

Key to School Meal Eligibility

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Today I will:

- **Highlight** the *August 2014 USDA Eligibility Manual for School Meals*
- **Discuss** California's confidentiality laws pertaining to information provided within free and reduced-price meal applications



Eligibility

Definition:

The determination of a student's eligibility for free or reduced-price school meal benefits.



To Receive Free/Reduced-Price Benefits:

- A child must be directly certified, documented as categorically eligible,
- OR***
- The family must submit an **application** for free/reduced-price meals



Direct Certification

- No eligibility application needed
- All NSLP agencies are federally mandated to qualify school aged CalFresh recipients for free meals through direct certification
- Only RCCIs without day students are exempt



Direct Certification (continued)

- Welfare assistance program benefit recipients are matched with student enrollment data
- Direct Certification with CalFresh must be conducted a minimum of three times per school year
- Other benefit groups eligible for Direct Certification:
Migrant, Runaway, Homeless, Foster, children enrolled in Head Start and Even Start programs



Methods to Conduct Direct Certification


Direct Certification can be conducted in two ways:

1. Statewide Match
2. Local Match



Direct Certification of Categorically Eligible Programs

- ✓ CalFresh (required process)
- ✓ CalWORKs (included in State match and sometimes in local match)
- ✓ FDPIR



Direct Certification of Categorically Eligible Programs (continued)

Documentation required to establish eligibility includes -

- Name(s) of child(ren)
- Multiple Identifiers (birth date, address, etc.)
- Date and signature of certifying official
- For computer matches: A written agreement between the Assistance Program office and LEA



Direct Certification of Categorically Eligible Programs (continued)

Note:

- Direct Certification of categorical eligibility is *extended* to the entire household
- Eligibility is in effect for the entire school year



Direct Certification of Other Source Categorical Eligible Programs

- ✓ Migrant Education
- ✓ Runaway and Homeless
- ✓ Foster
- ✓ Federally funded Head Start or Even Start literacy program



Direct Certification of Other Source Categorical Eligible Programs (continued)

To establish eligibility, following documentation must be included:

- ✓ A dated eligibility list/roster with each child's name
- ✓ Signature of certifying district liaison/coordinator
- ✓ For computer matches: A written agreement between the Assistance Program office and LEA
- ✓ Effective date for each child



Direct Certification of Other Source Categorical Eligible Programs (continued)

Note:

- Direct Certification eligibility obtained through other source categorical eligible programs is *not extended* to the entire household
- Eligibility is in effect for the entire school year



Determination of Effective Date

USDA Policy Memo – SP 51-2014

Flexibility allowed to LEAs to establish the effective date of eligibility as:

- Date a child is first identified as directly certified through automated data matching or letter method

OR

- Date the automated direct certification file was processed/approved



Implementation of Effective Date Flexibility

LEAs implementing this flexibility must:

- Use direct certification data file generated in current school year only
- Do so consistently for all the direct certification methods
- Apply the flexibility consistently to all students directly certified across **all participating schools and school meal programs** within the LEA



Implementation of Effective Date Flexibility (continued)

- Document the effective date used
- Apply this provision to eligibility extended due to CalFresh, CalWORKs, and FDPIR
- Refund any money paid by or on behalf of the student
- Notify their SNP specialist before implementing and after canceling out of this option



Household Applications

- Two types of applications:
 - Categorical applications
 - Income-based applications
- Duration of eligibility determination: entire school year
- Households are not required to report a change in household size and/or income - unless it benefits the student



Categorical Applications

A complete categorical application must provide:

- Name(s) of the applicant child(ren)
- CalFresh, CalWORKs, or FDPIR case number or identifier
- Signature of an adult household member

Note: SSN is not required



Categorical Applications (continued)

Please note:

- Eligibility through categorically eligible programs is *extended* to the entire household
- Eligibility is in effect for the entire school year



Other Source Categorically Eligible Applications

A complete other source categorically eligible application must provide:

- Name(s) of the applicant child(ren)
- Indication of child's categorical eligibility status
- Signature of Adult Household Member

Note: SSN is not required



Other Source Categorical Applications (continued)

- Eligibility through other source categorically eligible programs is *not extended* to the entire household
- All other source categorically eligibility status (except foster status) must be confirmed prior to certification
- Eligibility is in effect for the entire school year



Other Source Categorical Eligibility for Foster Children

- Application needs to indicate name and indication of child's foster care status
- No further action/follow up is required
- Benefits are not extended to the foster family
- Signature of adult household member is required

Note: SSN is not required



Income Applications

A complete income application must provide:

- Names of all household members, including the applicant child(ren)
- Current income amounts, by source, for all household members
- Signature of adult household member
- Last 4 digits of Social Security Number (SSN) of adult signing the application (or indication of “none” on the application)



