



NUTS & BOLTS

OF SCHOOL NUTRITION PROGRAMS



Meal Benefit Issuance: Compliance, Refreshers, and Common Challenges

Kerry Callahan
Bridget Ziniti



MASSACHUSETTS DEPARTMENT OF
ELEMENTARY AND SECONDARY
EDUCATION

1

Non-Discrimination Statement



In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.


Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](http://www.ascr.usda.gov/complaint_filing_cust.html), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Massachusetts Department of Elementary and Secondary Education

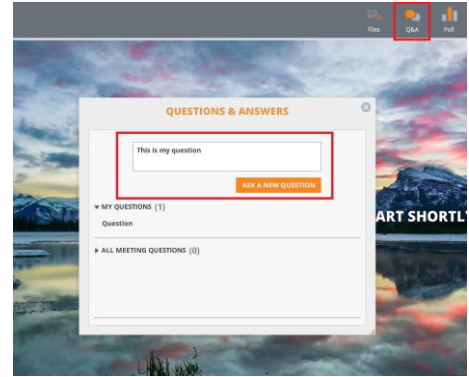
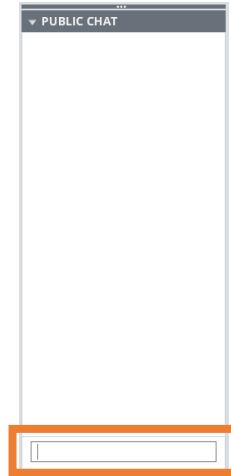


2

Please ask questions!

How to submit questions:

- Chat box:
 - Type your questions in the chat box to the left of your screen
 - Press enter to submit to the group
- Q&A Button
 - Click on the "Q&A" icon at the top of the screen
 - Type question into box
 - Press "Ask a new question" to submit
- All questions will be answered at the end



Learning Objectives

After this webinar you will be able to:

- Explain the Meal Benefit Application Process including its relation to Performance Standard 1
- Describe the SFA's responsibility for administering the School Meals Programs
- Determine eligibility for free and reduced price meals/milk
- Outline household notification procedures consistent with program regulations



Overview



- Highlight common challenges LEAs have when administering the School Meals Programs' Meal Benefit Issuance and how to avoid making costly errors including:
 - Public Outreach and Household Notification procedure requirements
 - The Meal Benefit Application
 - The Application Packet
 - Determining Eligibility for free and reduced price meals/milk
 - Processing Applications and Eligibility status

Massachusetts Department of Elementary and Secondary Education



5

Program Authority



7 CFR Part...

- 210 National School Lunch Program (NSLP)
- 215 Special Milk Program (SMP)
- 220 School Breakfast Program (SBP)
- 225 Summer Food Service Program (SFSP)
- 226 Child and Adult Care Food Program (CACFP)
- **245 Determining Eligibility for Free and Reduced Price Meals and Free Milk in Schools**

Massachusetts Department of Elementary and Secondary Education



6

Public Outreach Requirements



• Public Notification/Media Release

- The LEA must publicly announce that families may apply for benefits and provide the current income eligibility guidelines (IEGs)
- IEGs can be found in the Document and Reference Library
- Media, unemployment office, major employers contemplating large layoffs in the attendance area of the school

• Information Letters and Applications to Households

- Must be distributed to households of children attending the school – **remember late enrollments as well!** (common finding)
- Postal service, e-mail to parent/guardian, or information packet provided to students

Massachusetts Department of Elementary and Secondary Education



7

Information to Households: Optional Documents



Application-related materials: Sharing Information

- Sharing Information with Medicaid/CHIP
- **Sharing Information with Other Programs**
 - These are programs specific to your school and programs that are available to ALL students.
 - Athletics, PSATs/SATs, School Transportation
 - The local Kiwanis Club that wants to give Thanksgiving turkeys to F/R children is not a school program. Children would be overtly identified.
 - **Non application programs** must use a different income assessment form to seek income assessment information for these programs and cannot use the Meal Benefit Application.

