

# Community Eligibility Provision Workshop



**Sponsor Workbook**

**August 4, 2015**

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# CEP Timeline of Events

## July

- Publicize the CEP media release in venue of your choice: newspaper, radio, television, or any combination of these.
- Market the CEP program on your website, school flyers, open houses, etc.
- Ensure there are 2 CEP posters per site; one in the cafeteria, and one near the school entrance.
- Communicate with principals, DPPs, and district leadership on CEP with the intent of increasing meal participation.
- (*Partial CEP Districts*) Process all household applications—including mixed CEP households.
- Follow guidelines on synchronization of meal status between POS and Campus.

## August

- Obtain signed and dated runaway/homeless/migrant lists from district coordinator; enter these in POS and Campus as directly certified (DC).
- Import the August DC file. Inform the FRAM Coordinator of import and that data synchronization has been properly set up. FRAM Coordinator can begin processing HIF forms.

## October

CEP schools do not conduct verification reporting. However, CEP districts complete sections 1-2, 2-3, 3-1, and 5-1 in CNIPS.

## November

- Report site enrollment (aka October qualifying data):
  - **Full CEP:** Report the Free % by multiplying each site ISP by 1.6 and apply this figure to the current October enrollment number to estimate the number of children approved for Free Lunches. CEP sites will not report Reduced Price data.
  - **Partial CEP:** For the CEP sites, report as instructed above, for the Non-CEP sites report Free, Reduced, and Paid status for Site Enrollment (October qualifying data).

## April

- Report April DC numbers.

## Daily

- Complete the “Edit Check Worksheet for CEP Schools” (unless your system has been modified to compare the number of total meals served to the number of attendance adjusted enrollment).
- Assist FRAM Coordinator with assigning an SES status for runaway, homeless, and migrant students.

## Monthly

- Import the monthly DC file into your POS and Campus.
- Enter claim in CNIPS by 15<sup>th</sup> of each month.
- Ensure your Closing Bank Balance does not exceed the 3-month operating expense.
- *Best Practice:* In partial CEP districts, share the POS roster of free/reduced students who attend CEP schools with the FRAM Coordinator. He/she can use this information and forego processing the HIF form.

## Annually

- Re-apply for CEP on your NSLP application in CNIPS.

# CEP Calculator

## Instructions for CEP Monthly Federal Reimbursement Estimator

### **Step 1: Calculating the Identified Student Percentage (reflective of April 1)**

1.1 Enter the total number of identified students reflective of April 1. Identified students are defined as the students certified for free meals not through the submission of individual applications. This definition includes students directly certified through SNAP, TANF, and FDPIR participation, and homeless on the liaison list, Head Start, pre-K Even Start, migrant youth, runaways, and non-applicants approved by local officials. Foster children certified through means other than an application are also included (7 CFR 245.6a(c)(2)).

Students who are categorically eligible based on submission of a free and reduced price application (e.g., submitted an application with a SNAP number on it) are not included.

1.2 Enter the total student enrollment reflective of April 1.

### **Step 2: Federal Reimbursement Rates**

Use the drop down menus to select your current free and paid reimbursement rates for the NSLP and SBP.

- The reimbursement rates table is unprotected and may be updated each year.
- If you do not know your reimbursement rates, click on the link in the upper right corner of the worksheet for assistance.
- If your reimbursement rate is not listed in the drop down menu, enter your reimbursement rate in the table in the lower left of the worksheet. Enter reimbursement rates in blank cells under "----OTHER----". Once entered into the table, select your reimbursement rate from the drop down menu under the "OTHER" header.

If your School Food Authority is certified to receive the 6 cents performance-based reimbursement, select \$0.06 from the drop down menu.

### **Step 3: Monthly Meal Data**

3.1 Enter the total number of lunches served in a month for the local educational agency, school, or group of schools considering the Community Eligibility Provision.

3.2 Enter the total number of breakfasts served in a month for the local educational agency, school, or group of schools considering the Community Eligibility Provision.

### **Step 4: Anticipated Participation Change Due to Serving All Free Meals**

4.1 If you anticipate that participation will increase or decrease due to all meals being served free, enter the estimated percent change in participation. For more information regarding CEP impacts on student participation, see the CEP Evaluation Study.

**Results**

The LIGHT GREEN box in the middle right hand side provides an *estimate* of monthly Federal reimbursements (monthly totals and per meal) under CEP, based on data entered in steps 1-4 above.

**Optional Comparison:**

**Federal Reimbursement + Student Payments (non-CEP) vs. Federal Reimbursement under CEP**

This section displays the estimated difference between the *estimated* Federal reimbursement operating under CEP and the current Federal reimbursements and student payments (if applicable).