Determination of Effective Date

USDA Policy Memo – SP 11-2014 gives flexibility to LEAs to establish:

- Date of submission of an application

OR

- Date the application was approved



Implementation of Effective Date Flexibility

LEAs exercising this flexibility must:

- Use applications submitted in current school year only
- Apply the flexibility consistently to all students across all participating schools and school meal programs within the LEA
- Have a method to document the date the application was submitted



Implementation of Effective Date Flexibility (continued)

- Refund any money paid by or on behalf of a child
- Submit current monthly reimbursement claims and adjust claims after initial submission to reflect changes in meal eligibility
- Notify their SNP Specialist in writing before implementing and after canceling out of this option



Income Eligibility

Compare household size and income to the USDA *Income Eligibility Guidelines*

SPECIAL SITUATIONS:

- Adopted child
- Joint Custody
- Seasonal Workers
- Self Employment Versus Wages
- Military benefits

Refer to the 2014 USDA Eligibility Manual



Special Situation: Foster Child's income application

- The child must be the legal responsibility of the welfare agency or court
- The application does have to include the foster child's "personal-use" income
- The foster parent/guardian signature is required on an income application



Zero Income

- Zero income means “no income” received by household
- Zero income should be indicated for each household member without an income
- Temporary approval on the basis of zero income is prohibited. Eligibility is good for the entire school year



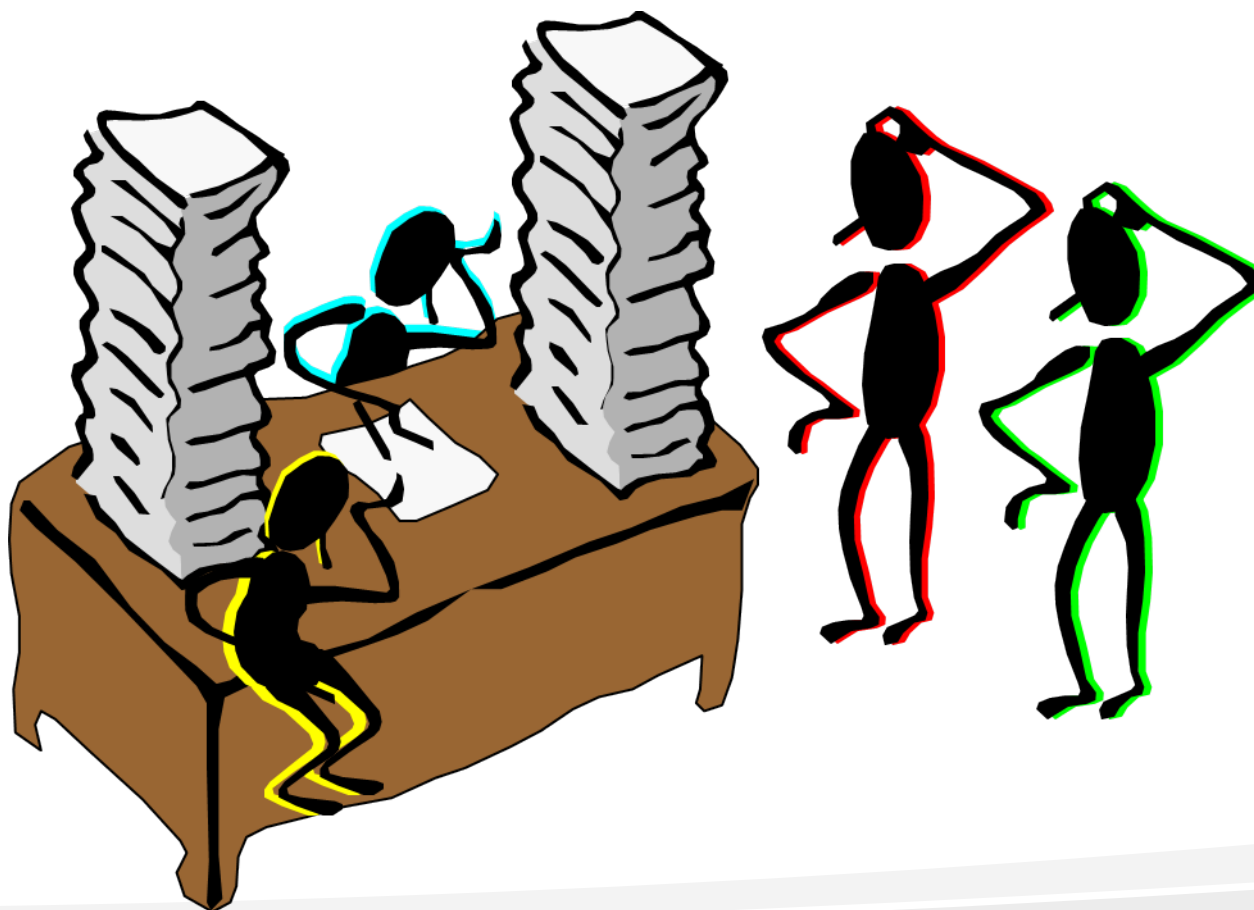
Income Eligibility Guidelines (IEG)

The **IEGs** are now divided into “annualized” categories, in order to calculate multiple intervals of income within the same household.

