

# Food Service Facts

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\*Source – Eligibility Manual for School Meals, August 2017

## 7. Determining Eligibility for Free & Reduced Price Meals

### Informing Households

Each year at the beginning of school, a letter about the school nutrition programs must be distributed to each household with children attending school. This letter tells families which school nutrition programs are available, that meals may be available free or at a reduced price, or that milk may be available free. All sponsors must be able to provide households with paper applications and informational materials.

### Timing of Distribution of Letter to Households

The letter must be sent to households of all school children before the beginning of the school year or as early as possible in the school year. Sponsors are to send out the letter or post online no earlier than July 1. Letters cannot be sent home at the end of the school year for the next year; nor can the sponsor begin accepting and processing applications before the beginning of the federally-defined school year which is July 1 through June 30.

### Paper-based Application Processing

If the sponsor only uses paper applications, an application form and instructions must be included with the letter to households.

### Computer or Web-based Application Processing

If the sponsor uses a computer or web-based system to process applications, a letter must be provided to households explaining how to access the system to apply for benefits. In addition, the letter must explain to the household how to obtain and submit a paper application. This may be done by including a telephone number or a form to return requesting that an application be sent.

### Unacceptable Practices

Sponsors cannot require households to complete an application, but they can provide assistance in completing the application, as long as the assistance is provided in a confidential manner.

It is **NOT** acceptable:

- ◆ To have applications available on a table, within sight of other people, for a parent/guardian to pick up.
- ◆ To ask a parent/guardian, in hearing distance of other people, if he/she would like an application.
- ◆ To require a parent/guardian to request an application.
- ◆ To provide an “incentive” to the parent/guardian to complete an application.

## Required Forms for Determining Eligibility

The forms listed below are part of the annual program renewal packet. KSDE prefers that sponsors use these forms exactly as they are provided; except for inserting variable data such as meal prices and contact information. If the sponsor chooses to modify the format or content of any of the following forms, KSDE must annually approve the revised version before it is distributed. These forms are available on the Checklist Tab in KN-CLAIM.

### Letter to Household & Application Packet for Free & Reduced Price Meals

The Letter to Household tells families which school nutrition programs are available, that meals may be available at a free or reduced price, or that milk may be available free. It provides answers to many frequently asked questions and explains how to apply for reduced price or free benefits. The letter is completed by filling in current meal prices and the Hearing Official's name, phone number and address.

The Application for Free and Reduced Price School Meals collects all of the information necessary to make a determination of student eligibility.

### Letter to Household about School Meal Benefits

Each household that completes an application must be notified of its eligibility determination. Households that are approved for benefits may be notified verbally or in writing (letter or email). All students denied benefits must be notified in writing (letter or email). For students denied eligibility, a copy of the completed Notify Household about School Meal Benefits (found on the Checklist Tab in KN-CLAIM) should be attached to each application and filed.

Each household with Directly Certified students must be informed of its students' eligibility for free or reduced price meals and given the right to decline these benefits. Use the Notify Household about School Meal Benefits letter to notify households of students directly certified based on food assistance or TAF, certain Medicaid benefits (MED-F or MED-R) foster children, and migrant students. Letters should be sent to households with Directly Certified students as soon as possible to notify them that it is not necessary to complete an income application. Keep hard copies or electronic copies of the notification letters sent to households.

### Consent for Disclosure

If the sponsor provides optional benefits based on eligibility for reduced price or free CNP benefits, the parents or guardians of eligible students must waive confidentiality before the optional benefits are provided. The Consent for Disclosure (found on the Checklist Tab in KN-CLAIM) is used to obtain such waivers from households. Sponsors must receive the completed consent form from the parent/guardian **before** providing optional benefits to a directly certified student.

## Foreign Language Translations

KSDE's Spanish translations are available in KN-CLAIM, Checklist Tab.

USDA translations are available at <https://www.fns.usda.gov/cn/translated-applications>. Translations are provided in Spanish and many additional languages including Japanese, Chinese, Laotian and Thai. The USDA translations are acceptable but look different from the KSDE forms. Download USDA's English version to assist the determining official with understanding information provided by applicants on USDA's foreign language forms.

A sponsor must send appropriate non-English language applications and letters to the household if a significant number of enrolled children come from households belonging to the same foreign language group which has limited English communication skills. If the number of non-English language households is not significant, the sponsor need not provide foreign language translations. However, sponsors should provide assistance in filling out applications through the use of translators.

### Distribution of Applications

**Q** *May applications be provided at the end of the school year for parents to return at the beginning of the next school year?*

**A** No, the application must be based on the household's eligibility at the beginning of the new school year. Therefore, households must be provided with the eligibility criteria near the beginning of the school year and not before July 1.

### Pre-printed Applications

**Q** *In a computerized operation, may a pre-printed copy of last year's application be given to the household so that they can easily update the application? What items may be pre-printed?*

**A** It is the household's responsibility to complete the application. A school may send households an application with the child's name pre-printed. No other information may be pre-printed.



## Electronic Applications & Scanning Paper Applications

Although a sponsor must be able to provide households with paper applications and materials, the application and supporting materials may also be distributed electronically via the Internet. Households may submit applications electronically using electronic signatures. However, all disclosure restrictions must be met and acceptance of the application and electronic signatures must be in accordance with guidance issued by USDA. KSDE has developed an online Kansas Free and Reduced Price Meal Application that is available for all Kansas schools to utilize. Request to use the free online application on the Forms Tab in KN-CLAIM. If using the Kansas Free and Reduced Price Meal Application, a Request to Use Electronic Transactions in the Child Nutrition Program is not required.

On an annual basis, sponsors wishing to use an online application must complete a Request to Use Electronic Transactions in the Child Nutrition Program. The Request to Use Electronic Transactions in the Child Nutrition Program should be completed by the Sponsor's Food Service, Technology and Legal Counsel. It is recommended that Sponsors submit the completed request to KSDE by June 1 of each year. Requests should be submitted and reviewed by KSDE prior to accepting electronic transactions.

The sponsor may also accept paper applications and electronically scan them. The scanning process must meet all regulatory requirements as well as perform functions as outlined in this guidance. For example, the software/scanner system must be able to recognize and accept less than whole dollar amounts.

USDA and FNS do not evaluate, recommend, approve, or endorse any software used for certification or verification purposes. There are no Federal specifications for software vendors. Sponsors are responsible for assuring that the certification and verification processes meet all regulatory requirements and policies including the calculation of income frequencies. Therefore, if software is used to perform all or part of the certification or verification process, the Sponsor must assure the software used is performing correctly and meets all requirements.

## Use of Application for Other Purposes

Sponsors are allowed to offer additional benefits to individual students based on reduced price or free benefit eligibility. For further information see Chapter 6 of *Food Service Facts*. However, a sponsor that requires income information from **all** households with enrolled children must secure that information through means other than the Application for Child Nutrition Program Benefits. Forms used to collect income information from all households cannot be labeled as applications for Child Nutrition Program benefits or give any indication that such benefits are contingent upon a household returning the application. Funds in the nonprofit School Food Service Fund cannot be used to pay costs associated with collecting and processing applications for other than reduced price or free meal/milk benefits.

## Determining Official's Responsibilities

The determining official(s) must review each application submitted to ensure that it is complete. If it is complete, the determining official approves or denies it based on the reported information. Any questionable or inconsistent information on the application must be clarified before the application is processed.

