Notify the public and adhere to all certification and verification requirements

TRANSFERRING ELIGIBILITY

- ✖ For transfers within a LEA between a CEP school to a non-CEP school:
 - + the non-CEP school must offer the student free meals for up to 10 operating days
- ✖ For Transfers between LEAs from a CEP LEA to a non-CEP LEA:
 - + it is at the discretion of the non-CEP LEA to offer free meals to the student for up to 10 days

Community Eligibility: Outreach to School Districts

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Hunger Solutions New York



Overview

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- Participation in community eligibility in New York State
- State agency promotion of community eligibility
- Our approach to target and reach out to promote community eligibility
 - Identifying stakeholders
 - Key messages about the option
 - What do school districts want to know?
 - Examples of effective outreach activities
- Targeting school districts to participate in 2014-15



Community Eligibility in New York State

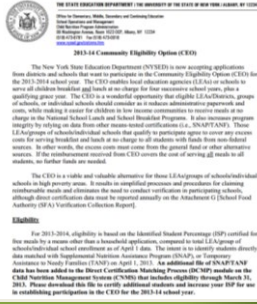
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- NYS applied to be phased in 2012-2013
- Current participation:
 - 67 school districts
 - 416 individual schools
- 4 out of the 5 largest districts in NYS are participating in community eligibility
- State agency working to improve direct certification and addressing state education funding dependent on free and reduced price income data



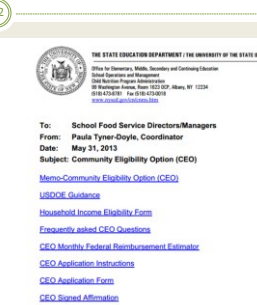
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- HUNGER SOLUTIONS**
NEW YORK UNITING POLICIES AND PROGRAMS TO END HUNGER

Identifying Stakeholders

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- School system leaders
 - Superintendents
 - Board of Education
 - Business Officials
 - School Nutrition Directors
- Community members
 - Parents
 - Elected Officials
 - Health and Wellness Partners (ie. Action for Healthy Kids, Dairy Council)



Hunger Solutions Outreach Activities

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- Integrating information about community eligibility into our existing child nutrition activities:
 - School Breakfast Outreach
 - Breakfast in the Classroom Technical Assistance
 - School Health and Wellness events
- Targeting key school leaders at annual statewide events:
 - NYS Association of School Superintendents
 - NY School Nutrition Association Conference
 - Healthy Choices for Children Conference



What do school districts want to know?

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- Guidelines for eligibility to participate
- How reimbursement works in participating schools?
- Ripple effects of no longer collecting individual income data via school meal applications
 - How it would affect the operations of the school food program
 - How it would affect other programs that rely on data from school meal applications
 - How operating under community eligibility will affect their share education funding (ie. Title I)
- District obligations to students and state administrators when participating in community eligibility



Key Messages about Community Eligibility

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- Community eligibility benefits both students and the school nutrition department's bottom line.
 - Less administrative work by eliminating paper applications
 - No applications = freeing up staff time and resources
 - Increased participation = improves the overall financial viability of school nutrition programs
- By offering breakfast and lunch for free to all students, schools can ensure access to two healthy meals each day, so that all students are fueled up and ready to learn.



Traditional Promotion Activities

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Radio Interview:

- Coverage: 60 unique radio stations, 10 multiple plays
- Reach: over 4.2 million people statewide

Letter to the Editor:

- Submitted to local newspaper near high-poverty districts
- Provided our contact information about eligibility
- Utilized momentum from National School Lunch Week

Online Outreach to Existing Networks

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Social media posts

- Facebook: 9 likes, 4 shares
- Twitter: retweet FRAC



Child Nutrition Newsletter

- Provided links to resources from state agency & advocates



Targeting Districts to Implement Community Eligibility in 2014-2015 SY

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- Strategically targeting school districts with 75%+ F/RP rate to provide resources & promote community eligibility
- Feature stories about school districts who have successfully implemented CEO to highlighting impact on participation & school environment
- Continued communication with state agency to ensure unified message (deadline to apply, application process, list of participating districts/schools)



Contact Information:

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Stay Connected!