Income listed in different intervals on an application must be converted (“annualized”) as follows:

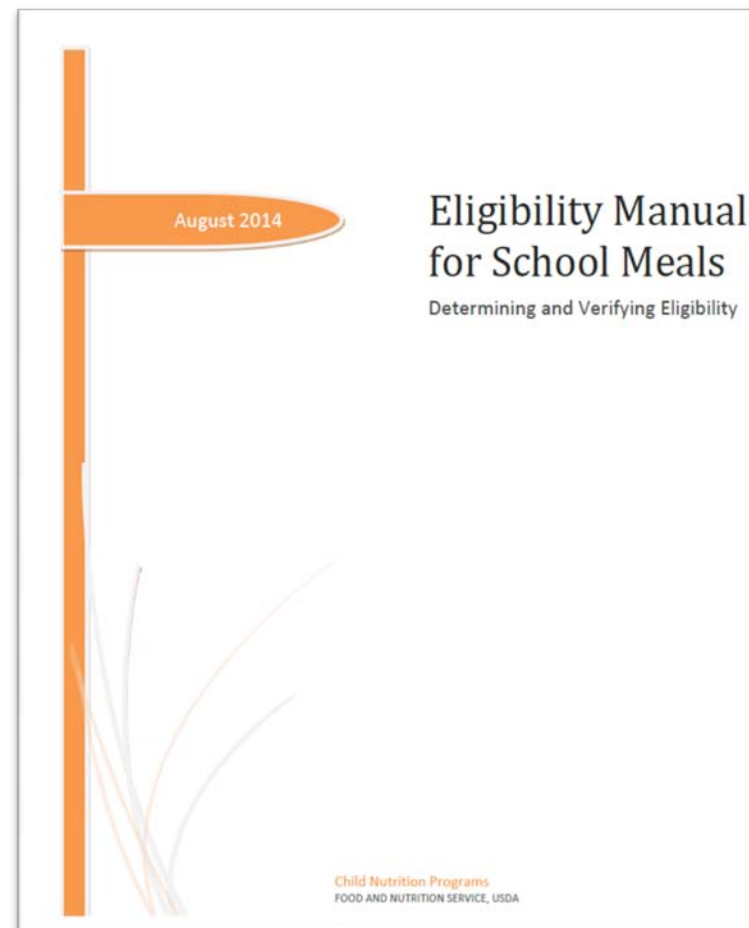
- Weekly income x 52
- Biweekly (every two weeks) income x 26
- Twice a month income x 24
- Monthly income x 12

 ***So much to remember...***





Such a great resource



http://www.fns.usda.gov/sites/default/files/cn/EliMan_h.pdf



Confidentiality





Can Meal Eligibility Data or Records be Shared?

Currently, School Food Services may share:

- **ONLY** the name and eligibility status of a child; and
- **ONLY** share this information with:
 - Academic Achievement Testing Coordinator recognized by your district; and/or
 - No Child Left Behind (NCLB) Coordinator for qualifying students for “school choice” and “supplemental educational services” – and only in Program Improvement Schools



California's Confidentiality Laws

Education Code Section 49558

NOTE: This law is more restrictive than and supersedes federal law(s) regarding the disclosure of free and reduced-price meal information; and supersedes Part 8 of USDA's *Eligibility Manual for School Meals (disregard in California)*

Education Code Section 49558 is available on www.leginfo.ca.gov



Confidentiality Policies for School Meal Programs

Management Bulletin 98-101, February 1998

www.cde.ca.gov/ls/nu/sn/mb98101.asp

Management Bulletin NSD-SNP-12-2010

www.cde.ca.gov/ls/nu/sn/mbnsdsnp122010.asp

Education Code Section 49558

www.leginfo.ca.gov



Contact Information

- CDE/NSD Web site: www.cde.ca.gov/ls/nu/sn
- Regional Field Services Unit Child Nutrition Consultant
- Person named as the contact on any NSD Management Bulletin
- School Nutrition Program Issues:

Call 800-952-5609, ask to speak to the SNPU analyst assigned to your county



Thank You for attending!

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