Healthy School Meals for All Frequently Asked Questions

This resource provides answers to frequently asked questions about the Healthy School Meals for All program, including guidance on program implementation, how school food authorities can opt-in to the program and how to maximize federal funding through implementation of the Community Eligibility Provision.

This document will be updated as needed. New information will be highlighted in yellow.

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COLORADO
Department of Education
School Nutrition

National School Lunch and School Breakfast Programs Overview

1. **What are the National School Lunch and School Breakfast Programs?**
   The National School Lunch Program (NSLP) and School Breakfast Program (SBP) are federal school meal programs that provide nutritionally balanced, low-cost or no-cost meals to students each school day. All students can participate, but certain eligibility requirements allow students to receive a free or reduced-price meal based on their family's income or participation in certain federal assistance programs. Students that do not qualify for free or reduced-price meals pay for breakfasts or lunches.

2. **How are School Food Authorities reimbursed for meals served in the National School Lunch and School Breakfast Programs?**
   School Food Authorities that participate in the National School Lunch or School Breakfast programs receive a per meal federal reimbursement for each reimbursable meal they serve. In the state of Colorado, families that qualify for reduced-price meals do not pay the $0.30 co-pay for breakfast or the $0.40 co-pay for lunch because the state reimburses eligible SFAs for meals claimed for all reduced-price students through Colorado's Start Smart Nutrition Program and the Child Nutrition Lunch Protection Act.

   For SFAs that opt in, the Healthy School Meals for All program will provide free meals to all students by covering the cost of meals provided to students that would otherwise pay full price for a meal.

   SFAs that choose not to participate in the Healthy School Meals for All program will continue to receive reimbursement from the federal government and the reduced-price co-pay from the state of Colorado for meals served based on a student's eligibility.

Healthy School Meals for All Program Overview

1. **What is the Healthy School Meals for All program?**
   The Healthy School Meals for All program provides funding opportunities to Colorado public school food authorities participating in the National School Lunch and School Breakfast Programs:
   - Reimbursement for meals provided to students that would otherwise pay full price for a meal (required to opt-in to the program)
   - Funding to purchase local food from Colorado farmers and ranchers (optional to apply for once opted into the program) – on hold
   - Funding to increase wages or provide stipends to staff who prepare and serve the meals (optional once opted into the program) – on hold

2. **What does meal reimbursement mean?**
   The Colorado Department of Education receives annual funding from the U.S. Department of Agriculture to reimburse school food authorities (SFA) for meals served to students that meet federal nutrition standards. This funding helps SFAs pay for food, kitchen equipment, labor, etc. Reimbursement amounts are based on three income classifications. The free rate is the highest reimbursement amount, followed by reduced-price and paid reimbursement rates. For non-CEP schools, state funding will continue to cover the reduced-price co-pay for students so that students that qualify for reduced-price meals don't have to pay for those meals. State funding will cover additional reimbursement for students that pay full price for a meal to ensure all students receive meals for free. Note that the additional state reimbursement for paid students will be the base federal rate for all sponsors, even if the sponsor has a severe need qualification
   Current reimbursement rates can be found on the Reimbursement and Funding webpage.

3. **What will the Healthy School Meals for All program cost the state of Colorado?**

Beginning in FY 2023-24, the state of Colorado will reimburse districts for meals based on the federal free reimbursement rate for each meal served, minus the amount a SFA receives from the federal and state meal reimbursement programs. In FY 2023-24, meal reimbursements were $166 million.

Meal reimbursements are estimated to be lower in FY 2024-25, and subsequent years, based on projected meal counts and possible program participation rates. This cost is less than estimated for FY 2023-24 because of the direct certification of children in Medicaid to begin in SY 23-24, which will impact CEP eligibility in FY 2024-25. An increase in direct certification matches is estimated to increase Community Eligibility Provision (CEP) eligible sites which would increase federal reimbursement and reduce the state funding needed to provide free school meals to all.

4. **When do Healthy School Meals for All program initiatives start?**
The portion of the program that provides reimbursement for meals provided to students that would otherwise pay full price for a meal began in School Year 2023-24 for participating school food authorities.

Other portions of the program, including funding for pay increases and stipends for kitchen employees and incentives for local purchasing are currently on hold and subject to available appropriations beginning in School Year 2025-26.

SFAs are required to opt-in annually to each portion of the program in which they plan to participate. In order to participate in the Healthy School Meals for All program, SFAs must provide free meals to all students at participating schools. Funding for pay increases and stipends for kitchen employees and incentives for local purchasing are optional, and separate program initiatives, for SFAs implementing the program.

5. **What are the timelines for opting in and implementing the Healthy School Meals for All Program?**
CDE School Nutrition has conducted trainings over the past several months to cover frequently asked questions about the program and how to implement the Community Eligibility Provision (CEP) for eligible schools. View recordings of previous trainings. Additional trainings, resources and deadlines will be announced in the Dish e-newsletter.

All districts opting into HSMA will need to follow CDE's operating recommendations to maximize federal reimbursements. Districts and schools that are not recommended for CEP will notify CDE of their decision to participate in Healthy School Meals for All during the annual application submission process.

