



# **HOW TO IMPROVE SCHOOL MEALS APPLICATIONS**

By Zoë Neuberger and David V. Sanchez

August 31, 2012

The Center on Budget and Policy Priorities, located in Washington, D.C., is a non-profit research and policy institute that conducts research and analysis of government policies and the programs and public policy issues that affect low and middle-income households. The Center is supported by foundations and individual contributors.

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## Overview

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The school meals programs support the healthy development of children and help to ensure that low-income school-aged children have access to adequate nutrition. The process of enrolling for free or reduced-price meals and the application form itself are the gateway to these benefits. Typically school districts send home school meals applications and parents complete them at home without assistance.<sup>1</sup> In contrast to many other income-tested programs, there are no caseworkers dedicated to helping parents navigate the application form or process. Thus, it is particularly important that these applications be easy to use, provide clear directions, and avoid steps that might deter eligible families from applying. If parents do not complete and return the application form, their children may miss meals, jeopardizing their healthy development and learning.<sup>2</sup> Fortunately, eligibility for the school meals programs is relatively straightforward, making a user-friendly application an achievable goal for states and school districts.

As a result of changes in recent legislation reauthorizing the federal school meals programs, every school district in the country had to revise its school meals application for the 2011-2012 school year.<sup>3</sup> In order to assess the changes that were made and to identify problems that still exist on many applications, the Center on Budget and Policy Priorities reviewed school year 2011-2012 applications and other household materials, such as instructions, that are available online for each state and the largest school districts. This review builds on an earlier review, which examined 2010-2011 applications in anticipation of the revisions.<sup>4</sup>

Our review of materials in use by states and large school districts for the 2011-2012 school year revealed that in some instances required elements of household materials are missing and that even when all requirements are met, household materials are not always as simple and clear as they could

### Key Steps To Improve Program Access

By improving school meals applications in the following ways, states and school districts can help families struggling against hunger get healthy meals for their children.

- Provide materials in a [language](#) and at a [level](#) parents can understand.
- [Simplify](#) applications for categorically eligible children.
- Reduce opportunities for [math errors](#).
- Encourage eligible families to [apply](#).
- Encourage eligible families selected for [verification](#) to respond.

This paper provides specific suggestions for revisions to school meals applications to help achieve these goals.

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<sup>1</sup>Any adult in the household may complete an application on behalf of a child in the household. There is no requirement that the adult be a parent or legal guardian of the child. For the sake of brevity, this paper refers to the adult completing the application as the parent.

<sup>2</sup> Some children are automatically enrolled for free meals as a result of direct certification and no application is necessary. In addition, school officials are permitted to complete an application on behalf of a child if they have information indicating that the household is eligible. See 7 C.F.R § 245.6(d) and Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, p. 27, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf).

<sup>3</sup> See P.L. 111-296, the Healthy, Hunger-Free Kids Act of 2010, <http://www.gpo.gov/fdsys/pkg/BILLS-111s3307enr/pdf/BILLS-111s3307enr.pdf>.

<sup>4</sup> See Zoë Neuberger and Abby Lane, *A Unique Opportunity to Improve School Meals Applications*, Center on Budget and Policy Priorities, April 2011, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3479>.

be. Applications and other household materials can be improved to streamline the application process and substantially enhance program access for eligible children.

This paper is intended as a resource for states and school districts as they develop household materials related to the school meals programs.<sup>5</sup> It is not a comprehensive guide to developing these materials; rather, it focuses on a few key elements of the application by highlighting best practices from around the country and pointing out areas where current materials often fall short.

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<sup>5</sup> The legal responsibility for developing applications and other household materials falls on local educational agencies (LEAs), although many states provide model materials or approve local forms. This paper uses the term “school district” to refer to local education agencies.

## A Guide to This Report

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The Center on Budget and Policy Priorities reviewed school year 2011-2012 applications and other household materials for each state and the 100 largest school districts where they are available on the web (building on a previous review of school year 2010-2011 applications).<sup>6</sup> The packet of school meals materials provided to parents at the start of the school year typically includes a letter explaining the school meals programs, instructions on how to complete an application for free or reduced-price meals, and an application form.<sup>7</sup> We were able to find on the web and review 87 sets of printable household materials (43 from states and 44 from large school districts).<sup>8</sup> In addition, we reviewed 50 state and school district applications that may be completed and submitted electronically.<sup>9</sup> Altogether, we reviewed 137 sets of household materials.

In some cases, not all household materials were available (a school district, for example, may have posted a parent letter and application instructions but no application form). In other cases, we could not determine whether the household materials met a stated criterion because we were not confident that the materials on the web reflected everything that parents receive. Throughout this report, the number of states, large school districts, and online applications described as having relevant materials refers to those with up-to-date materials that were posted online and for which determinations about the stated criteria could be made.

While we reviewed every set of materials for compliance with every program requirement, this report only discusses areas: (a) that are central to program access, (b) where program rules are not being met, or (c) where materials are not as clear as they could be.<sup>10</sup> The review allowed us to identify best practices as well as areas for improvement. This report discusses the key features we encourage state and local program administrators to consider as they develop applications and related materials. While no single set of household materials includes all the practices we recommend, we point to specific state or local examples of the features that make materials easier to use and understand.<sup>11</sup>

This report represents the Center on Budget and Policy Priorities' assessment of household materials. We were not able to test materials with eligible households, a step that we strongly encourage states and districts to undertake in order to ensure that the application is understandable to the people who will actually complete it.<sup>12</sup>

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<sup>6</sup> The review was conducted between September 2011 and March 2012.

<sup>7</sup> Examples of other household materials are notification of direct certification, approval or denial of meal benefits, and notification of selection for verification.

<sup>8</sup> This paper refers to applications that must be printed and completed manually for submission as “printable” applications.

<sup>9</sup> This paper refers to applications that may be submitted electronically as “online” applications.

<sup>10</sup> Additional information on the more detailed review may be provided upon request.

<sup>11</sup> Note that when we highlight a best practice on an application, we are not endorsing other features of the application.

<sup>12</sup> USDA has published a guide to improving applications for SNAP benefits, which program administrators may wish to consult as an additional resource. The guide covers some important overarching aspects of developing clear applications that elicit accurate information and discusses how to test draft materials with potential applicants. See Food and

We also examined whether applications incorporated three changes required as a result of policy changes in the 2010 child nutrition reauthorization legislation:

- Applications must now treat foster children as categorically eligible for free meals regardless of income and may no longer ask for information about the income of foster children to determine their eligibility. In addition, households may not be required to complete a separate application for foster children.<sup>13</sup>
- Applications may now ask only for the last four digits of the Social Security number of the adult signing the application or an indication that he or she does not have one.<sup>14, 15</sup> As was previously the case, information about the Social Security number or lack of one is required only for households that must provide income information on the application.
- Social Security numbers may not be requested for *any* household member as part of the *verification* process.<sup>16</sup>

Because these provisions are new, we wanted to assess whether state and district household materials accurately reflect them. We found that implementation of these changes is incomplete and requires numerous changes. This report identifies materials that reflect and explain the changes in ways that parents are likely to understand so that other states and districts may adopt similar approaches.

The U.S. Department of Agriculture makes available a prototype application and related materials to assist states and school districts as they design household materials.<sup>17</sup> USDA's prototype materials reflect the changes in the reauthorization legislation and offer a helpful starting point for school meals staff who are developing household materials. USDA has also provided translations of those materials in 33 languages.<sup>18</sup>

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Nutrition Service, *Guide to Assessing Food Stamp Application Forms*, USDA, July 2003, <http://www.fns.usda.gov/snap/government/pdf/assessment-guide.pdf>.

<sup>13</sup> See P.L. 111-296 § 102 amending 42 U.S.C. § 1758(b) and (d) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Categorical Eligibility of Foster Children*, USDA, revised March 16, 2011, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP17\\_CACFP08\\_SFSP05-2011\\_osr.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP17_CACFP08_SFSP05-2011_osr.pdf).

<sup>14</sup> See P.L. 111-296 § 301 amending 42 U.S.C. § 1758(d)(1) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Privacy Protection and the Use of Social Security Numbers in Child Nutrition Programs*, USDA, February 15, 2011, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19\\_CACFP09\\_SFSP06-2011\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19_CACFP09_SFSP06-2011_os.pdf).

<sup>15</sup> As applications may no longer ask for full Social Security numbers, FNS has stated that applications no longer must contain the Privacy Act statement. Instead, FNS's "Use of Information Statement" must be provided on the application. See Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, p. 14, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf).

