



November 17, 2020

Dear County and District Superintendents, Charter School Administrators:

## **2020-21 Requirements for Collecting Free and Reduced-Price Meal Eligibility Data Used to Determine Supplemental and Concentration Grant Funding**

Due to the coronavirus pandemic (COVID-19), the United States Department of Agriculture (USDA) issued nationwide waivers allowing schools to operate summer meal programs through December 31, 2020. On October 9, 2020, the USDA announced the extension of these waivers to June 30, 2021. With the operation of the summer meal programs, all children receive meals at no charge and no free and reduced-price meal (FRPM) applications, which are required under the National School Lunch Program (NSLP), are collected.

In California, students who are determined to be FRPM-eligible based on an FRPM application are included in the Unduplicated Pupil Count (UPC) used to determine supplemental and concentration grant funding under the Local Control Funding Formula (LCFF). Prior to the USDA announcing the summer meal programs waiver extension through June 30, 2021, the California Department of Education (CDE) had communicated to local educational agencies (LEA) that those school sites opting to operate under the waiver may continue to solicit FRPM applications for LCFF funding purposes, and in anticipation of the waiver expiring on January 1, 2021. With the USDA waiver now in place for the entire school year, **all school sites within an LEA operating summer meal programs need to transition to collecting alternative household income forms to determine FRPM eligibility for the UPC.** FRPM applications distributed prior to October 9 and received by December 31 are valid for LCFF and LEAs do not need to collect alternative household income forms from these families at the affected school sites.

The CDE anticipates that many school sites will opt to operate summer meal programs since all students may receive free meals and to benefit from the significantly reduced administrative burden. The purpose of this letter is to provide LEAs with specific information on ways to mitigate the FRPM application LCFF funding impact when operating the summer meal programs now that the waiver has been extended to June 30, 2021.

Attachment A provides specific actions LEAs may take based on whether the school is operating the summer meal programs, under a Community Eligibility Provision (CEP), or Provision 2/3. In order to maximize the return of completed forms, LEAs collecting alternative household income forms may want to provide information to households

November 17, 2020

Page 2

regarding the importance of the information being collected and the potential benefit to their LEA.

It should also be noted that an LEA's FRPM-Eligible count that the CDE posts on DataQuest is used for various other programs/grants beyond LCFF. These counts are derived from the same data LEAs certify for the UPC as part of the Fall 1 submission to the California Longitudinal Pupil Achievement Data System (CALPADS). Therefore, any increased count that results from the time extension and other accommodations that have been made this year to support LEA efforts to collect UPC data for LCFF, will be reflected in the FRPM-eligible count, posted on DataQuest, that LEAs rely on for other purposes.

The CDE recognizes all the challenges the LEAs are facing this year and it is unlikely that any additional COVID-19 related legislation will be considered until next year. In the meantime, please direct any questions as follows:

- For questions related to LCFF funding and the alternative household income form, please contact the Principal Apportionment Section by email at [PASE@cde.ca.gov](mailto:PASE@cde.ca.gov).
- For questions about NSLP, summer meal programs, CEP, or Provisions, please contact the School Nutrition Program Unit by email at [SNPinfo@cde.ca.gov](mailto:SNPinfo@cde.ca.gov).
- For questions related to CALPADS, please contact the CALPADS Service Desk by email at [calpads-support@cde.ca.gov](mailto:calpads-support@cde.ca.gov).

Sincerely,

Elizabeth Dearstyne, Director  
School Fiscal Services Division

Kim Frinzell, Director  
Nutrition Services Division

KF:ED:pm

cc: Chief Business Officers  
Food Service Directors  
CALPADS Administrators

## Attachment 1

### **2020–21 Requirements for Collecting Free and Reduced-Price Meal Eligibility Data Used to Determine Supplemental and Concentration Grant Funding Based on Meal Program Type**

#### **Basic Requirements for All Meal Program Types**

In order to be included in the Unduplicated Pupil Count (UPC) that determines supplemental and concentration grant funding under the Local Control Funding Formula (LCFF), a student must be identified in the California Longitudinal Pupil Achievement Data System (CALPADS) as enrolled on Census Day and meeting *at least one of the following criteria*:

- Free and Reduced-Price Meal (FRPM) eligible based on one of the following:
  - An FRPM application that was distributed prior to October 9, 2020 and received by December 31, 2020.
  - An alternative household income form that was received by December 31, 2020.
  - A direct certification match in one of the CALPADS monthly matches conducted through January 2021.
  - A local direct certification match for students with eligibility established on or before December 31, 2020.
  - A migrant, homeless, or tribal foster youth status on Census Day.
  - A foster youth on Census Day as identified through the statewide match or local match functionality in CALPADS.
- An English Learner (EL), identified as such by December 31, 2020.

