Eligibility and the Definition of a Site

Joan Davis

School Nutrition Programs Specialist

California Department of Education

Agenda Topics

- Discuss Eligibility
  - Definition
  - Different types of meal applications
  - Processing requirements
  - Benefit issuance findings during an School Nutrition Programs administrative review (AR)
  - Correctable meal applications

- Discuss the difference between school and site

What is Eligibility?

- The determination, certification, and verification to qualify a student for free or reduced-price (F/RP) meal benefits

- Reminder: Remains in effect for the entire school year

- Not required to report changes unless eligibility will benefit household

  - Paid ⟶ Reduced-price

  - Paid ⟶ Free

  - Reduced-price ⟶ Free

How Does a Student Qualify for Meal Benefits?

- F/RP Meal Benefits Qualifications
  - Direct Certification (DC)
  - Other Source Categorical
  - Meal Application

- Reminder: Carryover of Eligibility
  - Previous school year eligibility status
  - Beginning on the first operating day of school
  - Valid for 30 operating days

Types of Meal Applications

Free and Reduced Meal Benefit Applications

SUBMIT

Meal Applications

- Types of Applications
  - Categorical
    - Assistance program case number
    - Other Source program
  - Household size and income

- Limited English Proficiency
  - Be aware of language needs within your district
  - Households must have access to communications in their appropriate language

Meal Applications

- Requirements
  - Distribute to all households unless directly certified
  - Must provide instructions
  - One application per household

- May share copy with another school food authority

- Reminder: Optional to apply
  - Households cannot be forced to apply for meal benefits

Meal Application Requirements

Meal Application—Processing Requirements

- Determining complete application
  - Must include all required information
  - Missing or unclear information (incomplete) cannot be processed

- Determining official may not complete an application using school records

Meal Application—Assistance Programs

- Complete categorical application
  - Names of all students
  - CalFresh, CalWORKs, or FDPIR case number
  - Signature of adult household member

- Social Security number (SSN) not required

- Must ensure case number is consistent

- Reminder: Extend benefits to **all** children in household

Meal Application—Other Source

- Complete categorical application
  - Names of all students
  - Student's status (homeless, migrant, or runaway check box)
  - Signature from adult household member

- SSN not required

- Must confirm child's status with program liaison
  - Except foster children

- Reminder: Benefits only apply to the **individual child**

Meal Application—Foster

- Complete categorical application for foster children
  - Name of foster child
  - Indication of child's foster status (check box)
  - Signature from adult household member

- SSN not required

- No confirmation of foster status required

- Reminder: Benefits only apply to the individual foster child

Meal Application—Income

- Complete income and household size application
  - Names of all household members (children and adults)
  - Amount, source, and frequency of current income for each member
  - Signature from an adult household member
  - Last four digits of the SSN **or** an indication of NO SSN

- Household composition is based on an economic unit
  - Related or nonrelated individuals living as one unit

Meal Application—Mixed Household

- Complete application for "mixed" households
  - Names of all household members (children and adults)
  - Amount, source, and frequency of current income for each member
  - Indication of child's Other Source status (foster, homeless, migrant, or runaway)
  - Signature from an adult household member
  - Last four digits of SSN **or** an indication of NO SSN

- Cannot require separate application for mixed households

- Must confirm child's status with program liaison

Meal Application—Guidelines

- Current reportable income
  - Whole dollars
  - Gross earned income before deductions
  - Include income from all household members (children and adults)

- Zero income
  - No income received by the household member
  - Application considered complete
  - May be selected for verification or verified for cause

Reportable Income

- Types of income sources
  - Wages
  - Net income from self-owned business
  - Unemployment benefits
  - Supplemental Security Income
  - State or local government assistance
  - Social Security
  - Adoption assistance payments

- Special situations for income
  - Seasonal workers
  - Self-employed
  - Rental properties
  - Military benefits
  - Foster child's income
  - Child's income
  - Child support

Income Eligibility Guidelines

- Compare household size and income to applicable IEGs

- Received at different frequency
  - Household receives income in different intervals (i.e., weekly and monthly)
  - Must annualize all income sources
    - Weekly by 52
    - Bi-weekly by 26
    - Twice a month by 24
    - Monthly by 12

Income Eligibility Guidelines

- Received at same frequency
  - Household receives income on same schedule (i.e., monthly)
  - Total all sources and compare to IEG pay period
  - Do not annualize