<sup>16</sup> See P.L. 111-296 § 301 amending 42 U.S.C. § 1758(d)(1) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Privacy Protection and the Use of Social Security Numbers in Child Nutrition Programs*, USDA, February 15, 2011, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19\\_CACFP09\\_SFSP06-2011\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19_CACFP09_SFSP06-2011_os.pdf). The verification process, which occurs after applications have been approved, is discussed in the final section of this paper.

<sup>17</sup> USDA's prototype materials for school year 2011-2012 are available in English at <http://www.fns.usda.gov/cnd/Translations/English/E-SchoolMealApp.pdf>.

<sup>18</sup> USDA's translations are available at <http://www.fns.usda.gov/cnd/frp/frp.process.htm>. Translations are available in Arabic, Armenian, Cambodian, Chinese (Traditional and Simplified), Croatian, Farsi, French, Greek, Gujarati, Haitian

Our review also assessed how applications treat households and children who are “categorically eligible” for school meals, meaning that they can qualify without providing information about family income. In many cases, these households have provided income information to other assistance programs with eligibility standards that are similar to the school lunch program and with more rigorous application processes. In other cases, these children are members of vulnerable groups that face unique hardship and whom Congress chose to provide with free meals. Categorical eligibility is intended to simplify the certification process by eliminating an income assessment for children who would almost always have qualified anyway.

All households that are categorically eligible can be “directly certified” for free meals, which means they are enrolled based on information from a third party rather than through an application.<sup>19</sup> If, however, these households apply for school meals by filling out an application, the application does not usually need to ask for information about household income or a Social Security number. Too often the design of applications — both paper applications and those submitted electronically — is unclear or appears to require the family to complete all sections of the application.

Ensuring that applications are simplified for categorically eligible children is important. Asking families to provide information that is not needed to make an eligibility determination violates program rules, creates an unnecessary burden for the household and program administrators, and may dissuade some families from applying for free or reduced-price school meals. Yet, as our review shows, applications for categorically eligible children are not as simple as they could be.

The sections and Appendices in this report are described below. Each section can serve as a stand-alone guide for school food administrators or other interested parties who are focused on a particular aspect of household materials or on reaching a particular group of children. For each section, each specific feature that we discuss is listed with an indication of whether it is required under program rules or recommended to improve program access. The results of our review are summarized in a table at the end of each section.

## **1. Provide Materials in a Language and at a Level That Parents Can Understand**

This section describes ways that states and school districts can ensure that households with limited English proficiency or limited literacy receive all information about the school meals program in a language and at a level they can understand. We discuss the importance of states and school districts:

- Identifying the primary language of each household (required)
- Providing translated materials (required)
- Conducting all communications in the household’s primary language (required)
- Accommodating households with limited literacy by simplifying application language and providing assistance (required)

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Creole, Hindi, Hmong, Japanese, Korean, Kurdish, Laotian, Mien, Polish, Portuguese, Punjabi, Russian, Samoan, Serbo-Croatian, Somali, Spanish, Sudanese, Tagalog, Thai, Tigrinya, Ukrainian, Urdu, and Vietnamese.

<sup>19</sup> By directly certifying children from these programs for free school meals, states can avoid having multiple programs collect the same information from families while ensuring that school meals programs reach the neediest children. Moreover, direct certification can also help districts generate resources to support their meals program; districts will have fewer paper applications to process, fewer applications to verify, and more federal reimbursements.

## 2. Clarify and Simplify Applications for Households Receiving Selected Public Benefits

This section describes how to simplify the enrollment process for children in households receiving public benefits that confer categorical eligibility — the Supplemental Nutrition Assistance Program (SNAP, formerly the Food Stamp Program), the Temporary Assistance for Needy Families (TANF) cash assistance program, or the Food Distribution Program on Indian Reservations (FDPIR). States and school districts can simplify enrollment by certifying all children in the household and asking only for necessary information. We reviewed whether states and school districts:

- Certify all children in the household
  - Request information about additional children in the household on the direct certification notice (required)
  - Request a single case number (recommended)
  - Identify all public benefits that confer categorical eligibility (required)
  - Describe the “case number” clearly (recommended)
- Ask only for necessary information
  - State clearly, before the income section of the application, that the household does not need to provide income information if it has provided a SNAP, TANF cash assistance, or FDPIR case number (practice is required; placement is recommended)
  - Clarify that households do not have to provide income information for *children* if the household provides a case number (practice is required; explanation is recommended)
  - Clarify that households providing a case number do not have to provide Social Security number information (practice is required; explanation is recommended)

## 3. Update and Clarify Applications for Children in Foster Care

This section describes how to update and clarify applications for children in foster care. We reviewed whether states and school districts:

- Explain clearly that children in foster care are categorically eligible for free meals (practice is required; explanation is recommended)
- Make applications consistent with policies for children in foster care (required)
- Explain the process and consequences of applying for children in foster care and non-foster children jointly or separately (recommended)

## 4. Clarify Procedures for Homeless, Migrant, and Runaway Students

This section explains how to clarify the enrollment process for homeless, migrant, and runaway children. We reviewed whether states and school districts:

- State in the parent letter that homeless, migrant, and runaway children qualify for free meals (recommended)
- Clearly explain the steps parents need to take if their children have not been directly certified and they believe they are homeless, migrant, or runaway (recommended)
- Clarify whether and when households must provide income information and information about a Social Security number (recommended)

## 5. Reduce Math Errors

This section explains how to design applications in order to reduce the likelihood of math errors. We reviewed whether states and school districts:

- Provide options on the application to note the frequency with which the household receives income without doing calculations (recommended)

## 6. Encourage Eligible Families to Apply

This section explains how applications can encourage eligible families to apply. We reviewed whether states and school districts:

- Encourage applications throughout the school year (recommended)
- Reach out to parents who become unemployed (statement is required; outreach is recommended)
- Avoid multiple, unnecessary applications (required)
- Reassure non-citizens (recommended)
- Assure families they will be treated fairly (required)
- Highlight the income eligibility limit for reduced-price meals (required)

## 7. Encourage Eligible Families Selected for Verification to Respond

This section explains how to encourage eligible families to respond to requests for more detailed verification of their circumstances. We reviewed whether states and school districts:

- Include a no-charge phone number for assistance and specify that it is cost-free to families (providing number and informing families of it are required; stating that it is no-charge is recommended)
- Explain the timeframe for which information may be provided (practice is required; explanation is recommended)
- Explain how families with homeless, runaway, or migrant children can verify their eligibility (required)
- Explain how households with no income can verify their eligibility (recommended)
- Remove any request for Social Security numbers (required)

■ Appendices A and B provide more detail about which states and districts post household materials on the web, the specific materials that are available (such as a parent letter, instructions, or application), and the form in which they are to be submitted (printable or online).<sup>20</sup>

■ Appendices C and D summarize the legally required elements of application and verification materials, respectively, including requirements adopted as part of the reauthorization legislation.

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<sup>20</sup> Any state or district materials that are available online but are missing from our review reflect an error by the authors. Note that not all school districts and states posted all relevant forms online (for example, some posted parent letters and notices of direct certification but not application forms).

- Appendix E shows USDA’s “I Speak” form, which school districts may use to identify a parent’s primary language.
- Appendix F includes a link to each state’s school meals program homepage and school meals forms (where available). Alternatively, readers can access state school meals program websites by clicking on a state name in the list or map below.
- Appendix G includes links to the school meals website for the 100 largest school districts.

<a href="#"><u>Alabama</u></a>	<a href="#"><u>Kentucky</u></a>	<a href="#"><u>North Dakota</u></a>
<a href="#"><u>Alaska</u></a>	<a href="#"><u>Louisiana</u></a>	<a href="#"><u>Ohio</u></a>
<a href="#"><u>Arizona</u></a>	<a href="#"><u>Maine</u></a>	<a href="#"><u>Oklahoma</u></a>
<a href="#"><u>Arkansas</u></a>	<a href="#"><u>Maryland</u></a>	<a href="#"><u>Oregon</u></a>
<a href="#"><u>California</u></a>	<a href="#"><u>Massachusetts</u></a>	<a href="#"><u>Pennsylvania</u></a>
<a href="#"><u>Colorado</u></a>	<a href="#"><u>Michigan</u></a>	<a href="#"><u>Rhode Island</u></a>
<a href="#"><u>Connecticut</u></a>	<a href="#"><u>Minnesota</u></a>	<a href="#"><u>South Carolina</u></a>
<a href="#"><u>Delaware</u></a>	<a href="#"><u>Mississippi</u></a>	<a href="#"><u>South Dakota</u></a>
<a href="#"><u>District of Columbia</u></a>	<a href="#"><u>Missouri</u></a>	<a href="#"><u>Tennessee</u></a>
<a href="#"><u>Florida</u></a>	<a href="#"><u>Montana</u></a>	<a href="#"><u>Texas</u></a>
<a href="#"><u>Georgia</u></a>	<a href="#"><u>Nebraska</u></a>	<a href="#"><u>Utah</u></a>
<a href="#"><u>Hawaii</u></a>	<a href="#"><u>Nevada</u></a>	<a href="#"><u>Vermont</u></a>
<a href="#"><u>Idaho</u></a>	<a href="#"><u>New Hampshire</u></a>	<a href="#"><u>Virginia</u></a>
<a href="#"><u>Illinois</u></a>	<a href="#"><u>New Jersey</u></a>	<a href="#"><u>Washington</u></a>
<a href="#"><u>Indiana</u></a>	<a href="#"><u>New Mexico</u></a>	<a href="#"><u>West Virginia</u></a>
<a href="#"><u>Iowa</u></a>	<a href="#"><u>New York</u></a>	<a href="#"><u>Wisconsin</u></a>
<a href="#"><u>Kansas</u></a>	<a href="#"><u>North Carolina</u></a>	<a href="#"><u>Wyoming</u></a>