The determining official then signs and dates the bottom of the application and notifies the household of approval or denial. If a system is used where a computer generates the determination, the determining official may sign and date a sheet of paper that would be attached to a batch of applications. The computer system must be able to capture the original date of approval, the household size and income, and have the capability to update the status of applications due to transfers, withdrawals, terminations, and other changes.

Notification letters from Child Nutrition & Wellness, KSDE should be used as provided. See Notify Household about School Meal Benefits on the Checklist Tab in KN-CLAIM.

Applications should be processed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within ten (10) working days of receipt of the application. Once an application has been received, it becomes the official record. Sponsors should keep the information on the application up to date. Documentation of contacts with the household and of all information received should be recorded directly on the application or attached to it.

## Duration of Eligibility

A child's eligibility is in effect from the date of eligibility for the current school year and up to 30 operating days into the subsequent school year. Sponsors may elect additional flexibility concerning the effective date of certification for meal benefits (see Effective Date of Eligibility Determinations). However, this does not apply when the initial eligibility determination was incorrect or when verification of household eligibility, including verification for cause, does not support the level of benefits for which the household was approved. In those instances, officials must make appropriate changes in eligibility.

## Effective Date of Eligibility Determinations

Effective Date of Eligibility Determinations is a flexibility option available to Sponsors processing applications or determining eligibility through direct certification. Sponsors using this flexibility must do so consistently for all children in all participating schools and Programs.

## Applications

Children are generally certified eligible for free or reduced price meal benefits on the date the household application is approved. However, Sponsors have flexibility concerning the effective date of certification for NSLP, SBP and SMP benefits. If a Sponsor chooses, it could establish the date of submission of an application as the effective date of eligibility, rather than the date the official approves it. This flexibility extends to the Child and Adult Care Food Program and the Summer Food Service Program, as applicable.

Refer to SP 11-2014, Effective Date of Free or Reduced Price Meal Eligibility Determinations, for more information.



## Direct Certification

The effective date of eligibility determinations is available to Sponsors when determining the date of eligibility for children who are directly certified to receive free meals or free milk in the NSLP, SBP, and SMP.

The effective date of eligibility for free school meal or milk benefits is the date of the automated data matching file (or benefit recipient file from another agency) which first identifies the student as eligible for direct certification, rather than the date the Sponsor accesses and processes the automated data matching file into their local point of service (POS) system. To be used for this purpose, the data file must be generated and received by the Sponsor in the current school year.

Letter method and lists or other forms of documentation may be used to directly certify children as members of TAF and FDPIR households, as well as Other Source Categorically Eligible Programs. Sponsors using this flexibility may consider the effective date of eligibility for free school meal or milk benefits to be the date the household or appropriate State or local agency submitted the letter, list, or other form of documentation to the Sponsor. Note: Eligibility for MED-F or MED-R is only through the Direct Certification file and not through application or other forms of documentation.

Refer to SP 51-2014, *Eligibility Effective Date for Directly Certified Students*, for specific examples using this flexibility.

**Q** *Is State agency notification required if a Sponsor chooses to use this flexibility?*

**A** Sponsors must notify KSDE by electing to implement this flexibility on the Sponsor application in KN-CLAIM.



**Q** *What documentation is required when using this flexibility?*

**A** Sponsors using this flexibility for direct certification must document the effective date used, such as a date stamp to document the date received for lists or letters from other agencies, or the documented and traceable run date of automated match files or recipient benefit files from another appropriate agency. This includes children who are extended eligibility because they are members of the same household as a student identified as receiving FA, TAF, MED-F, MED-R or FDPIR benefits. A date stamp or another method to document the date the application was submitted must be used when this flexibility is applied to the application process.



**Q** *Do Sponsors have to refund the money paid by or on behalf of a student for a reimbursable meal or milk during the period from the free meal eligibility effective date through the date the direct certification is actually implemented?*

**A** Sponsors must refund any money paid by or on behalf of the child for a reimbursable meal or milk during the period from the free meal eligibility effective date through the date the direct certification is actually implemented at the local school, including forgiving accrued debt, for any meals or milk adjusted to free due to the change in effective date. The Sponsor can only claim those meals or milk at the free reimbursement rate if the student is given a refund or the debt is discharged.



## Change in Household Circumstances

Because of year-long duration of eligibility, households are not required to report changes in income or household size or changes regarding participation in a program that makes the children categorically eligible. However, families may voluntarily report changes. If a change is reported that will increase benefits, the Sponsor must put that change into effect. However, if the change will decrease benefits (free to reduced price) or terminate free or reduced price benefits (free or reduced price status to paid status), the Sponsor must explain to the household that the change does not have to go into effect but that the household may request that the lower benefits go into effect. If benefits are decreased, the household would then be provided a notice of the adverse action.

## Transferring Eligibility

### Transferring Within the Same Sponsor

If a child transfers to another school in the same Sponsor in the same school year, his/her eligibility must be transferred.

When a child transfers *within the same Sponsor* from a school using CEP to a non-CEP school, a new application or direct certification is required unless the child's individual eligibility information was determined through direct certification in the same school year and is available. In addition, if there is an approved application for another child in the household, that eligibility status can be used.

### Transferring to another School District/Sponsor

Schools accepting applications and CEP schools are not required to share eligibility data with a new Sponsor/school district when a student transfers. However, the information below provides information on handling transfers between different school districts when the former district chooses to share the eligibility data.

When a student transfers to another school district, the new Sponsor may accept the eligibility determination from the student's former Sponsor without incurring liability for the accuracy of the initial determination. When a copy of an application is provided, the accepting Sponsor should review the application for arithmetic errors and compare the income and household size to the applicable Income Eligibility Guidelines (IEGs) to assure that the correct level of benefits was assigned. If the accepting Sponsor determines that an arithmetic error occurred, the accepting Sponsor must notify the household that it must file an application in the new Sponsor in order to receive benefits. Also, the accepting Sponsor must make changes that occur as a result of any verification activities or review findings conducted by that Sponsor.

When a student in a CEP school transfers to another school district/Sponsor, the new Sponsor may accept the eligibility determination from the student's former Sponsor if the eligibility for that student was based on current direct certification (i.e., transfers within the school year in which direct certification was conducted, or there is an approved application for other children in the household that do not attend a CEP school). If current eligibility is not available from the sending Sponsor, the student must either be directly certified by the receiving Sponsor or submit an application.

