

# **Title I and Community Eligibility Provision Frequently Asked Questions**

**1. Q: What is Community Eligibility Provision or CEP?**

**A:** Community Eligibility Provision (CEP) is an alternative way to serve universal free breakfast and lunch to all students in high poverty districts and schools. This program requires schools to offer breakfast and lunch but will allow individual schools to count and claim meals without the normal free and reduced application process. Schools that participate in CEP will no longer be required to collect Free and Reduced Price School Meals Family Applications to determine student eligibility for free meals. Meals will still need to be counted at Point of Service (POS), but just total meals, not meals by eligibility category.

**2. Q: How can we qualify?**

**A:** Any school building that has an Identified Student Percentage (ISP) of 40% or more, according to the building-level data reflective as of April 1 of a given year, will be eligible to participate in the following year. The percentage is calculated by taking all directly certified students and dividing by the student enrollment. Districts can participate in a variety of ways: by individual school building ISP, groups of schools' combined ISP, or by an entire district's combined.

**3. Q: What are the advantages of CEP?**

**A:** The advantages include:

- All students receive free breakfast and lunch
- Faster moving lunch lines
- Improves nutrition to students at-risk
- Reduces paperwork at the school district level
- Simplifies meal counting and claiming
- Increases breakfast and lunch participation

**4. Q: What are “identified students”?**

**A:** “Identified Students” refers to all students that are certified for free meals by any means other than the submission of individual paper applications. This definition includes students directly certified: Federal Head Start, Food Distribution Program on Indian Reservations (FDPIR), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance for Needed Families (TANF), as well as students identified as homeless, migrant youth, runaways and foster children certified through means other than an application. Students who are categorically eligible based on submission of a free and reduced price application are not included.

**5. Q: Do reduced-priced students count as “identified students”?**

**A:** No, “Identified Students” are students that are eligible for free meals without the need for a Household Application for Free and Reduced Price Meals. This group consists of students that are eligible for free meals through direct certification: homeless, migrant, runaway, Federal Head Start, TANF, SNAP, FDPIR, and Medicaid.

**6. Q: Do I have to have all schools within my district participate in the CEP?**

**A:** No. Districts can elect to have one school, a group of schools, or the entire school district participate.

**7. Q: How will districts be reimbursed for meals if the calculated participation rate is less than 100%?**

**A:** Districts will be reimbursed by multiplying their ISP by the United States Department of Agriculture (USDA) authorized factor of 1.6 to determine the percentage of free meals. If the percentage is less than 100% free meals, the district will be required to pay the remaining percentage from non-federal sources.

**8. Q: When using National School Lunch Program (NSLP) data as a poverty measure for Title I, which types of NSLP data may be included?**

**A:** Different combinations of available NSLP data may be used as a poverty measure for Title I purposes. For example, NSLP data might include a combination of data from household applications in addition to direct certification data. NSLP data might also include only free meals data identified through household applications and direct certification data. Finally, NSLP data might only encompass direct certification data for all schools, even non-CEP schools. This option would provide a consistent poverty measure for all schools in the district and would reduce the paperwork burden on schools, districts and families.

**9. Q: How does a district allocate Title I funds to schools when it has CEP and non-CEP schools?**

**A:** A school district with some CEP-participating and non-CEP-participating schools must establish a way to determine poverty rates for all schools on an equal basis. According to [ED's Guidance](#), a school district may do this in one of two ways:

1. The district may use poverty rates, as determined by approved participation in the federal school meals programs, for its non-CEP schools; for its CEP schools, the district would multiply the number of students directly certified for the meals program ("Identified Students") by the USDA multiplier of 1.6.
2. A district may also use direct certification numbers only for all schools.

[Guidance: The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of the 1965, As Amended](#), Question 18.

**10. Q: If a district has only CEP schools, does it need to apply the 1.6 multiplier for Title I ranking and allocation purposes?**

**A:** No. If a district has all CEP schools, a district does not have to apply the 1.6 multiplier to schools' direct certification data. The district may rank its schools by the percentage of directly certified students in each school.

[Guidance: The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of the 1965, As Amended](#), Question 19.

**11. Q: If the application of the 1.6 multiplier results in more than one school at 100 percent poverty, must a district allocate the same per-pupil amount to each of these schools?**

**A:** Not necessarily. At its discretion, a district may take into consideration the direct certification poverty percentage of each of these schools. Still under ESSA Section 1113, no school with a 100 percent poverty rate, including the multiplier, may receive less per pupil than non-CEP school with a lower poverty rate. All CEP schools with equal direct certification rates must receive the same per-pupil amounts.

[Guidance: The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of the 1965, As Amended](#), Question 20.

**12. Q: If a district chooses to group CEP schools to determine the reimbursement rate from USDA, does each school in a group then have the same poverty percentage for Title I ranking and allocation purposes?**

**A:** Schools must be ranked individually for allocation purposes. The CEP permits districts to determine direct certification rates for schools individually, for groups of schools, or districtwide. But under [ESEA Section 1113](#), all schools must be ranked by poverty individually.

[Guidance: The Community Eligibility Provision and Selected Requirements Under Title I, Part A of the Elementary and Secondary Education Act of the 1965, As Amended](#), Question 21.

**13. Q: If a district traditionally established a cut-off above which Title I eligible schools are served, does the district have any options if the use of CEP data increases the number of schools above the cut-off?**

**A:** Yes, the district has several options. One option, and perhaps the most straightforward option is for a district to raise its cutoff point. For example, if a district's policy was to serve all schools above 60 percent poverty, the district could choose to serve schools above a higher poverty percentage (e.g., 67 percent).

For the sole purpose of within-district Title I allocations, a second option would be for an district to use, as authorized by section 1113(a)(5) of the ESEA, another allowable poverty measure or combination of measures to rank its schools that might result in fewer schools above its cutoff.