

Title I, Part A Programs and Community Eligibility Provision

Florida Department of Education
Bureau of Federal Educational Programs
FASFEPA
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CEP OVERVIEW



Background

- ◆ Section 104(a) of the Healthy, Hunger-Free Kids Act
 - ◆ Provides an alternative to household applications for free and reduced price meals
 - ◆ Offers all students free meals in high poverty LEAs and schools

Standard Procedures vs. CEP

- ◆ School meal programs determine eligibility through:
 - ◆ Household income applications
 - ◆ Participation in assistance program (categorical eligibility)
- ◆ CEP determines eligibility by:
 - ◆ Eliminating household applications
 - ◆ Based on percentage of directly certified students

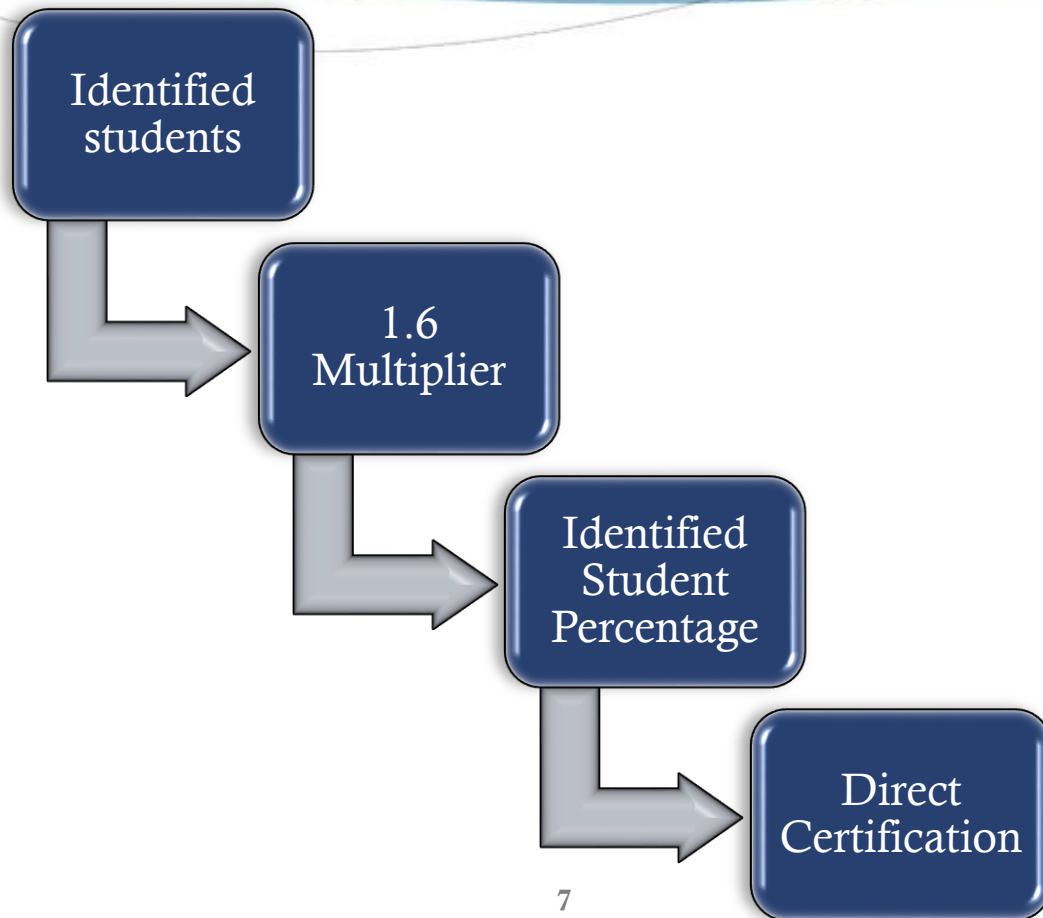
Implementation

- ◆ Phase in over three year period in limited number of states
- ◆ Florida was a pilot state in 2013
- ◆ Available nationwide beginning July 1, 2014

Currently Participating

- ◆ Eleven States currently participating
 - ◆ **Florida**, Georgia, Maryland, Kentucky, District of Columbia, Illinois, Michigan, New York, West Virginia, Ohio, and Massachusetts
- ◆ A total of 22 Florida LEAs
- ◆ Combined total of 11 Florida Charters and Private schools participating individually in CEP
- ◆ Approximately 344 Florida schools are participating in CEP

Key Community Eligibility Terms



Definition: Identified Students

Low income children who are certified for free school meals without the use of a household application.

Identified Students are those who are certified for free meals through the direct certification process.