## 1. Provide Materials in a Language and at a Level That Parents Can Understand

### Practices Discussed

In order to provide materials in a language and at a level that parents can understand, states and school districts need to:

- Identify the primary language of each household (required)
- Provide translated materials (required)
- Conduct all communications in the household’s primary language (required)
- Accommodate households with limited literacy by simplifying application language and providing assistance (required)

Food insecurity is more prevalent among young children with immigrant parents than those with native-born parents; among young children with immigrant parents, food insecurity is even more likely in families in which parents are learning English or have less education. Thus, school meals can be a critical resource for children whose immigrant parents are learning English.<sup>21</sup> If parents cannot understand the application, they may not apply for the meals for which their children qualify. Parents might, for example, incorrectly believe that receiving free or reduced-price school meals could negatively affect an application for citizenship. Providing support for households who do not speak English fluently is an important step to ensure that these vulnerable families have access to school meals.

Under the rules for the school lunch and breakfast programs, schools districts are directed to communicate with parents in a language they can understand.<sup>22</sup> USDA has recently clarified for states and school districts the kinds of measures that are necessary to comply with this provision and to ensure that no barrier for participation exists for limited English proficient (LEP) households.<sup>23,24</sup> According to USDA’s guidance, school districts “have a responsibility to be aware of the language needs of LEP households and ensure these households have access to the same information other parents have in a manner they can easily understand.” USDA has also clarified that *all* households must be offered LEP services and that “simply offering the most common alternative language is not sufficient.”<sup>25</sup> In particular, USDA expects state agencies and school districts to:

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<sup>21</sup> See Randy Capps, Allison Horowitz, Karina Fortuny, Jacinta Bronte-Tinkew, and Martha Zaslow, *Young Children in Immigrant Families Face Higher Risk of Food Insecurity*, February 2009, [http://www.childtrends.org/Files/Child\\_Trends-2009\\_02\\_20\\_RB\\_ImmigrantFood.pdf.pdf](http://www.childtrends.org/Files/Child_Trends-2009_02_20_RB_ImmigrantFood.pdf.pdf).

<sup>22</sup> See 7 C.F.R. § 245.6(a)(2) using language almost identical to the statutory provision at 42 U.S.C. § 9(b)(8).

<sup>23</sup> Food and Nutrition Service, *Applications and Other Household Materials for Limited English Proficient Households*, USDA, December 2011, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

<sup>24</sup> This paper uses the term limited English proficient (LEP), which the federal government uses to describe students whose first language is other than English and who are unable to perform ordinary class work in English. The term English language learner (ELL) is increasingly used in place of LEP.

<sup>25</sup> Food and Nutrition Service, *Applications and Other Household Materials for Limited English Proficient Households*, USDA, December 2011, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

- Identify the primary language of each household and communicate with the household in that language
- Provide written translations of applications, either by providing USDA’s translations or by producing their own
- Provide oral interpretation services
- Assist with verification
- Serve households with limited literacy<sup>26</sup>

Our review revealed that substantial numbers of states and school districts do not take basic steps to ensure that families can understand materials about the school meals programs. By taking the steps below, school districts can comply with USDA’s guidance and eliminate barriers for LEP families.

- **Identify the *primary* language of *each* household.** In order to ensure that language is not a barrier to participation in school meals programs, school food administrators need to identify the languages that households use at home. Existing school district resources may facilitate these efforts. Most schools have a system in place to identify parents’ primary language for communications regarding the child’s education and many school districts retain this information in a student database. State agencies and school districts can rely on this system to ensure that communications with households throughout the school year regarding the school meals programs are in an appropriate language.

For example, many districts use a Home Language Survey, conducted as part of the enrollment process, to determine the dominant language in the home. Alternatively, USDA’s “I speak” survey could be attached to the household materials to *identify the appropriate language for communications regarding school meals.*<sup>27</sup> Oregon uses its online application system to allow households to designate one of four languages in which further written materials will be provided.<sup>28</sup>

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<sup>26</sup> Additionally, USDA’s guidance reminds states and school districts that the parent letter or application form must include the required non-discrimination statement. The non-discrimination statement is discussed further in section 6 on encouraging eligible families to apply.

<sup>27</sup> USDA’s “I speak” survey is available at <http://www.fns.usda.gov/cnd/frp/Ispeak.pdf> and appears in Appendix E.

<sup>28</sup> The online application is available at <https://district.ode.state.or.us/apps/frlapp/>. The languages that may be selected are: Chinese, Russian, Spanish, and Vietnamese. The feature could be improved by placing it at on the school meals website or at the beginning of the application so that families would not have to complete an English application in order to indicate that they would prefer materials in another language.

## Oregon's Online Application Allows Families to Designate A Language for Future Communication

**Health Insurance Information**

I do not want my information shared with State Children's Health Insurance Program.

I have a child (or children) who do not have any kind of health insurance coverage -neither private health insurance nor Oregon Health reduced cost health coverage for at least one of my children.

I prefer all written correspondence in English

- English
- Spanish
- Russian
- Vietnamese
- Chinese

Oregon Department of Education  
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The New York City Department of Education's website includes a *translated* list of the 15 languages in which applications are available; an image of the translated application appears when a language is selected.<sup>29</sup> The translations allow parents who do not read English to find a word in their primary language when looking at the website.

## New York City's Website Includes a List Translated Into Other Languages Of Which Applications Are Available

**NYC**  
Department of Education  
Cathleen P. Black, Chancellor

PARENTS & FAMILIES | STUDENTS | EMPLOYEES

SEARCH:  Go

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SchoolFood  
FEED YOUR MIND

To obtain an original 2010-2011 Application for Free and Reduced-Price Meals in any of the 15 printed languages, Please contact your child's school or call the Office of SchoolFood Help Desk at (877) 363-6325. You may also call the SchoolFood Help Desk for assistance in completing the applications. For faster processing, families can also apply online at [www.nyc.gov/accessnyc](http://www.nyc.gov/accessnyc)

**New York City Department of Education**  
2010-2011 Application for Free and Reduced-Price Meals

**English**  
Español  
لغة العربية  
বাংলা  
中文  
Français  
Ελληνικά  
Kreyòl Ayisyen  
תענית  
Italiano  
한국어  
Русский  
हिन्दी  
POLSKI  
اردو

**LIST ONLY THE CHILDREN ATTENDING THIS SCHOOL**

Child Line	First Name	Last Name	Grade	DOB # (Student ID Number)
1				
2				
3				
4				
5				

**LIST ALL CURRENT INCOME AND PAY PERIOD**

Print First and Last Name	Bank Deposited (or Other)	Year (Month)	Child Assistance	Year (Month)	Pay Period	Any Other Income	Year (Month)
1							
2							
3							

<sup>29</sup> This feature may be viewed at [http://www.opt-osfns.org/osfns/Mealsapp/forms\\_reduced.aspx](http://www.opt-osfns.org/osfns/Mealsapp/forms_reduced.aspx). It could be improved by allowing parents to print a translated application. Currently applications, including English applications, must be obtained from a school or by calling a central help desk.

- **Provide translated materials for limited English proficient (LEP) households.** State agencies or school districts may choose to develop written translations of their own materials in the languages that are most prevalent locally.<sup>30</sup> In the absence of a state or local translation, school districts must provide USDA’s translation. School districts can improve communications with parents who are learning English by, at a minimum, explaining how to obtain materials or assistance in other languages and placing a link on the school district’s website to USDA’s website with translations in 33 languages or providing printed copies of USDA’s materials.