In order to be included in the UPC, a student does not require an FRPM application or alternative household income form, if they are an EL, foster, homeless, migrant, or directly certified. LEAs may therefore choose to focus any additional collection of FRPM applications or alternative household income forms on students who are not already meeting one of the other UPC criteria. LEAs are reminded, however, that not collecting applications or forms from students who are EL and who are not directly certified, will impact their FRPM-Eligible count.

LEAs are required to certify the data used to determine their UPC, by approving their Fall 1 CALPADS submission, which includes Report 1.17 – *FRPM/English Learner/ Foster Youth Count* in CALPADS. In order to be included in First Principal Apportionment (P-1) LCFF funding calculations, the required records must be included

in LEAs' approved Fall 1 submission by the December 18, 2020 certification deadline. To be included in Second Principal Apportionment (P-2) LCFF funding calculations, the required records must be included in LEAs' certified Fall 1 submission by the close of the amendment window on January 29, 2021. Subsequent changes to CALPADS counts for LCFF can only be submitted through the audit process.

## Summary of Meal Program Requirements for 2020–21

Table 1

Meal Program Type	FRPM Application Required for Meal Program	FRPM Application Allowed for LCFF	Alternative Household Income Form Required for LCFF (a)
Summer Meal Programs	No	No (b)	Yes (b)
National School Lunch Program (NSLP)	Yes	Yes	No
Community Eligibility Provision (CEP)	No	No	Yes (c), if base year or collecting annually
Provision 2/3	Yes, in base year only	Yes (d)	Yes (d)

- a. Alternative household income form prototypes can be found on the California Department of Education (CDE) LCFF Frequently Asked Questions web page at: <https://www.cde.ca.gov/fg/aa/lc/lcfffaq.asp#PROV2and3>.

Alternative household income forms may be distributed and collected online, and electronic signatures are acceptable.

In 2020–21, LEAs may complete an alternative household income form on behalf of a student's household by collecting the required information over the telephone provided the LEA documents 1) the date, time, and name of the student's adult household member spoken to, and 2) the date, time, name, and signature of the LEA staff member collecting the information.

- b. FRPM applications that were distributed prior to October 9, 2020 and which are received by December 31, 2020 are valid for LCFF.

- c. Alternative income forms may be collected to establish an LCFF base year during the CEP cycle, or collected each year during the CEP cycle if an LEA chooses not to establish an LCFF base year.
- d. Provision 2/3 schools collect FRPM applications only in the base year. LEAs may choose to use FRPM applications collected in the Provision 2/3 base year to establish an LCFF base year. LEAs that choose not to establish an LCFF base year, may collect alternative income forms in Provision 2/3 non-base years of the Provision cycle

## Information Specific to Meal Program Type

### 1. Schools Participating in Summer Meal Programs

Schools opting to participate in summer meal programs should no longer solicit FRPM applications. (Information about the summer meal programs can be found here: <https://www.cde.ca.gov/ls/nu/cnpcovid19guidance.asp>.) Such LEAs should no **longer distribute FRPM applications at these school sites, and should only distribute alternative household income forms for LCFF information.**

Any FRPM applications that were distributed prior to October 9, 2020 (announcement of the June 30, 2021 waiver extension), and are received by December 31, 2020, are valid for identifying a student as eligible to be included in the UPC which is used to determine LCFF funding.

The CDE recognizes the difficulty of implementing the collection of a new form at this late date. However, United State Department of Agriculture (USDA) policy prohibits the distribution of FRPM applications for purposes other than establishing eligibility for participation in Child Nutrition Programs. Alternative household income form prototypes can be found on the CDE's LCFF Frequently Asked Questions web page at <https://www.cde.ca.gov/fg/aa/lc/lcfffaq.asp#PROV2and3>. These forms may be distributed and collected online, and electronic signatures are acceptable.

