

ELIGIBILITY GUIDANCE FOR SCHOOL MEALS

NOTE: Further information regarding the determination of eligibility for free and reduced priced meals can be found in the USDA Eligibility Manual for School Meals located in SNEARS.

I. APPLICATION CATEGORIES

A. Direct Certification (DC)

1. Children who are directly certified are automatically approved for free meals or free milk based on information received from the NJ SNAP (Food Stamp), TANF (Temporary Assistance for Needy Families) or Foster (Department of Children & Families) offices, without further application. Access to DC is through SNEARS. **The file upload method must be used for the four mandated file uploads.**

The user will agree to a statement of confidentiality and select the appropriate municipality codes. The SFA will download their current enrollment with access to meals into the required Excel format. This data will be uploaded into SNEARS and merged with the NJ SNAP, TANF and Foster data. A list of the directly certified students will be generated. The SFA will certify the matched names with their enrolled students with access to meals.

An individual student match should only be used to check the status for new students during the school year or to check student's eligibility on a case by case basis. It cannot be used in lieu of the file upload.

2. The DC database is updated on a monthly basis from NJ SNAP/TANF and nightly for Foster students. Districts must conduct DC a minimum of four times as follows:
 - 1st Time: Between July 15 but not later than August 30, 2016
 - 2nd Time: Between September 1 and September 30
 - 3rd Time: Between October 1 and October 30
 - 4th Time: Between March 1 and March 30, 2018

The DC Notification Letter(s) must be sent to all DC households.

3. Eligibility for free meals is extended to all children in a household if one member has been directly certified as SNAP or TANF. The extension **does not** apply for Foster. The DC process has been refined to help LEAs identify other students in the household who are eligible for meal benefits. School's enrollment records and parents completing/returning the DC Notification Letter(s) can also serve as useful tools to "capture" siblings.
4. If a Foster child receives SNAP or TANF benefits, during the DC process, they will be determined as SNAP or TANF not FOSTER. Remember SNAP always takes precedence. The students' status on the MEL should match the DC list.

5. Applications received from DC households can be kept and filed separately in the event they are needed to extend benefits to DC siblings.
6. The Master Eligibility List (MEL) should be updated to reflect changes after each DC match.
7. Children who are directly certified are not subject to verification.

B. Categorical Applications

NJ SNAP/TANF Applications

Applications for children receiving NJ SNAP or TANF benefits **MUST CONTAIN:**

Step 1 - Name of each child household member, school name. Check (✓) whether or not the student attends the school district.

Step 2 –NJ SNAP or TANF case number for one household member who is receiving benefits.

A Medicaid or WIC number is not acceptable.

Step 4 - Adult household member's signature in the signature box. A printed name is an acceptable signature.

The last four digits of the social security number is not required when NJ SNAP or TANF case numbers are given. Children's racial & ethnic identities are optional.

Other Source Categorically Eligible Applications (Homeless, Migrant, Runaway and Foster Child)

Applications for homeless, migrant, runaway and foster children **MUST CONTAIN:**

Step 1 – Name of each child household member, school name. Check (✓) whether or not the student attends the school district. The appropriate box checked (✓) for foster child or migrant, homeless, or runaway.

Eligibility must be documented as follows:

Homeless Children: The School Food Authority (SFA) Homeless Liaison or the director of the homeless shelter where the household is residing **must** substantiate free meal eligibility. Documentation to substantiate free meal eligibility must consist of the child's name or a list of names, effective date(s), signature of the LEA liaison or director of homeless shelter and date signed. The Documentation for Homeless and Runaway Students (Form #146) can serve as documentation or the director of the homeless shelter can provide a letter.

Migrant Children: The Migrant Education Program (MEP) Coordinator **must** substantiate free meal eligibility. Documentation must consist of a dated list with each child's name and the signature of the MEP Coordinator or the state MEP director.

Runaway Children: The SFA liaison must document that the runaway child is receiving assistance under the Runaway and Homeless Youth Act (RYHA). Documentation of the runaway's RYHA participation must consist of the child's name, effective date, signature of the school district's homeless liaison and date signed. The Documentation for Homeless and Runaway Students (Form #146) can also serve as documentation.

Foster Children: A foster child's eligibility can be determined four ways.

1. Through the DC process.
2. If the household provides a letter (DCF 5-49) from the Department of Children and Families (DCF) documenting that the child is a foster child, an application for free meals is not required. The letter is considered documentation that the foster child is categorically eligible for free meals.
3. If an application is submitted ONLY for a foster child (or foster children), the application **MUST CONTAIN**:

Step 1 - Name of each foster child enrolled in the district, school name, the box checked (✓) indicating that the student attends the school district.

Step 3A – Any foster child's personal use income must be listed. If a foster child does not have any personal use income, enter "0" or leave this space blank.