Enter current monthly Federal reimbursements plus student payments (add together and enter a total) revenue for both breakfast and lunch.

**Results**

If the differences boxes in the lower right are bright green, then CEP is *estimated* to generate the same or more Federal revenue. If the differences boxes in the lower right are red, then current procedures generate higher Federal revenue. LEAs will need to assess the availability of non-Federal sources to cover any meal costs above the Federal reimbursements.

Community Eligibility Provision (CEP) Monthly Federal Reimbursement Estimator			
Use to <i>estimate</i> the level of Federal reimbursement received under the CEP			
District Name:			
<b>Step 1: Calculating the Identified Student Percentage</b> If grouping schools, use the grouping calculator to assist in determining 1.1 and 1.2. Enter the number of identified students and enrolled students that is reflective of April 1 <sup>st</sup> in 1.1 and 1.2 <a href="#">Click to define Identified Students</a>		<b>Step 2: Federal Reimbursement Rates</b> Select the current reimbursement rates used for each program (without the \$0.06). The additional \$0.06 is applied in the next box	
1.1) Enter the number of identified students		Lunch	Breakfast
1.2) Enter the TOTAL student enrollment		Free	0 0
Percentage of identified students =	0.00%	Paid	0 0
**This percentage must be at least 40% to be eligible**		Select *\$0.06* if the SFA is certified for the additional \$0.06.	
Percentage of meals reimbursed at the Federal FREE rate =	0.0%	<input type="checkbox"/>	
Percentage of meals reimbursed at the Federal PAID rate =	0.0%		
<b>Step 3: Monthly Meal Data</b> Enter in the number of LUNCHES and/or BREAKFASTS served in a month in 3.1 and 3.2		<b>Estimated CEP Monthly Federal Reimbursements</b>	
3.1) Enter the total number of LUNCHES served in a month:		Reimbursement for LUNCH =	\$0.00
3.2) Enter the total number of BREAKFASTS served in a month:		Reimbursement for BREAKFAST =	\$0.00
Total number of MEALS served in a month:	0	Total Reimbursement Level =	\$0.00
Step 4: Anticipated Participation Change due to serving all FREE meals (for example enter 2 for 2%):	NLSP SEP	Federal Reimbursement per LUNCH =	\$0.00
number of LUNCHES reimbursed at FREE rate =	0	Federal Reimbursement per BREAKFAST =	\$0.00
number of LUNCHES reimbursed at the PAID rate =	0	Optional Comparison: Enter current monthly Federal reimbursements and student payment revenue	
number of BREAKFASTS reimbursed at FREE rate =	0	LUNCH =	
number of BREAKFASTS reimbursed at the PAID rate =	0	BREAKFAST =	
CEP Difference:		LUNCH	Total

# Division of School and Community Nutrition

## Community Eligibility Provision (CEP)

### Eligibility Criteria and Pre-Implementation Steps

Shown below are the eligibility criteria to participate in the Community Eligibility Provision (CEP):

- The LEA reports April DC data per SCN data collection and reporting requirements. The deadline for reporting is April 15<sup>th</sup>.
- All eligible feeding sites are required to have a minimum percentage (40%) of identified students (either on an individual basis or by grouping with other eligible sites), who are directly certified for free meals through means other than individual household applications (i.e. students directly certified through the SNAP, KTAP, Medicaid, and the foster child monthly downloads, or on a certified list) in the school year prior to implementing the CEP provision.
- The LEA must participate in both the SBP and NSLP, providing lunches and breakfasts to all students at no charge.
- Financial viability of participating in CEP is the responsibility of the LEA. The USDA provides a financial calculator to assist districts in that decision making.

#### Pre-Implementation Steps

By participating in CEP, the LEA agrees to abide by the following policies and procedures:

1. The eligible LEA will **notify** SCN of their intent to participate in CEP on behalf of a single school, select group, or districtwide by May 15<sup>th</sup>. An SCN program consultant will be assigned to the district to assist with the application and approval process.
2. The LEA must submit documentation of school board approval (the form is provided below). This documentation will confirm the school board's approval and that the following will be implemented:
  - a. Cover with non-Federal funds any costs of providing free meals to all students that exceed the Federal reimbursement (e.g. a la carte sales, catering, district's general fund).
  - b. Eliminate collection of NSLP household applications for free and reduced price meals because meal reimbursement will be based on claiming percentages derived from the identified student percentage.
  - c. Appoint a FRAM Coordinator to distribute, collect, and process the household income form (HIF). Such processes will be developed and managed totally separate from the School Nutrition Program: no food service staff shall be used to process the HIF forms. It is expected that the form/request for household information for non-Program purposes would

clarify its purpose, and affirmatively state that receipt of school meal benefits would not be affected by a household's decision to complete and return the form/request. The Division of District Support provides a form for this use along with further guidance on CEP for districts: [http://education.ky.gov/districts/SHS/Pages/Community-Eligibility-Option-\(CEO\).aspx](http://education.ky.gov/districts/SHS/Pages/Community-Eligibility-Option-(CEO).aspx)