## Eligibility Based on Prior Year’s Application

Basis for Eligibility in Prior School Year	Criteria for Carry-Over of Prior School Year’s Eligibility Status
<b>Household Application for Child Nutrition Program Benefits</b>	
<p>The student was eligible for reduced price or free meals based on household size and income reported on an approved <b>Application for CNP Benefits</b>.</p>	<p>The student is eligible for <b>reduced price</b> or <b>free</b> meals for the first 30 food service operating days in the current school year UNLESS during that period a new eligibility determination is made based on:</p> <ul style="list-style-type: none"> <li>• Confirmation that the student is currently directly certified</li> </ul> <p style="text-align: center;"><b>OR</b></p> <ul style="list-style-type: none"> <li>• An application received from the student’s parent/guardian</li> </ul>
<b>Direct Certification</b>	
<p>The student was approved for free or reduced price meals based on any one of the following:</p> <ul style="list-style-type: none"> <li>• Eligible for <b>Food Assistance</b> or <b>Temporary Assistance for Families (TAF)</b> as certified by the Kansas Department for Children and Families (DCF)</li> <li>• Eligible for <b>Food Distribution Program on Indian Reservations (FDPIR)</b> as certified by a local tribal official</li> <li>• <b>Foster Child</b> as placed by a State child welfare agency or court</li> <li>• Participant in <b>Head Start, Even Start, or Early Even Start</b> as certified by an official of one of these programs</li> <li>• Certified as <b>runaway</b> or <b>homeless</b> by the local educational liaison or a homeless shelter official</li> <li>• Certified as <b>migrant</b> by a migrant recruiter</li> <li>• Eligible for certain Medicaid Benefits (MED-F or MED-R)</li> </ul>	<p>The student is eligible for <b>free or reduced price</b> meals for the first 30 food service operating days in the current school year (<u>even if the student is not on a new direct certification list for the current school year</u>) UNLESS during that period a new eligibility determination is made based on:</p> <ul style="list-style-type: none"> <li>• Confirmation that the student is currently directly certified</li> </ul> <p style="text-align: center;"><b>OR</b></p> <ul style="list-style-type: none"> <li>• An application received from the student’s parent/guardian</li> </ul>

Households should be notified immediately if benefits are denied or reduced from the level of the previous year to provide adequate time for the family to make appropriate arrangements for payment to prevent the household from accumulating meal charges. A new lower eligibility determination should be implemented only after the family has been notified. For example, in the case of a household that received free benefits the previous year and will now receive reduced price benefits for the new school year, adequate notice should be provided to the household.

## Eligibility of Newly Enrolled Siblings during Carry-over Period

If a student's eligibility for reduced price or free school meals is carried over into the new school year, newly enrolled siblings are eligible for the same benefits during the carry-over period. Eligibility is effective on the date documentation is completed. To document carry-over eligibility of newly enrolled siblings, please do the following:

### 1. Carry-over based on last year's Application for Child Nutrition Program

#### Benefits:

The newly enrolled sibling's name is on the application. On last year's Application for CNP Benefits, the determining official should highlight or circle the newly enrolled sibling's name; and initial and date by the name.

#### OR

The newly enrolled sibling's name is NOT on the application. On last year's Application for CNP Benefits, the determining official should add the newly enrolled sibling's name in RED; and initial and date by the name.

### 2. Carry-over based on last year's Direct Certification list:

The newly enrolled sibling's name is on the Direct Certification list. On the copy of the **Notify** Household about School Meal Benefits sent to the household last year, the determining official should add the newly enrolled sibling's name in RED; and initial and date by the name. On the Direct Certification list, highlight or circle the newly enrolled sibling's name.

#### OR

The newly enrolled sibling's name is NOT on the Direct Certification list. On the copy of the **Notify** Household about School Meal Benefits sent to the household last year, the determining official should add the newly enrolled sibling's name in RED; and initial and date by the name.

### Benefits Based on Prior Year Approval

**Q** *A household completed a new application 15 days after the beginning of the school year. May I continue to provide meals based on last year's eligibility for 30 food service operating days even though an application for the current school year indicates a change in the benefit level?*

**A** No. Households should be notified immediately if benefits are denied or reduced from the level of the previous year to provide adequate time for the family to make appropriate arrangements for payment to prevent the household from accumulating meal charges. A new lower eligibility determination should be implemented only after the family has been notified.



### Benefits Prior to Approval

**Q** *If a student has charged meals prior to an application being approved, may those meals be claimed at the benefit level established by the new application?*

**A** No. Eligibility status is not retroactive unless the Sponsor has requested flexibility for establishing effective date of eligibility on the Sponsor Application in KN-CLAIM.

## Eligibility Based on Household Size & Income

The application must include:

- ◆ Names of student(s)
- ◆ Names of all household members
- ◆ Number of household members
- ◆ The last four digits of the Social Security number of the adult household member who signs the application; or an indication that the adult household member does not have a Social Security number
- ◆ Income earned by children
- ◆ Gross income for each adult household member in the prior month and the source of income (i.e. earnings from work, public assistance (child support/alimony), pension, retirement, and all other income)
- ◆ Signature of an adult household member

### Applications with Missing Information

Any application that is missing required information, that contains inconsistent information, or that is unclear is considered an incomplete application and cannot be processed. The determining official should make reasonable efforts to contact the household to obtain or clarify **required** information. Any adult listed on the application has authorization to make changes on the application.

The determining official must not delay approval of an application if the household fails to provide any **non-required** information. For example, households are not required to complete the address information.

Every reasonable effort should be made to obtain required missing information prior to denying the application. If an application is incomplete, it may be returned to the household (or the household may be contacted either by phone or in writing) to obtain the information. Document the details of the contact, enter the information received on the application, initial and date the entry. Sponsors should never cover any information provided by the household on the application with correction fluid. If any information provided on the application is discovered to be incorrect (through contact with the household) the sponsor should:

1. Cross out the original information with one line in red ink.
2. Correct the information as provided by the household.
3. Document the source of the correct information.
4. Initial and date the changes.

If the application is missing the signature of an adult household member, the application must be returned to the household. The household member's signature certifies that the information on the application is true and correct.

**Complete Applications**

**Q-1** *Does an emancipated child sign his/her own application? Are the last four digits of a Social Security number required?*

**A** An emancipated child who lives alone as a household of one, or as a member of a household with no adult household members, must sign his/her own application. The last four digits of a Social Security number are not required since the emancipated child is not an adult.



**Q-2** *A household voluntarily provided pay stubs that indicate reduced price eligibility while the income information on the household's application indicates free eligibility. What should the determining official do?*

**A** First, the determining official must approve or deny the application on face value and notify the household of the initial eligibility determination. Second, the official should do one of the following:

- ◆ Send the household a letter about benefit decrease. This option gives the household the 10-day notice period to resolve the discrepancy.  
OR
- ◆ Send the household a verification letter (based on “verification for cause”, see Chapter 8) and complete verification for the household.

## Determining Household Income

A household that is not directly certified or categorically eligible to receive CNP free benefits must provide household size and income information on the Application for Free and Reduced Price School Meals. Households must report their current income which is based on the most recent information available. This may be for the prior month, the current month, or the amount projected for the first month for which the application is made. Income that must be reported is any money received on a recurring basis including:

- ◆ Payment for services, wages, salaries, tips, commissions or fees, including regular overtime earnings
- ◆ Earnings of a student for full-time or regular part-time work
- ◆ Social Security benefits
- ◆ Supplemental Security Income (SSI)
- ◆ Alimony or child support payments
- ◆ Unemployment compensation
- ◆ Government civilian employee or military retirement or pension
- ◆ Veteran's payments
- ◆ Private pension, annuities or retirement income
- ◆ Regular contributions from persons not living in the household
- ◆ Strike benefits
- ◆ Worker's compensation or disability benefits
- ◆ Net income for self-employed farmers and businesspersons, net rental income and royalties
- ◆ Dividends or interest on savings or bonds
- ◆ Income from estates or trusts
- ◆ Other cash income including cash amounts received or withdrawn from investments, trust accounts, savings, and other resources that would be available to pay for student meals
- ◆ Military benefits received in cash, such as housing allowances for military households living off base and food allowances