A link to USDA’s translations is most useful when it appears on a state’s school meals homepage or the page where a state’s free and reduced-price applications are posted. In addition, the link must be clearly labeled; if the link is difficult to find, school administrators and households looking for translations will be unlikely to use it.<sup>31</sup> FNS is developing a version of the translations specifically designed for parents.<sup>32</sup> The forthcoming version will separate household applications from notices and verification materials, which may make the translation more useful to school districts.

Table 1 below shows the translated materials that states and school districts made available online. In general, most school districts provided some information about obtaining assistance in another language; the record among states was more mixed. While our review indicated that families who require Spanish language materials may often be able to obtain them, few states or large school districts provided translated materials in languages besides Spanish. USDA requires school districts to provide services for *all* LEP households, not merely for the households who speak the most common languages. Based on the materials posted online, many school districts appear to fail to provide materials for families who speak languages other than English and Spanish.<sup>33</sup>

- **Conduct all communications in the household’s primary language.** Providing a translated application is an important starting point, but the goal is to make sure all parents understand all relevant information about the school meals programs. Therefore, all communications with families about the school meals programs need to be in a language parents can understand. This is crucial to ensuring that parents understand and comply with program rules. Once a household is identified as LEP, records need to be kept on the language they speak, and all subsequent communication must be in this language. This is especially important for the verification process, so that LEP families can respond. For parents who speak languages for which USDA translations are not available, or who have limited literacy in their primary language, states and school districts would benefit from identifying oral interpretation services for communications with households

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<sup>30</sup> States and school districts that choose to translate their own application materials may wish to consult Center for Health Literacy, *Translation — A Must-Have Guide*, Maximus, July 2010, <http://www.maximus.com/services/health/health-literacy/translation-services>.

<sup>31</sup> Some state links are hard to find. For example, some states place the link in policy documents for administrators or in a bulletin or memo archive. The link is most useful when it is placed in a location where LEP families are likely to see it.

<sup>32</sup> Food and Nutrition Service, *Applications and Other Household Materials for Limited English Proficient Households*, USDA, December 2011, p. 3, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

<sup>33</sup> As our review only examined materials or information posted online, it would not identify school districts that make translations available at schools or a district office.

about school meal benefits.<sup>34</sup>

- **Accommodate households with limited literacy by simplifying application language and providing application assistance.** It is also important for states and school districts to ensure that English speakers with limited literacy can understand household materials. USDA’s guidance clarifies that “State agencies and LEAs [school districts] are expected to provide assistance so that [limited literacy households] can understand and complete the application, certification, and verification process.” USDA’s prototype materials are designed to be comprehensible to someone with low literacy, so states and school districts can look to USDA’s materials as an example of how applications can be written in clear, simple language.

Congress and the Obama Administration have recently emphasized the importance of using clear and simple language when communicating with the public about federal benefit programs. In October 2010, the Plain Writing Act of 2010 was enacted with the purpose of improving “the effectiveness and accountability of Federal agencies to the public by promoting clear Government communication that the public can understand and use.”<sup>35</sup> Under the statute, applications for federal benefits had to comply with its plain language requirements by October 13, 2011. The Office of Management and Budget’s memorandum implementing the new law explained why clear communications are so important:

Plain writing should be seen as an essential part of open government. . . . Transparency, public participation, and collaboration cannot easily occur without plain writing. Clear and simple communication can eliminate significant barriers to public participation in important programs for benefits and services. Avoiding ambiguity and unnecessary complexity can increase compliance simply because people understand better what they are supposed to do. Plain writing is no mere formal requirement; it can be essential to the successful achievement of legislative or administrative goals, and it promotes the rule of law.<sup>36</sup>

Unfortunately, applications for public benefits often are not written simply enough for many adults to understand. For example, a recent review of online applications for Medicaid or the Children’s Health Insurance Program (CHIP) found that, on average, English applications were written at a reading level of 12<sup>th</sup> grade or higher, which is far more advanced than the 6<sup>th</sup> grade reading level that is typically recommended for those with low literacy.<sup>37</sup>

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<sup>34</sup> For example, a school district could contract for a telephone translation service such as Language Line (see <http://www.language-line.com/page/industry-government/>). Because this paper is based on a review of materials provided on the web, we are unable to assess the availability of oral translation services.

<sup>35</sup> P.L. 111-274, available at <http://www.gpo.gov/fdsys/pkg/PLAW-111publ274/pdf/PLAW-111publ274.pdf>.

<sup>36</sup> For the full memorandum, see <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2011/m11-05.pdf>.

<sup>37</sup> Lorraine S. Wallace, Jennifer E. DeVoe, and Julie S. Hansen, “Assessment of Children’s Public Health Insurance Program Enrollment Applications — A Health Literacy Perspective,” *Journal of Pediatric Health Care*, February 2011, [http://www.medscape.com/index/list\\_4827\\_0](http://www.medscape.com/index/list_4827_0).

Federal rules governing school meals require applications to be “clear and simple in design.”<sup>38</sup> Iowa’s application offers an example of a design that is relatively easy to read and that includes clear instructions, on the application itself, regarding who needs to complete each section.<sup>39</sup>

**Iowa Eligibility Application** FFY 11-12

Complete one application per household. School Year 2011-2012

<b>Part 1. Check all applicable boxes:</b>		<input type="checkbox"/> school meals	<input type="checkbox"/> children in child care center	<input type="checkbox"/> children in child care home(HP)				
		<input type="checkbox"/> special milk (restrictions apply)	<input type="checkbox"/> Tier I home provider (HP)	Provider name: _____				
			<input type="checkbox"/> Head Start/Even Start					
<b>Part 2. Children enrolled: REQUIRED OF ALL APPLICANTS. If applicable, list FIP or Food Assistance Case Number.</b>								
List name(s) of all enrolled child(ren) in your household. Children's Racial and Ethnic identities are optional. Provide one or more if you choose (see code).								
Ethnicity: H=Hispanic or Latino, N=Non Hispanic or Latino		Race: A=Asian, B=Black or African American, I=American Indian or Alaska Native, P=Native Hawaiian or other Pacific Islander, W=White						
Last Name	First Name	Middle Name or Initial	Check box for FOSTER child	Date of Birth	Grade	OPTIONAL		Name of School/Head Start/ Child Care Center/Home
						ETHNICITY	RACE	
1.			<input type="checkbox"/>					
2.			<input type="checkbox"/>					
3.			<input type="checkbox"/>					
4.			<input type="checkbox"/>					
5.			<input type="checkbox"/>					
<b>FIP or Food Assistance Eligible:</b> Enter the FIP or Food Assistance Case Number for ANY household member as listed in the Notice of Decision. NOTE: Medicaid, Title XIX, FIP card number and EBT card number are not acceptable.								
Name of household member with Case Number _____		List Case Number _____						
<b>Part 3. Total Household Gross Income. DO NOT COMPLETE THIS PART IF YOU LISTED A FIP OR FOOD ASSISTANCE NUMBER IN PART 2.</b>								
Report the gross income received by EACH household member in the correct column: weekly, every 2 weeks, twice a month or monthly. Gross income is the amount earned before taxes and other deductions, not take-home pay. Report all other monthly income received. Self-employed persons, see the worksheet on reverse side.								
List the names of everyone living in your household, including the children listed in Part 2. Attach a separate page if more space is needed. For FOSTER children, include only money available for child's personal use or child's own income.					<b>Gross Income: Report income by how often the household member is paid.</b>		Other Monthly Payments or Income Received.	

Because low-income parents often have less education and may have more limited reading skills than the general public, it is especially important for program administrators to focus on readability as they revise school meals applications. There are widely available resources available to assist administrators in developing simple materials and assessing readability. The federal government has a website devoted to plain writing, which includes detailed guidelines for writing readable documents.<sup>40</sup> USDA has published a guide to help states make applications for SNAP benefits more user-friendly; the guide includes suggestions on how to convey a helpful and professional tone and make forms easier to understand.<sup>41</sup> Tools are also available to assess the grade level of text.<sup>42</sup>

<sup>38</sup> See 7 C.F.R. § 245.6(a)(1).

<sup>39</sup> Iowa’s application is available at [http://educateiowa.gov/index.php?option=com\\_docman&task=doc\\_download&gid=11781&Itemid=4271](http://educateiowa.gov/index.php?option=com_docman&task=doc_download&gid=11781&Itemid=4271).

<sup>40</sup> See <http://www.plainlanguage.gov> and <http://www.plainlanguage.gov/howto/guidelines/bigdoc/TOC.cfm>.

