



Community Eligibility Provision FAQ

CEP Participation

Is a district/school required by law to implement CEP?

No. Although this program is now being offered nationwide, participation at the district/school level is completely optional.

How does a district/school indicate its interest in participating in CEP?

It will enroll using the regular application packet via the Tennessee Meals, Accounting and Claiming (TMAC) system.

CEP and Pre-K/Head Start Programs

Will CEP enrollment affect identification for Pre-K eligibility?

No. Determination for eligibility for the Voluntary Pre-K program in Tennessee is application based. For questions on Pre-K eligibility, contact Connie.Casha@tn.gov.

Are all Pre-K students considered direct certified?

No. Pre-K students are treated the same as all students for CEP. Some students may be direct certified while others may be eligible as determined by the application process.

If a district/school has a pre-K program that is not a Head Start pre-K, can it still include the pre-K students in the enrolled and or identified student count (as applicable)?

Students in Tennessee's Pre-K are not automatically eligible for free lunches; they must be directly certified or complete an application. In order to receive free or reduced meal benefits, they must be included in enrollment and identified students as applicable.

Direct Certified Data

What direct certified data will a district/school use if it begins implementing the Community Eligibility Provision (CEP)?

A district/school will use the direct certified data as of April 1 of the school year prior to implementation. For example, for the 2015-16 school year, a district/school would use the direct certified data collected through the March 2014 claiming process.

Do charter schools in a district participate as part of the community program or as individual schools?

It depends whether the charter school is operating as an independent entity (school food authority) or as a part of a school system. If a charter school is acting independently, it will



use the data it has gathered. If a charter school is operating as a school within a LEA, it will use the data for the school or other schools within the district.

Household Information Survey

Where can my district/school obtain a copy of the State Household Information Survey?

This form is in the CEP District Toolkit located on the department website (available in English and Spanish) at <http://www.tn.gov/education/article/community-eligibility-provision-cep>.

Why is a new Household Information Survey being released?

The Household Information Survey uses the USDA income guidelines which may change each school year. The form was updated to reflect the recently released USDA income guidelines for the 2015-16 school year.

Secondly, the format of the Household Information Survey was changed based on feedback that the department received last year, including during the 2014 CEP Listening Tour. A survey was sent to participating CEP districts with three sample forms, and the most popular version is being implemented for the 2015-16 school year.

The revised Household Information Survey addresses three common issues shared across districts:

1. Asks parents to list the student's name as listed on his/her birth certificate.
2. Removes the sentence "One form per household."
3. Asks parents to write in their household size and check the appropriate income box.

Why is the form locked?

To comply with data request requirements and to ensure the consistency of information across Tennessee, the Household Information Survey was created in a restricted Word document to lock certain fields while allowing districts and schools to modify the organization information. The only editable area is the top block which can be updated with the district/school information as appropriate.

Can districts/schools create alternate versions of the Household Information Survey?

Yes, districts/schools may create an alternate version of the Household Information Survey including creating electronic/digital forms. However, staff members can change only the format, layout and/or medium; they cannot add, remove or change any of the information requested. All alternate versions must first be approved by the department before use,



and the department logo must remain on the form. Please send requests to use an alternate form to Jacki.Wolfe@tn.gov.

Is information available to assist non-school nutrition staff in determining if a student meets the income guidelines for at-risk/economically disadvantaged?

The economic data in the Household Information Survey have traditionally been captured from the free and reduced price lunch application and processed by school nutrition staff. Page three of this document is designed to assist non-school nutrition staff with this process.

Who should process the Household Information Survey? Can my school nutrition staff process the Household Information Survey?

This is a local decision; however, any employee paid 100% from school nutrition funds cannot collect or process the Household Information Survey. During the 2014 CEP Listening Tour, several districts shared that they allocate a small amount of non-USDA funds to their school nutrition personnel to do this work as these staff members are experienced with income guidelines and determinations. This is allowable.

Is there anything that districts/schools can do to assist non-school nutrition staff with this process?

One best practice shared during the 2014 CEP Listening Tour is to use the Household Information Survey guide to conduct a brief training session for all staff members who input this information into the local student management system. This allows districts the opportunity to ensure that the process was understood by all; it also provides for time to address questions with the entire team and communicate a consistent method to be used across the district.

My district/school is not enrolling in CEP. Do we have to collect the Household Information Survey?

No. Districts/schools not participating in CEP will continue current practices (i.e. collecting free and reduced price lunch applications).