Additionally, for the 2020–21 school year only, LEAs may complete an alternative household income form on behalf of a student's household by collecting the required information over the telephone provided the LEA documents 1) the date, time, and name of the student's adult household member spoken to, and 2) the date, time, name, and signature of the LEA staff member collecting the information. Food service staff may also assist in the distribution and collection of alternative household income forms. However, the time spent on this activity cannot be charged to food service funds. LEAs should refer to the time documentation guidelines in the *California School Accounting Manual*, available on CDE's Accounting Definitions, Instructions & Procedures web page at <https://www.cde.ca.gov/fg/ac/sa/> to ensure time documentation requirements are satisfied.

Schools that choose not to operate under the summer meal programs waiver, must adhere to all NSLP rules, which includes collecting FRPM applications.

## **2. Schools Operating under CEP**

Schools participating under the CEP receive reimbursements for meals served based on the percentage of students who have been directly certified each year (in a four-year cycle, plus grace year), and are prohibited from collecting FRPM applications. Students are directly certified through a state or local match that determines school meal program eligibility based on students' enrollment in public assistance programs, such as CalFresh. Since CEP schools are prohibited from collecting FRPM applications, *California Education Code* authorizes the collection of alternative household income forms for LCFF purposes. To minimize this data collection, the *EC* also authorizes CEP schools to determine students' eligibility in an "LCFF base year" and to report that eligibility in each of the following three school years, after which the school must establish a new LCFF base year.

During this COVID-19 year, the need to collect alternative household income forms primarily impacts schools that did not opt to establish a base year and collects forms annually, and those schools establishing an LCFF base year in 2020–21. The CDE recognizes that these schools may find it difficult to collect forms from families this year. Unfortunately, the CDE does not have the authority to exempt schools from this statutory requirement. To provide more time during this COVID-19 year, the deadline by which LEAs must receive those forms in order to be included in the UPC was extended from October 31, 2020 to December 31, 2020. LEAs may also distribute and collect alternative household income forms online, and electronic signatures are acceptable. Additionally, for the 2020–21 school year only, LEAs may complete an alternative household income form on behalf of a student's household by collecting the required information over the telephone provided the LEA documents 1) the date, time, and name of the student's adult household member spoken to, and 2) the date, time, name, and signature of the LEA staff member collecting the information.

LEAs may also establish a new base year earlier than required. Anticipating that the number of students who are FRPM-eligible due COVID-19 will be higher this year, some LEAs are choosing to establish a new LCFF base year in 2020–21. This is permissible, but LEAs are reminded that they must only use the information collected in 2020–21. For example, if a household was previously identified as FRPM eligible, but does not return a form in 2020–21, they will no longer be considered FRPM eligible since the base year has been reset. Alternatively, LEAs may establish a new base year in 2021–22 should schools anticipate a higher UPC due to increased collection of alternative household income forms when operations return to normal.

## **3. Schools Operating Under Provision 2/3**

Schools operating under Provision 2/3 receive reimbursement for meals served based on participation in a base year (of a four-year cycle for Provision 2; five-year cycle for Provision 3). These schools collect NSLP applications in the base year, and are prohibited from collecting applications in subsequent years the school is on a Provision 2 or 3 status, except to reestablish a base year. For LCFF purposes, these schools must also establish an LCFF base year, similar to CEP schools. Schools, however, may

November 17, 2020

Page 7

perform the LCFF base year data collection during the same year that they establish a “Provision 2/3 base year” under the NSLP, in which case, NSLP applications can be used for LCFF purposes.

On November 2, 2020, the USDA issued guidance to state agencies and LEAs regarding the establishment of Provision 2 base years at school sites in the 2020–21 school year. This guidance stipulates that since schools that operate summer meal programs for a portion of school year 2020–21 will not have a complete base year and claim data to establish claim percentages, Provision 2 base years cannot be established for such schools in 2020–21. The CDE’s Nutrition Services Division will contact LEAs approved for a Provision 2 base year in 2020–21 with options for restarting a base year in 2021–22.

LEAs that operate Provision 2 or 3 and established a separate LCFF base year that must be reestablished in 2020–21, can collect alternate income information forms to establish the UPC for LCFF. Like CEP, the deadline by which LEAs must receive those forms in order to be included in the UPC was extended From October 31, 2020 to December 31, 2020.