<sup>41</sup> See Food and Nutrition Service, *Guide to Assessing Food Stamp Application Forms*, USDA, July 2003, pp. 22-23 and 45-62, <http://www.fns.usda.gov/snap/government/pdf/assessment-guide.pdf>.

<sup>42</sup> Examples of such tools are the Simple Measure of Gobbledygook (SMOG) Readability Index (<http://execsec.od.nih.gov/plainlang/guidelines/evaluating.html#smog>) and the Lexile Analyzer (<http://www.lexile.com/analyzer/>). Word processing programs also have tools that assess the reading level of a document or assist in counting words or sentences and finding the average length of sentences and paragraphs.

States and districts may wish to field test applications with parents who have limited literacy to make sure the materials are comprehensible and elicit accurate information. Such tests need not be elaborate or expensive; for example, a few volunteers could be solicited at a parent event to complete a draft application and then be interviewed about the materials.<sup>43</sup>

School districts also may wish to develop a system to assist parents who have limited literacy or do not read at all. While such parents may seek out a friend or relative to read the forms, districts could designate a staff member to read forms to parents who are unable to read.

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<sup>43</sup> For a more detailed discussion about how to test draft materials with potential applicants, see Food and Nutrition Service, *Guide to Assessing Food Stamp Application Forms*, USDA, July 2003, pp. 77-83, <http://www.fns.usda.gov/snap/government/pdf/assessment-guide.pdf>.

Table 1

### Summary of Findings: Providing Materials in a Language That Parents Can Understand

Provides a link to USDA translations	<b>21 out of 43 states</b> for which relevant materials were available adopt this practice <sup>A,B,C</sup>
	<b>2 out of 44 large districts</b> for which relevant materials were available adopt this practice <sup>D</sup>
	<b>2 out of 50 online applications</b> for which relevant materials were available adopt this practice
Provides materials in Spanish	<b>20 out of 43 states</b> for which relevant materials were available adopt this practice <sup>E</sup>
	<b>39 out of 44 large districts</b> for which relevant materials were available adopt this practice <sup>F</sup>
	<b>37 out of 50 online applications</b> for which relevant materials were available adopt this practice <sup>G</sup>
Provides materials in a language besides English or Spanish	<b>5 out of 43 states</b> for which relevant materials were available adopt this practice <sup>H</sup>
	<b>9 out of 44 large districts</b> for which relevant materials were available adopt this practice <sup>I</sup>
	<b>3 out of 50 online applications</b> for which relevant materials were available adopt this practice <sup>J</sup>
Provides <i>neither</i> a link to USDA materials nor translated materials	<b>15 out of 43 states</b> for which relevant materials were available
	<b>5 out of 44 large districts</b> for which relevant materials were available
	<b>13 out of 50 online applications</b> for which relevant materials were available

## Notes for table:

<sup>A</sup> Throughout this paper, the number of states, large school districts, and online applications described as having relevant materials refers to those with up-to-date materials that were posted online and for which determinations about the stated criteria could be made. Note that in all the tables in this paper, the states and large school district rows refer to printable materials, while the online application rows refer to both states' and school districts' online applications.

<sup>B</sup> While we recommend that states take steps to make sure this link is easy to find, in this table we count any link we were able to locate.

<sup>C</sup> Maine is counted in this table as providing a link to the USDA website, but Maine's link is titled "Somali Packet" and does not indicate that materials in any languages besides Somali are available at the linked webpage.

<sup>D</sup> Gwinnett County (GA) and Lewisville (TX) provide links to the USDA translations (Lewisville's link is provided through its link to Aramark's MealSense informational guide). Cobb County (GA) and Washoe County (NV) provide links to the USDA translations but they are not counted in this table because they do not provide printable applications (Washoe's link is provided through its link to Aramark's MealSense informational guide).

<sup>E</sup> New Jersey did not provide a parent letter, application, or instructions, so it is not counted in this table. But New Jersey does provide certain notices in Spanish (incomplete application, eligibility determination, verification results, and sharing information with other programs).

<sup>F</sup> In Baltimore County (MD) and Henrico County (VA), parents must call a number in order to be given translated application materials. The applications of Brevard County (FL) and Memphis City (TN) contain directions in Spanish on how to complete the application, but no other Spanish materials are provided. In this table, these four school districts are counted as providing materials in Spanish.

<sup>G</sup> New York City provides two online applications—ACCESSNYC and an "Apply for Lunch" application. Our review is based on the latter application.

<sup>H</sup> The states that provide languages besides Spanish are DC (French, Chinese, Vietnamese, and Amharic), Maine (French), Minnesota (Hmong and Somali), Oregon (Chinese, Russian, and Vietnamese), and Wisconsin (Hmong). Note that Maine does not provide any translated applications, but does provide a parent letter and application instructions in French. In this table, Maine is counted as providing materials in additional languages.

<sup>I</sup> Nine large school districts provide printable materials in languages besides English and Spanish on their websites. These are Anchorage (AK) (Hmong, Korean, Samoan, and Tagalog), Garden Grove (CA) (Vietnamese and Korean), Long Beach (CA) (Khmer), Los Angeles (CA) (Armenian, Chinese, Korean, Russian, and Vietnamese), Palm Beach (FL) (Creole), Montgomery County (MD) (Chinese, French, Korean, Portuguese, and Vietnamese), Boston (MA) (Cape Verdean Creole, Chinese, Haitian Creole, Portuguese, Somali, and Vietnamese), Arlington (TX) (Vietnamese), and Fairfax County (VA) (Arabic, Farsi, Korean, Urdu, and Vietnamese).

<sup>J</sup> The three large school districts that allow for electronic submission of an application in a languages besides Spanish or English are San Francisco (CA) (Chinese), Jefferson County (CO) (Russian), and Broward County (FL) (Creole and Portuguese).

## 2. Clarify and Simplify Applications for Households Receiving Selected Public Benefits

### Features Discussed

In order to certify all children in the household, states and school districts must:

- Request information about additional children in the household on the direct certification notice (required)
- Request a single case number (recommended)
- Identify all public benefits that confer categorical eligibility (required)
- Describe the “case number” clearly (recommended)

In order to avoid requesting unnecessary information, states and school districts must:

- State clearly, before the income section of the application, that the household does not need to provide income information if it has provided a SNAP, TANF cash assistance, or FDPIR case number (practice is required; particular statement is recommended)
- Clarify that households do not have to provide income information for *children* if the household provides a case number (practice is required; statement is recommended)
- Clarify that households providing a case number do not have to provide Social Security number information (practice is required; statement is recommended)

All children who live in households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP, formerly the Food Stamp Program), the Temporary Assistance for Needy Families (TANF) cash assistance program, or the Food Distribution Program on Indian Reservations (FDPIR) are categorically eligible for school meals.<sup>44,45</sup> For children who are categorically eligible due to their receipt of public benefits, the required information is simplified. These households must provide the “case number” associated with the benefit program that confers eligibility.<sup>46</sup> The provision of a case number establishes eligibility for free school meals and these households do not have to provide the names of adults in the household, income information, or any information about a Social Security number.<sup>47</sup> Asking for this information once a family has provided a case number is not only redundant but violates program regulations, which state that the information requested on the application “shall be limited to that required to demonstrate that the household does, or does not, meet the eligibility criteria for free or reduced price meals.”<sup>48</sup>

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<sup>44</sup> See 7 C.F.R. § 245.6 (c)(5)

<sup>45</sup> To confer categorical eligibility, TANF cash assistance programs must use standards that are comparable to or more restrictive than those in effect on June 1, 1995. See 42 U.S.C. § 1758(b)(5)(A). All TANF cash assistance programs in operation currently meet this criterion.

<sup>46</sup> If a parent provides a letter or other document documenting eligibility that was obtained from the agency that administers the public benefit program, the children must be directly certified for free school meals. See 7 C.F.R. § 245.6(b)(5)(ii)(A).

<sup>47</sup> See 7 C.F.R. § 245.6(a)(6).

<sup>48</sup> See 7 C.F.R. § 245.6(a)(1).

These categorically eligible children can be enrolled for free school meals either through a school meals application that includes a SNAP, TANF cash assistance, or FDPIR case number or through direct certification. Ideally all children in these households would be directly certified so that families do not have to complete a duplicative application and school districts do not have to waste resources processing unnecessary paper applications. Nonetheless, in many households that receive SNAP, TANF cash assistance, or FDPIR benefits, the direct certification process misses some or all children. Moreover, as many as 2 million children who are categorically eligible based on receipt of these benefits fail to be enrolled through either direct certification *or* applications.<sup>49</sup>

Our review revealed that many household applications need to be improved so that children in households receiving these public benefits are expeditiously certified for free school meals. The steps described below explain what school districts can do to update direct certification notices and simplify and clarify applications, thereby helping to ensure that these children do not miss out on the free meals for which they are eligible.