CEP eligible districts, including districts that have all CEP eligible schools as well as districts with some CEP eligible schools and some non-CEP eligible schools, should engage in the following activities to prepare (note: the timeline below includes approximate timeframes and may change):
- **December - April:** Keep records of eligibility and continue to conduct direct certification per existing guidance
- **April 1:** Report Identified Student Percentage (ISP)
- **May 1:** CDE will notify CEP eligible districts and work collaboratively to determine grouping of sites
- **June 30: SFAs must notify CDE of intent to implement CEP using the CEP Request Form.**
- **May - June:** Submit ISP documentation to the CDE
- **July - September:** Begin implementing CDE's operating recommendations in eligible schools

6. **Can a school food authority operate HSMA and a provisional program at the same time (e.g., CEP or Provision 2)?**

Yes, participation in HSMA does not prevent a SFA from participating in provisional programs. SFAs are required to implement CDE's operating recommendations (e.g., CEP, Provision 2, or non-provisional programs) in order to remain eligible for HSMA state reimbursements.

7. **What should school food authorities do now and what additional factors should be considered for program implementation?**
School food authorities opting into the program should start to think through and work with their administration on ensuring adequate mealtimes, length of meal time, number of lunch periods, staffing challenges and equipment needs, if applicable, to meet the needs of increased participation in their meal programs. SFAs should also begin communicating with their vendors to obtain estimates for food, milk, paper supplies, etc.

Resources for adequate meal time may be found on the CDE School Nutrition website or the Center for Disease Control and Prevention website. Additionally, CDE has guidance on school district calendar and instructional time.

SFAs should also evaluate how participation in the program may impact the contracts they have with various vendors (e.g., food, supplies, labor, etc). If participation in the Healthy School Meals for All program constitutes a material change for a contract, the sponsor should go out to bid. Material change is determined by the SFA, and is defined by USDA as a change that, had other bidders known of the change at the time they submitted their responses/proposals, would have caused them to bid differently. SFAs should calculate what the projected value of change will be if they implement Healthy School Meals for All, assess the cost of any additional resources that might be needed to support the change in scope or value from the current contract. Resources for procurement may be found on the CDE School Nutrition website.

8. **What are the benefits of opting-in to the Healthy School Meals for All program?**

- Community Eligibility Provision schools:
    - Promotes equity and reduces stigma of school meals
    - Eliminates unpaid meal debt once implementing CEP (see unpaid meal charges section for more details)
    - Reduces administrative burden
    - Increase in the number of students who eat breakfast and lunch each day
    - Simplifies meal counting and claiming processes
    - Easier implementation of alternative serving models (e.g. breakfast in the classroom, kiosks, etc.)
    - Simplifies the administrative review
- Non-Community Eligibility Provision schools:
    - Promotes equity and reduces stigma of school meals
    - Eliminates unpaid meal debt once implementing the program (see unpaid meal charges section for more details)
    - Increase in the number of students who eat breakfast and lunch each day

9. **How should school food authorities communicate information about the program to their community?**

An Outreach Toolkit is available for districts to use with resources to support communicating information about the Healthy School Meals for All program with your school community. Resources include social media copy, images, flyers, and drop-in letters.

10. **Will additional funding be available for equipment, food and other supplies needed to implement the program?**
Sponsors may apply for funding to purchase equipment through the U.S. Department of Agriculture Equipment grant. USDA typically releases funds for additional Equipment Grants each fall, and future funding opportunities will be announced via [The Dish](#).

Sponsors that choose to opt into the local school food portion of the program will receive funds to purchase local food. In addition, sponsors may receive additional funding to purchase equipment through the technical assistance and education grant program.

Other grant opportunities may be available through organizations and vendors. [Available grants and funding opportunities can be found on the reimbursement and funding webpage.](#)

Healthy School Meals for All Program Eligibility and Participation

1. **What school food authorities are eligible to participate in the Healthy School Meals for All program?**
Any Colorado public school district, charter school food authority, day treatment facility, or Residential Child Care Institution that participates in the National School Lunch Program or School Breakfast Program may opt into the Healthy School Meals for All program. HSMA is optional; SFAs are not required to participate. To participate, a SFA must:

   - Provide annual notice of participation to the department of education
   - Maximize the amount of federal reimbursement by implementing CDE's operating recommendations, which may include CEP, Provision 2, and/or non-Provisional program sites.
   - Provide free meals to all students enrolled in participating schools
   - Complete activities identified in the [HSMA Application Collection Policy](#) (for sites not recommended for CEP)

Private schools are not eligible to opt into HSMA.

2. **May a public or charter school that does not currently participate in the National School Lunch Program or School Breakfast Program begin participating in the meal programs?**

If a public or charter school does not currently participate in the National School Lunch Program or School Breakfast Program, they should first reach out to the food service department in their school district or a charter collaborative, if applicable. A list of participating school food authorities is located on the [CDE School Nutrition data webpage.](#)

If a district charter school is unable to come to an agreement for services with their district food and nutrition services, then the district may allow the district charter school to transfer their food service operations to another SFA. This would include transferring to an existing SFA, or the charter school could become their own SFA. [View the Become a Sponsor webpage for more information](#).

The application deadline for becoming a new school food authority is February 15 of each year.

3. **Do all schools within the school food authority have to qualify for the Community Eligibility Provision to implement the Healthy School Meals for All program?**

No. If a school district does not have any schools that qualify for the Community Eligibility Provision, or if CDE does not recommend operating CEP to maximize federal reimbursements, they can still participate in the Healthy School Meals for All program. Schools that are not implementing CEP will collect household income applications and claim students based on their eligibility status.