Personal use income is defined as:

- Funds provided by the welfare agencies which are specifically identified by category for personal use of the child, such as for clothing, school fees and allowances. Welfare funds identified by category for shelter and care, and those identified as special needs funds, such as those for medical and therapeutic needs are NOT considered as income. In a situation where welfare funds cannot be identified by category, then no portion of the provided funds are considered as income and zero income should be listed.
- Other funds received by the child. This includes, but is not limited to, monies provided by the child's family for personal use and earnings from employment other than occasional or part-time jobs.

Step 4 - Adult household member's signature in the signature box. A printed name is an acceptable signature.

Optional - Child's racial and ethnic identity.

4. If an application is submitted for a household that consists of the household's children and foster children, the application **MUST CONTAIN**:

Step 1 - Name of each child household member, school name. Check (✓) whether or not the student attends the school district. The appropriate box checked (✓) for each foster child.

Step 3A – The *total* income earned by *all children*. If the children do not earn any income, enter “0” or leave this space blank.

Step 3B – List all adult household members. Report the total income for each source (round to whole dollar amount) and frequency. If there is no income to report, enter “0” or leave this space blank. Report the total the number of household members. Provide the last four digits of the primary wage earner or other adult household member’s social security number (SSN) or check (✓) the no SSN box.

Step 4 - Adult household member’s signature in the signature box. A printed name is an acceptable signature.

Optional - Child’s racial and ethnic identity.

Homeless, migrant, runaway and all foster children are identified on the MEL as categorically free and “excluded from verification”. The eligibility category (free, reduced or denied) for the other students on the foster/household application must be based on the total household size (including the foster child) and income information stated on the application. These applicants must be listed on the MEL under the appropriate category (free, reduced priced or denied).

C. Income Applications

Household size and income applications **MUST CONTAIN:**

Step 1 - Name of each child household member, school name. Check (✓) whether or not the student attends the school district.

Step 3A – The *total* income earned by all children. If the children do not earn any income, enter “0” or leave this space blank.

Step 3B – List all adult household members. Report the total income for each source (round to whole dollar amount) and frequency. If there is no income to report, enter “0” or leave this space blank. Report the total the number of household members. Provide the last four digits of the primary wage earner or other adult household member’s social security number (SSN) or check (✓) the no SSN box.

Step 4 - Adult household member’s signature in the signature box. A printed name is an acceptable signature.

Optional - Child’s racial and ethnic identity.

These applicants must be listed on the MEL under the appropriate category (free, reduced priced or denied).

II. ELIGIBILITY DETERMINATION FACTS

- A.** Before the applications are processed and approved for the current school year, the SFA can only claim and be reimbursed for free and reduced price meals or free milk served to:
1. Children who were approved for free/reduced priced benefits from the previous year
 2. New children whose siblings were approved for free/reduced benefits from the previous year
 3. Previously approved children who transfer from one school to another within the same district
- B.** The prior year's benefits can be carried over up to 30 operating days (beginning with the 1st day of school) into the current school year or until a new eligibility determination is made. The new eligibility determination supersedes the carryover eligibility.
- C.** An eligibility determination must be made and implemented within 10 working days of the receipt of the application. Whenever possible, applications should be processed immediately, particularly for children who do not have approved applications on file from the previous year.
- D.** Review the application to determine if all required information is included.
- E.** If the application is incomplete and contains inconsistent information, or is unclear, the application must be denied unless the information is obtained or clarified. School officials may obtain or clarify the information prior to denial by:
- Contacting the household by phone. Document on the application all contacts with households. (Include date, information received and initials)
- OR -
- Contacting the household in writing (Form #64)
- F.** If the application is complete, determine eligibility based on the current fiscal year's income eligibility guidelines (Form #127 or #178):
1. If one income is reported or all income reported is the same frequency (i.e. all biweekly), total the incomes and household members and compare to the corresponding frequency on the income eligibility guidelines.
 2. If two or more income frequencies are reported, the income must be annualized, by the *determining official*, using the following formulas:
- Weekly x 52*
Every 2 weeks x 26
Twice a month x 24
Monthly x 12
- Calculate the household's total income and household members and compare it to the annual income eligibility guidelines.
- G.** Identify those applications that are error prone by checking the error prone box. Error prone is defined as:
- Weekly: \$0-\$25 below the free/reduced price income eligibility limit.
 - Every two weeks: \$0-\$50 below the free/reduced price income eligibility limit.

-Twice a month: \$0-\$50 below the free/reduced price income eligibility limit.

-Monthly: \$0-\$100 below the free/reduced price income eligibility limit.

-Annually: \$0-\$1200 below the free/reduced price income eligibility limit.