### **Certify All Children in the Household**

To enroll some of the children whom the direct certification matching process missed, USDA implemented a policy change in 2009, known as extended categorical eligibility, under which *all* children in a household that contains a member who is receiving SNAP, TANF cash assistance, or FDPIR benefits are categorically eligible for free school meals, regardless of whether the individual child receives benefits.<sup>50,51</sup> School districts that have not yet fully implemented the new policy need to update both their household applications and their direct certification systems.

- **Request information about additional children in the household on the direct certification notice.** To reach children in households in which at least one child is directly certified based on receipt of SNAP, TANF cash assistance, or FDPIR benefits, the notice to parents informing them that a child has been directly certified must now include directions for notifying the school district about other children in the household.<sup>52</sup> Our review found that this requirement is widely met; 27

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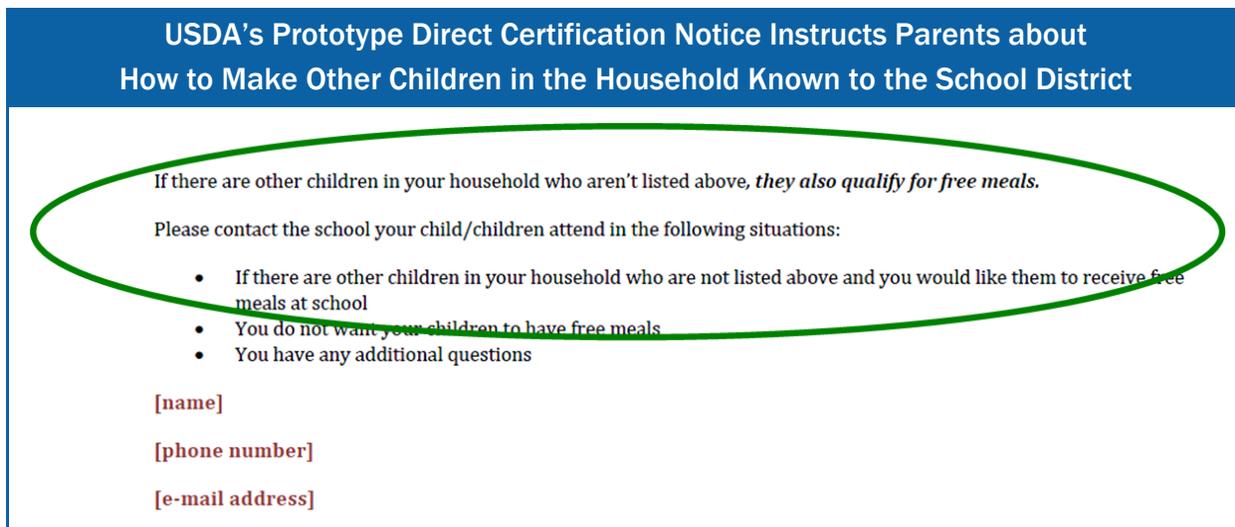
<sup>49</sup> See Food and Nutrition Service, *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011, Report to Congress*, USDA, October 2011, Table 3, <http://www.fns.usda.gov/ora/menu/Published/CNP/FILES/DirectCert2011.pdf>.

<sup>50</sup> See Food and Nutrition Service memorandum, *Extending Categorical Eligibility to Additional Children in a Household*, USDA, August 27, 2009, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf) and Food and Nutrition Service memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACFP\\_11\\_SESP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SESP_10-2010_os.pdf). For a more detailed discussion of extended categorical eligibility and how it can allow more eligible children to be automatically enrolled, see Zoë Neuberger and Tina Fritz Namian, *Enrolling All Children in a Household for Free School Meals*, Center on Budget and Policy Priorities, June 2010, <http://www.cbpp.org/files/6-16-10fa.pdf>.

<sup>51</sup> Extended categorical eligibility does not apply to homeless, runaway, migrant, or foster children. They are individually categorically eligible.

<sup>52</sup> Direct certification systems now need to be set up to use multiple sources of data in order to identify all children in a household. For example, once a child in a household is identified as a SNAP recipient, the system may be programmed to use either a SNAP database or the district's student database in order to identify all children in the household. Similarly, school districts are permitted to use other available records, such as the point-of-sale software used to count and claim school meals, in order to identify and directly certify additional children in the households of individually

out of 30 state direct certification notices instruct parents about how to make other children in the household known to the school district (school districts generally do not make these notices available on the web). USDA's prototype household materials offer an example of how to incorporate these instructions.<sup>53</sup>



- **Request a single case number.** For households that the direct certification process missed entirely, applications need to state clearly that only one case number must be provided in order to qualify all of the children in the household for free meals, and that the case number may be for any member of the household. Applications that have only one space for a case number, rather than having a space next to the name of each household member, convey more clearly that one number will suffice. We found that many, but not all, applications request a single case number from households.
- **Identify all public benefits that confer categorical eligibility.** It is important that all applications convey that either a SNAP or a TANF cash assistance case number can be used to establish categorical eligibility for a household. Moreover, in areas where households receive FDPIR, applications need to state that a FDPIR case number also conveys eligibility. Some applications request a SNAP case number without explaining that a TANF cash assistance number may also be provided.
- **Describe the “case number” clearly.** When writing the case number request, it is important for school meal program administrators to confer with SNAP, TANF cash assistance, or FDPIR administrators to determine the best way to describe the case number. Many states use their own

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matched children. Asking households to identify additional children will serve as a fallback to help ensure that no children in the household are missed.

<sup>53</sup> USDA's prototype materials are available at <http://www.fns.usda.gov/cnd/Translations/English/E-SchoolMealApp.pdf>.

names for these programs, such as “Family Independence Program” in lieu of TANF.<sup>54</sup> Moreover, in some states the term “case number” is not used, or participants are issued different identification numbers for individual programs. In such instances, it is important to use vocabulary that matches that used by the SNAP, TANF cash assistance, or FDPIR program and to include an explanation of which number to include. For example, Boston (MA)’s application states on the application itself, “If any member of your household receives SNAP (food stamp) or TAFDC benefits, please provide the Agency Identification Number located on the upper right side of the Department of Transitional Assistance (DTA) benefit letter.... Do not provide your EBT card number.”<sup>55</sup>

## Ask Only for Necessary Information

As described above, when applying for free meals for children who are categorically eligible due to their receipt of public benefits, parents must provide a case number for the program that confers eligibility, but they do not have to provide the names of adults in the household, income information, or any information about a Social Security number.<sup>56</sup> Asking families for this information not only creates an unnecessary burden, but violates the requirement that applications request only the information necessary to determine if a household meets program eligibility criteria.

Applications that are completed and submitted online are well suited to ask only for the required information. If a household provides a case number, that household must not be asked for the names of adults in the household, income information, or information about a Social Security number. This could be mechanized by automatically skipping such questions for households that provide a case number. Most online applications, however, do not take advantage of the opportunity to tailor the information that is requested. Instead, they ask for unnecessary and redundant information, which could deter eligible low-income households from completing the application or lead to mistakes when eligibility is determined.

A few revisions to applications would make much clearer that the application is simplified for these categorically eligible households:

- **State clearly, before the income section of the application, that the household does not need to provide income information if it has provided a SNAP, TANF cash assistance, or FDPIR case number.** Assembling income information is redundant because the household has already provided that information to another public benefit program. Households that are exempt from providing income information must be made aware of that fact. School districts would benefit as well, since they would be relieved of the burden of receiving unnecessary income information, which creates opportunities for administrative error.

While most states’ instruction pages explain which types of households must fill out which

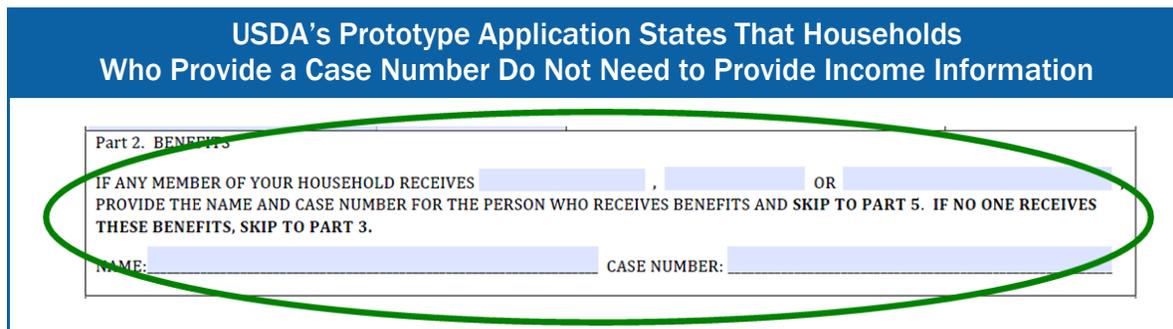
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<sup>54</sup> A list of state SNAP program names is available at <http://www.fns.usda.gov/snap/roll-out/state-chart.pdf>. A list of state TANF program names is available at <http://www.acf.hhs.gov/programs/ofa/states/tfnames.htm>.