If a district has some schools that CDE recommends operating CEP and some that do not, they may use a combination household income application to collect information used for meal benefits.

To tap into all available federal funds for eligible families, participating SFAs will implement CDE's operating recommendations at all qualifying sites. Schools that implement CEP must participate in both the school breakfast and school lunch programs, per federal regulations. If a school does not currently participate in the School Breakfast Program, it would not be required to start a breakfast program to implement CEP.

4. **May a school food authority claim preschool or pre-K students under the Healthy School Meals for All Program?**
   If a school food authority serves eligible preschool or pre-K programs under the School Breakfast (SBP) and National School Lunch Programs (NSLP) they would be included in the Healthy School Meals for All Program and all meals would be free for those students as well.

   Preschools or pre-K programs eligible to provide meals under the SBP and NSLP are those that are income-based programs, like Head Start, or ones that offer instructional time. Instructional time means a learning environment that supports children's growth in many areas such as language, literacy, and social and emotional development. If students attend the school for daycare, then the daycare students are not eligible for meals under SBP or NSLP.

   [To help clarify options for serving meals to preschool and pre-K students, view this informational chart](#)

   If pre-K students eat separately from older students, then they must be served meals that meet the pre-K meal pattern requirements. If pre-K students eat at the same time and in the same place as older students, then they may follow the NSLP and SBP meal patterns. [View the Plan Meals webpage](#) for additional information on the pre-K meal pattern. Pre-k meal service may also need to be structured to comply with [Colorado Department of Early Childhood licensing requirements](#).

5. **May a school food authority choose not to implement the Healthy School Meals for All program at all schools implementing the National School Lunch and/or School Breakfast Program?**
   No. If a school food authority chooses to implement the Healthy School Meals for All program, they must offer meals at no charge to all students enrolled in all public schools implementing the National School Lunch (NSLP) and/or School Breakfast Program (SBP).

   If a school or charter school does not operate the NSLP and/or SBP, the school is not required to begin operation of the NSLP or SBP if they are not currently under the SFA's jurisdiction.

6. **If a school food authority does not have any schools qualify for the Community Eligibility Provision, may they still opt-in to the Healthy School Meals for All program?**
   Yes. If a school food authority does not have any schools that qualify for the Community Eligibility Provision or if CDE does not recommend operating CEP, they may still opt-in to the Healthy School Meals for All program. In this scenario, all schools will collect free and reduced lunch applications and claim students based on each student's eligibility status. Under the Healthy School Meals for All program, sponsors will receive additional reimbursement from state funds for all paid meals claimed. The amount of reimbursement received for paid meals will equal the federal free reimbursement rate.

7. **How will school food authorities maximize the amount of federal funding they receive?**
   School food authorities will be required to maximize the amount of federal funding received by implementing CDE's operating recommendations, which may include participating in the Community

Eligibility Provision (CEP) for all qualifying schools, or grouping of schools, and by directly certifying students' eligibility, operating Provision 2, and/or continue operating non-Provisional program sites.

Direct certification is a method used to qualify students for free or reduced-price school meals by using documentation directly from state agencies or other authorized sources such as Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Medicaid, or migrant data. An online matching system and district liaisons are used to match students with available data and apply school meal benefits without requiring a household to provide income information through a free and reduced-price lunch application.

The Colorado Department of Education was approved to participate in a demonstration project with the U.S. Department of Agriculture to use Medicaid data to help directly certify more students starting in school year 2023-24. Utilizing Medicaid data increases the number of students that are directly certified and increases school identified student percentages which will increase the number of CEP eligible schools in subsequent school years.

Community Eligibility Provision

1. **What is the Community Eligibility Provision?**
   The Community Eligibility Provision is a funding option of the National School Lunch Act that enables schools to provide free meals to all students. To be eligible to operate CEP, a school, group of schools or district must have an identified student percentage (ISP) of 25 percent or greater (For School Year 2023-24, the CEP threshold was 40 percent of greater). To calculate ISP, a school must count all students who are categorically eligible for free school meals and divide by total student enrollment. Students are considered categorically eligible if they, or another student in their household, participate in public benefit programs (SNAP, TANF, Food Distribution Program on Indian Reservation) or are in foster care, homeless, migrant, runaway or enrolled in head start.

   More information on CEP is available on CDE School Nutrition webpage.

2. **What is the Identified Student Percentage?**
   Identified students are directly certified students who receive free meals based on their participation in SNAP, TANF, FDPIR, Medicaid, or their status as Migrant, Foster, Homeless/Runaway or Head Start students. Extended Eligible students are included. Students with reduced status are not included. The identified student percentage (ISP) is the number of directly certified students divided to the total number of enrolled students multiplied by 100. For example:

$$ISP = \frac{\text{students directly certified for free meals}}{\text{total enrolled students}} \times 100$$

3. **How do school food authorities determine which schools qualify for the Community Eligibility Provision?**
   A school, group of schools or district will be eligible for the Community Eligibility Provision if the identified student percentage (ISP) is 25% or greater. The ISP is the number of directly certified students divided by the total number of enrolled students multiplied by 100.

   Example: (35 students directly certified for free meals / 60 total enrolled students) x 100 = **58.33%** ISP. This school would be eligible for CEP.

4. **What does grouping schools for the Community Eligibility Provision mean?**
    Grouping is a flexible characteristic of the Community Eligibility Provision that may be used to maximize Federal reimbursements and administrative efficiencies and represents a strategic decision for some school food authorities.

