
Background

ODE CNP has adopted a streamlined, centralized approach to CEP data collection to reduce the burden on LEAs and to ensure uniformity in ISP calculations. LEAs are not required to retrieve or submit direct certification data from SNAP, TANF, or Medicaid. ODE retrieves these records directly from state systems and performs all matching against LEA-submitted enrollment data. In addition, ODE centrally identifies foster children through state data systems, consistent with USDA rules that recognize foster care as an Other Source Categorically Eligible status.

LEAs are responsible for submitting two categories of data to ODE, each accompanied by a signed certification statement:

- A **district-wide membership (enrollment) list**, accompanied by a signed certification statement from district membership (enrollment) personnel attesting that the list accurately reflects student enrollment as of April 1.
- **Lists of Other Categorically Eligible (OCE) students** for any qualifying programs operating in the district, accompanied by a separate signed certification statement from the program liaison for each list submitted.

The most important part of the CEP election process is the submission of accurate membership lists (enrollment and OCE program data), which ODE CNP will use to calculate ISPs. Submitting data in the format prescribed below will allow a quicker turnaround of ISP calculations.

Personally Identifiable Information (PII)

NOTE: State agency emails are open to public records requests and cannot contain Personally Identifiable Information (PII). Please send files containing PII using ODE's secure file transfer system.

Primary Source Documents Required

District-Wide Membership List

Obtain the entire district's membership list directly from the student information system as of April 1st of the current school year, using the ODE template titled **District Wide Membership for CEP** as a guide for the required format.

Community Eligibility Provision (CEP) Data Collection Instructions

- The student membership list must come directly from the student information system (e.g., Synergy, PowerSchool). ODE CNP requires nutrition service staff to collaborate with the membership reporting personnel to obtain a complete membership (enrollment) list for the entire district. The enrollment list cannot come from a nutrition service or point-of-service system.
- ODE CNP has created a membership (enrollment) list template that must be used when electing CEP. Detailed instructions are included in the template.
- Ensure that students from programs that the district sponsors (early learning, alternative, etc.), who are not reported as part of your district's average daily membership (ADM), are included in the membership list. A complete list, including these students, increases the likelihood of a higher ISP by improving match coverage.

Certification Statement for District Wide Membership List

A signed certification statement from your membership (enrollment) personnel is required. This statement can be a separate document on letterhead or an email with the liaison's signature block.

I, [Full Name], certify that the attached membership list accurately reflects [Name of LEA]'s student enrollment as of April 1, [Year], and includes all students enrolled in the district, including students of programs not reported as part of the district's Average Daily Membership (ADM). The list is comprehensive and includes all requested data fields.

Signature

[Printed Name]

[Title]

[Organization]

Other Categorically Eligible (OCE) Student Lists

If an LEA operates one or more of the programs listed below, the LEA must obtain original documentation from a program liaison or designated staff and include names of qualifying students and effective participation dates. Use the ODE template titled **Other Categorically Eligible Students** as a guide for the required format.

Homeless Students:

- McKinney-Vento Homeless Assistance Act

- Runaway and Homeless Youth Act (RHYA)
- Homeless children residing within another household.

Migrant Education Program (MEP)

- Students identified as migratory children under section 1309 of the Elementary and Secondary Education Act [20 U.S.C. 6399].

Foster Care

- Oregon centrally identifies students in foster care through state data systems. LEAs are not required to obtain or submit separate foster-care documentation for students who already appear on ODE's matched foster list.
- If a student is known by the LEA to be in foster care but does not appear on ODE's matched list, the LEA must provide documentation from the State or local welfare agency or court (e.g., letter, court order, or agency-generated list) confirming foster-care status or legal custody placement.

Food Distribution Program on Indian Reservations (FDPIR)

Oregon does not centrally match FDPIR participation data. If an LEA has students who participate in FDPIR, the LEA must obtain documentation directly from the Indian Tribal Organization (ITO) or State agency administering FDPIR and submit it to ODE CNP.

Acceptable documentation includes:

- A letter or written certification from the ITO or FDPIR administering agency that includes: the name of the student; a statement certifying that the student is a member of a household receiving FDPIR benefits; sufficient information to match the student to your district's enrollment list; and the signature and date of an authorized program official [7 CFR 245.6(b)(4)]; or
- A benefit eligibility letter issued by the FDPIR administering agency to the household, submitted by the household to the LEA [7 CFR 245.6(b)(5)(ii)(B)].

Early Learning Students:

- Head Start / Early Head Start: Federally funded programs administered by the U.S. Department of Health and Human Services.
- Oregon Pre-K (OPK): Oregon's [state-funded early childhood program](#) paralleling federal Head Start, administered by the Oregon Department of Early Learning and Care (DELIC).