Massachusetts Department of Elementary and Secondary Education



8

Household Application- Distribution

- LEAs may post the application on school/district websites, provide information in newsletters sent to families, and use other existing notification methods (“Eligibility Manual for School Meals” pg. 10).
 - Print
 - Telephone, Text Message
 - Email
 - Social Media
 - Paper
 - Electronic
 - Scanned
 - Computer/Web-based



Household Application- Distribution

- Whatever method(s) the LEAs choose, the LEA must ensure the method(s) is effective to reach all enrolled student parent/guardian (“Eligibility Manual for School Meals” pg. 9).
 - Limited English Proficiency
 - Disability
- If the LEA only provides applications to students NOT directly certified, then the LEA must assure these children are not overtly identified through the method used to distribute applications.



Household Application



- Use the Massachusetts Application whenever possible.
- LEAs that choose to use a web-based application must submit the Online Application Questionnaire. Please contact your consultant.
 - Any web-based application identified as not meeting the USDA requirements may result in fiscal disallowance.
 - ESE memo was sent June 25, 2019.
- **Outdated applications** may result in fiscal disallowance.

Massachusetts Department of Elementary and Secondary Education



11

The Application Determining Eligibility



Households apply based on...

- Income & Household Size
- Assistance Program
 - SNAP, TANF
- Other Source Categorical Eligibility
 - Foster, Homeless, Migrant, Runaway

Massachusetts Department of Elementary and Secondary Education



12

Determining Eligibility



Carryover of Previous Year's Eligibility

- LEAs must carryover all student's approved eligibility from the last operating day of the previous school year.
- Approval may be used for up to 30 operating days from the first day of school.
 - **A student's prior year's eligibility remains in effect until a new eligibility determination is made in the current school year, or, if no determination is made, for up to 30 operating days**
- Applies to all categorical eligibility determinations and income based applications.
- Schools must process applications as they are received and **promptly** notify households of their eligibility status.

Massachusetts Department of Elementary and Secondary Education



13

Determining Eligibility



Determining Household Composition

- Application approvals are based on an economic unit.
- Economic unit is defined as a group of related or unrelated individuals who are living as one economic unit, and whose members share housing, significant income, and expenses.

Massachusetts Department of Elementary and Secondary Education



14

Household Composition



Special Conditions

- An adopted child for whom a household has accepted legal responsibility is considered to be a member of that household.
- A child who is temporarily away at school (college, boarding school) is a household member.
- A child living with one parent, a relative, or friend (with no welfare agency or court legally responsible) is considered a member of the household with whom the child resides.

Massachusetts Department of Elementary and Secondary Education



15

Special Conditions



- Joint custody- if both parents apply for benefits, the greater benefit is issued.
- Emancipated Child- living alone or as a separate economic unit is a household of one.
 - There would be court documents indicating the child is emancipated.
 - <https://www.mass.gov/info-details/massachusetts-law-about-emancipation-of-minors>
- Foreign exchange student- is considered a member of the household in which the student resides (host).

Massachusetts Department of Elementary and Secondary Education



16

Determining Household Income



Reporting Current Income

- Current income is defined as **gross income** received by the household for the current month, or the amount projected for the month the application is filled out, or for the month prior to application.
- Gross income must be reported.
 - Self-employment can report net income.
 - If an applicant supplies income documentation (paystubs, etc) you are obligated to review the documents
- Seasonal workers may **project an annual rate** of income

Massachusetts Department of Elementary and Secondary Education



17

Determining Household Income



Reportable Income

- Wages, salaries, tips, commissions;
- Foster child's income from part-time job(s);
- Child/student income (regardless of age/grade) who is full-time or regular part-time employee;
- Children's income from SSI;
- Strike benefits, unemployment & worker's compensation;
- Non-deployed Military basic pay, cash bonuses & allowances for off-base housing, food, clothing ("Eligibility Manual for School Meals" pg.28);

Massachusetts Department of Elementary and Secondary Education



18

Determining Household Income



Reportable Income

- Alimony payments;
- Child support payments;
- Veteran's benefits;
- Pensions and Retirement Social Security;
- Income from trusts or estates; Investment income;
- Net rental income;
- Cash withdrawn from savings;
- Garnished waged- the total gross is to be reported regardless of the amount garnished or used to pay creditors.