    CDE School Nutrition has provided suggested groupings to CEP-eligible sponsors. Groupings were identified using a calculator tool that uses reported ISP data plus Average Daily Participation (ADP) for breakfast and lunch. The calculator runs thousands of combinations of sites to find the most optimal grouping to maximize the amount of federal funds received. With the inclusion of ADP data, the calculator takes the number of meals served at each site into account. The more meals served, the greater the impact on the overall amount of reimbursement received. Overall, suggested groupings are predicted to yield the greatest amount of federal funding and meet the mandate of HSMA.

    Example 1: If a school in the district has an identified student percentage (ISP) of 15 %, but all of the schools in total have an ISP of 43%, all the schools may participate in CEP.

    Example 2: Using groupings strategically, a district may group a selection of schools in one group so that the total cumulative ISP for the group is maximized, resulting in the highest possible free claiming percentage for those schools. They may choose to leave other schools out of the grouping if that might bring down the ISP and result in lower federal reimbursement.

5. **How do school food authorities claim reimbursement at a Community Eligibility Provision school?**
    School food authorities receive reimbursement by counting and claiming the total number of meals served each day. The identified student percentage (ISP) that establishes eligibility for CEP is also used to determine a free claiming percentage (FCP). The FCP is the percentage of total meals served that can be claimed at the free reimbursement rate and paid with federal funds. The FCP is calculated by multiplying the ISP by 1.6.

    For example, a school with an ISP of 60% qualifies for a FCP of 96% (60% x 1.6). If they serve and claim 200 meals, 192 meals will be reimbursed using federal funds at the free reimbursement rate. 8 meals will be reimbursed using federal funds at the paid reimbursement rate.

    Under Healthy School Meals for All program, any meals reimbursed using federal funds at the paid rate will receive additional reimbursement from state funds to bring the total schools receive for each meal up to the free reimbursement rate for all meals served.

    For example, if a school, district or grouping of schools has an ISP of 45%, they would qualify for a FCP of 72% (45% x 1.6). If 100 meals were served, 72% of the meals would be reimbursed by federal funds at the free reimbursement rate. 28% of the meals would be reimbursed by federal funds at the paid reimbursement rate and state funds under the Healthy School Meals for All program would add additional reimbursement to the 28% of meals to bring the amount of reimbursement up to the free reimbursement rate.

    Non-CEP schools will utilize standard meal counting and claiming procedures. Under the Healthy School Meals for All program, sponsors will receive additional reimbursement from state funds for all paid meals claimed. The total amount of reimbursement received will equal the federal free reimbursement rate.

Provision 2

1. **What is Provision 2?**
   Provision 2 allows school food authorities to serve breakfast and lunch to all children at participating schools at no charge by reducing the application process to once every four years and simplifies meal counting and claiming procedures by allowing a school to receive meal reimbursement based on claiming percentages established in a Base Year. During a Base Year, there is no change in traditional procedures and administrative burden. During years two, three and four of the cycle, the school makes no new eligibility determinations and continues to serve all children meals at no charge and counts only the total number of meals served each day. Then, based on the Base Year Percentages, meals are reimbursed at Free, Reduced, and Paid rates.

2. **Is Provision 2 an option under the Healthy School Meals for All program?**
   Provision 2 is an option for school food authorities who opt-in to the Healthy School Meals for All program in and may be included in CDE's operating recommendations.

3. **How do school food authorities claim reimbursement at a Provision 2 school?**
   Schools that opt in-to Healthy School Meals for All and implement Provision 2 will claim using the methods specified by Provision 2, by establishing base Claiming Percentages of Free, Reduced and Paid students. These percentages are then applied to the total number of meals served in years 2-4 of the program.

   Example: During a Provision 2 Base Year, a sponsor collects applications and determines eligibility as normal. In the Base Year, they claim 35% of their meals as Free, 15% of their meals as Reduced, and the rest (50%) as Paid meals. In years 2-4, they do not collect applications or determine eligibility, but keep a total of meals served. The Claiming Percentages in the first year are applied to the total. So if they served 200 meals in the first month of Year 2, they would claim 35% of the meals at the Free rate = 70 meals, 15% of the meals at the Reduced rate = 30 meals, and the rest, 50% at the Paid rate = 100 meals.

   Under the Healthy School Meals for All program, sponsors will receive additional reimbursement from state funds for all paid meals claimed. The total amount of reimbursement received will equal the federal free reimbursement rate. [More information about Provision 2 is available on the CDE School Nutrition webpage.](#)

State Funding for Meal Reimbursements

1. **What additional state reimbursement will school food authorities receive when implementing the Healthy School Meals for All program?**
   SFAs participating in Healthy School Meals for All will receive state reimbursement that is equal to the federal free reimbursement rate multiplied by the total number of meals served, minus any other federal or state reimbursement that the SFA receives for providing meals.

   This state reimbursement is the difference between the Federal Free and Federal Paid reimbursement rate. Note that the additional state reimbursement for paid students will be the base federal rate for all sponsors, even if the sponsor has a severe need qualification.
   [Current reimbursement rates can be found on the Reimbursement and Funding webpage.](#)

2. **Will school food authorities still receive state funding for Reduced-Price meals if implementing Healthy School Meals for All under the Start Smart and Lunch Protection programs?**

This funding will continue, but all sponsors and/or sites may not receive this reimbursement based on their participation in CEP. Sponsors and/or sites not eligible for CEP will continue to receive an additional $0.30 for breakfast and $0.40 for lunch for meals served to Reduced-Price students. Sponsors and/or sites operating CEP will no longer have a Reduced-Price designation – all meals will be claimed as either free or paid. As such, the additional reimbursement for Reduced-Price meals would no longer apply.