Income **NOT** to be counted or reported in the determination of a household's eligibility for CNP benefits includes:

- ◆ Any cash income or value of benefits a household receives from any federal program that excludes such income by legislative prohibition, such as the value of food assistance provided under the Food Assistance program
- ◆ Student financial assistance provided for the costs of attendance at an educational institution, such as grants, and scholarships awarded to meet educational expenses and not available to pay for meals
- ◆ Loans, such as bank loans, since these funds are only temporarily available and must be repaid
- ◆ The value of in-kind compensation, such as military on-base housing or any other non-cash benefit
- ◆ Occasional earnings received on an irregular basis, e.g., not recurring, such as payment for occasional babysitting or mowing lawns
- ◆ Foster payments received by the family from the placing agency are not considered income and do not need to be reported

Lump sum payments or large cash settlements are not counted as income since they are not received on a regular basis. These funds may be provided as compensation for a loss that must be replaced, such as payment from an insurance company for fire damage to a house. However, when lump sum payments are put into a savings account and the household regularly draws from that account for living expenses, the amount withdrawn must be counted as income.

Household members are required to report gross income. Gross income is the amount before money is withheld for taxes, contributions to Worker's Compensation or health insurance premiums, etc. Total gross income must be considered regardless of amounts that are garnished or used to pay creditors.

Income must be identified on the Application for Free and Reduced Price School Meals by the name of the individual who received it and its source (i.e. earnings from work or other regular income). It is the responsibility of the determining official to compute the household's current gross income and compare the total amount to the federal Income Eligibility Guidelines (IEG).

If the income reported seems inappropriate for the pay frequency specified, contact the household and clarify how often the income is received.

If the household reports an hourly wage but does not report the number of hours worked, the sponsor must contact the household and clarify how many hours are normally worked, before calculating household income.

### How to Compute Household Income

Households are required to report income in whole dollars.

#### **If ALL household income is received with the same frequency:**

1. Add the income from all sources.
2. Look up the household's total income using the Income Eligibility Guidelines for the applicable income frequency (i.e. weekly, bi-weekly, twice a month, or monthly).

#### **If household income is received with different frequencies:**

1. For each income frequency, total the income from all sources, including cents if listed.
2. Convert the total income for each frequency to a yearly amount using the following conversion factors:
  - ◆ Weekly income x 52
  - ◆ Bi-weekly income (received every 2 weeks) x 26
  - ◆ Semi-monthly income (received twice a month) x 24
  - ◆ Monthly x 12

**Only** the conversion factors listed above can be used for manual calculations and in automated systems.

3. Compute total household income by adding the annualized income for each frequency.
4. Look up the household's total income using the Income Eligibility Guidelines for yearly income.



Software programs that certify or scan Applications for CNP Benefits cannot use other conversion factors or automatically convert income unless there are different pay frequencies listed on the application.

### Seasonal and Self-Employed Workers

Seasonal workers usually earn more money in some months than in other months. The previous month's income may not represent the household's current circumstances. Therefore, seasonal workers, construction workers and self-employed persons may project their annual rate of income and report this amount as current income or use the prior year's income if it provides a more accurate reflection of the household's current income.

Self-employed persons are allowed to report net business income rather than gross business income. Net income for self-employment is determined by subtracting business expenses from gross receipts. Net income for a self-employed farmer is figured by subtracting the farmer's operating expenses from gross receipts. Self-employed persons may use income tax records for the preceding calendar year as a basis to project the current year's net income, unless the current net income provides a more accurate measure.

Additional income received from other kinds of employment must be treated as separate and apart from the income generated from a self-owned business. For example, if the business operated at a net loss, but the household member or another household member held additional employment for which a salary was received, the income for purposes of applying for reduced price and free meals would be the income from the salary only. The loss from the business cannot be deducted from a positive income earned in other employment. For purposes of applying for CNP benefits, it is not possible to report a negative income from any business venture. The least income possible is zero (no income).

### Determining Household Size

A **household** is defined as "a group of related or unrelated individuals who are not residents of an institution or boarding house but who are living as one economic unit."

An **economic unit** is "a group of related or unrelated people who share housing and/or all significant income and expenses of its members." Generally, individuals residing in the same house are an economic unit. More than one economic unit may reside together in the same house, but separate economic units in the same house are characterized by prorating expenses and economic independence from one another.

**Students who are temporarily away at school**, such as those who attend boarding schools or colleges, should be counted as members of the household.

**Military personnel** on shore duty living with the household or away on Temporary Duty (TDY) are considered household members. Military personnel serving overseas or assigned to a military base and not living with the household are not considered members of the household for purposes of determining eligibility and only the money sent to the household is considered household income.

Exception: Any member of the armed services who is activated or deployed in support of any military combat operation is still counted as a household member. Only that portion of

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income made available to the household will be counted as household income. Combat pay is excluded if it is received in addition to the service member's basic pay; received as a result of the service member's deployment to or service in an area that has been designated as a combat zone; **and** not received by the service member prior to his/her deployment to or service in the designated combat zone.

An **adopted child** for whom a household has accepted legal responsibility is considered to be a member of that household. If the adoption is a "subsidized" adoption, which may include children with special needs, the subsidy is included in the total household income. Therefore, the household's size and total income is considered in the eligibility determination.

A **foreign exchange student** is considered to be a member of the host family or the household in which he/she resides.

A child in **joint custody** physically resides in one parent's household for a period of time and then moves to the other parent's household. If one parent's household is determined eligible for reduced price or free Child Nutrition Program benefits, the child in joint custody is eligible throughout the year; regardless of which parent currently has custody of the child. If one parent's household is eligible for free benefits and the other parent's household is eligible for reduced price or paid benefits, the child in joint custody is eligible for free benefits.

A **household of one** is a one-person household such as an emancipated child living alone or as a separate economic unit or an institutionalized child.

In some cases, an emancipated student may be living with relatives or friends. If the household is one economic unit, all income and household members must be included to determine eligibility. Age is not a factor in defining an emancipated student.

### **Eligibility of Siblings When a Household Member on CNP Application is Eligible for Food Assistance, TAF or FDPIR**

If a household's Application for Child Nutrition Program Benefits lists a household member with a Food Assistance, TAF or FDPIR case number, ALL of the students listed on the application are automatically eligible for free school meals regardless of household income.

### **Temporary Approval**

Temporary approval of an application is no longer applicable because of the year long duration of eligibility. If school officials are concerned with the authenticity of the information provided on an application, they may, on a case by case basis, verify the application for cause.

## Foster Child / Institutionalized Child Applications

The Healthy, Hunger-Free Kids Act of 2010 provides categorical eligibility for free meals to foster children.

A **foster child** is defined as a child whose care and placement is the responsibility of an agency that administers a State plan under Part B or E of Title IV of the Social Security Act, or a child who is formally placed with a relative or other caretaker household by a court or State child welfare agency. For CNP eligibility purposes, a foster child is considered a member of the foster parents' household if the child is placed through a formal arrangement by a court or State child welfare agency. Whether placed by the State child welfare agency or a court, in order for a child to be considered categorically eligible for free meals, the State must retain legal custody of the child.