CEP Eligibility

40 percent of students are **identified through the direct certification process**



Serve meals to **ALL** students attending the CEP school



Do not collect free and reduced price lunch applications in CEP participating schools

Identified Student Percentage

Identified Student Percentage

=

$$\frac{\# \text{ of Students Identified by Direct Certification} \times 1.6}{\text{Total Enrollment}} \times 100$$

- ◆ The identified student percentage may be determined by:
 - ◆ An individual participating school
 - ◆ A group of participating schools in the LEA
 - ◆ Entire LEA is all schools participate

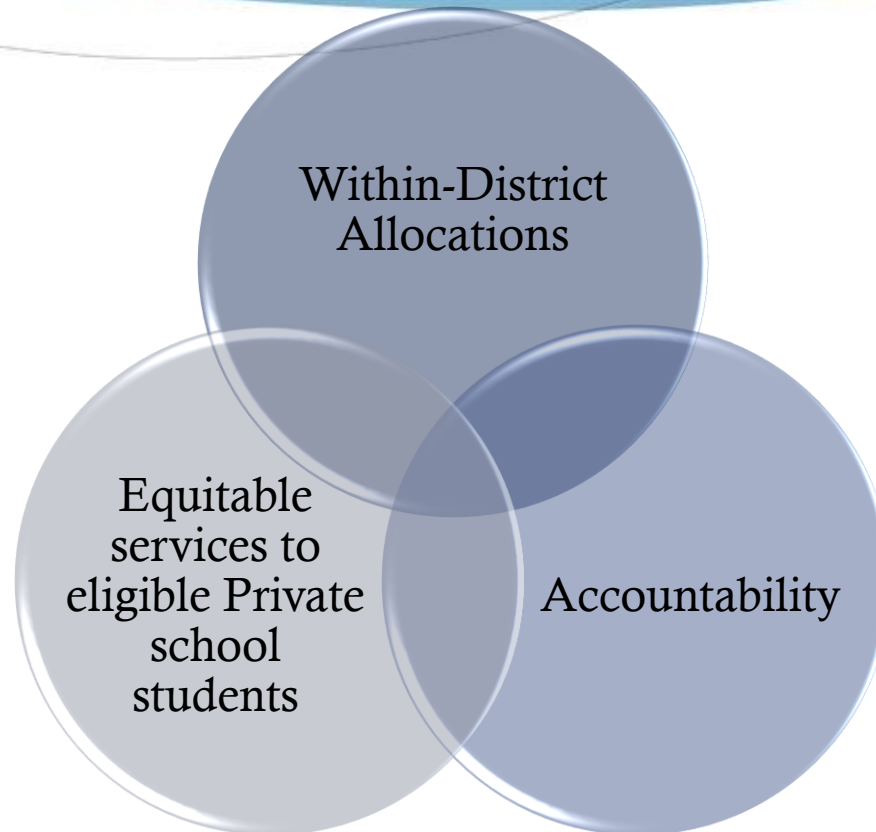
THE TITLE I, PART A PROGRAM



Title I, Part A Eligibility

- ◆ No changes to Title I, Part Eligibility provisions
- ◆ LEAs are required to use Part A funds in **eligible school attendance areas**
- ◆ **Eligible school attendance** area means a school attendance area is equal to or greater than that of the District's Poverty Average (DPA)

Intersection Between Title I, Part A and CEP



The Public School Eligibility Survey (PSES)

- ◆ Two new selection buttons added to PSES for CEP:
- ◆ **Option 1-** For LEAs using Option 1 to determine poverty rates (CEP and non-CEP schools ranking)
 - ◆ Direct certification in CEP schools
 - ◆ FRPL application data in non-CEP schools
- ◆ **Option 2-** For LEAs using Option 2 to determine poverty rates (CEP and non-CEP schools **ranked solely** on the basis of the percentage of students directly certified)

Title I, Part A Current Practice

Title I ranking and serving procedures require school-level poverty data.

Choices of school-level poverty measures include school lunch data as an option.

CEP data are part of school lunch data.

ED CEP guidance on within-district allocations applies when a school district has a CEP school and uses school lunch data to rank and serve schools

Title I, Part A Provision

LEAs **must** serve schools with a poverty rate above 75.01 percent (OLD)

Title I, Part A

LEAs **may** serve schools with a poverty rate as low as 35 percent (OLD)

Title I, Part A

ALL school funded must be served in rank order without regard to grade span

Within-district allocation CEP and Non-CEP schools Option 1

- ◆ When LEA has both CEP and Non-CEP schools USE
- ◆ **OPTION 1**-Multiply the number of students identified by direct certification in a school by 1.6 multiplier and divide by the school enrollment to derive at the schools **poverty percentage in the CEP school**
 - ◆ LEAs continue to collect FRPL Applications in all **NON-CEP** schools

Within-district allocation CEP and Non-CEP schools Option 1

- For CEP schools multiply the number of students identified through direct certification in a school by the 1.6 multiplier and divide by the enrollment in the school. Using the multiplier for CEP schools

Enrollment	CEP Identified Students	NSLP Count	Poverty Rate
1000	600	$600 * 1.6 = 960$	96 percent

- For 2014-15, Florida has only 23 districts (piloted in 2013-14) eligible to use this method for ranking and serving schools

Within-district allocations CEP and Non-CEP Schools

- ◆ Direct Certification: Rank ALL schools (CEP and Non CEP) solely on the basis of the percentage of students directly certified through SNAP or other direct certification measure available annually to the LEA.
 - ◆ Direct certification data is provided to LEA food service staff frequently during the year.

