CEP Documentation Types

The primary/secondary documentation framework described in this document is an Oregon Department of Education Child Nutrition Program (ODE CNP) administrative construct to assist Local Education Agencies (LEAs) in understanding which documentation ODE CNP considers most reliable for ISP verification purposes. It is not a federal regulatory category established by USDA or FNS. Federal guidance refers broadly to acceptable "documentation" without a primary/secondary tier. When electing Community Eligibility Provision (CEP), it is important to note the difference between primary documentation and secondary documentation. Primary documentation must be provided as the backup documentation to ISP data submitted to ODE as part of the CEP election process. Secondary documentation may be accepted in certain instances when Primary documentation is not available but will often require further investigation and validation.

Primary Documentation

Information and documents that are straight from the source and have not been altered in any way. These documents are required as backup documentation to CEP election. The documents below must be collected and submitted per the CEP Data Collection Instructions published by ODE CNP.

Examples of Primary Source Documentation:

- District membership list (enrollment) exported directly from student information system software (e.g., Synergy, PowerSchools), accompanied by a signed certification statement from the district attesting that the list accurately reflects student enrollment as of April 1
- ODE retrieves SNAP, TANF, FDPIR, and Medicaid direct certification data directly from state systems. **LEAs are not required to submit those lists**.

LEAs are required to submit **Other Categorically Eligible (OCE) student lists** for any of the programs below that operate in their district, accompanied by a signed certification statement for each list:

- McKinney-Vento Homeless or Migrant Education OCE student list, provided by the district's McKinney-Vento homeless liaison or Migrant Education liaison, including:
  - Names of participating students
  - Effective dates
  - Signed certification statement from the liaison attesting to the accuracy and completeness of the list

- Foster care OCE student list: a letter, court order, or agency-generated list from the State or local welfare agency or court confirming the child's foster care status or legal custody placement, accompanied by a signed certification statement
- Head Start OCE student list: a roster of Head Start student enrollment with enrollment dates, accompanied by a signed certification statement from the Head Start program director or authorized official
- Runaway and Homeless Youth OCE student list: documentation from programs established under the Runaway and Homeless Youth Act [42 U.S.C. 5701] identifying students served, accompanied by a signed certification statement from the program coordinator
- Principal-approved non-applicant OCE student list: written documentation from a local education official (e.g., school principal) approving non-applicant students based on available information, consistent with 7 CFR 245.9(f)(1)(ii), accompanied by a signed certification statement from the approving official

Secondary Documentation

Information pulled from a source to which primary documentation has been uploaded or altered in some way. These documents may need further investigation or validation.

Examples of Secondary Documentation:

- Student Eligibility documents with method of certification downloaded from Point of Service (POS) or Meal service software (ex. Mealtime, NutriKids, PrimeroEdge).
- Indication of foster as listed in Student Services software.
- Extended eligibility documentation (screen shots of student connections to directly certified students showing an identical guardian name, address, or listing of siblings in student records).

Note on Point of Service (POS) Reports: Federal guidance (CEP Planning & Implementation Guidance, p. 22) identifies POS reports as among the most accurate and timely ISP documentation. ODE classifies POS exports from meal service software as secondary because ODE considers a student information system (SIS) export containing direct enrollment records, constitutes more reliable primary evidence of enrollment status. The POS system is downstream of the SIS; it receives and may further alter data from it, making the SIS export the preferred

primary source. LEAs should not rely on a POS export as their sole ISP documentation submission to ODE.

Recordkeeping Reminder

Documentation requirements do not end at the point of election. Under 7 CFR 245.9(h)(3), LEAs must retain ISP documentation, including all primary and secondary source materials submitted to ODE, for a minimum of three years after submission of the last Claim for Reimbursement based on that data, and longer if required by audit resolution. Failure to retain required documentation may result in removal from CEP and/or fiscal action.