

# Community Eligibility

## Making High-Poverty Schools Hunger Free



# Eliminating School Meal Applications....

- Community Eligibility Provision Introduction  
Madeleine Levin, FRAC
- CEP and Title I – U.S. Dept. of Education Guidance  
Richard Long, National Title I Association
- State Implementation  
Laurie Cartrett, Jennifer Davenport and Cindy Ham  
Georgia Department of Education
- Q and A

# How Community Eligibility Works

- High-poverty schools provide free breakfasts and lunches to all students without collecting applications
- Any school district can use this provision if at least one of its schools has 40 percent or more students certified for free meals without application (called “Identified Students”)
- Most schools with a 40 percent Identified Student Percentage have 75 percent or more of their students qualifying for free or reduced-price meals
- The district may implement community eligibility in one school, a group of schools or district-wide.
- By May 1 of next year, states must publish lists of all schools that are eligible for community eligibility and all schools that are near-eligible

# Who Are “Identified Students”?

## **Children certified for free meals without submitting a school meal application**

Includes children who are directly certified (through data matching) for free meals because they live in households that participate in the

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families Cash Assistance (TANF)
- Food Distribution Program on Indian Reservations (FDPIR), or
- Medicaid (in districts participating in USDA’s demonstration project)

Includes children who are certified for free meals without application because they are

- in foster care
- in Head Start
- are homeless or
- are migrant

# Reimbursements Under Community Eligibility

- $\% \text{ Identified Students} \times 1.6 = \% \text{ meals reimbursed at "free" rate}$ ; the rest are reimbursed at "paid" rate
- Example: a school with 50 percent Identified Students would be reimbursed at the free rate for 80 percent of the breakfasts and lunches it served ( $50\% \times 1.6 = 80\%$ ) and the remaining 20 percent would be reimbursed at the paid rate
- Participating schools are guaranteed to receive the same reimbursement rate (or a higher one if the Identified Student Percentage increases) for 4 years

# Programs that Use School Meal Eligibility Data

- E-rate Schools and Libraries Program, helps schools obtain telecommunications and Internet access
- Title I of the federal Elementary and Secondary Education Act provides funding and tracks education outcomes of “disadvantaged” students
- State Education Funding – many states allocate funding to schools based in part on F/RP eligibility
- Child Nutrition Programs (e.g. SFSP, CACFP) rely on data from school meal applications to determine which sites qualify to provide meals at no charge

# Alternative Data Sources

- **The school's free claiming percentage under community eligibility:** serves as a proxy for the share of students who would be certified for free or reduced-price meals if applications were still taken.
- **The school's Identified Student Percentage:** For some purposes, using the Identified Student Percentage may make more sense than the claiming percentage under community eligibility.
- **Medicaid data:** Medicaid data is already a permissible alternative to school meal applications for allocating Title I funds.
- **Census data:** Census data are already a permissible alternative to school meal applications for allocating Title I funds within a school district.

# Federal Guidance from USDA and USDE

U.S. Departments of Education and Agriculture no longer require data from school meal applications, or any individual income data, for any of their programs.

US Department of Education recently released expanded guidance on flexibility for schools utilizing community eligibility.





## Title I – What I need to know about it



# What is Title I?

- Title I is the first major section of the Elementary and Secondary Education Act that was first signed into law in April 1965. It was last changed as part of No Child Left Behind in 2002.
- It is a funding stream to school districts that do not have the tax base to help all of their children living in poverty to learn reading and math and other subjects too.



# What age ranges does it cover?

- It covers Pre-K – 12<sup>th</sup> grade (with even a few projects for home visits of 2 year old children.
- The vast majority of funds are spent in elementary schools, then middle schools with 2.5% going both to pre-school and to high schools



# How is the money allocated?

- The census provides the number of families living in counties who are considered economically disadvantaged.
- Based on that count district allocations are made.
- Districts must allocate to school buildings by rank ordering them.
- It is the within district allocation where how children are counted makes a difference. CEP is just one of the ways children can be counted.

# + How do I speak Title I?

- There are several key concepts in Title I that impact what funds are spent on:
  - Some schools are targeted assistance – which means that only the students who are eligible are served.
  - Other schools are schoolwides – which means that if a school has 40% or greater poverty then all the children are eligible as are all of their instructionally related activities.



