CEP Part 2: Eliminating School Meal Applications

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Today’s Moderator

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Today’s Topics

Participants will:

• Hear about alternatives to school meal application data in CEP schools,

• Learn how to adapt Title I policies in CEP schools and

• Hear from districts about how they handled eliminating applications.
Today’s Panelists

Zoë Neuberger
Senior Policy Analyst
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David Brown
Food Service Director
Rochester City Schools
NY

Penny Holt
Food Service Director
Paducah Public Schools
KY
Today’s Panelist

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What I Will Cover

• Very brief review of how the Community Eligibility Provision (CEP) works

• How income data from school meals applications are typically used

• Alternative data sources for typical uses

• Title I – federal funding for disadvantaged students
How CEP Works

• Schools provide breakfasts and lunches at no charge to all students
• In exchange for forgoing meal fees, schools do not have to collect applications, make eligibility determinations, verify applications, or track eligibility categories when meals are served
• Any school district can use this option if at least one of its schools has 40 percent or more students certified for free meals without application (called “Identified Students”)
• The district may implement community eligibility in one school, a group of schools or district-wide
• Free claiming percentage = ISP * 1.6 (capped at 100%)
• 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% x 1.6 = 80%) and the remaining 20 percent would be reimbursed at the paid rate
• Participating schools are guaranteed to receive the same free claiming percentage (or a higher one if the Identified Student Percentage increases) for 4 years
Income Data from School Meal Applications is Used to Target Resources to Schools

- Eliminating applications is an important simplification for school meal programs
- But income data from school meals applications is often the only data on income readily available at the school level
- Percentage of students who qualify for free or reduced price meals is used to assess the poverty level of a school for purposes of allocating resources
Alternative Approaches to Targeting Resources to Schools

- **Use CEP free claiming percentage**
  + All CEP schools have it
  + Consistent with Title I
  - A proxy, so not identical to free and reduced price percentage

- **Use CEP Identified Student Percentage (ISP)**
  + All CEP schools have it
  - Comparable to ISP at non-CEP schools, not the free and reduced price percentage

- **Use other data (such as Census data or Medicaid data)**
  + Comparable across CEP and non-CEP schools
  - May not be readily available at the school level
Income Data from School Meal Applications is Used to Provide Benefits to Individual Students

- Income data from school meals applications are used to determine whether that child received a fee waiver or other benefit.
- Alternative data sources that help assess the poverty level of a school, do not indicate which individual children are low-income.
Alternative Approaches to Providing Benefits to Individual Students

• Provide benefits to all students
  + Students do not lose benefits
  - May not be affordable

• Provide benefits only to Identified Students
  + Comparable across CEP and non-CEP schools
  - Not all students who formerly qualified for benefits will receive them

• Collect individual income data (outside school meal programs and without SFA funds) and use that data to provide benefits to selected students
  + Allows for precise targeting or monitoring
  - Undermines paperwork reduction
  - Creates a barrier to participating in CEP even when low-income children could benefit from improved access to school meals
Guiding Principles

• Participating in CEP should not disadvantage high-poverty schools or low-income children with regard to education funding or services

• Interest in data from school meal applications should not stand in the way of making it easier for low-income children to get nutritious meals they need at school
Major Uses of Low-income Student Data Under Title I

• Targeting federal Title I funds to schools

• Monitoring achievement of low-income students
USED Policy Guidance on Title I and CEP

- USED published comprehensive policy guidance on CEP and Title I in January 2014

- This guidance describes and emphasizes a range of options available to states and LEAs

- Flexibility allows CEP to expand with minimal interference with Title I programs
Federal Title I Funding
Census data are used to allocate Title I funds to LEAs

Not affected by CEP

Data from school meal applications are used to allocate Title I funds to schools

CEP schools need alternative data source
Allocation of Title I Funds to Schools **Within LEAs**

- Options under Title I statute for identifying low-income students for purposes of school selection and allocations:
  - eligibility for free and/or reduced-price school lunches;
  - eligibility for Temporary Assistance for Needy Families (TANF);
  - eligibility for Medicaid;
  - Census poverty estimates (if available); or
  - a combination.

- Approximately 90% of LEAs receiving Title I funds use free and/or reduced-price school lunch data — sometimes alone, sometimes in combination with other authorized criteria.
Options for CEP Schools for Identifying Low-Income Students for Funding Allocations Under USED Policy Guidance

• In the first year of CEP implementation in a school only, free and/or reduced-price lunch (FRPL) data from the last school year

• The Medicaid, Temporary Assistance for Needy Families (TANF), Census (if available), or composite data authorized under the Title I statute

• Free meal reimbursement percentage = percentage of children certified without application multiplied by 1.6, capped at 100% of enrollment (must be calculated for individual school even if school I part of a CEP group)

• Percentage of children certified without application = ISP without use of the 1.6 multiplier, if used for all schools in the LEA, CEP and non-CEP (must be calculated for individual school even if school I part of a CEP group)

• Percentage of students from low-income families as determined through an income survey
Implications of CEP for Title I School Accountability Policies

• Schools that receive Title I funds must monitor the educational achievement of certain groups of students, including low-income students, and take action to improve the performance of schools where achievement results are inadequate.