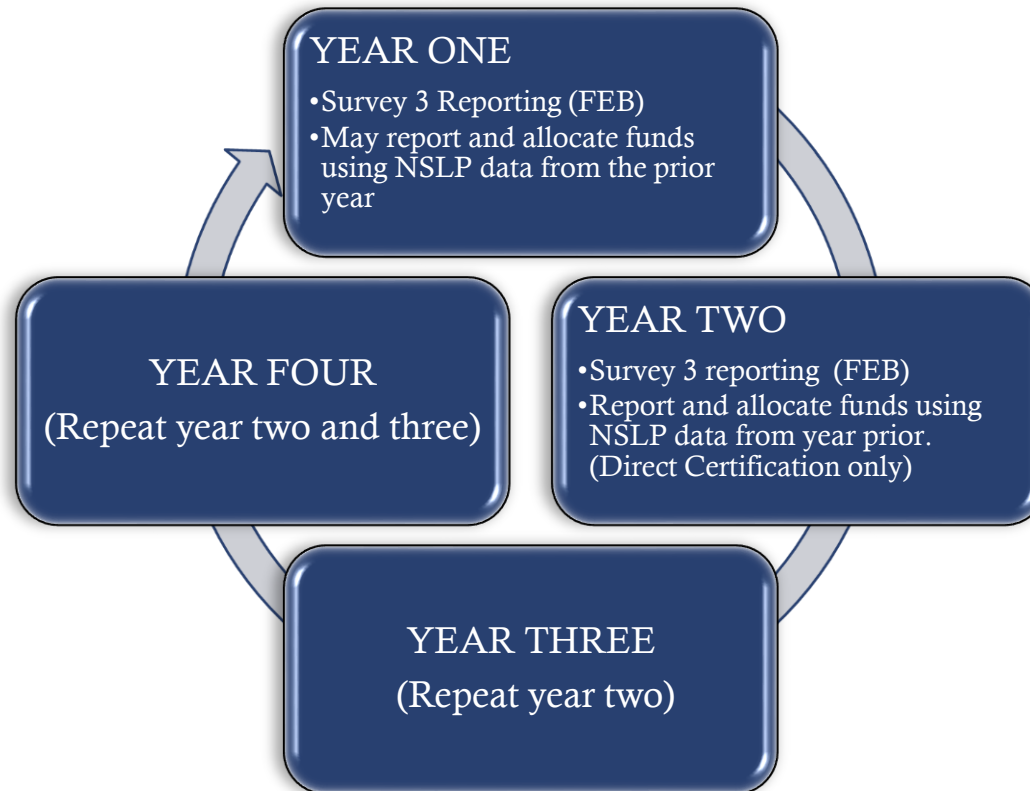
Enrollment	Direct Certification	Poverty Rate
750	500	$500/750=67\%$

Within-district allocation

Option 2

- When LEA has CEP only (district-wide CEP participation) or the LEA has a combination of CEP and Non-CEP schools the LEA can rank all schools based on the percentage of students directly certified
- When applying this method both CEP and Non-CEP schools must be ranked using DIRECT CERTIFICATION data

Within-district allocations for:



Title I Accountability

- ◆ Florida does not recognize all students attending a CEP participating school as economically disadvantaged.
- ◆ Students identified through the direct certification process are deemed economically disadvantaged for assessment purposes.

Definition: Economically Disadvantaged

- ◆ Old definition: Lunch status is defined as the student's eligible for participation in the Free, reduced, or full price lunch program evidenced by submission of an application.
- ◆ New definition: Lunch status is defined as student's eligible to participate in an approved national school lunch meal program.

