

# 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 weekly, as needed. New information will be highlighted in yellow.



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**COLORADO**  
Department of Education  
School Nutrition

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## 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 opt into 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
- Funding to purchase local food from Colorado farmers and ranchers
- Funding to increase wages or provide stipends to staff who prepare and serve the meals

### 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.

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

[A fiscal analysis](#) estimates it will cost approximately \$100 million annually to fund the program.

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 are estimated at up to \$115.0 million, depending on actual federal reimbursement rates.

Meal reimbursements are estimated at between \$48.5 million and \$78.5 million 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, pending approval, to begin 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 will begin in School Year 2023-24 for participating school food authorities.

Other portions of the program, pending approval of a direct certification/Medicaid pilot program, including funding for pay increases and stipends for kitchen employees and incentives for local purchasing would begin in School Year 2024-25.

SFAs will be required to opt-in annually to each portion of the program in which they plan to participate.

#### 5. What are the timelines for opting in and implementing the Healthy School Meals for All Program?

CDE School Nutrition will conduct several trainings over the next eight months to cover frequently asked questions about the program and how to implement the Community Eligibility Provision (CEP) for eligible schools.

Districts and schools that are not eligible for CEP will conduct operations as usual and 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:** CDE will notify CEP eligible districts and work collaboratively to determine grouping of sites, if applicable
- **May - June:** Submit ISP documentation to the state
- **July:** Begin implementing CEP in eligible schools

Training, resources and deadlines will be announced in the [Dish e-newsletter](#).

#### 6. 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 meal times, 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](#).

## 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 or charter school food authority that participates in the National School Lunch Program or School Breakfast Program may choose to opt-in and participate each year. SFAs are not required to opt-in to the program. To participate, a SFA must:

- Provide annual notice of participation to the department of education
- Maximize the amount of federal reimbursement by participating in the federal Community Eligibility Provision (CEP) at eligible schools
- Provide free meals to all students enrolled in participating schools

It is optional for SFAs to provide wage increases or stipends to front line staff or receive funds to purchase local food.

### 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](#).

Public and charter schools that are interested in becoming a new school food authority should contact Megan Johnson at [johnson\\_m@cde.state.co.us](mailto:johnson_m@cde.state.co.us) or 303-653-6138. 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 this program?

No. All schools within the school food authority do not have to qualify for CEP to implement this program; however, any school that does qualify for CEP in a participating district must implement CEP. Schools that implement CEP must participate in both the school breakfast and school lunch programs, per federal regulations. If a school does not qualify for CEP, they will collect free and reduced lunch applications and claim students based on the student's eligibility status.

### 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.

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 offers instructional time through the [state sponsored preschool program or soon to be universal preschool program starting school year 2023-24](#). 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.

**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, 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 participating in the Community Eligibility Provision (CEP) for all qualifying schools, or grouping of schools, and by directly certifying students' eligibility.

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), 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 lunch application.

Additionally, as part of the bill, the Colorado Department of Education applied to participate in a demonstration project with the U.S. Department of Agriculture to use Medicaid data to help directly certify more students. The CDE is awaiting USDA approval. Utilizing Medicaid data should increase the number of students that are directly certified and increase 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 40 percent or 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.

**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 or their status as Migrant, Foster, Homeless/Runaway or Head Start students. Extended Eligible students are 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:

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

### 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 40% 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. SFAs have discretion in how to group schools to optimize CEP benefits and administrative ease.

**Example 1:** If a school in the district has an identified student percentage (ISP) of 35%, 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.

Tools and resources to assist in optimizing grouping to achieve the maximum federal reimbursement are forthcoming.

### 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 amount of reimbursement received will equal the federal free reimbursement rate.

## 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 provide wage increases or stipends to food service employees if implementing the program. There will be a separate opt-in process for this portion of the program beginning in SY 24-25.
- 2. When is funding for wages and stipends available?**  
Pending approval for the direct certification-Medicaid pilot, a SFA may opt- in to receive funding beginning in School Year 2024-25.
- 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?**  
State board rules will determine what documentation will need to be submitted before funds will be disbursed. The rules should be finalized and approved by April 2023.
- 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 operate the Local Food Program if implementing the Healthy School Meals for All 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?**  
Pending approval for the direct certification-Medicaid pilot, a school food authority may apply to implement the Local Food Program beginning in School Year 2024-25.
- 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.

## 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 should notify households that while costs are being covered by state funds, Colorado school districts must maximize federal reimbursement to ensure sustainability of the program. In order to do this, households are encouraged to fill out a free and reduced lunch application regardless of income level.

**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.

In the past, CEP eligible districts have used a combination form if the district includes CEP and non-CEP schools. The Colorado Department of Education is looking into allowable options and more guidance is forthcoming.

### **Title 1 Funding and At-Risk Student Identification**

**1. How will school districts document eligibility for Title I funding if they are opting into the Healthy School Meals for All program and not collecting free and reduced lunch applications?**

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.

For more information, visit USDA's [Title 1 Guidance Memo for CEP](#) and [CEP and Title 1 Guidance](#) resources, as well as [CDE's Title I page](#).

**2. How will school districts identify at-risk students if they are not collecting free and reduced lunch applications?**

Colorado [House Bill 22-1202](#) identifies a new at-risk measure to identify students who are at risk of below-average academic outcomes because of socioeconomic disadvantage or poverty. An [At-Risk Measure for School Finance Working Group](#) will offer recommendations for implementation of a new at-risk measure for the 2023-24 budget year. Visit CDE's [At-Risk Count](#) | [CDE \(state.co.us\)](#) webpage for more information.

CDE School Nutrition will provide more information once recommendations and implementation are determined.

### **Unpaid Meal Charges**

**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

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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.

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.