• Free/reduced-price school lunch data is the primary source used to determine which children are low-income.

• In some states, low-income students may be selected to receive supplementary educational services, or priority for school choice.
Options for CEP Schools for Identifying Low-Income Students for Accountability Purposes Under USED Policy Guidance

• Consider *all* students in CEP schools to be from low-income families for accountability purposes since the vast majority of students are

• Consider only Identified Students to be low-income

• Use state/LEA income survey to determine which students are low-income
Conclusion

• Title I policies offer a helpful model for states and districts grappling with establishing their own policies for other uses of school meal application data

• With planning, feasible alternatives to data from school meal applications can be identified

• Participating in CEP should not disadvantage high-poverty schools or low-income children with regard to education funding or services

• Interest in data from school meals applications should not stand in the way of making it easier for low-income children to get nutritious meals they need at school
Today’s Panelist

David Brown
Food Service Director
Rochester City Schools
NY
Rochester City School District
Perspective on Income Data Application for Title I Funding

• 2012 SY RCSD opted to participate in the Community Eligibility Option (CEO).

• No more Meal Applications 😊 BUT.....

• NYSED still wanted Income Data for Title I reporting AND they had no Prototype document for us to use?! 😢

• NOW WHAT?
Don’t reinvent the Wheel!

We modified the meal app and submitted to SED not only did they approve they made this their prototype for the State.
Rochester City School District
Perspective on Income Data Application for Title I Funding

• Just because you build it doesn’t mean they will use it.

• By Oct. 1, 2012 we had a dismal 44% of applications back. Oct. 1 of 2011 we had 72%.

• Time to PANIC??

• NO. We got creative.
Rochester City School District
Perspective on Income Data Application for Title I Funding

• Engage your peers; this is not solely a food service issue anymore (in fact school food funds cannot be used to collect the data)

• Collaborate efforts between Central Office staff (Superintendent and Deputies, Board of Ed) and on-site School administration (Principals, AP’s, school secretaries)

• Coordinated efforts raised our application % up to 72% by Nov. 15th, and by the end of the SY we were at 78.6%, down 1.2% from 2011.

• Now averaging ~2,500 MORE meals/day than before CEO DESPITE declining enrollment!
Today’s Panelist

Penny Holt
Food Service Director
Paducah Public Schools
KY
PADUCAH PUBLIC SCHOOLS-PADUCAH KY

• 3132 students enrolled - Head Start - 12 Grade

• Six schools-three elementary schools, one middle school, one high school and one alternative school

• Paducah Public Schools became a CEP District in 2011
Application for Socio-Economic Status

• Under the Community Eligibility Provision, KY districts must collect an alternative income form - Household Income Form (HIF) - as opposed to the traditional free/reduced meal form.

• In the state of Kentucky personnel other than food service employees must administer and verify HIF forms. Our district appointed a FRAM coordinator to handle the HIF form and procedures related to maintaining all data related to student socio economic status. In our district, the coordinator works directly under the Director of Pupil Personnel.

• HIF forms are not used for Title I funding allocations. Instead, each school’s ISP multiplied by 1.6 (capped at 100%) is used.
CEP PROS

• ALL STUDENTS EAT AT NO CHARGE - ADVERTISE THIS FACT IN YOUR COMMUNITY AS MUCH AS POSSIBLE AND EMPHASIZE THAT BREAKFAST AS WELL AS LUNCH IS AT NO CHARGE

• Directly Certified students do not have to complete a HIF form - reduces form processing and record maintenance

• More students will participate in the food service meal program which enhances student performance

• Reduces paperwork for both the food service operation as well as families. Under traditional programs a meal application as well as a fee waiver form was required. The HIF form serves to provide information for all aspects of determining student socio-economic status.
**CEP TIPS**

- To help with understanding how CEP works and the transition of responsibility with HIF forms, organize meetings with district officials and personnel.

- Although in Kentucky food service personnel is not allowed to process or maintain HIF forms, we answer questions and help FRAM personnel as much as possible to get started with the process.

- There are really only positives to this Provision when all aspects are explained and worked through properly.
Thank You

Archives, CEU information, and other resources available at www.schoolnutrition.org/webinars