



Kenton County School District | *It's about ALL kids.*

**THE KENTON COUNTY BOARD OF  
EDUCATION**

1055 EATON DRIVE, FORT WRIGHT, KENTUCKY  
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Dr. Henry Webb, Superintendent of Schools

**KCSD ISSUE PAPER**

**DATE:**

June 12, 2019

**AGENDA ITEM (ACTION ITEM):**

Consider/Approve The Kenton County Board of Education participation in the Community Eligibility Provision (CEP) at two additional schools for the 2019-20 school year. White's Tower Elementary and Woodland Middle school will offer no cost lunch and breakfast to all students in addition to Beechgrove Elementary, Caywood Elementary, Ft. Wright Elementary, River Ridge Elementary, and Taylor Mill Elementary.

**APPLICABLE BOARD POLICY:**

Support Services 7.11

**HISTORY/BACKGROUND:**

CEP is a provision from the Healthy, Hunger -Free Kids Act of 2010 that allows schools with high poverty rates to provide free breakfast and lunch to all students. CEP eliminates the burden of collecting household applications to determine eligibility for school meals, relying instead on information from other means-tested programs such as the Supplemental Nutrition Assistance and Temporary Assistance for Needy Families. A school is eligible to participate if a minimum of 40% of the students enrolled are receiving other Federal program benefits.

**FISCAL/BUDGETARY IMPACT:**

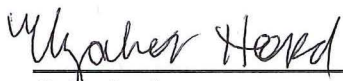
The district must appoint a FRAM Coordinator to distribute, collect and process household income forms. Such process needs to be developed and managed separate from the School Nutrition Program

**RECOMMENDATION:**

Approval of participation in the CEP program at White's Tower Elementary, and Woodland Middle.

**CONTACT PERSON:**

Elizabeth Hord, Director of Student Nutrition

  
Principal

  
District Administrator

  
Superintendent

Use this form to submit your request to the Superintendent for items to be added to the Board Meeting Agenda.

Principal –complete, print, sign and send to your Director. Director –if approved, sign and put in the Superintendent's mailbox.

**Kenton County Board of Education**

Board Members: Carl Wicklund, Chairperson Karen L. Collins, Vice Chairperson Carla Egan Shannon Herold Jessica Jehn  
"The Kenton County Board of Education provides Equal Education & Employment Opportunities."

## 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.
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- 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.



## **Community Eligibility Provision Intent to Participate**

### **Public School Districts**

I certify that the Kenton County Board of Education hereby intends to participate in the Community Eligibility Provision offered by the USDA's National School Lunch Program. By doing so I agree that the following policies and procedures shall be abided by:

- 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)
- d. Maintain documentation to validate April data reported annually that is utilized to determine the CEP claiming percentage(s):
  - ✓ Rosters for all schools used in April reporting. (All should be the same date. Dated April 1 or the last operating day in March whichever was used).
  - ✓ The electronic DC download history file.
  - ✓ Copies of the signed and dated homeless list, runaway list, migrant list, Federally Funded Head Start list and Foster Child list (if provided from authoritative agency outside of the direct certification download).

- ✓ Records that can validate the children who are directly certified through an extension of eligibility of another household member. These should be the same records that are used to identify and confirm the household composition that enabled the extension of eligibility. For public school sponsors, a student census report from Infinite Campus should provide this information and can be electronically archived. (Location in IC: Census>Reports>Census Verification; recommend including SSID and SSN on the report).

SCN will review these records during Administrative Reviews in order to validate the accuracy of the CEP claiming percentage(s) calculated. Failure to maintain the required documentation may result in fiscal and/or corrective action up and including termination from CEP.

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Food Service Director

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Date

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Chairman of Board

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Date

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Superintendent

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Date

## Community Eligibility Provision Intent to Participate

### Private Schools

I certify that \_\_\_\_\_ hereby intends to participate in the Community Eligibility Provision offered by the USDA's National School Lunch Program. By doing so I agree that the following policies and procedures shall be abided by:

- 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, private school'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 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:  
[http://education.ky.gov/districts/SHS/Pages/Community-Eligibility-Option-\(CEO\).aspx](http://education.ky.gov/districts/SHS/Pages/Community-Eligibility-Option-(CEO).aspx)
- d. Maintain documentation to validate April data reported annually that is utilized to determine the CEP claiming percentage(s):
  - ✓ Rosters for all schools used in April reporting. (All should be the same date. Dated April 1 or the last operating day in March whichever was used).
  - ✓ The electronic DC download history file.
  - ✓ Copies of the signed and dated homeless list, runaway list, migrant list, Federally Funded Head Start list and Foster Child list (if provided from authoritative agency outside of the direct certification download).

- ✓ Records that can validate the children who are directly certified through an extension of eligibility of another household member. These should be the same records that are used to identify and confirm the household composition that enabled the extension of eligibility.

SCN will review these records during Administrative Reviews in order to validate the accuracy of the CEP claiming percentage(s) calculated. Failure to maintain the required documentation may result in fiscal and/or corrective action up and including termination from CEP.

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Food Service Director

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Date

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Chairman of Board

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Date