Are the Household Information Surveys subject to school nutrition administrative review?

Because the Household Information Survey is not used to determine eligibility for meal services, it is not subject to the school nutrition administrative review. However, it may be reviewed during general school audits.

Do district/school personnel need to verify the income?

There is no requirement to verify the income listed on the Household Information Survey.

Will school nutrition audit the Household Information Survey?

No. The Household Information Survey is not used to determine eligibility for meal services. As a result, it is not subject to the school nutrition administrative review. However, it may be reviewed during a general school audit. It is important that the form is signed by the parent/guardian.

How long must districts/schools retain the Household Information Survey?

While there is no record retention requirement for the Household Information Survey specifically, we strongly encourage districts/schools to retain them for at least five years as many use the economic information from the survey for various federal poverty reports.

Percentage Changes

If a district/school has enrolled in CEP and decides to update its identified student percentage, does that update begin a new four-year cycle?

No. These updates occur within the four year cycle.

If a district's/school's direct certified percent increases within the 4 year cycle, will the CEP claiming percentage automatically increase accordingly or will the district/school remain at the original claiming percentage determined at the time of application?

No. The CEP claiming percentage will not automatically increase if a district's/school's identified student percent increases. It will remain at the original claiming percentage determined at the time of application unless the district/school requests an update.

Will the multiplier change during the four year cycle?

Once enrolled, a district/school will maintain the same multiplier throughout the entire four year cycle.

Student Identification Codes

If the district/school chooses to enroll in CEP, does the school use the "X" or "Y" classification codes its student identification system (SIS) to identify free or reduced price lunch?

No. They will use the "3/CEP" to indicate a student meets the definition of "economically disadvantaged" as determined by the Household Information.

Is the "3/CEP Eligible" code linked to school nutrition?

This designation of "3/CEP eligible" is not a school nutrition code. This is a student classification code that indicates a student meets the definition of being economically disadvantaged as defined in Tennessee Code Annotated based on the information



provided on the Household Information Survey. It has no impact on or relation to the school nutrition program.

Should districts/schools use the “3/CEP Eligible” designator if a student is directly certified through other methods such as migrant, homeless or runaway?

It is at the district’s/school’s discretion as to if it will select the “3” in its student information system (SIS) **in addition to** indicating a student is migrant, homeless, runaway and/or direct certified. However, the “3” should not be used in lieu of indicating a student is migrant, homeless, runaway and/or direct certified as the data from these student classifications is used for other funding decisions and reports.

What if a student is directly certified through SNAP, TANF and/or is foster certified?

Districts will use the “J” classification code to identify students who are direct certified by way of SNAP, TANF or are foster certified. You can read more information about this in the August 19, 2015 [memo](#).

What if a student is directly certified by “extended benefits” (i.e. a sibling is directly certified)?

Please work with your school nutrition team to identify students who are directly certified by extended benefits. These students should also be identified in your student information system using the new direct certified code mentioned above.

Where can I find the “3/CEP Eligible” classification code in my SMS?

Please contact the vendor of the local student management system as the location varies by product.

Reimbursements

Is reimbursement per day or per meal?

Reimbursement is per meal served.

What is the reimbursement rate? Is it the same for breakfast and lunch?

The reimbursement rate is different for breakfast and lunch. The current reimbursement rates are on the U.S. Department of Agriculture site <http://www.fns.usda.gov/cnd/Governance/notices/naps/NAPs.htm>

Is dinner included as a reimbursable meal under CEP?

No. However, the CEP free claiming percentage may be used when determining school or site eligibility for other School Nutrition Programs such as the Fresh Fruit and Vegetable program, Afterschool Snacks and the Seamless Summer Option.



Are schools enrolled in CEP allowed to charge for a la carte items? What about second servings?

Consistent with current practice, all schools, including CEP schools, must charge for a la carte items and second meals.

The menus/servings must be planned to serve one meal per child per meal service (breakfast, lunch). No schools, including CEP schools, may provide a second serving or second meal for free.

Title I and E-Rate

How will a district determine within-district Title I allocations among schools?

Districts will use the free and reduced price data from the 2014-15 school year to make school level allocations for the 2015-16 school year. The department will continue to provide guidance on determining school level allocations for future school years.

How will a district/school determine its E-rate discount?

The Federal Communications Commission, which sets policy for the E-rate program, set new rules that require school districts to determine the E-Rate discount at the district level rather than the school level. Refer to the USDA memo [SP 08-2015](#), which was released on November 21, 2014, for more information.