Common Benefit Issuance Errors

Meal Application Errors

- Missing information
  - No case number
  - Last 4 digits of SSN or an indication of NO SSN

- Incorrect household income calculation

- Missing household members

- Determining official did not sign and/or date application

Roster and Extending Benefits Errors

- Point of Service (POS) roster (manual and/or electronic) does not match eligibility from application

- Extending benefits to non-household members

- Missing supporting documentation

Income Calculation Errors

- Annualizing income when not required

- Annualizing income incorrectly

- Frequency miscalculated (bi-weekly vs. twice a month)

- Incorrect pay period

- Not calculating all income sources (children and adults)

- Incorrect IEG scale based on household size and income

What Will Result in Fiscal Action During an AR?

- Information missing

- Certifications miscategorized

- Benefit issuance errors

- Failure to update status in POS, when required

Definition of a Site

What is a Site?

- The physical location (address) where:
  - Program meals are served to students
  - Students consume a complete reimbursable meal
  - The sponsor claims the meal

- Applies to all child nutrition programs

CNIPS Site Application

- One application per feeding location

- Multiple schools at the same address
  - One site application per sponsor
  - Sponsor may separate schools within POS

- One school at different addresses
  - School under same administrative jurisdiction
  - Two site applications, one per physical location

How to Add a New Site?

- Review CNIPS Download Forms section for step-by-step instructions

- Required documents to approve new site

REQUIRED DOCUMENTS	SCHOOL/AGENCY TYPE					
	Public School, COE	Direct Funded Charter Schools	Local Funded Charter Schools	Private Schools (non-profit)	RCCIs	Non-Public Camps or Non-public Schools
Health Permit per feeding site	x	x	x	x		x
*IRS 501(c)(3) Letter *Copy Accepted*		x				
Facility License *Copy Accepted*					x	

Health Permit

- All new CNIPS Site Applications require an active health permit
  - Special situations: LA County only

- California Health and Safety Code Section 113789
  - Food facility that stores, prepares, packages, serves, vends, or otherwise provides food for human consumption

PERMIT REQUIRED

Definition of a Site Quiz

- Sponsor operates a preschool and elementary school at 123 Main Street. How many site applications are needed for this sponsor?

  - One site application

- Sponsor A operates an elementary school and Sponsor B operates a charter school at 60 Disney Way. How many site applications for each sponsor?

  - One site application per sponsor

Definition of a Site Quiz

- Students attend school at 321 Ocean Avenue, but receive lunch daily at 320 Ocean Avenue. How many site applications are required for this sponsor? At what address should the sponsor claim lunch?

  – Only one site application and claim lunch at 320 Ocean Avenue

- A new high school was built and must be added in CNIPS. In order to approve the new site application, what must the sponsor submit to their SNP specialist?

  – Complete site application and required documentation

Resources

USDA Eligibility Manual

Tips for a Successful SNP AR

- Attend a Pre-review AR Workshop

- Review the USDA AR Manual

- Stay up to date with USDA Policy Memos and CDE Management Bulletins

- Ensure all operational procedures are current

- Review the CDE Tips for Success Web page at http://www.cde.ca.gov/ls/nu/ar/artips.asp

Helpful Web Pages

CDE School Nutrition
www.cde.ca.gov/ls/nu/sn/

CDE Guidance, Manuals, and Resources
www.cde.ca.gov/ls/nu/sn/mgmb.asp

USDA School Meals Guidance and Resources
www.fns.usda.gov/school-meals/guidance-and-resources

Cal-Pro-NET SNP Primer
calpronet-sj.org/snp_primer.htm

Contact Information

- SNP County Specialist
  - CNIPS Download Form section, Form ID Caseload
  - 800-952-5609, Option 2

- Field Services Unit (AR questions)
  - 800-952-5609

Questions

Professional Standards Crediting Information

- Key Area: Administration (code 3000)

  – Key Topic: Free and Reduced-price Meal Benefits (code 3100)

    - Learning Objectives: Eligibility (code 3110)

      Direct Certification (code 3120)

- Total Instructional Hours: 1.0

Follow us on Twitter @CDENutrition!

- Realtime Check-ins from Trainings and Events

- Policy Information and Updates

- News about Grants and Resources

- Insider's Scoop on Life at CDE, and more!

Thank You

This institution is an equal opportunity provider.