An **institutionalized child** is one who is living (even temporarily) in a residential child care institution. A student who attends but does not live in an institution is considered a member of the household in which he/she resides.

Foster children may be directly certified for free meals without an application if the sponsor uses web based KN-CLAIM direct certification. This provision only applies to foster children formally placed by a State child welfare agency or a court and not to informal arrangements that may exist outside of State or court-based systems.

In lieu of an application, **eligibility certification lists** may be used for institutionalized children. Such a list must include each child's name and any personal use income received by the child, the child's date of birth, date of admission and date of release. The list must be signed by an official of the court or the agency responsible and provide the official's title and contact information.

Households with foster and non-foster children may choose to include the foster child as a household member, as well as any personal income earned by the foster child, on the same household application that includes their non-foster children. This may help the foster family's non-foster children qualify for free or reduced price meals based on household size and income.

When processing an application that contains a foster child, the sponsor would certify the foster child for free meals, and then make an eligibility determination for the remainder of the household based on the household's income (including personal income earned by the foster child) or Food Assistance, TAF, or FDPIR case number. Foster payments received by the family from the placing agency are not considered income and do not need to be reported. The presence of a foster child in the household does NOT convey eligibility for free meals to all children in the household in the same manner as Food Assistance, TAF, and FDPIR participation does.

**Personal use income** is income received and kept by the student for his/her own personal use. It is not the income a foster family receives for care of the child. If the student works part-time or receives an allowance, this income must be reported when determining the foster family's household income.

### Adoption Assistance Payments

**Q** *Are children for whom households receive adoption assistance payments under Title IV-E of the Social Security Act automatically eligible for free school meals?*

**A** No. Sections 673 and 674 of the Social Security Act specify that, for purposes of Titles XIX (medical assistance) and Title XX (child care), children whose parents receive adoption payments are not extended eligibility to the NSLP, SBP, or SMP. Additionally, there is no legislative prohibition from considering the adoption assistance payments as income. Therefore, the amount of the adoption assistance payment must be included as household income. Children eligible for Food Assistance or TAF may be certified eligible for free meals.

## Additional Guidelines for Application Approval

### Notification of Eligibility Determination

All households must be notified of their eligibility status. Households approved for benefits may be notified verbally.

Households who have been denied benefits must be notified in writing. The notification must advise the household of:

- ◆ The reason for the denial of benefits
- ◆ The right to appeal
- ◆ Instructions on how to appeal
- ◆ A statement that the household may re-apply for reduced price or free benefits at any time during the school year

The Notify Household about School Meal Benefits (found on the Checklist Tab in KN-CLAIM) contains all required information and should be used exactly as provided. If the sponsor chooses to modify the format or content of the letter, KSDE must annually approve the revision before it is distributed.

**Free Eligible Household Requests Full or Reduced Priced Benefits**

**Q** *What if a child is eligible for free meals, but the household wants to pay the full or reduced price?*

**A** The sponsor should respect the household’s wishes and allow the child to pay the full or reduced price charge. The application should correctly reflect that the child is eligible for free or reduced price meals. However, the school should note on the application that the household has elected to pay the reduced price or full meal charge. The meals served to such a child must be claimed for reduced price/paid reimbursement since the school received the reduced price/full payment from the household.

**Joint Custody Issues**

**Q** *Parents share the custody of their child who lives alternately with the mother and father. Based on the mother’s application, the child is eligible for free meals.*

(1) *Is the child automatically eligible for free meals when residing with the father?*

**A** - Based on the mother’s application the child is eligible for free meals regardless of where he/she resides.

(2) *Is the child considered a member of both households?*

**A** - Since the child is part of each parent’s economic unit while in residence at the respective households, both parents may include the child as a household member.

(3) *What if the father doesn't want the child to get free meals while with him?*

**A** - When a child resides with a parent who pays for the child’s meals, the meals cannot be claimed at the free or reduced price rate.

**Clarifying Information on a Scanned Application**

**Q** *A school scans applications into an electronic system for storage and retrieval. In some cases, a household has written legibly enough for the school personnel to read and make an eligibility determination, but the electronic scanner is unable to pick up some of what has been written. Are school personnel allowed to overwrite the information on the application, thereby making it darker and more readable?*

**A** Any alternation or modification to the application must be documented on the application by the school personnel handling the application. It would be preferable for school personnel to perform appropriate modifications or enhancements to a photocopy of the application rather than to the application itself, and then file the “scanner copy” with the original.

## Needy Households That Do Not Apply

Local officials may complete an application for a student **known to be eligible** if the household fails to apply. This option is intended for **limited use** in individual situations and must not be used to make eligibility determinations for categories or groups of children. It should be used only as a last resort in certifying a child for benefits.

When exercising this option, the school official must complete an application on behalf of the student based on household size and income information provided by a collateral contact. A collateral contact is a credible person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income or Food Assistance/TAF/FDPIR status. Collateral contacts include employers, social service agencies and religious or civic organizations. A collateral contact should be used **only** when the household has not been able to provide adequate written evidence of eligibility. **The source of the information must be noted on the application.**

Names of household members, last four digits of a Social Security number, and signature of an adult household member are not required. The household **MUST** be notified that the student has been certified eligible and is receiving reduced price or free CNP benefits. These applications should be excluded from verification.

### Needy Household Does Not Apply for Benefits

**Q** *What if we are not able to reach the student's parents or guardians or if they refuse to complete an application?*

**A** The determining official could complete an application on behalf of the student based on the best household size and income information available, and then make an eligibility determination. The source of the information about household size and income must be noted on the application. The household must be notified that the student has been certified and is receiving reduced price or free meals. This option is intended for limited use in individual situations.

## Hardship Cases

Households that are not categorically eligible or income eligible cannot be approved for benefits. There are no provisions for making exceptions based on unusual household circumstances, such as high medical expenditures, etc.

Sponsors may establish a special fund to cover the costs of meals for students that cannot be approved for benefits, but who are in need. Contributions from individuals or civic organizations can be provided to cover the costs of these meals. If a sponsor chooses to implement this option, it is important to remember that the confidentiality of the student must be protected at all times.

## Citizenship

U.S. citizenship is not a factor in determining eligibility. An eligibility determination is based on household size/income or the receipt of Food Assistance/TAF/FDPIR for the child as reported on a completed application. The sponsor must apply the same eligibility criteria for citizens and non-citizens.

## Appeals

A household may appeal the level of benefits for which they have been approved. The hearing procedures outlined in the Program Agreement must be followed.

When a household appeals the determining official's decision, the hearing official must base the final decision on the information supplied by the household and the Income Eligibility Guidelines. Providing reduced price or free benefits for households that do not meet the eligibility guidelines is **NOT** allowed. The decision of the hearing official is final.

## Changes in Household Circumstances

Once approved for reduced price or free benefits, a household is not required to report changes in circumstances, such as an increase in income, a decrease in household size or when the household is no longer certified eligible for Food Assistance or TAF.

The household will remain eligible for Child Nutrition Program benefits for the entire school year and 30 food service operating days after the first day of the subsequent school year or until an eligibility determination is made in the new school year, whichever comes first.

## Alternative Schools/Cooperative Schools

Many sponsors currently participate in some type of alternative school or site that involves several cooperating sponsors. The guidelines discussed below should be followed when establishing procedures for maintaining applications and counting and claiming reimbursable meals for this type of school.