Community Eligibility Provision (CEP) Data Collection Instructions

- Oregon Preschool Promise (PSP): Oregon's mixed delivery, [publicly funded preschool program](#) administered by DELC. Where available, please indicate if the student is equal to or below the 130% of the federal poverty level (FPL).¹

Principal-Approved Non-Applicant Students (if applicable):

- Non-applicant students approved by a local education official (e.g., school principal) based on available information, consistent with 7 CFR 245.9(f)(1)(ii). The approving official must provide a written list of approved students with a signed certification statement.

NOTE: Students listed in the OCE categories above must also appear in your district-wide membership/enrollment file. ODE will first attempt to match all enrolled students against the DC system; DC status takes precedence over OCE status. Students not matched via DC will then be evaluated against the submitted OCE lists. Students who do not appear in the membership file cannot be matched against DC data or OCE lists and will not be included in the ISP calculation.

Certification Statement for Other Categorically Eligible Student List(s)

A separate signed certification statement is required for each OCE list submitted. This statement can be a separate document on letterhead or an email with the liaison's signature block.

I, [Full Name], as the liaison for the [Program Name] program, certify that the students listed on the attached list are qualified program participants. The participant list is current as of April 1, [Year], comprehensive, and includes all requested data fields.

Signature

[Printed Name]

[Title]

[Organization]

¹ The 130% threshold is established by the Richard B. Russell National School Lunch Act, Section 9(b)(1)(A) [42 U.S.C. 1758(b)(1)(A)], which sets the income eligibility standard for free meals. Only students at or below 130% FPL, those who would qualify for free meals, may be counted in the ISP. Students above 130% FPL qualify for reduced-price meals at most and are excluded from the identified student count.

LEA submits CEP Documentation to ODE CNP

After gathering the required documentation, send all documentation in a zipped file through Secure File Transfer to ODE.SchoolNutrition@ode.oregon.gov. The zip file and its contents should look similar and not limited to the example below:

```
LEA Name - CEP Data Collection.zip
├── District Wide Membership.xlsx
├── District Wide Membership Certification.pdf
├── Other Categorically Eligible Students.xlsx (OCE program lists)
├── Head Start Certification.pdf
├── McKinney-Vento Certification.pdf
└── Migrant Ed Certification.pdf
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If the documentation is incomplete or does not match the requirements, ODE CNP will request individual files for correction. Complete and accurate files must be received by ODE CNP to move forward in the CEP process.

REMINDER: The submission of student-level data containing personally identifiable information (PII) must be submitted through ODE's secure file transfer system.

Please follow the instructions linked below to create a zip file and send it through the [ODE Secure File Transfer web portal](#).

[Instructions on how to create a zip file and send it through secure file transfer.](#)

ODE Performs DC Matching and ISP Calculations

ODE CNP will perform matching between the district's enrollment list and students in Oregon's direct certification (DC) system. This matching identifies students certified for free meals through SNAP, TANF, and Medicaid (Oregon participates in USDA's Direct Certification with Medicaid Pilot Project). In addition, ODE CNP will match the enrollment list with the OCE student lists submitted by the LEA. Students from the membership list matched via direct certification or through OCE programs will count toward the identified student count used in the ISP calculation.

- ODE CNP will use the submitted data to conduct the initial matching. Results will be compiled and summarized in an Excel workbook.

- There may be back-and-forth communication with ODE CNP for clarification during this process. To minimize communication and ensure a faster return of results, please ensure the instructions for gathering data and files are followed carefully.
- ODE CNP will return the matched file results to the Child Nutrition Program Manager listed in CNPweb, and the designated point of contact, by secure file transfer. The match results file will include site-specific ISP determinations. Accompanying the match results file will be instructions explaining how to gather and return any required supporting documentation.

Recordkeeping Requirements

Documentation requirements do not end at the point of election. Under 7 CFR 245.9(h)(3), LEAs participating in CEP must retain source documentation used to confirm the ISP for the entire duration of CEP participation, and for a minimum of three years after submission of the final Claim for Reimbursement for the last fiscal year of CEP. If audit findings have not been resolved, records must be retained beyond the three-year period and for as long as required for resolution of the audit.

Records that must be retained include:

- The district-wide membership (enrollment) list submitted to ODE
- OCE student lists and associated certification statements submitted to ODE
- ISP determination results received from ODE CNP
- Annual selection of the ISP and claiming percentages
- Total number of breakfasts and lunches served daily
- Non-federal funding sources used to cover any excess meal costs
- School-level information provided to ODE for publication, if applicable

NOTE: Failure to retain required documentation may result in removal from CEP and/or fiscal action (7 CFR 245.9(h)(3); SP 09-2024, p. 26).