ASK AWAY THURSDAY Community Eligibility Provision (CEP) Q&A

July 30, 2020

1. Q: This is my second year of CEP. Do I need to send income applications to the parents/guardians?

   A: If you are in your second year of CEP, you will be providing meals to children at no charge; therefore, an Application for Free and Reduced-Price School Meals/Milk is NOT required.

   However, since income data is used as a proxy for many education and other purposes in New York State, a sample prototype is provided for this purpose. Schools can choose to collect this information using a different process as collection of this information is not required for Child Nutrition Program purposes. This is the link to the Household Income Eligibility Form if you choose to use this template.

   English http://www.cn.nysed.gov/common/cn/files/spohouseholdincomeform.pdf

   Spanish http://www.cn.nysed.gov/common/cn/files/spoincomeappspanish.pdf

2. Q: Is there a new CEP household income eligibility form on the SED website or do we use the same form we have used the past three years?

   A: No, we do not issue a new form each year, therefore, you can use the same form as previous years. We have a prototype household income eligibility form on our website (see links below.

   English http://www.cn.nysed.gov/common/cn/files/spohouseholdincomeform.pdf

   Spanish http://www.cn.nysed.gov/common/cn/files/spoincomeappspanish.pdf

3. Q: Is it too late to apply for CEP for 2020-2021?

   A: We are accepting CEP applications until August 31st. Just a reminder that the Direct Certification Matching Process (DCMP) data that you'll be using for your enrollment records will only be available until August 10th, so you'll need to pull your enrollment record data before August 10th, even though the application isn't due until August 31st.

4. Q: I am beginning the fourth year of my CEP approval. Can I reapply now if I am still at 100%?

   A: If you are still at 100% in year 4, you do not need to reapply. If your identified student percentage (ISP), has gone up, even slightly, you can reapply and receive another 4-year cycle. This is true regardless of what year within the 4-year cycle you are in.

5. Q: Is the 40% ISP the first measure of qualification?

   A: Yes. If the school or group of schools meets the 40 percent ISP threshold you are eligible to apply for CEP.

6. Q: If I am in the fourth year CEP, do I use the April 1st enrollment numbers and status?

   A: For the 2020-2021 school year, USDA provided a nationwide waiver to extend certain CEP deadlines. This includes the enrollment data, which can now be pulled from any time between April 1st and June 30th.

7. Q: Where do I access the DCMP data on the Child Nutrition (CN) website?

   A: To access your DCMP data, you will go to the business portal and you will access it through the New York State Student Identification System (NYSSIS) application. The business portal is on the top right corner of our website (the blue box). It requires a different username and password than CNMS (where you access your claims, your verification, your SNAP and Medicaid reporting). If you need an account updated or created for you in the business portal, you will need someone within your district to do that, usually it is your superintendent, authorized official or principal. We are not able to do that in our office.

8. Q: Is the Planning and implementation Guidance found at http://www.cn.nysed.gov/common/cn/files/cep-planning-and-implementation-guidance.pdf the best place for guidance?

   A: Yes, it is the best place. Also, you can find the new CEP information and the deadline guidance here: http://www.cn.nysed.gov/content/CEP.

9. Q: We have not provided meals since March; will this affect our CEP in September as far as filing a claim?

   A: This should not affect you claiming for CEP for the 2020-2021 school year. If you do have issues with claiming, contact your CN representative.

10. Q: When do we need to inform parents?

    A: You should be informing parents that you will be operating CEP before the beginning of the school year or upon approval by sending the parent letter, which can be found in our guidance:

    http://www.cn.nysed.gov/file/special-provision-option-p2-non-base-year-and-cep-only-parent-letter

11. Q: If we end up doing all virtual or hybrid this school year, can we still operate CEP, or would we have to run under SSO?

A: Currently, SSO will NOT be an option for this school year. You will be operating the National School Lunch and/or School Breakfast Programs. CEP will still be allowed. We understand that schools are trying to figure out how they are going to operate in the fall. Whether the SFA returns to school fully, hybrid model, or remotely, the SFA may operate CEP. If the student is learning remotely, you still will be responsible to have a system in place to take accurate meal counts and have accountability for all meals that you are providing.

12. Q: Is there anyone available to walk me through the application process?

A: If you know who your CN representative is, you can email them, and they will help you walk through the application. If you do not know, please email cn@nysed.gov and the email will get forwarded to your representative.

13. Q: Do we have to physically mail the parent letter and household income eligibility form, or can we just post them on our webpage?

A: The letters may be distributed by mail, email to the parent or guardian and/or included in an information packet provided to the students.

14. Q: If my district completes a download in August, using the 2020-2021 DCMP data, and the district is now found to be over 40%, can the district apply for CEP for this year or does it have to wait until next year to apply?

A: If the district completes the download by August 10, 2020, the district can apply for CEP by August 31, 2020. If the DCMP download occurs after August 10, 2020, after the 2020-2021 DCMP data is posted, the district will need to wait until spring 2021 to apply.