3. **How will the new state reimbursement for Paid meals be coded?**
   The funds have a source code of 3000. The paid reimbursement for breakfast will have Grant Code HSMA Breakfast 3163. The paid reimbursement for lunch will have Grant Code HSMA Lunch 3162. [For reference, all Grant Codes for School Nutrition Programs can be found here](#).

Funding for Wages and Stipends

1. **Are school food authorities required to provide wage increases or stipends to food service employees if implementing the Healthy School Meals for All program?**
   No. School food authorities are not required to participate in this aspect of the program. There will be a separate opt-in process for this portion of the program beginning in SY 2025-26, as appropriations are available.

2. **When is funding for wages and stipends available?**
   A SFA may opt-in to receive funding beginning in School Year 2025-26, as appropriations are available.

3. **How much money will each school district receive for wage increases or stipends?**
   Participating school food authorities will be eligible to receive a minimum of $3,000 or $0.12 per school lunch served in the previous school year.

4. **What documentation will need to be submitted before funds will be disbursed?**
   Participating SFAs will be required to submit an application to receive funding for wages and stipends, which may include supporting documentation. Detailed instructions on how to apply will be released as funds are appropriated for the program.

5. **What staff are eligible to receive a wage increase or stipend?**
   Only employees that directly prepare and serve meals for the School Breakfast and/or National School Lunch Programs are eligible for a wage increase or stipend.

Local Food Program

1. **Are school food authorities required to operate the Local Food Program if implementing the Healthy School Meals for All program?**
   No. School food authorities are not required to participate in this aspect of the program.

   There will be a separate application process for this portion of the program. If a SFA applies to implement the Local Food Program, and is approved, they will use the funds to purchase Colorado grown, raised, or processed products. Additionally, each SFA will be required to create an advisory committee made up of students and parents to help ensure that meals are culturally relevant, healthy and appealing to all students.

2. **When do Local Food Program initiatives begin?**
   A SFA may apply to implement the Local Food Program beginning in School Year 2025-26, as appropriations are available.

3. **How much money will each school district receive for the Local Food Program?**
   Participating school food authorities may receive a minimum of $5,000 or $0.25 per school lunch served to students in the previous school year.

<u>Afterschool Snack Program (ASP) & Fresh Fruit and Vegetable Program (FFVP) under the Healthy School Meals for All program</u>

Visit the [Afterschool Snack Program webpage](#) and the [Fresh Fruit and Vegetable Program webpage](#) for more information.

1. **How will schools qualify for the Afterschool Snack Program if opting into HSMA?**
   Site eligibility for the Afterschool Snack Program will not change if opting into Healthy School Meals for All program or not opting into HSMA. There are two eligibility options for schools to operate ASP:
   a. Area-eligible schools: the school has a student enrollment made up of at least 50% of students eligible for free or reduced-price school meals or is located in the attendance area of a school that has a student enrollment of at least 50% of students eligible to receive free or reduced-price school meals. Area eligible ASP sites serve snacks free to all students and are reimbursed at the free rate.
   b. Non-area eligible schools: the school does not have a student enrollment made up of at least 50% of enrolled students eligible for free or reduced-price meals and is not located within the attendance area of school that does. Snacks must be counted and claimed based on the student's approved eligibility (free, reduced, or paid) and is reimbursed at the free, reduced, and paid rates. The maximum reduced-price charge is $0.15.
   Sponsors interested in operating the ASP may apply through the [Colorado Nutrition Portal](#) at any time throughout the school year and application instructions are available on the [How to Apply webpage](#).

2. **How do CEP schools qualify for the Afterschool Snack Program?**
   In the first year of CEP, schools may qualify for ASP using the most recent October Count data to establish area-eligibility or may operate ASP under non-area eligible provisions. After the first year of CEP, LEAs and schools must use the CEP claiming percentage to establish area-eligibility or operate under non-area eligible provisions. A CEP school is area-eligible if:
   a. At least 50% of students are free or reduced-price eligible (a school's individual ISP is at least 31.25%), or
   b. The school is located within the attendance area of another school in which at least 50% of the enrolled children are eligible for free or reduced-price school meals.

3. **How do area-eligible CEP schools claim ASP?**
   Area-eligible CEP schools claim all snacks at the Federal free rate. [Current reimbursement rates can be found on the Reimbursement and Funding webpage](#).

4. **How do non-area eligible CEP schools claim ASP?**
   Non-area eligible CEP schools claim snacks under their CEP claiming percentages. For example: if 84 percent of snacks are reimbursed at the free rate, then 100 percent minus 84 equals the percentage of snacks reimbursed at the paid rate (i.e. 16% of snacks will be reimbursed at the paid rate).

5. **How do CEP schools qualify for FFVP?**
   CEP elementary schools may qualify for FFVP by using the individual school's ISP multiplied by 1.6 A school's individual ISP must be at least 31.25% to qualify for FFVP. [Specific application instructions are available on the FFVP webpage](#).