<sup>55</sup> [http://www.bostonpublicschools.org/files/english\\_and\\_spanish\\_application\\_and\\_instructions.pdf](http://www.bostonpublicschools.org/files/english_and_spanish_application_and_instructions.pdf)

<sup>56</sup> As discussed in this section, we reviewed whether applications ask for income information or information about a Social Security number if parents provide a case number, but we did not review whether applications ask for the names of adults in the household.

sections of the application, many households are likely to read only the instructions embedded in the application. A statement that households who provide a case number do not need to provide income information can be included next to the request for the case number or at the start of the income section. Many states and school districts follow the format of USDA's prototype for school year 2011-2012, which states above the space for a case number on the application that if the family has provided a case number, it should skip the income-reporting section.



Regardless of whether this statement is located near the case number request or at the start of the income information section, it is particularly important that this information be conveyed *on the application*, as the majority of states and school districts do.

- **Clarify that households do not have to provide income information for *children* if the household provides a case number.** Households that provide a case number do not have to provide any income information. However, some applications ask for the income of *children* even when the household provides a case number.

Often the problem stems from asking for children's income before asking for the income of other household members and directing households who provide a case number to skip only the latter section. Other applications appear to intend to ask only for the personal-use income of children in foster care but instead make it likely that households will believe they must provide the income of all children.

An easy way to fix these problems would be to place all requests for information about income together (including requests for the personal-use income of foster children) and direct households who provide a case number to skip this combined section. USDA's prototype application follows this approach.

- **Clarify that households providing a case number do not have to provide Social Security number information.** Households that provide case numbers are not required to provide the signer's Social Security number (or state that they do not have one). Applications must reflect this rule.<sup>57</sup>

<sup>57</sup> As part of our review, we evaluated whether applications state prominently that a Social Security number is not required to apply and that an indication that the signing adult does not have one will suffice for households that must provide information about a Social Security number. (It is best to explain these alternatives on the application itself rather than only in the instructions, so that families do not miss it.) There are several ways to address this issue on the application. The USDA prototype application provides a check-box labeled "I do not have a Social Security Number"

Most printable applications ask for the Social Security number (or indication that the adult does not have one) with the adult’s signature at the bottom of the application. Many of these applications explain, in the instructions, that households who are categorically eligible based on receipt of public benefits do not need to provide information about a Social Security number; other applications provide this information on the application next to where applicants provide this information.

Unfortunately, these explanations are easy to miss. States can easily avoid this potential barrier by including the Social Security number request as part of the household income-reporting section. The same households that are exempt from providing income information are exempt from providing information about a Social Security number. Placing the request for information about a Social Security number in the income section makes it clear that only households completing the income section need to provide that information. Iowa’s application offers an example of this format.<sup>58</sup>

**Iowa’s Application Places the Request for Information About a Social Security Number in the Income Section**

**Part 3. Total Household Gross Income. DO NOT COMPLETE THIS PART IF YOU LISTED A FIP OR FOOD ASSISTANCE NUMBER IN PART 2.** Report the gross income received by EACH household member in the correct column: weekly, every 2 weeks, twice a month or monthly. Gross income is the amount earned before taxes and other deductions, not take-home pay. Report all other monthly income received. Self-employed persons, see the worksheet on reverse side.

List the names of everyone living in your household, including the children listed in Part 2. Attach a separate page if more space is needed. For FOSTER children, include only money available for child’s personal use or child’s own income.				Gross Income: Report income by how often the household member is paid.				Other Monthly Payments or Income Received.		
Last Name	First Name	Age	Check if NO Income	Gross amount earned weekly	Gross amount earned every 2 weeks	Gross amount earned twice a month	Gross amount earned monthly	Welfare, child support, alimony, adoption subsidies	Pension, retirement, social security, SSI, VA benefits	All other income
1.			<input type="checkbox"/>							
2.			<input type="checkbox"/>							
3.			<input type="checkbox"/>							
4.			<input type="checkbox"/>							
5.			<input type="checkbox"/>							
6.			<input type="checkbox"/>							

My Social Security Number: X XX - X X - \_\_\_\_\_.  I do not have a Social Security Number.  
 If Part 3 is completed, the adult signing the form must provide the last 4 digits of his or her Social Security Number or mark the "I do not have a Social Security Number" box. For further information refer to the Privacy Act Statement in the parent letter.

Most states and school districts do not place the request for information about a Social Security number in the income section. In addition, many online applications ask for information about a Social Security number even if the parent has provided a case number, missing an important opportunity for simplification and improved access.

next to the space for the Social Security number. Alternatively, applications could include directions to write “none” in the space asking for the Social Security number. State officials may wish to consult with organizations representing various immigrant communities on which approach best addresses the immigrant communities’ needs in their state. Our review of state and local materials showed that applications almost universally explained that a parent may apply even if he or she does not have a Social Security number, which suggests that state and local program administrators understand the importance of this policy. In particular, 42 out of 43 states, 33 out of 33 large school districts, and 49 out of 50 online applications we reviewed adopted this practice.

<sup>58</sup> Iowa’s application is available under “School Meal Programs Documents” at [http://educateiowa.gov/index.php?option=com\\_content&view=article&id=369&Itemid=402](http://educateiowa.gov/index.php?option=com_content&view=article&id=369&Itemid=402).

Table 2

### Summary of Findings: Clarifying and Simplifying Applications for Households Receiving Public Benefits

The application explains that one case number for any child or adult in the household is sufficient	<b>40 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>27 out of 33 large districts</b> for which relevant printable materials were available adopt this practice
	<b>35 out of 50 online applications</b> for which relevant materials were available adopt this practice <sup>A</sup>
The household materials explain that both SNAP and TANF cash assistance numbers can be used <sup>B</sup>	<b>41 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>43 out of 43 large districts</b> for which relevant printable materials were available adopt this practice
	<b>42 out of 43 online applications</b> for which relevant materials were available adopt this practice
Explains clearly <i>on the application</i> that households that provide a case number do not have to provide <i>household</i> income information <sup>C</sup>	<b>38 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>28 out of 33 large districts</b> for which relevant printable materials were available adopt this practice
	<b>48 out of 49 online applications</b> for which relevant materials were available do not ask for household income information if the household has provided a case number
Explains clearly on the application or in the instructions that households that provide a case number do not have to provide <i>children's</i> income information	<b>38 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>30 out of 41 large districts</b> for which relevant printable materials were available adopt this practice
	<b>45 out of 49 online applications</b> for which relevant materials were available do not ask for children's income information if the household has provided a case number
Explains clearly in application or instructions that households that provide a case number do not have to provide Social Security number information	<b>41 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>37 out of 42 large districts</b> for which relevant printable materials were available adopt this practice
	<b>38 out of 50 online applications</b> for which relevant materials were available do not ask for Social Security number information if the household has provided a case number
The application places the request for information about a Social Security number in the income-information section on the application <sup>D</sup>	<b>3 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>3 out of 33 large school districts</b> for which relevant printable materials were available adopt this practice

Notes for table:

<sup>A</sup> Online applications for Fulton County (GA), Gwinnett County (GA), and Columbus City (OH) contain contradictory information on whether one case number is sufficient. In this table, they are treated as not explaining that one case number is sufficient.

<sup>B</sup> Applications are required to identify a household member's receipt of SNAP, TANF cash assistance, and FDPIR benefits as sufficient to qualify a child for free meals. This table focuses on SNAP and TANF cash assistance because the FDPIR program does not operate in all locations. We found that 28 out of 43 states, 16 out of 43 large school districts, and 15 out of 43 online applications also specify that a FDPIR case number can be used.

<sup>C</sup> In some instances, this explanation appears on the instructions rather than on the application. Specifically, we found that 43 out of 43 states and 38 out of 41 large school districts include this explanation either on the application or in the instructions. Note that in this table, online applications are counted as meeting this requirement if they included this explanation on the application or did not request income information when a case number had been requested.

<sup>D</sup> We did not evaluate online applications on this criterion because online applications must not ask for information about a Social Security number if it is not necessary and therefore the location of the request is irrelevant.