3. Updates to the NSLP Policy Statement and attachments from the district will be required (i.e. Meal Counting and Claiming). The Meal Counting and Claiming procedures must identify any alternative point of service system, must clearly demonstrate that accurate meal counting practices are instituted, provide a description of the procedures that will be used to ensure that there are no second meals counted for reimbursement, provide a description of the internal controls that will be employed to monitor for problems in the meal counting system and provide a copy of any forms that will be used.
4. The LEA must submit updates to the Policy Statement, complete the Sponsor Application Packet in CNIPS, and receive SCN's approval prior to implementation of the Community Eligibility Provision at the start of program year.
5. The LEA must provide and maintain documentation of training on the Meal Counting and Claiming procedures, complete any required USDA civil rights training, and applicable HACCP procedures with all applicable staff.

The LEA needs to notify SCN of their intent to participate with CEP by May 15<sup>th</sup>. While the decision to participate in CEP resides with the LEA, SCN is required to confirm the LEA's eligibility and that the criteria to participate have been met.

# CNIPS Decoded

*All CNIPS data reporting information will come from your Point of Sale (POS).*

<p><b>Application Packet: Sponsor Application</b>            Verification Question Set:</p> <ul style="list-style-type: none"> <li>• # 23 Hearing Official- N/A (if full)</li> <li>• #24 Determining Official- yourself due to DC List</li> <li>• #25 Verifying Official- N/A (if full)</li> <li>• #26- Verification Method- N/A (if full)</li> <li>• #27 Confirming Official- N/A (if full)</li> </ul>	
<p><b>Application Packet: Sponsor Application</b></p> <ul style="list-style-type: none"> <li>• #31- N/A (if full)</li> <li>• #35- Yes</li> <li>• #36- No (if full)</li> <li>• #37- No (if full)</li> </ul>	
<p><b>Application Packet: Site Application</b></p> <ul style="list-style-type: none"> <li>• #A7- Yes, CEP</li> <li>• Pricing- Non-Pricing</li> </ul>	
<p><b>CEP Schedule</b>            What is your First Year?             What is your Year Used?</p>	
<p><b>Community Eligibility Provision</b>            April 1<sup>st</sup> Reporting</p>	
<p><b>Site Enrollment Reporting</b></p> <p>For CEP Sites:</p> <ul style="list-style-type: none"> <li>• Enrollment(site ISPx1.6)= Free Students</li> <li>• Enrollment- Free Students = Paid Students</li> </ul>	

<p><b>Site Enrollment Reporting</b></p> <p><u>Directly Certified</u></p> <ul style="list-style-type: none"> <li>• Only CEP sites will complete this section.</li> <li>• Enter number of SNAP DC students on Oct. 31.</li> <li>• Enter all other DC students (KTAP, Foster, Medicaid, etc.) on Oct. 31.</li> </ul>	
<p><b>Verification Reporting</b></p> <p>Even though “verification” is not required for CEP Districts, Reporting IS!!!</p>	
<p><b>Verification Reporting</b></p> <ul style="list-style-type: none"> <li>• Sections 1 and 2: Student totals as of October 31st</li> <li>• Answer: 1-1, 2-3 (answer will be the same if FULL CEP)</li> <li>• Full CEP- Check box 3-1</li> <li>• Mixed Districts: Answer Only 3-2 and 3-3 for NON-CEP Sites</li> <li>• Full CEP Districts: Check box in 5-1</li> </ul>	

## Scope of the Administrative Review

Notes	Things to Do

# Meal Counting and Claiming Requirements

## Does Your Policy Pass the Test?

The Meal Counting and Claiming Policy is a written set of instructions for how all meals are counted and subsequently claimed for reimbursement. It is important to ensure that all procedures are clearly stated and in compliance with the appropriate regulations.