Survey 3 Reporting New Data Elements

Use these codes for ALL CEP participating schools:

- ◆ C = The student is enrolled in a USDA - approved Community Eligibility Provision (CEP) school and the student is identified as categorically eligible for free meals based upon the Direct Certification or the extension of eligibility to the household due to eligibility of an identified direct certified student. Identified students include students directly certified through SNAP; TANF; the Food Distribution Program on Indian Reservations; children experiencing homelessness who have been identified on the local liaison's list; Head Start participants; identified migrant youth; identified runaways; non-applicants approved by local officials; foster children who are certified through means other than a household application; those eligible for Medicaid. **(Only FDACS - approved CEP schools use this code.)**
- ◆ N = The student enrolled in a USDA – approved a Community Eligibility Provision (CEP) school but the student is NOT identified as categorically eligible for free meals through the Direct Certification Process or the extension of eligibility to the household due to eligibility of an identified direct certified student. **(Only FDACS - approved CEP schools use this code.)**

EQUITABLE SERVICES TO ELIGIBLE PRIVATE SCHOOL STUDNETS



Equitable Services

- ◆ When determining funding for Title I equitable services, LEAs should continue to follow the current non-regulatory guidance: *Title I Services to Eligible Private School Children*.
- ◆ During consultation with private school officials, an LEA should identify the method it will use to determine the number of private school children from low income families who reside in participating public school attendance areas.

Equitable Services

Method for determining the number of private school children from low-income families

- ◆ Same poverty measure used by LEA for public school students
- ◆ Comparable poverty data from a survey, extrapolating when complete data is unavailable
- ◆ Comparable poverty data from a different source
- ◆ Proportionality
- ◆ Equated measure

Equitable Services

- ◆ CEP data are most relevant where an LEA uses school lunch data to allocate Title I funds for public schools and such data are also available for private school students
- ◆ Only students who reside in a participating public school attendance area generate the funds and LEA would use to provide equitable services.
- ◆ IF the LEA uses direct certification data in the participating public school attendance area for Title I allocations to public schools then only directly certified students in a CE private school who reside in those areas generate funds. NOT all students in attending the private school.

Equitable Services

- ◆ IF LEA uses NSLP data to determine allocations for TIA schools. Use the same method for private school equitable services if the data is available.
- ◆ When the same data is not available, the LEA should consider a survey or comparable data from a different source, such as a scholarship application.

FREQUENTLY ASKED TITLE I QUESTIONS



What is the Community Eligibility Provision (CEP)?

CEP is a National School Lunch Program that permits eligible schools to provide meal service to **ALL** students at no charge, regardless of economic status.

- ❑ All Students in a **CEP eligible** schools receive meals at no charge
- ❑ **MEAL** reimbursement is based on the **PERCENTAGE** of identified students multiplied by **1.6**
- ❑ **CEP** operates on a four year cycle
- ❑ LEA or school must have an identified student percentage of at least **40 percent** as of **April 1** of the **school year prior** to implementing CEP

Frequently Asked Questions

Considering CEP?

CEP Cycle

- CEP is a four year reimbursement option for eligible high poverty LEAs and schools

Opting

- LEAs and schools may opt in or opt out annually

Participants

- Some or all schools in the LEA may participate in the program

Frequently Asked Questions

- ◆ **Question:** It seems that even if an LEA elects to participate in CEP for schools, that would not affect Title I services until the second year?
- ◆ **Response:** Generally, an LEA uses data from the prior year to determine its within-school allocations. As a result, with respect to a CE school for the first time, the data available will likely be from the previous year and may include FRPL and direct certification data. Therefore, with respect to Title I school allocations, an LEA would likely first use CE data for a school that is a second-year CE school.

Frequently Asked Questions

- ◆ **Question:** If the LEA decides to opt out of the CEP program, what data do we need to report for Survey 3 for the upcoming school year?
- ◆ **Response:** The LEA would report the data available from the prior school year. This is likely to be direct certification data because the LEA did not collect individual family income data the year prior.

Frequently Asked Questions

- ◆ **Question:** How is CEP different than Provision 2?
- ◆ **Response:** CEP eliminates the use of free and reduced price meal applications as a means to determine poverty and requires CEP eligible schools to identify eligible students through the direct certification process solely. Under Provision 2, all children are served free meals without individual student income certification. However, participating schools are required to collect family income data once every four years.

FREQUENTLY ASKED QUESTIONS

- ◆ **Question:** I used CEP data with the multiplier. Using the multiplier increased the number of schools in my district eligible for Title I funding. What do I need to consider when determining what my Title I school allocations will be?
- ◆ **Response:** The LEA has options. The first option is to raise the cutoff point at which the district chooses to serve schools. For example, if last year, the LEA served all elementary schools and then served middle schools with a poverty rate of 60 percent or higher; the LEA may consider serving middle and high schools with a poverty rate of 65 percent instead. An LEA may also consider using another permitted poverty measure or composite of permitted measures.

Frequently Asked Question

💧 **Question:** What are the advantages of CEP?

💧 **Response:**

- 💧 All students receive free meals
- 💧 Improves nutrition to students in high poverty areas
- 💧 Reduces paperwork at the district and household levels

Questions?

