

219 North Main Street, Suite 402, Barre, VT 05641 (p) 802-479-1030 | (f) 802-479-1835

## **MEMORANDUM**

TO: Principals, Superintendents, PreK Program Directors, School Approving Officials

FROM: Laurie M Colgan, Director, Child Nutrition Programs

SUBJECT: Student Census Household Income Data Collection for PreK, Provision Schools

and Non-NSLP Schools

DATE: August 22, 2017

The Student Census data collection requires that student eligibility to receive free and reduced lunch be reported annually whether or not students receive lunch at school. Schools that no longer participate in the National School Lunch Program (NSLP), and report Student Census must still collect and report household income data.

*PreK Programs, CEP & Provision 2 Schools, and schools not participating in National School Lunch Program* –Schools that are required to report Student Census data must collect and report household income data which can be a challenge when schools:

- 1. do not participate in the National School Lunch Program (NSLP) or
- 2. do not distribute free and reduced price meal applications due to participation in the Community Eligibility Provision (CEP) or Provision 2, or
- 3. have students participating in Pre-Kindergarten education programs (PreK) that do not have access to meal programs.

Free and reduced priced lunch eligibility has been widely used as a determining factor for eligibility and funding of a number of state and federal programs for families and schools. Other programs depend on the household income data to determine things like a student's eligibility for services, a family's eligibility for reduced internet service rates, the school's e-rate, and other criteria that are used in federal and state grant applications. Schools must report this data for all enrolled students including PreK. Please continue reading for guidance on how participating and non-participating schools must collect and report this data.

Since schools not participating in the National School Lunch Program are ineligible to access the Directly Certified List, the Household Income Form may also be used by non-participating schools to collect and report all household income necessary for reporting in the Student Census. Since USDA does not permit these schools to use the federal free and reduced price meal application to determine household income, the AOE has prepared and provided the <a href="Household Income Form">Household Income Form</a> for public schools enrolling students to PreK Programs (public and private providers), CEP and Provision 2 schools, and non-NSLP schools to use so that you may collect household income information from those families and households whose children are not on the Directly Certified List. The federal income guidelines may be used to make the student determinations.

CEP Student Eligibility Data & Direct Certification – USDA's Community Eligibility Provision (CEP) changed the way schools must collect and report student-level eligibility for free and reduced price school meals programs. The school's eligibility to participate in CEP, as well as the level of free reimbursement claimed, is based on the number of directly certified students enrolled in the school, including PreK students that participate in the school meals program. The school must continue to collect and identify directly certified students throughout the school year in order to determine the accurate level of reimbursement for the next program year. USDA guidance allows schools to adjust their claiming percentages which is based on the current "Identified Student Percentage" reported in April as long as the student data has been collected and verified; increases in the number of directly certified students allows the school(s) to earn a higher percentage of free reimbursement for all meals served. In addition, these schools must also distribute the household income form to collect data to report the eligibility status of students not directly certified.

If you have any questions about CEP and Provision 2 and the required reporting, please contact Laurie Colgan at (802) 479-1187.

Enc.