*Use this simple checklist to review your counting and claiming procedure!*

<b>Main Areas</b>	<b>Points to Cover</b>	<b>Necessary Updates</b>
<b>Documentation of Eligibility</b>	<ul style="list-style-type: none"> <li>• How does the point of sale identify a student's eligibility?</li> <li>• Direct Certification Documentation on file.</li> <li>• Free/Reduced Application on file (Traditional Schools only).</li> <li>• Benefit Issuance Document (BID) (manual or electronic).</li> <li>• Back-up BID process.</li> <li>• Updates to BID (enrollment, withdrawn, status change).</li> </ul>	
<b>Collection Procedures</b>	<ul style="list-style-type: none"> <li>• Medium of Exchange used to identify students on the BID.</li> </ul>	
<b>Point of Service</b>	<ul style="list-style-type: none"> <li>• Procedure to ensure meals:               <ul style="list-style-type: none"> <li>- meet the meal pattern;</li> <li>- are served to eligible students;</li> <li>- are counted daily by category.</li> </ul> </li> <li>• Cash on line procedure.</li> </ul>	
<b>Record of Daily Operations</b>	<ul style="list-style-type: none"> <li>• Procedure for counting the number of reimbursable meals.</li> </ul>	
<b>Claim for Reimbursement</b>	<ul style="list-style-type: none"> <li>• Procedure for the number of meals documented on the record of daily operations are combined or consolidated to generate a monthly claim for reimbursement.</li> </ul>	

<p><b>Internal Controls</b></p>	<ul style="list-style-type: none"> <li>• Procedures for Edit Checks (daily and monthly) to ensure: <ul style="list-style-type: none"> <li>- meal counts that exceed eligible students are documented;</li> <li>- constants counts are recognized;</li> <li>- extremely high meal counts are identified;</li> <li>- pattern counts are recognized;</li> <li>- served counts that equal delivery counts are recognized.</li> </ul> </li> <li>• Monitoring review system in place to ensure compliance.</li> <li>• Implementation of OVS when applicable.</li> <li>• Procedure for incomplete/non-reimbursable meals.</li> <li>• Procedure for second meals.</li> <li>• Procedure for visiting student meals.</li> <li>• Procedure for adult, non-student, and a la carte.</li> <li>• Procedure for field trips.</li> <li>• Procedure for lost, stolen, misused, forgotten, or destroyed medium of student exchanges.</li> <li>• Procedure for charged and/or prepaid meals.</li> <li>• Procedure for student and adult charges.</li> <li>• Procedure for new students without approved certification of free or reduced-price benefits.</li> <li>• Procedures for Alternate Meal Locations (Breakfast in the Classroom, Grab-in-Go).</li> </ul>	
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**CEP Edit Check Worksheet with Instructions - Optional**

Site: \_\_\_\_\_ CNIPS #: \_\_\_\_\_ Month/Year: \_\_\_\_\_

Average Daily Attendance: \_\_\_\_\_ (divided by) Highest Enrollment: \_\_\_\_\_ = Attendance Factor (AF): \_\_\_\_\_%

Number of Attendance Adjusted Eligible Students (Highest Enrollment x Attendance Factor (AF)): \_\_\_\_\_

A.	B.		C.		D.		E.	F.
Date	Enrollment	x	Attendance Factor	=	Attendance Adjusted Eligible		Number of meals claimed at this service	If column E is more than column D, give an explanation here:
<i>Example</i>	750	x	.942 %	=	707 (always round up)		712	High participation: Pizza day
1		x		=				
2		x		=				
3		x		=				
4		x		=				
5		x		=				
6		x		=				
7		x		=				
8		x		=				
9		x		=				
10		x		=				
11		x		=				
12		x		=				
13		x		=				
14		x		=				
15		x		=				
16		x		=				
17		x		=				
18		x		=				
19		x		=				
20		x		=				
21		x		=				
22		x		=				
23		x		=				
24		x		=				
25		x		=				
26		x		=				
27		x		=				
28		x		=				
29		x		=				
30		X		=				
31		x		=				

1<sup>st</sup> party signature: \_\_\_\_\_ Date: \_\_\_\_\_

2<sup>nd</sup> party signature: \_\_\_\_\_ Date: \_\_\_\_\_

Prior to filing your monthly claim for reimbursement, the USDA requires you (an NSLP sponsor) to perform daily meal count “edit checks” at each of your sites. The purpose of the edit check is to alert you of potential meal claiming/counting errors before you submit your claim to KDE.

### **CEP Edit Check Worksheet Instructions**

1. Fill in the name of the site, the CNIPS site number, and the current month/year.
2. Select today’s date. Ask the front office at your school for today’s enrollment or locate it in your POS. (If two or more schools eat together at the same site, then add both of the schools’ enrollments together to get one site enrollment.
3. Record the Attendance Factor %.

**Ways to determine Attendance Factor (AF):** 1. Ask your DPP for the current monthly attendance factor for your school(s). (Remember to combine and average the attendance factors for schools that eat at the same site). 2. Use the attendance factor established annually by USDA. 3. Use the attendance factor already set in your POS.