- H. Complete *for school use only* box on the second bottom page of the application. This section provides the total income by frequency, household size, eligibility and the determining official, confirming and verifying official's signature with the approval date and eligibility determination. (F=free, R=reduced, and D=denied).
- I. Eligibility determinations are valid for the entire school year unless the household ***chooses to reapply to improve their benefits.***
- J. If all students listed in Step 1 of the application withdraw, record date withdrawn at the top of the application and on the MEL. If only one student in Step 1 withdraws, record the date withdrawn next to that student's name and on the MEL.
- K. Sharing Information with Other Programs (Form #124) must be completed by the household in order to share eligibility information with other programs or for any services. This includes but is not limited to providing free books, dental services, test fees, athletic fees, field trip fees, prom tickets, etc. Each specific reason must be listed separately on the form.

III. **MAINTAINING THE APPLICATION AT THE CENTRAL LEVEL**

- A. After determination of eligibility,
 - 1. All original applications must be sent to a central location
 - 2. Eliminate duplicate applications
 - 3. Assign number to each application
 - 4. Generate district and school MEL
 - 5. Generate eligibility status letter
- B. File applications numerically

IV. **DEVELOPING THE MASTER ELIGIBILITY LIST (MEL)**

A MEL is required for the district and for each school. The MEL must be generated and updated from a central location and should contain:

- 1. School Name
- 2. Application number (or indication that the student is DC).
- 3. Date of approval
- 4. The first and last name and the eligibility status of each child

If applicable:

- 5. Error prone status
- 6. Verification selection
- 7. Date withdrawn from the district/school

V. ELIGIBILITY DETERMINATIONS BY COMPUTER SYSTEM

A. Computer determination:

1. Determining official may sign or initial and date a sheet of paper attached to a batch of applications. (Each application does not have to be individually signed).
2. The computer system must be able to capture the original date of approval.
3. The computer system must be able to update the status of applications to account for transfers, withdrawals, terminations, verification results and other changes.

B. Updating Applications:

1. The change in status of an application may be maintained in a computer instead of being noted on the application. The ability to change meal eligibility in the database must be restricted to specified personnel.
2. Changes must be readily retrievable by school.
3. Changes must be indicated on the MEL and in the meal counting system at the school level.

VI. MAINTENANCE OF THE POINT OF SALE DATABASE TO SERVE AS A MEL

1. Historical information, as reflected in the database, must be retrievable on a school-by-school basis. Historical data includes child (ren)'s eligibility status, date of approval, and if applicable, transfer date, verification results, any other eligibility changes, and the effective dates.
2. If historical data can be retrieved, the POS (Point of Sale) database can serve as the MEL.
3. If historical data can not be retrieved, the following system must be implemented.
 - Print a copy of the database, from the point of sale terminal, on the first or last day of each month. Any changes in meal eligibility status must be manually documented on this list during the month.
 - The database list with the manual changes should be filed with the edit check worksheet each month.
4. All enrolled students must be in the POS database with their respective eligibility.

VII. PROCEDURE FOR UPDATING A HOUSEHOLD'S ELIGIBILITY STATUS

A. Household submits a new application:

1. Attach the new application to the old application (most current on top)
2. Determine the application and assign the same application number

3. Complete *for school use only* box on the second page of the application located on the bottom.
4. Update MEL with change(s)
5. Generate Letter to Notify Household of Eligibility status (Form #70)
6. Notify all appropriate personnel of eligibility changes
7. Update all meal count rosters, meal tickets or POS at school level

B. Eligibility changes as a result of an AR, verification or internal audit

1. Note effective date and change(s) on the application
2. Update *for school use only* box the second page of the application located on the bottom.
3. Update MEL with changes
4. Generate letter to notify household of new eligibility status:
 - Letter of Audit Results (Form #255) for AR or internal audit changes
 - We Have Checked Your Application (Form #244) for verification changes
5. Notify all appropriate personnel of eligibility changes
6. Update all meal count rosters, meal tickets or POS at school level

VII. CIVIL RIGHTS PROCEDURES

Recipients of Federal financial assistance from USDA must enforce regulations prohibiting discrimination on the basis of race, color, national origin, gender identity, disability, sex and age. Sponsors must comply with the following:

1. Collect ethnic and racial data for each school's enrollment **and** free, reduced priced and denied applicants (Form #86). The collection of the data is through observation, personal knowledge, or voluntary self-identification. Documentation must be maintained for three years.
2. Include the non-discrimination statements on all publications, including websites.
3. ". . . And Justice for All" poster must be prominently displayed in the service area.
4. Any complaints of discrimination must be immediately forwarded in writing to FNS or Division of Food and Nutrition. Complaints will be investigated by interviews with all parties, witnesses and collaborative contacts.
5. When a student has a life threatening disability which has been medically documented by a doctor, accommodations must be made.
6. When a student has a food intolerance, accommodations MAY BE made.
7. SFAs are required to take reasonable steps to ensure limited English proficient households have access to the program.