15. Q: When will the DCMP student status for 20-21 SY be uploaded onto the SED website?

A: It will be available after August 10, 2020. We will post a notice on the website when the rollover is complete. Again, you have until August 10th to access your CEP enrollment data to apply for the 2020-2021 school year.

16. Q: If a District has both CEP and standard counting and claiming, would the district use the same household number for both applications?

A: Districts may opt to use the Application for Free and Reduced-Price School Meals/Milk to collect household income information from students in both CEP and non-CEP schools to streamline

information collection. A school using a single form must ensure that all information required for non-CEP schools is contained on the form. The following details the requirements for Partial CEP Districts using a single form.

Single forms developed for this purpose must:

- Contain all information required on the school meals application;
- Include a clear, concise, and prominent disclaimer to indicate that, in CEP schools, receipt of school meals does not depend on households returning the form; and

SFA's opting to use a single form must be able to:

- Distinguish between forms from students in CEP vs. non-CEP households so the SFA can comply with Program requirements related to household applications (e.g., only non-CEP applications are used for selecting the verification sample, conducting an independent review of applications, and the Certification and Benefit Issuance portion of the Administrative Review); and,
- Cost-allocate expenses for form processing; costs for form processing for students in CEP schools may not be paid from the nonprofit school food service account.

17. Q: Do charter schools located in NYC qualify for CEP even if they do not use NYCDOE School Food?

A: All SFAs are eligible to apply for CEP if they meet the required ISP. This includes NYC charter schools operating independently and not receiving food from NYCDOE School Food.

18. Q: We are in our second year of CEP. What forms or steps are needed to submit to the CN office?

A: If you are in your second year there is no application process. You are required to complete your SFA Annual Renewal. Your SFA will also be required to conduct at least one direct certification data match in the 2020-21 school year and to report the number of SNAP and Medicaid matched eligibles, by recipient agency (RA), to SED by November 30 for federal reporting purposes on the FNS 834 Direct Certification Rate Data Element Report.

19. Q: School year 2020-2021 will be our 4th year of CEP. Can we wait until the end of this school year to reapply?

A: Yes. If you will be operating your 4th year of CEP, you will continue CEP for the 2020-2021 school year and reapply in spring 2021.

20. Q: When we download the charter school data, the SIRS number and student information on the direct certification seems outdated, for example students by age mixed with information.

A: We use the same system that NYSED P-12 enrollment data is reported through for the Student Information Repository System (SIRS). The SNAP and Medicaid data is run through a matching engine that uses historical P-12 data to find probable student matches; therefore, the direct certification data could be matched to an enrollment record for a student who is no longer enrolled in your District or school. If you believe that there are errors in enrollment data, you will need to notify your contracted Level 1 host.

21. Q: Is Provision 2 like CEP?

A: In both programs, there is less of an administrative burden and students receive meals at no cost. In general, the similarities end there. Please review the guidance below or you can contact your Child Nutrition Program representative for assistance.

Provision 2 Guidance: https://fns-prod.azureedge.net/sites/default/files/Prov2Guidance.pdf

CEP Guidance: http://www.cn.nysed.gov/content/CEP

22. Q: How do you keep track of meals once you have been approved for CEP?

A: Consistent with the Federal regulations at 7 CFR parts 210.7(c) and 220.11, any institution participating in the Federal school meal programs is required to take an accurate count of reimbursable meals served to students at each meal service. Schools implementing CEP do not need to track the number of meals served by free, reduced or paid category since meals are provided at no charge to all students. Accurate meal counts may be achieved through a variety of methods. .

23. Q: If we use paper rosters to serve meals outside the cafeteria can we enter them as bulk sales per day or do we have to track each meal individually as we do in the cafeteria?

A: For CEP, you can enter them as bulk meals before the accountability system is closed out for the day.

24. Q: How does the DCMP roster get updated? How do bulk matches work?

A: If you are accessing the direct certification data, you have three options. We first suggest you go to your state matches to see how many matches you find there. Then, if there are students that are not in your state matches, we would suggest that you go to search. You can search individually, or you can do a bulk search. Bulk search allows you to upload a roster of your enrolled students. The system compares your uploaded roster to the SNAP and Medicaid records to determine if there are any potential matches. You can download the potential matches and then it is the responsibility of the SFA to certify the potential matches. Please note that once you have uploaded a roster, the system will continue to compare your original upload to each SNAP and Medicaid file as they are received throughout the

school year to see if there are any new potential matches. Any updates to potential matches will display in the potential number of candidates on your bulk upload view. The only time you would need to upload a new roster for matching purposes would be if you have new students. In that case, we suggest you upload a roster of the new students only, not the entire enrollment.

25. Q: Are out of district students counted in the application process?

    A: If those students have access to either breakfast or lunch within your district, then you should include them in your enrollment and in your ISP. If they do not have access to either breakfast or lunch in your district, then you would NOT include them.

26. Q: Is it a problem if not all schools are included in the CEP application process? We have one school where the enrollment does not meet the 40% threshold.

    A: You do not have to apply for all your schools. You may apply SFA wide, for one building, or a group of buildings. However, if you have one building that is not at 40%, you should consider grouping it with other buildings as long as that group or entire SFA meets that 40% threshold.