# Other Key Title I ideas/concepts

- Supplement, not supplant
  - This is the cornerstone of Title I. Title I is designed to direct federal money to school districts to use in addition to, not instead of their state and local dollars.
  - Basically (but not universally) if a state and local program serves all kids than Title I funds do not support it – this can be at the district or building level



# Funding

- Congress appropriates – forward funding and advanced funding
  - Forward Funding – Money appropriated in FY 14 is spent SY 14 – 15.
  - Advanced Funding – Money appropriated from budget year when it is spent – Thus FY 14 appropriations is actually an FY 15 budget year and spent SY 14 -15
  
- According to NEA data (using estimates of per pupil expenditures and poverty) full funding would be more than \$40 billion (current funding is close to \$14 billion).



# USED Funding

- Key Question – “When I ask my Title I director how much we have next year, frequently I don’t get an answer – it is something about: the census, maintenance of effort, and a bunch of other stuff – why can’t I just get an answer?”
- Preliminary allocations – theoretically in November of previous year; but Congress has been slow, it is now an annual question: “When will the final district allocations be released.”
  - State allocations (even these change due to Congressional action)
  - District allocations preliminary then the Final allocations – can be late in the school year and sometimes into the summer





# What do you need to know when talking Title I

- Title I money is a formula program – little discretion in where the money goes and there are requirements as to how it is used.
- Local district submits plan to SEA for approval.
- It is aimed at improving instruction/learning as at its core Title I is about providing access and equity.



# Counting Students

- The reality is that there are more students who are eligible for Title I than receive services.
- School Districts must rank order schools by their percentage of students who are eligible, and then use funds to serve those students based on per-pupil expenditure until they run out of money
- Several different options to count students

# + Guidance from USED



- Guidance issued January 2014: The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended.
- 25 pages Description, Within-District Allocations, Equitable Services, Within-State Allocations & Title I Accountability



# Issues for Title I



- Within-district allocations, equitable services for eligible private school students, within-state allocations and accountability
- School lunch data often used as an indicator of poverty
- Key point – if you use CEP does that mean you must use that data for Title I? -- NO



# Title I issues - 2



- How does the allocation work if one of my schools uses the CEP formula and comes up with more than 100%
  - You do not necessarily have to use the CEP formula for all of your schools
- This is one example of decisions and options districts have as CEP is applied to Title I



# Going forward



- Learn from the pilot states/schools
- Read the January USED guidance
- Know that there are options within the framework

A photograph of a group of young children sitting at tables in a cafeteria, eating from yellow trays. The children are smiling and looking towards the camera. The text 'CEP' is overlaid in large green letters at the top center.

CEP

Community  
Eligibility Provision

# Planning for CEO Pilot

with

## ***Title I, Part A***

***Georgia Department of Education (GaDOE)***



- ✿ Met with GaDOE Title Programs Director and Title I, Part A Program Manager
- ✿ Discuss CEO (CEP) requirements
- ✿ Discuss ramifications of no F/R applications in CEP districts/schools
- ✿ Determine how best to approach this issue
- ✿ Forged a partnership to educate and train



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# Planning Steps

- 🔥 Decide which data is needed by Title I.
- 🔥 Determine if using *Identified Student* Eligibles or the *Identified Student Percentage*.
- 🔥 Title I develop form for calculations.



# Training

- ✿ Emailed information concerning CEP
- ✿ CEP Conference for all interested.
- ✿ Provided USDA memorandums, individual phone conversations and technical assistance visits.
- ✿ Attended and participated at State Title Programs Conference, presenting with Title I Program Manager.
- ✿ Attended and presented in Data Collections Conference and GASBO.



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# Data Needed for Title I

- ❖ October free eligibles for CEP schools
- ❖ October data is year prior to implementation of CEP
- ❖ Data can be gathered October of the preceding year of implementation or through a conversion method using FTE information



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# Data Collection for Title I

- 🦋 Prepared guidance for local SNP for the collection of data needed by Title I.
- 🦋 Discussed guidance and received approval from Title I before sending to local districts.