Massachusetts Department of Elementary and Secondary Education



19

Determining Household Income



Income Exclusions ("Eligibility Manual for School Meals" pg.30)

- Cash income/value from SNAP and some Federal education benefits.
- Payments received from foster care agency or court for the care of foster children.
- Student financial assistance for cost to attend educational institution (grants, scholarships).
- Loans (i.e. bank loans)
- Infrequent earnings received on an irregular basis (baby-sitting, yard work).

Massachusetts Department of Elementary and Secondary Education



20

Processing Applications



Determining Complete Applications

- Only complete applications can be processed. Any application missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be processed.
- Reasonable efforts should be made to contact the household to obtain or clarify information.
 - If information is taken over the phone, document the information with the date and initial (SSN, income frequency).



Complete Applications



Income-based Applications

- Names of ALL household members
- Amount, source & frequency of current income for ALL household members
- Signature of an adult household member
- Last four digit of Social Security Number
 - Indication of no SSN



Indication of 'No Income'



- Applications must still request that applicants write a zero when there is no income to report but will no longer require a separate indication of no income.
- Applications with blank income fields are to be processed by the school district as complete, rather than incomplete as in prior practice.
- If local officials have information that the household has intentionally misrepresented its income, they must verify any such application for cause (SP 34-2016).
 - All households for whom benefits are to be reduced or terminated must be **given 10 calendar days** (pg. 57) written advance notice of the change. The first day of the advance notice period is the day the notice is sent.

Massachusetts Department of Elementary and Secondary Education



23

Complete Applications



Other Source Categorical

(Foster, Homeless, Migrant, Runaway)

- Names of all children for whom the application is made.
- Indication of child's categorical eligibility status.
- Signature of adult completing the application.

Massachusetts Department of Elementary and Secondary Education



24

Foster 7 CFR 245.2



- A child who is formally placed by a court or a State child welfare agency (DCF).
 - The LEA is required to have current school year documentation to support the foster/court order.

- Whether placed by the State child welfare agency or court, in order for a child to be considered categorically eligible for free meals, the State must retain legal custody of the child.
 - In some cases, foster children are placed with relatives (the State has formally placed these children).
 - This definition does not apply to informal arrangements or permanent guardianship placements that may exist outside of State or court-based systems.

Massachusetts Department of Elementary and Secondary Education



25

Foster & Non-foster



- A foster family may include their foster child(ren) on the household application for their non-foster children.

- This will streamline the application process and may help the foster family's non-foster children qualify for free or reduced price meals based on household size and income.
 - Under this method, it is possible that foster children are FREE and non-foster children are REDUCED.

Massachusetts Department of Elementary and Secondary Education



26

Homeless 7 CFR 245.2



- Homeless families identified by the district liaison should not complete an application.
 - Do you know who your homeless liaison is?
- Districts often realize a family is homeless when they self declare through the application process.
 - If/when this happens, you are obligated to report that family to the homeless liaison for proper LEA documentation and services the children are entitled to under the McKinney-Vento Homeless Assistance Act.
 - The Act declares a student homeless if they lack a fixed, regular, and adequate nighttime residence or if they are residing in a homeless shelter.
 - Eligible for the duration of the school year and up to 30 days into subsequent school year regardless of a change in their living situation.

Massachusetts Department of Elementary and Secondary Education



27

Homeless



Residing With Another Household

- When a household hosting a homeless family applies for benefits for their own children, the host family may include members of the homeless family as household members **IF** the host family provides financial support to the homeless family.
 - Financial support = shelter, utilities, clothing, food
- When applying for benefits, the host family **MUST** include any income the homeless family receives.
 - Under this method, it is possible the homeless children are FREE and the host family's children are REDUCED.

Massachusetts Department of Elementary and Secondary Education



28

Assistance Program: SNAP, TANF



STEP 2

Do any Household Members (including you) currently participate in one or more of the following assistance programs: SNAP, TANF, or FDPIR?

