

This document is a compilation of the most frequently asked questions from School Food Authorities (SFAs) that are new to operating under the Community Eligibility Provision (CEP). This high-level resource outlines the basic operational changes that need to be implemented when transitioning to CEP.

Minor wording changes and revisions to regulatory citations to reflect publication of the final rule are included. [New/Revised] appears next to new or revised questions.

Schools and households are asking about meal prices for the school year, how do I get the word out about CEP?

Schools should use their usual channels of communication with media and households to notify the community that school meals, both breakfast and lunch, will be available at no charge to all students enrolled at CEP schools. A combination of outreach strategies is typically best to ensure all households are aware of CEP and its many benefits. Successful communication strategies include:

- ✓ *Placing CEP notifications prominently on websites, social media and in any “back-to-school” packets.*
- ✓ *Sending email notifications or letters to households.*
- ✓ *Providing CEP information at school board meetings and “back-to-school” nights.*
- ✓ *ODE has notification letters available in several languages ([English](#), [Chinese](#), [Russian](#), [Spanish](#), [Vietnamese](#))*

I am not sure if I should have Household Applications for Free and Reduced-Price meals available?

The NSLP and SBP regulations at [7 CFR 245.9\(f\)\(4\)\(iv\)](#) prohibit CEP schools from collecting free and reduced-price household applications. In the executed CEP agreement, SFAs participating in CEP agree NOT to distribute, collect or process Free and Reduced Meal Applications. Applications that are available at CEP schools should be removed including websites.

The High School Athletic Director has asked me to process Free and Reduced applications for student athletes for athletic fee reductions, can I make an exception for this?

No, the NSLP and SBP regulations at [7 CFR 245.9\(f\)\(4\)\(iv\)](#) prohibit CEP schools from collecting free and reduced-price household applications. The Oregon Family Income Survey ([English](#), [Spanish](#)) can be used to determine eligibility for fee reductions etc. The family income surveys are not school meal applications, and any costs associated with collecting household income information in CEP schools are not allowable costs to the Non-Profit Food Service Account.

I received an email from the ODE Helpdesk stating that I have not downloaded my direct certification file, do I still need to download direct certification?

CEP schools must download direct certification, which is a match between SNAP records and student enrollment records at least once annually. This means the SNAP Direct Certification file must be downloaded at least once every school year and retained on file.

Conducting direct certification at least annually allows LEAs participating in CEP to take advantage of any ISP increases and ensures directly certified households are aware of their eligibility status which may be used for other programs and benefits, such as Summer EBT or for other educational and school-level benefits. Additionally, running direct certification helps LEAs observe demographic trends.

[Revised] Do I have to send direct certification eligibility notifications to CEP households?

LEAs must continue to provide direct certification eligibility notifications to households, even if the children in that household attend a CEP school ([7 CFR 245.6\(c\)\(6\)\(ii\)](#)). The LEA's public notification cannot fulfill this requirement.

We have a lot of unpaid meal balances that are outstanding from previous years. What should I do with these now that we are operating CEP?

If the debt is considered collectable, reasonable efforts can still be made to collect the unpaid meal charges. If the SFA determines the debt is no longer collectable and ceases efforts to obtain payment, then the unpaid balance would be considered bad debt. The revenue loss from bad debt must be restored to the Non-Profit Food Service account with non-federal sources.

Can I offer milk at no charge to students who are bringing a lunch from home?

Managing milk sales can be a challenge with CEP. It is hard for students and families to understand that the meal is at no charge but there is a charge for milk. A SFA may choose to charge student accounts directly for milk sales. As an alternative SFAs can allow students to take milk for free; however, this is not reimbursable or an allowable cost to the Non-Profit Food Service Account and would have to be paid for in full through nonfederal funds. The same applies to non-reimbursable meals and a la carte sales.

What is different about meal counting and claiming?

Meal Counting and Claiming in CEP is streamlined, as individual eligibility categories are eliminated. During meal service, schools are required to keep accurate meal counts and maintain a Point of Service (POS) system that ensures reimbursements are claimed only once for each student served a reimbursable meal. Schools may not claim reimbursement for additional meals served to students. Clicker and tally sheets are acceptable meal counting methods as long as there is a system in place to ensure duplicate meals are not claimed for the same child.

How do I conduct verification for CEP schools?

All Sponsors must complete the FNS- 742 Verification Collection Report. SFA's that are districtwide CEP do not perform verification activities but are required to submit the FNS-742 Verification Collection Report, as it contains baseline enrollment information that is submitted to USDA. SFAs with some, but not all schools electing CEP must conduct verification in schools operating standard counting and claiming.

Helpful Resources:

- ✓ [ODE SNP: Special Provisions](#)
- ✓ [Community Eligibility Provision Resource Center | Food and Nutrition Service \(usda.gov\)](#)
- ✓ [CEP Planning and Implementation Guidance](#)

Regulatory Reference:

- ✓ [7 CFR 245.9\(f\)](#) Community Eligibility.
- ✓ [SP 09-2024 – Community Eligibility Provision: Guidance and Updated Q&As](#)
- ✓ [SP 08-2024: Community Eligibility Provision: Planning and Implementation Guidance - Updated](#)

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