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# Regrouping

- 🔥 Webinar sponsored by Title I – Listened to and responded to the guidance
- 🔥 Developed new and simpler form



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# Sample of Data Conversion for Title I

GaDOE School Code	Schools	Maximum FTE from Fall 2012 School Enrollment	Maximum Free from Fall 2012 FTE	Multiplier	New Number ISE (TANF/SNAP/DC)	Total Number of Pre-K	Total Number of Pre-K Free	Multiplier	New Pre-K Number ISE (TANF/SNAP/DC)				
12013	ELEM SCHOOL A	1000	650	0.6071	395	40	25	0.6071	15				
22013	MIDDLE SCHOOL SOUTH	700	450	0.6071	273	0		0.6071	0				
32013	HIGH SCHOOL A	2400	1200	0.6071	728	0		0.6071	0	GaDOE Only Total (Column 4)	GaDOE Only % ISP	GaDOE Only - Claiming Percentage for Free (Column 7)	New Raw Data for Title I (Column 6)
21997	ELEM SCHOOL C	1500	1100	0.6071	668	80	45	0.6071	27	282	59.37%	0.95	451
11999	ALTERNATIVE SCHOOL	800	790	0.6071	480	0		0.6071	0	182	39.22%	0.63	291



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[illegible]

**This information may be generated electronically or calculated from the October FTE information on the form provided by the SA**

Signature and title \_\_\_\_\_ Date \_\_\_\_\_



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# Fee Waivers for High School Students

## Parents:

The ACT (American College Testing) and The College Board (SAT, PSAT) offer fee waivers to reduce the cost of the ACT, SAT, and PSAT exams for students from families who qualify under the criteria listed below. Qualifying students should speak with their counselor about fee waivers for these examinations.

The College Board also offers a reduced fee exam for students taking the Advanced Placement (AP) exams each May. The criteria for the reduced exam fee are the same as the criteria for fee waivers (listed below). Qualifying students who plan to take AP exams should speak with their counselor and the AP Testing Coordinator for their school to ensure they are listed on the schools' records as qualifying for the exam at a reduced fee.

To be eligible, you must meet **at least one** of the requirements below:

Annual family income falls within the [Income Eligibility Guidelines](#) set by the USDA Food and Nutrition Service.

Enrollment in a federal, state, or local program that aids students from low-income families (e.g. Federal TRIO programs such as Upward Bound).

Family receives public assistance.

Lives in federally subsidized public housing, a foster home or is homeless.

A ward of the state or an orphan.

## Check all that apply

☐ My household receives TANF or SNAP or other public assistance.

☐ My household's monthly total income is \$\_\_\_\_\_. Indicate the number of people who live in your household \_\_\_\_\_

☐ My family lives in federally subsidized public housing.

☐ My family is homeless.

☐ My child is a Foster child.

☐ My child is a ward of the State of Georgia.

☐ Another child in my household receives free or reduced meals.

Parent /Guardian Signature: \_\_\_\_\_ Date \_\_\_\_\_



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# Advantages of CEP

No Paper Applications- No Web Applications

Saves Money on Printing Cost, Labor Cost, Returned Check Fees

No Charged Meals, No Charge Letters, No Alternative Meals

Faster Service – Simplifies Meal Counting & Claiming

No Overt Identification

Increased Breakfast, Lunch Participation

Improves Nutrition to At Risk Students. Potential for Attendance Rate and Test Score Improvement



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# Lessons Learned

- 🔥 Common language/vocabulary is critical to avoid misunderstanding
- 🔥 Frequent communication between SNP and Title I is essential
- 🔥 When in doubt, ask questions from the appropriate source



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# Q & A



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# Preparing For Implementation

- Calculate the financial Impact by using the USDA calculator to estimate federal reimbursements under community eligibility
- Improve direct certification systems and procedures to locate all Identified Students
- Set up a workgroup to identify and address implications of eliminating school meal applications that includes staff from school nutrition, Title I, assessment, school funding, accountability, and E-rate
- Prepare to publish lists of eligible schools by May 1

# 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 Events at <http://frac.org>

- **Afterschool Meals Matter:**  
Starting the Transition from Afterschool to Summer Meals  
February 19, 2-3 pm ET
- **2014 National Anti-Hunger Policy Conference**  
March 2-4, 2014  
Omni Shoreham Hotel, Washington, DC
- **Expandiendo el Acceso a Desayunos, Alimentos de Verano, y Alimentos después de la Escuela en Las Comunidades Latinas**  
Increasing Access to Breakfast, Summer, and Afterschool Meals in Latino Communities  
*This webinar will be presented entirely in Spanish and co-hosted by the National Council of La Raza.*  
Wednesday, March 19th, 2014 at 2:00 PM ET