Write the Agency ID Number, then go to **STEP 4** (Do not complete STEP 3)

EBT number not accepted; SNAP award letter may be requested

Agency ID Number: _____

- Determining officials must ensure that the Assistance Program's case number is consistent with the format used.
 - EBT Numbers are not acceptable
 - SS Numbers are not acceptable
 - MassHealth Number is not acceptable

Massachusetts Department of Elementary and Secondary Education



29

Applications- Assistance Programs (SNAP, TANF)



What is my responsibility (**since August 2017**) (p.34)

Step 1 Applicable case number must be identified.

Step 2 Child is provided free meals.

Step 3 You will compare the application(s) with a case number to the direct certification list.

Step 4 If a match is found, disregard the application and ensure the child(ren) are matched as DC.

Step 5 If a match is not found, the LEA must contact the household for further clarification OR verify for cause.

Massachusetts Department of Elementary and Secondary Education



30

Reviewing Applications



Application Processing **Timeframe**

- Applications must be reviewed in a timely manner.
- **Within 10 operating days** ("Eligibility Manual for School Meals" pg. 50) **of receipt of application:**
 - An eligibility determination must be made (determined & confirmed)
 - The family must be notified of its status (can be via email but only sent to the adult who signed the application).
 - The status must be implemented.
- The confirming official must edit check all determinations, sign and date
- POS system may be either the determining or confirming (not both)
 - This still required 2 humans to complete
 - Check data entry for accuracy
 - Application can be batch signed & dated

Massachusetts Department of Elementary and Secondary Education



31

Approved Applications



Household Notifications

- Use the **most current USDA prototype notification.**
 - Add most current notification to the point of sale default settings
 - The most current notifications are located in the Meal Benefit Application Packet in the Document and Reference library
- Household must be notified.
 - Letter method and or email
 - Maintain templates for review

Massachusetts Department of Elementary and Secondary Education



32

Duration of Eligibility



- Eligibility is yearlong.
- Families are not required to submit new application if their income changes.
- Families can reapply at any time throughout the school year that were denied or approved for reduced price meals and have a change in their income that will result in a greater benefit.
- Temporary approval no longer exists.

Massachusetts Department of Elementary and Secondary Education



33

Transferring Eligibility



Within the Same LEA

- Transferring from one school to another, the child's eligibility status must be transferred.
- Transferring from Provision 2 school (breakfast and lunch, non-base year) to non Provision 2 school, a new application is required.
- If a child transfers within the same LEA from a school using CEP to a non-CEP school, a new application is required (or current DC determination)

Massachusetts Department of Elementary and Secondary Education



34

Transferring Eligibility



Transferring to Another LEA

- LEAs and schools are encouraged, but not required to share eligibility data with a new LEA when a child transfers
- The new LEA may accept the eligibility determination from the former LEA.
- If an application is provided, the accepting LEA should review the application for accuracy.
 - If an error is found, the LEA must notify the household that it must file a new application in order to receive benefits.

Massachusetts Department of Elementary and Secondary Education



35

Transferring CEP



Transferring to Another LEA

- When a child in a CEP school transfers to **another LEA**, the new LEA may accept the eligibility determination from the child's former LEA only if eligibility was based on current direct certification or there is an application on file for other children in the household that do not attend a CEP school.

Massachusetts Department of Elementary and Secondary Education



36

Households That Have Not Applied



7 CFR 245.6(d)

- Local **school** officials **may complete an application for a child** known to be eligible for meal benefits if the household has not applied.
- When exercising this option, the school official must complete the application with household size and income information (pg. 42).
 - Source of information must be noted on application
 - Household notification is required to be sent.
 - Intended for limited use

Massachusetts Department of Elementary and Secondary Education



37

Questions



Massachusetts Department of Elementary and Secondary Education



38

THANK YOU

Kerry Callahan & Bridget Ziniti

✉ kerryc@doe.mass.edu

✉ bziniti@doe.mass.edu

🏠 www.doe.mass.edu

🏠 75 Pleasant Street, Malden, MA 02148