If a student is counted in the official enrollment of the "home district" where he/she is enrolled, the "home district" may count the student for state "At-Risk" funding if the student has an approved application for free CNP benefits on file as of the date official enrollment is counted.

A copy of the approved application may be mailed to the sponsor where the student attends class and consumes meals/snacks/milk. Applications should **NEVER** be faxed. The application should be reviewed and initialed by a determining official of the sponsor where the student attends class and consumes meals/snacks/milk.

Reimbursement is claimed by the sponsor of the site where the student consumes meals/snacks/milk. If the student's Application for Free and Reduced Price School Meals is approved by the sponsor where the student consumes meals/snacks/milk, a copy of the approved application is acceptable in the student's "home district".

A student's attendance in an alternative school may be short-term (a few days) or long-term (entire school year). Adjustments and notations must be entered on records to justify the claim and to document current numbers of approved students.



## Categorical Eligibility of Homeless & Runaway Students

A runaway child is one who receives assistance through a program under the Runaway and Homeless Youth Act (RHYA) and the McKinney-Vento Act. These programs are established by the Family and Youth Services Bureau of the U.S. Department of Health and Human Services and are coordinated through a school district homeless liaison.

Documentation of eligibility must include: (1) the student's name, (2) effective date and (3) the signature of either the sponsor's homeless liaison or the Runaway/Homeless Youth service provider. The list of homeless children as identified by the sponsor's homeless liaison should be on file in lieu of an application.

Eligibility is not retroactive unless the Sponsor has requested flexibility for establishing effective date of eligibility on the Sponsor Application in KN-CLAIM.

It is NOT necessary to notify households of the student's eligibility for free meals.

## Categorical Eligibility of Migrant Students

Students certified as "migrant" by the Kansas State Department of Education's Migrant Education Program (MEP) are eligible for free Child Nutrition Program (CNP) benefits. Eligibility is determined from information provided by the local MEP director to the CNP determining official. Following is guidance for CNP officials and MEP directors to help assure continuous free meal eligibility for migrant students.

- ◆ The MEP director should make every effort to provide a current Kansas Migrant Student Network (KMSN) list to the school's CNP determining official no earlier than July 1. A KMSN list dated earlier than July 1 is not acceptable. The KMSN list must be signed and dated by the MEP director.
- ◆ School personnel should NOT request a copy of the student's migrant Certificate of Eligibility (COE) or Qualifying Arrival Date (QAD) due to Family Educational Rights and Privacy Act (FERPA) regulations.
- ◆ A migrant student's free meal eligibility from the prior school year can be carried over for no more than 30 food service operating days in the new school year. If an updated KMSN list is not received by the end of the carry-over period, migrant students' free meal eligibility must be terminated.
- ◆ If a student on the current KMSN list is also on a household's Application for CNP Benefits, disregard the application and use the KMSN list to determine eligibility.
- ◆ Eligibility is not retroactive unless the Sponsor has requested flexibility for establishing effective date of eligibility on the Sponsor Application in KN-CLAIM. Eligibility for free school meals begins on the date that the CNP determining official confirms that a student on the KMSN list is enrolled in the school or the date certified by the migrant recruiter if flexibility has been requested. The CNP determining official will compare the information on the KMSN list to school

enrollment information to confirm that each student on the list is enrolled. The name and at least one other identifying factor (e.g., birth date, address) must be matched. The CNP determining official is to sign and date the KMSN list to document that the students' enrollment has been confirmed.

- ◆ The parent/guardian must be notified of the migrant student's eligibility for free meals using the [Notify Household about School Meal Benefits](#).
- ◆ When a migrant family moves to a new sponsor, to assure that the migrant child continues to receive free CNP benefits, sponsors are encouraged to provide a copy of the KMSN list or the household's approved application to the new sponsor.

See the questions and answers on the following page for further information about certifying eligibility of migrant students for free CNP benefits.

### Certifying Eligibility of Migrant Students

**Q-1** *How does a student become categorized as "migrant"?*

**A** Certification of migrant children is initiated by a migrant recruiter who works directly with a migrant family to determine its eligibility for the program. The recruiter completes a Certificate of Eligibility (COE) and submits it for approval and entry into KSDE's migrant computer system, the Kansas Migrant Student Network (KMSN).



**Q-2** *When should migrant students be certified eligible for free meals?*

**A** Eligibility is not retroactive unless the Sponsor has requested flexibility for establishing effective date of eligibility on the Sponsor Application in KN-CLAIM. Eligibility for free school meals begins on the date that the CNP determining official confirms that a student on the KMSN list is enrolled in the school or the date certified by the migrant recruiter if flexibility has been requested.



**Q-3** *What if a student's migrant Certificate of Eligibility has been submitted by the recruiter, but it is not yet approved in KMSN?*

**A** A school principal or other school official may submit an application on behalf of a child that they know to be categorically eligible due to his/her status as a **migrant, homeless or runaway child**. Once the documentation is received, that information must be noted on the application and the child's eligibility status is effective for the remainder of the school year and would carry-over for up to 30 food service operating days in the next school year.



## Categorical Eligibility of Food Assistance/TAF/FDPIR Recipients

Households currently receiving Food Assistance, Temporary Assistance to Families (TAF) or Food Distribution Program on Indian Reservations (FDPIR) are categorically eligible for free CNP benefits. If the household cannot be Directly Certified, an Application for Free and Reduced Price School Meals must be completed that provides the following information:

1. Name of student(s)
2. Food Assistance/TAF case number or other FDPIR identifier for any member living in the household
3. Signature of an adult household member

No further information is required for the application to be considered complete.

In Kansas, Food Assistance and TAF case numbers are computer-generated and always contain 8 digits. Currently all Kansas Food Assistance and TAF case numbers begin with the numbers 0, 1, or 2. The Kansas Department for Children and Families (DCF) provides some families with “Vision” cards. These cards are used like debit cards by the families receiving benefits. Vision Card numbers (beginning with 60143) and Medicaid numbers are **NOT** acceptable on the application and do not automatically qualify students for CNP benefits. Sponsors must be careful when reviewing applications to ensure that Food Assistance and TAF case numbers appear to be valid. If the household provides a questionable Food Assistance/TAF number, the sponsor may:

1. Refer to the KN-CLAIM Direct Certification system to obtain the correct Food Assistance or TAF number.
2. Approve/deny the application based on the household’s size and income information, if provided.
3. Call the local DCF office to verify that the household is receiving Food Assistance/TAF benefits (document the correct case number provided by DCF on the application).
4. Deny eligibility until a complete application can be obtained.

If a household has provided a valid Food Assistance or TAF case number and also reports income, the eligibility determination should be based on the fact that the children are eligible for Food Assistance or TAF benefits.

KSDE’s Direct Certification system may be used to directly certify those households reporting a Food Assistance or TAF case number. If the Food Assistance or TAF case number cannot be found on KSDE’s Direct Certification, but the case number contains 8 digits and begins with a 0, 1, or 2, the sponsor must approve the household for free benefits based on categorical eligibility.

The Food Distribution Program on Indian Reservations (FDPIR) is available in areas of Kansas that are close to an Indian reservation. Indian tribes that serve Kansas residents use the head of household’s Social Security number as the FDPIR number.