4. Multiply the enrollment x the attendance factor. This gives you an estimate of the number of students in attendance on an average day. Record your answer in column “D”. Always round up to the next highest number.
5. In column “E”, record the number of meals claimed for this meal service. If the number of meals claimed is higher than the number in column “D”, you must provide a written explanation in column “F” as to why this occurred.
6. At the end of each month, record the total number of breakfasts & lunches claimed. These totals should match the totals generated by your POS system and the totals submitted on your CNIPS claim. Ask a co-worker to second-party your count. Both of you must sign and date the form.

**Remember:** The claim you submit to KDE for reimbursement can’t be based on the edit check only; you must submit the meal count totals from your POS system. The edit check is a tool that must be used daily to alert you of errors before you submit the claim. If an over-claim is noted on the edit check an explanation for over-claim must be given.

## CEP Breakfast Meal Count Tally Sheet

This form is to be used for an alternative meal counting and claiming procedure.

Each number must be marked individually in order to be a valid meal count.

Site: \_\_\_\_\_

Date: \_\_\_\_\_

Instructions: Mark each student as he or she is served a breakfast meal at the Point of Service (POS).

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40	41	42	43	44	45
46	47	48	49	50	51	52	53	54	55	56	57	58	59	60
61	62	63	64	65	66	67	68	69	70	71	72	73	74	75
76	77	78	79	80	81	82	83	84	85	86	87	88	89	90
91	92	93	94	95	96	97	98	99	100	101	102	103	104	105
106	107	108	109	110	111	112	113	114	115	116	117	118	119	120
121	122	123	124	125	126	127	128	129	130	131	132	133	134	135
136	137	138	139	140	141	142	143	144	145	146	147	148	149	150
151	152	153	154	155	156	157	158	159	160	161	162	163	164	165
166	167	168	169	170	171	172	173	174	175	176	177	178	179	180
181	182	183	184	185	186	187	188	189	190	191	192	193	194	195
196	197	198	199	200	201	202	203	204	205	206	207	208	209	210
211	212	213	214	215	216	217	218	219	220	221	222	223	224	225
226	227	228	229	230	231	232	233	234	235	236	237	238	239	240
241	242	243	244	245	246	247	248	249	250	251	252	253	254	255
256	257	258	259	260	261	262	263	264	265	266	267	268	269	270
271	272	273	274	275	276	277	278	279	280	281	282	283	284	285
286	287	288	289	290	291	292	293	294	295	296	297	298	299	300

\_\_\_\_\_  
Site Contact Signature

*Certifying that the meal counts are correct and only those eligible for reimbursement are marked by an individual counting and documenting the number of meals served.*

**[Sponsor Name]**

**FOR IMMEDIATE RELEASE**

**[NAME OF SPONSOR]** today announced an amendment to its policy for serving meals to students under the **[National School Lunch / School Breakfast Programs]** for the **[Insert SY]** school year. All students will be served **[lunch/breakfast]** at no charge at the following sites:

**[You may either list sites here or insert a chart of sites]**

For additional information please contact: **[Name of Sponsorship]**, Attention: **[Name, Title]**, **[Department/Division]**, **[Address]**, **[City, State ZIP]**, **[Telephone Number]**, **[E-mail Address]**.

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Sample Letter to Households in  
Schools/Districts Participating in  
**Community Eligibility Provision**  
(Insert School District Letterhead)

Dear Parent or Guardian:

We are pleased to inform you that \_\_\_\_\_  
(insert name of school(s)/district) will be implementing a new option available to schools participating in the National School Lunch and School Breakfast Programs called the Community Eligibility Provision (CEP) for School Year 2015-2016.

**What does this mean for you and your children attending the school(s) identified above?**

Great news for you and your students! All enrolled students of \_\_\_\_\_ (insert name of school(s)/district implementing CEP) are eligible to receive a healthy breakfast and lunch at school at **no charge** to your household each day of the 2015-2016 school year. No further action is required of you. Your child(ren) will be able to participate in these meal programs without having to pay a fee or submit a meal application.

If we can be of any further assistance, please contact us at \_\_\_\_\_ (insert contact information).

Sincerely,

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# Resources

**SCN Community Eligibility Website:** <http://education.ky.gov/federal/SCN/Pages/Community-Eligibility-Option.aspx>

**USDA CEP Website:** <http://www.fns.usda.gov/school-meals/community-eligibility-provision>

**Food and Research Action Center Website:** <http://frac.org/federal-foodnutrition-programs/national-school-lunch-program/community-eligibility/>