Visit our website! <http://www.HungerSolutionsNY.org>

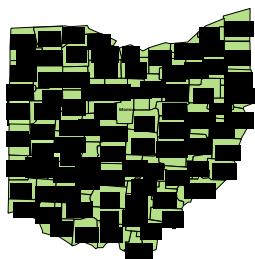


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Advocating
for Direct
Certification
Improvements
in Ohio

Charlie Kozlesky

Senior Vice President, School & Summer Nutrition



Partner Support & Concerns

National Partners

- FRAC
- USDA



State Partners

- ODE
- ODJFS
- Education Associations
- Educational Service Centers
- School Districts
- Community Schools
- Non-public Schools
- Community Organizations



Previous Direct Certification Process (2010)

- ☒ Direct Cert Reports provided to schools
only 1 time per year in July
- ☒ Many school districts not utilizing
 - ☒ Too cumbersome
 - ☒ No training/guidance
 - ☒ No time for procedures



2011 FRAC Conference: Strategy Sharing

- ☒ Matthew Sharp, California Food Policy Advocates, shared strategies for improving the direct certification process
- ☒ CHA facilitated phone conference with Matthew Sharp, ODE and ODJFS



CHA Strategies

- CHA requested ODE/ODJFS to increase the frequency of Direct Cert Reports to schools
- After a period of no changes, CHA sought legislative action to require more frequent reports to schools
- CHA conducted an interested party meeting and several legislative site visits
- HB-135 was introduced to require ODJFS/ODE to directly certify children **5 times during the school year**



Continued.....

- CHA arranged for several testimonies from school officials during House Education Committee hearings
- HB-135 received nothing but support during hearings
- Facing near certain approval of HB-135 ODE/ODJFS stated they could have a system of more frequent reports in place. HB-135 was placed on hold in order to provide an opportunity for follow-thru.



Current Direct Certification Process

- For SY 11-12, ODE/ODJFS began providing **monthly Direct Cert Report to schools**- a more frequent schedule than requested by HB-135
- The Healthy, Hunger Free Kids Act set performance benchmarks for direct certification and provided incentive bonuses to states that showed improvement
- For SY 12-13, ODE received bonus dollars



Setting the Stage for CEO Pilot

- ☞ Improvements in Ohio's Direct Certification process allowed for greater numbers of Free Eligible Students to be directly certified for free school meals.
- ☞ With greater accuracy in Direct Certification, more schools could consider operating CEO.
- ☞ CHA recommended ODE apply for the CEO pilot program
- ☞ CEO Pilot began in Ohio for SY 12-13.
- ☞ Last school year **250 schools** operated CEO. This year **over 300** operated CEO.



Questions

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Preparing For Implementation

New Resources Coming Soon:

- Model Comments to Proposed Federal Regulations for Community Eligibility
- Expanded guidance from the US Department of Education

Community Eligibility Resources

NEW MATERIALS

- *Community Eligibility: Making High-Poverty Schools Hunger Free*
- Report Summary - A Powerful Tool in the Fight Against Child Hunger
- A Guide to Implementing Community Eligibility
- Power Point Presentation
- Sample op-ed

OTHER MATERIALS

- Fact Sheets and Issue Briefs
- Sample letter to school district
- Sample School Board presentation

Materials Now Available at <http://frac.org/community-eligibility/>



Discussion

All Questions and Comments are
Welcomed and Encouraged!!



Thank you!

Register for our Upcoming Calls and Webinars at
<http://frac.org>

- **Afterschool Meals Matter:**
 - **Partnerships to Grow the Afterschool Meal Program**
December 18 at 12 noon
 - **Enrichment and Afterschool Programming Ideas**
January 15 at 2 pm
- **Summer Meals Matter:**
 - **Outreach Plans and Existing Resources to Promote the Summer Nutrition Programs**
January 7 at 1 pm

Save the Date:
2014 National Anti-Hunger Policy Conference
March 2-4, 2014
Omni Shoreham Hotel, Washington, DC