Children residing in households receiving Food Assistance or TAF are eligible for free meals. A household listing a Food Assistance or TAF number on the application certifies all students in the household to receive free meal benefits.

**Not All Children in Household Receive Food Assistance or TAF**

**Q** *How do I determine eligibility of a household with some children who receive Food Assistance and/or TAF benefits and other children who do not receive these benefits?*

**A**

- ◆ If a household’s **Application for Child Nutrition Program Benefits** lists a Food Assistance, TAF or FDPIR case number for a household member, **ALL** the students listed on the application are automatically eligible for free school meals regardless of household income.
- ◆ If at least one student in a household is eligible for free school meals based on **KSDE’s Direct Certification** list, all students in the household are automatically eligible for free school meals. Foster child eligibility is not extended to other household members.
- ◆ If a student’s eligibility for free school meals (based on Food Assistance/TAF/FDPIR eligibility) is **carried over** into the new school year, newly enrolled siblings are eligible for free meals during the carry-over period. Eligibility is effective on the date documentation is completed.

## Independent Review of Applications

Beginning in SY 2014-15, Sponsors designated by the State agency as demonstrating high levels of, or a high risk for, administrative error associated with certification and benefit issuance are required to conduct a second review of applications.

A second review of applications requires a re-evaluation of the eligibility determination made by the original determining official, based on the information provided by the household on the application. The second review must determine whether the application is complete, i.e., the application contains the signature of an adult household member, the last four digits of a social security number (or an indication of “none”), names of all household members including the student for whom the application is made, income amount (received by each household member identified by the individual who receives it), income source and frequency; or categorical information, if applicable. The second review must also confirm that the application was correctly approved based on current income eligibility information, as applicable, and that the master list or roster of student names correctly records the student’s eligibility.

The second review of applications must be done before the household is notified of eligibility and must not result in the delay of an eligibility determination. Sponsors required to conduct a second review of applications are still required to notify households of the child’s eligibility determination within 10 operating days of receiving the application.

Refer to SP 44-2014, Questions and Answers Related to the Independent Review of Applications, for more information on this requirement.

## Eligibility Based on Direct Certification

### What is Direct Certification?

Direct Certification is the process of providing automatic eligibility for free Child Nutrition Program benefits to students who are already eligible to receive Food Assistance, Temporary Assistance to Families (TAF), certain Medicaid benefits (MED-F and MED-R), or Foster Children.

### How does Direct Certification Work?

Direct Certification data is accessed via KN-CLAIM, the computer system for Child Nutrition & Wellness. On the second working day of July, DCF sends KSDE the complete file of Food Assistance/TAF, MED-F and MED-R recipients ages 3 -18 and foster children. KSDE matches the DCF data with data in KIDS, the Kansas Individual Data on Students system. A complete data file will be provided to sponsors for the month of July. For the remainder of the year, sponsors will receive only names added to the DCF file daily.

The following Direct Certification options are provided in KN-CLAIM for each sponsor.

1. **List and/or file of DCF students matched in KIDS:** Students on the DCF file who were matched in KIDS on first name, last name and at least one other identifier
2. **List and/or file of DCF students who were potentially matched in KIDS:** Students who were identified on the DCF file as associated with the sponsor, but who could not be matched in KIDS
3. **Search for an individual DCF student:** Look-up an individual student on the DCF file using first name, last name and at least one other identifier or Food Assistance/TAF/Foster Child case number.
4. **List and/or file of DCF students by county:** Students on the DCF file in each county served by the sponsor.
5. **List and/or file of DCF student for private schools:** Students on the DCF file matched in the KIDS system to a private school.

Following is information about how the Direct Certification process works. For further information refer to the *KN-CLAIM Quick Reference for Direct Certification* which is available in KN-CLAIM on the Quick Reference menu.

## 1. List and/or File of DCF Students Matched in KIDS

This is a list of students on the DCF file who were matched with the KIDS data. These students are eligible for free or reduced price CNP benefits if they are currently enrolled in the district. Following is the matching process order. When a student matches, they are removed from any subsequent matching.

1. First name, last name, date of birth, SSN and claiming district
2. First name, last name, date of birth, SSN
3. First name, last name, SSN
4. First name, last name, middle initial, date of birth, and claiming district
5. First name, last name, middle initial, date of birth, and residence district
6. First name, last name, date of birth, and claiming district
7. First name, last name, date of birth, and residence district
8. Sibling match by Food Assistance/TAF case number/MED-F/MED-R:  
These records will have no state or local student-id. This results from a match for a student with sibling(s) and there is only one matching KIDS district for the Food Assistance/TAF case number/MED-F/MED-R. The KIDS district from the sibling will be assigned to all the children on the case. If the case has multiple KIDS districts matched because they attend in different districts, a KIDS district will not be put on the sibling(s). These records will be left blank and will not have a matching district.

Students can have two Direct Certification records in the following situations:

1. The student has two records in the DCF file; one for Food Assistance and one for TAF and the address is different on each record. Result: Student gets two records for Direct Certification, each with a different address. KSDE is allowing both records to remain in the file so that the sponsor can determine which address matches local student records.
2. The student has a record in the KIDS system with a non-public school claiming the student and a public school specified as the residence district. Result: Student gets two records for Direct Certification: one under the non-public school number and one under the residence district.
3. The student is a foster student and either FA/TAF/MED-R or MED-R

**NOTE:** On all of the Direct Certification list screens, the lists can be sorted on any of the fields by clicking on the desired sort field (for example, Last Name or School Name).

### Follow these procedures to work with the “Matched Students” list:

1. Print the list from KN-CLAIM. Right-click your mouse anywhere on the screen and click “Print” OR click on the blue question mark in the upper right corner of the screen for instructions on how to print.
2. Repeat the following process for each student on this list.
  - ◆ Determine whether the student is currently enrolled in the district. For each student that is enrolled, highlight (i.e., underline, circle, or highlight) the student’s name on the printed list.
  - ◆ In the sponsor’s accountability system, update each enrolled student’s eligibility status to “free or reduced price”.
3. Notify each directly certified household of its student’s eligibility for free or reduced price Child Nutrition Program benefits based on Food Assistance, TAF, MED-F, MED-R, or foster child using the Notify to Household about School Meal Benefits letter.
4. When you have gone through the whole list, go back and sequentially number the highlighted names to obtain a partial count of directly certified students. This count will later be used in the verification reporting process. Keep the printed list on file for review or audit.



## 2. List and/or File of DCF Students Not Matched in KIDS

The students in this group are all eligible for free or reduced price school meals. In addition, the student's parent or guardian has indicated to DCF that the student is associated with the sponsor. However, the data on the DCF file could not be matched with the KIDS data using any of the groups of criteria for matching students. There could be many reasons for this, but most often it is due to differences in the spelling of first names. The district has data on file that can be used for matching (such as parent name) that is not available in KIDS.

### Follow these procedures to work with the “DCF Students Not Matched” list:

Print the list from KN-CLAIM. Right-click your mouse anywhere on the screen and click “Print” OR click on the blue question mark in the upper right corner of the screen for instructions on how to print. Repeat the following process for each student on this list.

