



**MEMORANDUM**

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**To:** Public Education Agency Data Coordinators

**cc:** Public Education Agency Administrators  
National School Lunch Program – School Food Authorities

**From:** Academic Achievement  
Exceptional Student Services  
Health & Nutrition Services

**Date:** November 26, 2024

**Subject:** Guidance on Reporting Income Eligibility 1 or 2 Needs and Student School Food Service Program Association data into Arizona Education Data Standards (AzEDS)

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For the Arizona Department of Education (ADE) to comply with federal reporting and business requirements, ADE requires that all Public Education Agencies (PEAs) submit Income Eligibility 1 or 2 data for eligible students. This memorandum guides PEAs in reporting the Income Eligibility 1 or 2 data into AzEDS based on the type (if any) of National School Lunch Program (NSLP) the PEA operates. When determining what source of information PEAs use to collect this student-level information, the PEA should leverage systems already in place. To provide accurate Income Eligibility 1 or 2 data into AzEDS, PEAs are advised to follow the questions and prompts below.

1. Does the PEA operate the National School Lunch Program (NSLP) or School Breakfast Program (SBP)?
  - a. If no, the PEA **must** distribute and process the alternative form for income-based eligibility and report any student determined as Income Eligibility 1 or 2.
  - b. If yes, proceed to number 2
2. Does the PEA’s NSLP and SBP operate Community Eligibility Provision (CEP), or is it in a non-base year for Provision 2 or Provision 3?
  - a. If no, the PEA **must** utilize the [USDA NSLP Household Application](#) and [CNP Direct Certification](#) to report a student as Income Eligibility 1 or Income 2.
  - b. If yes, proceed to number 3

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3. Does the PEA implement CEP or Provision 2 or Provision 3 for the NSLP and SBP at all of the PEA's school sites?
  - a. If no, then sites that operate regular NSLP must use 2(a) above at those school sites, **and** school sites operating CEP or Provision 2 or 3 in a non-base year must use the alternative form for income-based eligibility for all students at those school sites in addition to using CNP Direct Certification
  - b. If yes, then the PEA must use 1(a) above and, in addition to 1(a), may use CNP Direct Certification to report a student determined to meet the criteria for Income Eligibility 1 or 2.

PEAs are reminded that the alternative form for income-based eligibility and the USDA NSLP Household Application shall not be used simultaneously at the same site. Only when a PEA operates the CEP at one or more sites and operates the regular NSLP or SBP at other sites will both forms be used within the same PEA. See the table below for additional clarity.

PEAs must ensure confidentiality measures are in place when accessing and sharing student eligibility data associated with the NSLP, including eligibility status information derived from the CNP Direct Certification system. Additional details on the federal regulations and restrictions on the disclosure and use of household and student information obtained through the NSLP can be reviewed in Section 5 of the [Eligibility Manual for School Meals](#).

PEAs administering the alternative form for income-based eligibility can find a template on the Academic Achievement Title I website (<https://www.azed.gov/titlei>). PEAs using this form may submit an AzEDS start date before the signature date of the parent or legal guardian if the PEA can reasonably confirm the economic status of the child from a preceding date range. Failure to provide accurate and timely Income Eligibility 1 or 2 data will impact PEA's federal funding and accountability measurements. The department may also take appropriate enforcement relative to any program area affected. Please contact the Title I division for any questions at [ESEA@azed.gov](mailto:ESEA@azed.gov).

### **Student School Food Service Program Association**

Starting in the 2024-2025 school year, PEAs that administer the NSLP/SBP, as well as the legal owners of NSLP/SBP participating sites where another entity administers the NSLP/SBP through an inter-agency agreement, must report the eligibility status and source of eligibility for all enrolled students in both the NSLP and SBP. This new Program Association in AzEDS is not the same as income-eligibility, rather it is tied to the NSLP and SBP's *eligibility determination for free and reduced-price meals*. Eligibility for free and reduced-price meals may be determined based on a household's income and/or it may be based on a household or students' participation in another nutrition assistance program such as SNAP and/or it may be based on a student's placement in another federal or state program such as foster care.

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The Eligibility Source reported should reflect the method used to establish the eligibility status. The sources that may be used in the NSLP/SBP to establish eligibility are: 1. Match results from the CNP Direct Certification system; 2. The USDA NSLP Household Application certified free or reduced-price; 3. Categorical eligibility based on “other source”. This **does not** include the Alternative Form for Income-Based Eligibility as a source. The Alternative Form for Income-Based Eligibility **does not** convey eligibility for the NSLP/SBP.

NSLP/SBP operators should contact their assigned program specialist within the Health and Nutrition Services (HNS) division with any questions pertaining to the reporting of the Student School Food Service Program Association data, the NSLP/SBP eligibility determinations, and confidentiality/disclosure of NSLP/SBP eligibility data.

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This table outlines which source to use for reporting the Income-Eligibility 1 and 2 and the Eligibility Status and Source for Student School Food Service Program Association for the NSLP/SBP.

	Distribute and use <i>Alternative Form for Income-Based Eligibility</i> to report income eligibility 1 or 2	Use <i>CNP Direct Certification matches</i> to report income eligibility 1 or 2 <i>and</i> to report Student School Food Service Program Association data (NSLP/SBP Eligibility Status and Source)	Distribute and use the <i>USDA NSLP Household applications</i> to report income eligibility 1 or 2 <i>and</i> to report Student School Food Service Program Association data (NSLP/SBP Eligibility Status and Source)
National School Lunch Participating site (not operating CEP/Provision 2/3 non-base year for breakfast and lunch)		<b>X</b>	<b>X</b>
Site <b>not</b> operating NSLP	<b>X</b>		
Site operates CEP or Provision 2/3 non base year for breakfast and lunch	<b>X</b>	<b>X</b>	

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