

Implementing the Community Eligibility Provision with Title I and E-Rate

An overview of guidance and resources

April 29th, 2015



J. Kevin Maskornick, Program Analyst,
Child Nutrition Programs, *USDA Food and
Nutrition Service*

Dr. Monique Chism, Director, Office of State
Support, *U.S. Department of Education*

Todd Stephenson, Program Analyst, Office
of State Support, *U.S. Department of
Education*

Erica W. Myers, Senior Attorney-Advisor,
Telecommunications Access Policy Division,
Federal Communications Commission

Agenda

- Introduction
- Title I CEP guidance from U.S. Department of Education, overview and updates
- E-Rate CEP guidance from Federal Communications Commission, overview and updates
- Q&A



What is the Community Eligibility Provision? (CEP)

- CEP allows schools with a high percentage of needy children to serve healthy breakfasts and lunches to ALL enrolled students at no cost for up to four years.
- Eliminates the use of household income applications.
- School year (SY) 2014-2015 first year of nationwide availability.
 - Eleven pilot States participated in three year phased-in testing period.

States have made tremendous progress implementing CEP in its first year of nationwide availability. In SY 2014-2015:



Almost 14,000 schools



Over 2,000 school districts



Total enrollment of 6.4 million children



Schools participating in 49 States and DC

CEP Guidance for Other Federal Programs

- CEP is fully compatible with other Federal programs that provide funding and services to high-poverty schools
- Comprehensive guidance documents are available to assist State and local agencies to successfully implement CEP with the following programs:
 - **Title I** (*U.S. Department of Education*)
 - **E-Rate** (*Federal Communications Commission*)
- Today's session features presentations by representatives of both of these agencies





U.S. Department of Education (ED) Updates to Title I CEP Guidance



Introduction

- Purpose of the Title I, Part A (Title I) Program.
- Intersection between Title I and CEP.
- ED's Title I CEP guidance (updated March 2015): tool to support effective Title I and CEP implementation.
- Available at: <http://www2.ed.gov/programs/titleiparta/15-0011.doc>.



Guidance Updates

- Within-district allocations: Question 18.
 - Additional approach added.
 - Approaches from January 2014 guidance remain.
- Use of Title I funds for local survey: Question 23a.
 - *“Under what circumstances may an LEA use Title I, Part A funds to conduct a local survey to identify students from low-income families?”*
 - Builds on Question 23 from January 2014 guidance.



Guidance Updates (continued)

- Services to eligible private school students: Questions 28, 29, and 29a.
 - Substantively the same as January 2014 guidance.
 - Revised to improve clarity.
- Within-State allocations (for States that use school lunch data to allocate Title I funds to districts with under 20,000 total population): Question 31.
 - Approaches similar to within-district allocations.



Calculating E-rate Discounts for Community Eligibility Provision Schools

E-rate Program Overview

- Discounts are calculated using NSLP participation.
- All schools in the school district get the same discount
 - Single schools within a district never get their own discount rate, even if they are the only school receiving that service.
- Urban/Rural status is based on all of the schools in the district.
- Consortia calculate their discount based on the simple average of their consortia members. However, all consortia members now are listed at their district-wide discount rate, even if only some schools in the district participate in the consortia.

E-rate – Applying the Community Eligibility Provision

- All students eat free, but this does not mean they are counted as eligible for E-rate purposes. Must still determine eligibility percentage.
- Schools apply national multiplier (1.6) to directly certified population to determine NSLP eligible population.
- Schools are capped at 100% NSLP eligible for purposes of determining the E-rate discount.
- Schools that are part of a CEP group use their shared group direct certification percentage x 1.6 for each school in the group (capped at 100%).

E-rate – Applying the Community Eligibility Provision

Single School Example:

- Identify student population for the school
- Identify CEP eligible population for the school
- Multiply CEP eligible population for the school x the national multiplier for CEP (1.6) = the number of eligible students
- Calculate the percentage of eligible students (not to exceed student population)
- Determine urban/rural status of district
- Look up discount rate in discount matrix

E-rate – Applying the Community Eligibility Provision

Single School Example:

- School population = 1,000 students
- 50% are direct certified = 500 students
- $500 \text{ students} * 1.6 = 800 \text{ students eligible for NSLP}$
- $800/1000 = 80\%$ of students are eligible

% of students eligible for National School Lunch Program	Category one schools and libraries discount matrix		Category two schools and libraries discount matrix	
	Discount level		Discount level	
	Urban discount	Rural discount	Urban discount	Rural discount
< 1.....	20	25	20	25
1-19.....	40	50	40	50
20-34.....	50	60	50	60
35-49.....	60	70	60	70
50-74.....	80	80	80	80
75-100.....	90	90	85	85

At this discount rate, no urban and rural difference.

E-rate – Applying the Community Eligibility Provision

School District Example:

- Calculate student population for each school
- Calculate NSLP eligible population for each school
 - May require calculation for CEP schools (see Single school example)
- Sum NSLP eligible population for entire school district
- Sum student population for entire school district
- Calculate percentage of eligible students in district
- Determine urban/rural status of district
- Look up discount rate in discount matrix



Contacts & Q+A

- **USDA FNS**

- CEP Website: <http://www.fns.usda.gov/school-meals/community-eligibility-provision>
- E-mail: kevin.maskornick@fns.usda.gov

- **Universal Service Administrative Company (USAC)**

- Phone: (888) 203-8100
- Fax: (888) 276-8736
- Website: www.usac.org/sl

- **FCC**

- Contact: Erica Myers, Attorney-Advisor, Telecommunications Access Policy Division
- E-mail: Erica.Myers@fcc.gov

- **REMINDER:** Questions/Comments may be submitted using the Q+A tab on your LiveMeeting window