Free and Reduced Lunch Application Requirements

1. **May school food authorities require households to complete and submit a free and reduced lunch application?**
   No. Schools implementing the School Breakfast and National School Lunch Programs may not require households to complete and submit a free and reduced lunch application. It is the household's choice to complete and submit an application for meal benefits. However, a school food authority with non-Community Eligibility Provision schools is required to follow CDE's HSMA Application Collection policy, which outlines specific activities SFAs must complete to stay in compliance with HSMA program requirements.

2. **Will school food authorities collect free and reduced lunch applications at schools implementing the Community Eligibility Provision?**
   No. Schools implementing the Community Eligibility Provision will not collect free and reduced lunch applications and schools will claim reimbursement for meals served based on how many students are eligible for free meals, using the direct certification method.

   CEP eligible districts may use a combination form if the district includes CEP and non-CEP schools, or if operating CEP district-wide. You should continue marketing your application as normal.

3. **May school food authorities require or incentivize households to complete a combination form at Community Eligibility Provision schools?**
   Yes. If the form and information collected is not being used for meal benefits, a school food authority may require and incentivize families to complete a combination or other form. This is only allowable at CEP schools.

4. **Who is responsible for processing a combination form and how is it funded?**
   Districts opting to use a combination form must be able to distinguish between forms from students attending CEP vs. non-CEP schools so the district can comply with program requirements related to household applications. For example, only non-CEP applications are used for selecting the verification sample, conducting an independent review of applications, and the Certification and Benefit Issuance portion of the Administrative Review.

   School food service staff has expertise collecting household income forms. If a district decides it is necessary to collect alternate income forms (i.e. combination form) to allocate education funding, school food service staff may process the forms, but the cost of alternate income form processing may not be paid from the non-profit school food service account and the forms may not be associated with school meals. The district must pay for (or reimburse the non-profit school food service account) for the cost of processing forms.

   Additionally, the district must cost-allocate expenses for form processing. Costs for processing forms for students attending CEP schools may not be paid from the nonprofit school food service account. Non-federal funding sources that may be utilized include, but are not limited to;
   - Cash donations; and
   - In-kind contribution funds from outside sources, such as volunteer services
   - General fund transfer

5. **How should school food authorities communicate the collection of free and reduced lunch applications and/or a combination form to their families?**

CDE School Nutrition has developed a [communications toolkit](#) that includes letter templates, social media posts, and handouts for communication to families. Additionally, the communications toolkit includes newsletter write ups, robocall scripts, and copy for your district website.

Talking points SFAs may utilize and tailor include:

- The Healthy School Meals for All Program is helping make sure Colorado children and teens have access to nutritious food by providing the opportunity for districts to offer free breakfast and lunch to all students at participating schools.
- Starting in the 2023-24 school year, the program – which is made possible thanks to the support of Colorado voters — is available to all school districts that choose to participate.
- Just like in previous years, it's important for families to still provide their household income information when requested by their district. While meals will be provided for free to all students in participating schools, it's important for districts to continue gathering this information in order to receive full access to federal funding.
- Additional funds will go directly to schools to help cover the cost of meals, and will also support afterschool activities and other nutritional programs for students.
- Plus, families who qualify may receive discounted school fees, class materials, bus passes, utilities support and more.
- Having household income information is also important for establishing Summer EBT eligibility. Families that qualify for Summer EBT will receive $120 per child each summer to purchase groceries.
- All household income information provided to your school district is strictly confidential and protected. Only one form is required for all children in the household. Immigration, migrant, citizenship or refugee status is not required when completing the form.
- Contact your school's nutrition department for details about which form to complete and for more information. Learn more about Healthy School Meals for All at www.cde.state.co.us/nutrition/healthy-school-meals-for-all-program.

The following chart summarizes the program eligibility activity options for various scenarios:

	NSLP/SBP without HSMA	NSLP/SBP with HSMA (no CEP schools)	NSLP/SBP with HSMA (some CEP schools)	NSLP/SBP with HSMA (all CEP schools)
Must collect and process applications as part of normal operations	X	X	X (only for non-CEP schools)	
Must follow disclosure requirements	X	X	X	X
Must complete direct certification	X	X	X	X
Must complete verification	X	X	X	

			(only for non-CEP schools)	
May collect a combo form at all sites		X	X	X
May use a student's eligibility status from prior school year for 1st 30 days of new school year (carryover)	X	X	X (only for non-CEP schools)	

Title 1 Funding and At-Risk Student Identification

1. **What is Title I funding?**
   Title I is a federal program that provides financial assistance to school districts and schools with high numbers or high percentages of children from low-income families to help ensure all children meet challenging state academic standards. The state's Title I allocation is based on census data, not free and reduced lunch (FRL) application data. The only impact would be on a district's use of FRL for ranking and serving schools for the grant process. Districts may use other indicators of poverty other than FRL (e.g., federal census data or average per-capita income) when they rank and serve.

   The Colorado Department of Education uses the FRL data from Student October Count to prepopulate the poverty rates for each school; however, districts may change the poverty rate based on other data. Districts must be consistent in the data set used across all schools.

   Additionally, only Community Eligibility Provision eligible schools will not be required to collect FRL applications. Schools not eligible to implement CEP will still be required to collect FRL applications for their meal programs.