1. Try to match each student in the sponsor's student database. Match the student's name and at least one other identifier such as birthday, address, Social Security number or parent's name. For each student that is matched, highlight (i.e., underline, circle, or highlight) the student's name on the printed list and the matching identifier(s) found in the sponsor's student database.
2. In the sponsor's accountability system, update each matched student's eligibility status to “free or reduced price”.
3. Notify each directly certified household of its student's eligibility for free or reduced price Child Nutrition Program benefits based on Food Assistance, TAF, MED-F, MED-R, or foster child using the Notify Household about School Meal Benefits letter.
4. When you have gone through the whole list, go back and sequentially number the highlighted names to obtain a partial count of directly certified students. This count will later be used in the verification reporting process. Keep the printed list on file for review or audit.

## 3. Search for an Individual DCF Student

This screen can be used to look up an individual student on the DCF data file. This file includes all names (i.e. statewide) for July plus any additional names added for each subsequent month. If a student is associated with a sponsor on the DCF file, and then moves into another district/school, this screen can be used to match the student and document his/her eligibility for free meals.

### Use these procedures to directly certify a student:

1. Follow the instructions on the screen to enter allowable combinations of identifying information.
2. For each student that is found, print the screen. Right click anywhere on the screen and then click “Print” OR click on the blue question mark in the upper right corner of the screen for instructions on how to print.
3. In the sponsor's accountability system, update each matched student's eligibility status to “free or reduced price”.
4. Maintain the printed screen on file for review or audit.
5. Notify each directly certified household of its student's eligibility for free or reduced price Child Nutrition Program benefits based on Food Assistance, TAF, MED-F, MED-R, or foster child using the Notify Household about School Meal Benefits letter.



## 4. List or File of Eligible Students by County

When this option is selected, the system will display a list of the counties associated with the sponsor. When a county is selected, a list will display of all names on the DCF file that are associated with that county.

### Follow these procedures to work with the County list:

Print the list from KN-CLAIM. Right-click your mouse anywhere on the screen and click “Print” OR click on the blue question mark in the upper right corner of the screen for instructions on how to print. Repeat the following process for each student on this list.

1. Try to match each student in the sponsor’s student database. Match the student’s name and at least one other identifier such as birthday, address, Social Security number or parent’s name. For each student that is matched, highlight (i.e., underline, circle, or highlight) the student’s name on the printed list and the matching identifier(s) found in the sponsor’s student database.
2. In the sponsor’s accountability system, update each matched student’s eligibility status to “free or reduced price”.
3. Notify each directly certified household of its student’s eligibility for free or reduced price Child Nutrition Program benefits based on Food Assistance, TAF, MED-F, MED-R, or foster child using the Notify Household about School Meal Benefits letter.
4. When you have gone through the whole list, go back and sequentially number the highlighted names to obtain a partial count of directly certified students. This count will later be used in the verification reporting process. Keep the printed list on file for review or audit.

## 5. List and/or File of DCF Students for Private Schools

1. Log into Direct Certification using the X0 number.
2. If the school belongs to a larger organization, such as a diocese, the list will contain the students for the entire diocese.
3. Sort the list by “Site” and all the students for each individual private school will be listed together.
4. Print the list from KN-CLAIM. Right-click your mouse anywhere on the screen and click “Print” OR click on the blue question mark in the upper right corner of the screen for instructions on how to print.
5. Repeat the following process for each student on this list.
  - ◆ Determine whether the student is currently enrolled in the private school. For each student that is enrolled, highlight (i.e. underline, circle or highlight) the student’s name on the printed list.
  - ◆ In the sponsor’s accountability system, update each enrolled student’s eligibility status to “free or reduced price”.
6. Notify each directly certified household of its student’s eligibility for free or reduced price Child Nutrition Program benefits based on Food Assistance, TAF, MED-F, MED-R, or foster child using the Notify Household about School Meal Benefits letter.
7. When you have gone through the whole list, go back and sequentially number the highlighted names to obtain a partial count of directly certified students. This count will later be used in the verification reporting process. Keep the printed list on file for review or audit.

## Direct Certification of One Student in a Household Based on Food Assistance/TAF/FDPIR/MED-F/MED-R Qualifies All Other Students Residing in the Household for Free or Reduced Price Eligibility

If at least one student in a household is eligible for free or reduced price school meals based on Food Assistance/TAF/FDPIR/MED-F/MED-R, all students in the household are automatically eligible for free or reduced price school meals.

- ◆ Use the sponsor's enrollment records to identify additional students with the same parent/guardian and address as is on KSDE's direct certification list.
- ◆ Send Letter to the Household about School Meal Benefits which informs them of each additional student's eligibility and provides the opportunity to decline free or reduced price meals. This letter is available in KN-CLAIM on the Checklist Tab.
- ◆ Free or reduced price meal eligibility is effective on the date the letter is sent to the household or the created date if flexibility has been requested.
- ◆ The presence of a foster child in the household does NOT convey eligibility for free or reduced price meals to all children in the household in the same manner as Food Assistance, TAF, FDPIR, MED-F, or MED-R participation does.

## Directly Certified Households That Complete an Application for CNP Benefits

When both an application and Direct Certification is established for a child, eligibility determination should be based on the Direct Certification. If a student has been directly certified and then an application is received, the application should be stapled behind the Notify Household about School Meal Benefits letter and retained on file but should not be used to determine eligibility. If eligibility was determined based on an application but then the student is found on the Direct Certification List, staple the Direct Certification List to the top of the application and send a new or revised Notify Household about School Meal Benefits letter. An email notification is acceptable.

Note: If a student is directly certified as MED-R but an income application is completed that determines the household to be eligible for free meals, the application trumps the MED-R reduced eligibility and would be added to the verification pool.

## Directly Certified Students & Verification

Households whose children are determined eligible through use of the Direct Certification process are exempt from verification of income.

## Directly Certified Students & Optional Benefits

If the sponsor provides optional benefits based on eligibility for reduced price or free CNP benefits, the parents or guardians of directly certified students must still waive confidentiality before the optional benefits are provided. The Consent for Disclosure (found on the Checklist Tab in KN-CLAIM) is used to obtain consent from Directly Certified households. Sponsors must receive the completed consent form from the parent/guardian **before** providing optional benefits to a directly certified student.

## Application Retrieval

The sponsor must maintain Applications for CNP Benefits and Direct Certification documentation so that they can be readily retrieved by school. Applications may be maintained either at the school or at a central location with a list of eligible children maintained at the school. If the sponsor maintains applications at a central location, applications must be readily retrievable by school, and the sponsor must ensure that any changes in eligibility status and transfers in and out of the school are accurately and promptly recorded on each school's list.

## Application Retention

The documentation listed below must be kept on file for a minimum of five years plus the current year. However, if audit findings have not been resolved, the documentation must be retained until the audit is closed.

- ◆ Applications approved for CNP benefits
- ◆ Applications from households denied benefits and denial letters sent to them
- ◆ Inactive applications
- ◆ Direct Certification lists or electronic files from KN-CLAIM for students eligible for free or reduced price Child Nutrition Program benefits based on eligibility for Food Assistance, Temporary Assistance to Families, MED-F, MED-R, or Foster Children.
- ◆ Direct Certification lists or letters from the migrant recruiter, homeless/runaway educational liaison, homeless shelter official, and/or Head Start/Even Start official,
- ◆ Letters sent by the sponsor to households on the Direct Certification list/electronic file
- ◆ Rosters of students' eligibility status