

Provision 2 (P2)

General Information

The Provision 2 (P2) is a meal service option for School Food Authorities (SFA) to serve breakfast and/or lunch at no cost to all enrolled students while reducing the burden of collecting household applications to once every 4 years and simplifying meal counting and claiming procedures by allowing meal reimbursement to be based on claiming percentages.

Application

SFAs must [apply](#) for schools to operate P2 and obtain approval from the New York State Education Department (SED) before implementation.

Base Year

During the first year of P2, the school serves all student meals at no charge regardless of their free, reduced price or paid eligibility category. However, the SFA is required to make individual student eligibility determinations for free and reduced-price meals (income applications, direct certification, other source categorically eligible) and conduct verification procedures. Meals are counted at the point of service and claimed monthly by category.

Since base year claims are the source of subsequent year claiming, it is essential that base year eligibility certifications, meal counts, and funding levels are accurate. During the base year, SED will conduct a review of certifications and federal benefit issuance. This review may be conducted in conjunction with the Administrative Review or through a desk audit (on-site or off-site).

Duration and Extensions

Monthly funding levels established in the base year are used in the subsequent three years.

At the end of the 4-year cycle, a 4 year extension, to allow the base year funding levels to continue will be provided when the income level of the school's population, as adjusted for inflation, has remained stable, declined or had only negligible improvement since the base year. If an extension cannot be provided, the affected schools operate a streamlined base year, or start a new base year.

Claiming and Reimbursement

Schools participating in P2 must provide access to the program(s) approved (breakfast and/or lunch) for all students during each school day. Meals are counted at the point of service. In the base year, meals are claimed monthly by student eligibility category. In non-base years, total meals served by type (breakfast, lunch) are counted and claimed monthly. Schools may not claim reimbursement for additional meals served to students, or for meals that do not meet the meal pattern requirements.

As of school year 2025-2026, the State reduced-price and paid reimbursement rates will provide the difference between the federal reduced and paid rates. This ensures that all P2 meals are reimbursed at an amount equal to the total state and federal free reimbursement rate.

Monthly funding levels are set during the base year based on the eligibility certifications of participating students. For non-base years, monthly funding levels are determined by applying the percentages of free, reduced-price, and paid meals served in the corresponding month of the base year to the total meal count for the claiming month.

After-School Snack Program in P2 Schools

Schools that participate in the afterschool snack program serve reimbursable snacks to every student at no charge. For P2 schools, snack claims will be reimbursed according to the school's snack needy status. Schools that qualify as snack needy are reimbursed for all snacks at the federal free rate. P2 schools that do not qualify as snack needy (non-snack needy) are reimbursed for snacks based on the approved P2 claiming percentage.

Snack Needy Eligibility (Area Eligible)

In the first year of P2 participation, schools are considered snack needy if at least 50% of students enrolled in the school during the previous school year were eligible for free and reduced-price lunch in October. Once established, snack needy eligibility is effective for a period of five years.

If a school is not eligible for snack needy during the first year of P2 participation, snack needy eligibility will be determined through CNMS annually until such time the building is eligible. The school or site may also be considered snack needy if it is located in the attendance area of another school in which at least 50 percent of the children enrolled at the school are certified as eligible for free or reduced-price lunch.

Claiming Snack

For snack needy schools, the SFA will enter the total number of monthly snacks served by building into CNMS. All snacks claimed for snack needy schools will appear in the free reimbursement category.

Non-snack needy schools in their base year of P2 must enter snacks into the appropriate claiming category be eligibility (free, reduced, or paid). In non-base years, the SFA will enter the total claim number and CNMS will automatically distribute the claim to the appropriate claiming category based on the monthly lunch P2 claiming percentages. Claiming instructions can be found [below under Attachments](#).

Data Matching

SFAs operating P2 are required to conduct at least three direct certification data matches each school year and report the number of SNAP and Medicaid matched eligibles, by building, to SED with the September reimbursement claim.

Public Notification

At the beginning of the school year, the SFA must notify the media and distribute a letter to parents/guardians about the availability of school meals at no charge. The SFA may use the non-pricing public release, which indicates that the school will not be charging any child, regardless of eligibility category, for meals.

Documentation Retention

The SFA will retain specified base year records for the entire period that the school operates under P2, plus three years, or longer if there are audit findings and until resolution of the findings.

Collection of Income Information from Families for Other Federal, State and Local Funding/Reporting

Since income data is used as a proxy for many education and other purposes in New York State, a sample prototype CEP and P2 Household Income Form is provided for this purpose. However, schools can choose to collect information using a different process as collection of this information is not required for Child Nutrition Program purposes.

The collection and certification of the CEP and P2 Household Income Form or other SFA created form, cannot be charged to the Child Nutrition Programs and therefore must be supported/funded by the General Fund or other alternative non-federal funding.

The CEP and P2 Household Income Form cannot be used to determine a student's eligibility for free or reduced-price meals.

If you have any questions regarding this memo, [please contact your Child Nutrition Representative](#).