   Resources:
   - Information on within-State Title I and Title II allocations(pages 2-10 and 17-18)
   - Title 1 Guidance Memo for CEP
   - CEP and Title 1 Guidance (pages 9-11)
   - CDE's Title I page

2. **How will school districts document eligibility for Title I funding if they are opting into the Healthy School Meals for All program, all schools are implementing the Community Eligibility Provision and not collecting free and reduced lunch applications?**

   In the absence of free and reduced lunch (FRL) data in a Community Eligibility Provision (CEP) district, a district may use:
   - Direct certification counts adjusted by 1.6 in CEP schools or in CEP and non-CEP schools
   - Direct certification counts adjusted by 1.6 in CEP schools and direct certification counts plus counts from household applications in non-CEP schools
   - May use other indicators of poverty other than FRL (e.g., federal census data or average per-capita income)
   - Medicaid data, TANF data, Census data, average per capita income or a combination

   CEP only districts will not collect FRL applications.

3. **How will school districts document eligibility for Title I funding if they are opting into the Healthy School Meals for All program and have some Community Eligibility Provision schools (i.e. not collecting FRL applications) and some non – Community Eligibility Provision sites (i.e. collecting FRL applications)?**

Districts may use a combination form if the district includes CEP and non-CEP schools. You should continue marketing your application as normal.

Districts may use other data for CEP schools, including:

- o Direct certification counts adjusted by 1.6 in CEP schools or in CEP and non-CEP schools
- o Direct certification counts adjusted by 1.6 in CEP schools and direct certification counts plus counts from household applications in non-CEP schools
- o May use other indicators of poverty other than FRL (e.g., federal census data or average per-capita income)
- o Medicaid data, TANF data, Census data, average per capita income or a combination

4. **How will school districts document eligibility for Title I funding if they are opting into the Healthy School Meals for All program and have no Community Eligibility Provision sites (i.e. collecting FRL applications)?**

Districts will continue to collect and process FRL applications and complete direct certification matches as normal. A district may use FRL applications or the combination form.

5. **What's the current status of the at risk measure?**
Colorado House Bill 22-1202 identified a new at-risk measure to identify students who are at risk of below-average academic outcomes because of socioeconomic disadvantage or poverty. A At-Risk Measure for School Finance Working Group offered recommendations for implementation of a new at-risk measure for the 2023-24 budget year. In May 2023, the School Finance Senate Bill 23-287 was introduced and passed. The bill:

- Extends the implementation of the new at-risk factor requirement to SY 2024-25
- Requires CDE to conduct pre-implementation modeling and testing of total program funding using the new at-risk factor and report findings to the education committees and joint budget committee
- Creates an at-risk funding hold harmless for FY 23-24 to be implemented during mid-year true-up
- Creates a public school finance task force for the purpose of examining and making recommendations concerning school finance

View March 2024 updates from the At-Risk working group for more information. In summary, the new at-risk measure is delayed until SY2025-26, but the at-risk funding for SY2024-25 will be at least the amount received in SY2023-24. For SY2024-25, at-risk will continue to use Free and Reduced-price lunch eligibility through all meals (ie, free and reduced-price applications, categorical eligibility, and direct certification). Visit CDE's At-Risk Count | CDE (state.co.us) webpage for more information.

==At-risk reporting guidelines may differ from school nutrition reporting guidelines. Districts operating provisional programs may need to track student status for At-risk reporting separately from school nutrition. Per school nutrition guidelines, student carryover status may only be active for 30 operating days or until an application has been received for the current school year, while At-risk may allow an alternate carryover timeline.==

Unpaid Meal Charges, Paid Lunch Equity, and Nonprogram Revenue

1. **How will school food authorities handle unpaid meal charges?**
   School food authorities should follow their unpaid meal charge policy for balances accrued prior to opting into the program. The food service fund cannot absorb unpaid meals charges and must follow their district policy if writing off bad debt. For resources, including Unpaid Meal Price Policy Checklists, visit the Unpaid Meal Charges webpage.

   If a SFA opts into the Healthy School Meals for All program, unpaid meal charges will no longer accrue. SFAs operating an a la carte program should consider how to address student balances as it relates to a la carte purchases. It is not recommended to allow students to charge for a la carte items.

   If SFAs do not opt into the Healthy School Meals for All program, they must continue to follow their district's unpaid meal charge policy.

2. **Are school food authorities operating the Healthy School Meals for All program required to have an unpaid meal charge policy?**

   No, because the SFA would not be charging any students for meals, they are not required to have an unpaid meal charge policy.

3. **Are school food authorities operating the Healthy School Meals for All program required to complete the Paid Lunch Equity tool?**

   No, because the SFA would not be charging any students for meals, they are not required to complete the paid lunch equity tool.

4. **Are school food authorities who offer nonprogram foods (a la carte, vending, adult meals, catering) required to complete a Nonprogram Revenue Tool?**

   Yes, SFAs are required to assess revenue from nonprogram foods annually. This can be done by completing either the USDA nonprogram revenue tool or the simplified approach tool, which would be collected by CDE School Nutrition during an Administrative Review. More information on nonprogram revenue, including the nonprogram revenue tool, can be found here.

Special Dietary Needs

1. **Are school food authorities required to accommodate children with disabilities in school meal programs?**

   Yes. SFAs are required to continue to accommodate special dietary needs when due to a disability and supported by the appropriate documentation regardless of the meal service model. Best practices to consider include:
   - Assess the district's special dietary needs policy to ensure it still meets the needs of the sponsor and families. For example, if you did not allow special dietary needs forms to roll over from year to year previously, you could consider allowing it to streamline paperwork.
   - Post the district's meal accommodation policies and forms on the website to increase household awareness and improve access.
   - Use a consistent process to separate and identify special dietary meals and communicate to all who will be involved with meal service; for example, teachers serving meals in the classroom or

those assisting younger students in the serving line. Be sure to only share students' personal information with those who must know for meal service.

- Assess menus to make sure accommodations can be made within a modified cycle menu, if applicable. For example, substituting similar gluten free grains for the grains included on the cycle menu. If you have a large number of accommodations, consider developing a special dietary needs menu that contains as few allergens as possible in order to accommodate a variety of requests with one menu.
- If you are operating CEP and using tally sheets in place of an electronic point of service, consider having students pick up a card prior to meal service that they can turn in at the point of sale. These cards could be specific to each student and discreetly identify special dietary needs. Additionally, if not using an electronic point of sale to alert staff to special dietary needs, all staff should receive regular updates on menu ingredients and students with special dietary needs.
- Identify communication needs with school administrators, teachers, and parents. Resources can be found on the special dietary needs webpage.

Implementation Planning Best Practices

At the 2023 Colorado School Nutrition Association Conference, sponsors had the opportunity to share ideas and best practices around planning to implement the Healthy School Meals for All program in the 2023-2024 school year. Below is a summary of the best practices that were identified by program operators:

	Best Practices
Marketing Free/Reduced or Combo Form	- Maintain strong communication with administration, including sports/coaching staff - Make applications available in different modes: paper, online, send via email - Incentivize application completion (for CEP sites only) - Communicate local benefits (i.e., waived fees for families that qualify) and how this information may impact school funding - Use the communication templates in CDE's outreach toolkit to support sharing with different audiences - Share via social media, at back to school nights and post HSMA video on website
Staffing	- Use stipends for non-nutrition staff as incentive to help with nutrition programs - Use student workers, interns, or a prostart program to staff open positions. Parents may be good candidates as they are scheduled while their kids are in school - Cross-utilize district employees who aren't traditionally scheduled during that time of the day (ie, before/after care or transportation employees) - Market open positions on social media, in school newsletters or using yard signs outside of schools - Promote the mission of nutrition services – feeding kids healthy meals - Promote the benefits of working in school nutrition (school day hours, no nights or holidays, career that impacts children's academic success) - Provide incentives for employees (ie, prizes or reward program) - Share career growth opportunities - Cross-train your team to support increased volume and staffing shortages *Remember: additional funding for foodservice wages/stipends for sponsors participating in HSMA may be available in future years as appropriations are available.*

Alternate Serving Models	• Use vending machines, kiosks, or satellite serving stations (e.g., food trucks or BBQ trailers)
	• Use tablets for additional POS stations
	• Use barcodes or keypads to move students through the line quickly
	    o Place two stations at each POS (pin pads or scanners)
	• Offer all options on all serving lines
	• Modify the traditional POS at CEP sites and tally students served reimbursable meals
	• Add reimbursable vending machines
	• Evaluate needs for more equipment and/or POS stations
	• Evaluate staffing needs for updated serving models
	• Collaborate with administration regarding schedules
	    o Encourage teachers to bring students at their scheduled time
	    o Ensure there's enough time for students to get through the serving line, and enough time to eat
	    o Communicate changes in the lunchroom with admin in advance for understanding and grace when implementing new processes
	
	To ensure students' selections meet meal pattern and Offer versus Serve requirements, the point of sale should be stationed at the end of the serving line after all foods have been offered. Connect with your CDE School Nutrition point of contact to discuss alternate serving models and alternate points of sale.

Menu Planning	• Streamline/simplify menus at start of year to help staff adjust to higher volumes
	• Utilize cycle menus
	• Create menus for different staffing scenarios
	• Cross-utilize product or ingredients
	• Include pre-made/composed salads on salad bar
	• Offer grab & go reimbursable meals
	• Conduct taste testing for student feedback, consider QR codes to collect data
	• Plan for menu celebrations and promotions, and consider what is offered around school breaks
	• Plan easier to serve & prepare items
	• Improve variety and visibility of fresh produce
	• Plan menus that maximize equipment usage
	• Utilize offer vs. serve rather than pre-plated
	• Scratch cooking allows for more flexibility/control re: supply chain challenges
	    o Utilize a combination of scratch cooking & individually wrapped items to reduce labor
	• Plan separate menus for different grade levels
	    o Consider less options for Elementary students to choose from
	• Consider storage and equipment capacities when planning menus

Planning Tips from Other Districts	• Share regular communications to families
	o Back to School night tables
	o Social media campaigns
	o Reminders that reimbursable meals are free, a la carte and milk only purchases are not
	• Phase-in a la carte programs to allow staff to adjust to higher volumes
	• If adding breakfast program, plan for additional staff time and product orders
	• Forecast with sites, warehouse, and vendors
	• Implement traveling managers and staff to cover shortages and training needs
	• Utilize training videos: CDE's Moodle trainings, ICN resources
	• Consider warehouse needs - trucks, routes, storage, staffing
	• Consider how to handle an increase in special diets
	• Consider software platform needs and updates
	• Identify changes to equipment and delivery needs
	o Including charter schools
	• Consider logistics for serving Pre-K meals