### 3. Update and Clarify Applications for Children in Foster Care

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#### Features Discussed

In order to make applications clear and to comply with updated policies for foster children, states and school districts must:

- Explain clearly that children in foster care are categorically eligible for free meals (practice is required; explanation is recommended)
- Make applications consistent with the new policies for children in foster care (required)
- Explain the process and consequences of applying for children in foster care and non-foster children jointly or separately (recommended)

Most children enter foster care after suffering abuse or neglect exacerbated by extreme poverty, homelessness, mental illness, and/or parental substance abuse.<sup>59</sup> Moreover, foster families are more likely to have low incomes than other households with children.<sup>60</sup> Ensuring that children in foster care have access to school meals can promote healthy nutrition at a particularly difficult time in their lives.

The income of the foster family is not considered when determining the eligibility of a child in foster care. As a result of the 2010 reauthorization law, children in foster care are now categorically eligible for free meals regardless of their *personal income* as well.<sup>61</sup> Households are no longer required to provide a child in foster care's personal-use income when applying only for children in foster care.<sup>62</sup> In addition, households are no longer required to complete a separate application for children in foster care. Also, once enrolled for free meals, children in foster care remain eligible for the full year, even if their status changes and they no longer meet the legal definition of foster children.<sup>63</sup>

USDA strongly recommends that school districts directly certify children in foster care. Direct certification reduces the burden on foster households and minimizes the disruption in meal benefits when a child enters foster care or changes foster homes. To perform direct certification, school districts can compare lists of all enrolled students with lists of all children in foster care or perform electronic data matching. Several states have integrated data from the child welfare agency that

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<sup>59</sup> Sandra Bass, Margie K. Shields, and Richard E. Behrman, "Children, Families, and Foster Care: Analysis and Recommendations," *Children, Families, and Foster Care* (vol. 14, no. 1, winter 2004), pp. 5-29, [http://www.princeton.edu/futureofchildren/publications/docs/14\\_01\\_01.pdf](http://www.princeton.edu/futureofchildren/publications/docs/14_01_01.pdf).

<sup>60</sup> William P. O'Hare, *Data on Children in Foster Care from the Census Bureau*, Annie E. Casey Foundation, June 2008, p. 3, <http://www.aecf.org/~media/PublicationFiles/FosterChildrenJuly2508.pdf>.

<sup>61</sup> The change in law, mandated by the Healthy, Hunger Free Kids Act of 2010 (P.L. 111-296), took effect in December 2010 and was implemented by the Food and Nutrition Service memorandum "Child Nutrition Reauthorization 2010: Categorical Eligibility of Foster Children," USDA, revised March 16, 2011, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP17\\_CACFP08\\_SFSP05-2011\\_osr.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP17_CACFP08_SFSP05-2011_osr.pdf)

<sup>62</sup> Applications that include only children in foster care also do not require information about the Social Security number of the form's signer; this policy is unchanged.

<sup>63</sup> See 7 C.F.R. 245.6(c)(1). Note that full-year eligibility applies to all children, not just children in foster care.

oversees foster care into their direct certification matching process.<sup>64</sup> In addition, schools can use a notification by a court, state or local child welfare agency, or child welfare caseworker of a child's foster status in order to directly certify that child. School districts are not required to establish systems to directly certify children in foster care, but if they receive such notification, they must directly certify the children in foster care for free school meals. Even with direct certification systems in place, many children in foster care will qualify for free meals through applications submitted by their households. Improving and updating application materials for children in foster care are therefore very important to ensure that these children have access to free meals.<sup>65</sup>

Foster parents may now choose to include children in foster care on an application with the other children in a household, which increases the household's size and thus may help the family's non-foster children qualify for free or reduced price meals. (The presence of a child in foster care in the household does not, however, automatically confer eligibility for free meals on the household's non-foster children.) If a child in foster care is included on an application for a household's non-foster children, the child in foster care's personal-use income must be included, but this information will not affect the eligibility of the child in foster care. Moreover, foster payments received by the family from the placing agency are not considered household or personal-use income and need not be reported.

It is important to note that foster parents may identify their foster children without providing additional documentation of their foster status. An indication that a child is a foster child on a signed application is sufficient basis to certify a child for free meals. Although households can submit a state agency's or court's letter confirming the child's status, they are under no obligation to do so.<sup>66</sup> The school district may *not* request any further documentation from the foster family as a condition of certification, unless the application is selected for verification.<sup>67</sup>

Our review of school year 2011-2012 application materials found that many applications do not reflect the recent changes in eligibility and application processes for children in foster care. Moreover, many applications do not clearly explain all of the recent changes in policy (including the categorical eligibility of foster children) and how they affect foster families. There are three steps in particular that school districts and states can take to make sure their applications facilitate the certification of children in foster care.

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<sup>64</sup> Alabama, Delaware, Illinois, Indiana, and Washington conduct electronic data matching to directly certify children in foster care. See Shawn Fremstad, "Improving the Economic Security of Children in Foster Care and Young People Who are Transitioning from Foster Care," State Policy Advocacy and Reform Center and First Focus, July 2012, [http://www.firstfocus.net/sites/default/files/Improving%20the%20Economic%20Security..\\_0.pdf](http://www.firstfocus.net/sites/default/files/Improving%20the%20Economic%20Security.._0.pdf) and Nate Frentz and Zoë Neuberger, "Six Ways that States and School Districts Can Make It Easier for Children in Foster Care to Get Free Meals at School," Center on Budget and Policy Priorities, August 2011, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3559>.

<sup>65</sup> For more discussion of directly certifying foster children, as well as other policies that can help children in foster care enroll for free meals, see Nate Frentz and Zoë Neuberger, "Six Ways that States and School Districts Can Make It Easier for Children in Foster Care to Get Free Meals at School," Center on Budget and Policy Priorities, August 2011, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3559>.

<sup>66</sup> See Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, p. 53, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf)

<sup>67</sup> The verification process is discussed in section 7 of this paper.

## **Explain Clearly That Children in Foster Care Are Categorically Eligible for Free Meals**

Explaining clearly in the application materials that children in foster care are categorically eligible for free school meals will make foster families more likely to submit applications. This could be especially important in school districts that do not directly certify foster children and in circumstances where the direct certification process misses some foster children.

The parent letter in USDA's package of prototype household materials clearly states, "Any foster child in the household is eligible for free meals regardless of income."<sup>68</sup> Since USDA's prototype parent letter is used in many locations, such language is widespread among states and large school districts.

States or school districts may also want to consider directly communicating with foster parents outside of the school meals application process. For example, Massachusetts' Department of Children and Families issued a one-page letter to foster parents in August 2011 to explain the recent changes in policies regarding foster children. This letter explained clearly that children in foster care are now categorically eligible for free meals:<sup>69</sup>

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<sup>68</sup> USDA's prototype parent letter is available at <http://www.fns.usda.gov/cnd/Translations/English/E-SchoolMealApp.pdf>.

<sup>69</sup> It would be helpful for such letters to remind foster parents that in seeking free school meals they must not share with school meals administrators any information about foster children that must be kept confidential.

## Massachusetts' Letter Explains the Recent Changes In Policies Regarding Children in Foster Care



Deval L. Patrick  
Governor

★  
Timothy P. Murray  
Lieutenant Governor

★  
Judy Ann Bigby, M.D.  
Secretary

★  
Angelo McClain  
Commissioner

### Commonwealth of Massachusetts Executive Office of Health and Human Services Department of Children and Families

24 Farnsworth Street, Boston, MA 02210  
Tel. 617-748-2000 ★ F 617-261-7435 ★ www.state.ma.us/DCF

August 24, 2011

Dear Foster Parent:

We are pleased to inform you that there are important changes that have been made by the federal government to the school meal program that may benefit your family.

**All foster children can now receive free school meals.**

If your foster child was enrolled in the free school meal program during the last school year and continues to attend school in the same school district, eligibility for free school meals will automatically continue this year.

If you are enrolling your foster child for the first time this fall, the school will only require documentation of foster care status in order to be eligible for free meals. This can be done by:

- A copy of the child's court order provided by you or the social worker to the school,
- or the *Notice to LEA* form completed and delivered by the social worker directly to the school,
- or by declaring your foster child's status by checking the foster care box on the National School Lunch Program (NSLP) application and just signing it.

**Your children may be eligible for free or reduced-price meals too.**

If you have both foster children and your own biological or adopted children in your household, you may now include all children on one school meals application (as long as they are enrolled in the same school district). Doing so will make the application process easier and may enable your non-foster children to become eligible for free or reduced-price meals by increasing the household size.

**Children get free meals for the entire school year.**

Any child (foster or non-foster) who is approved to receive free or reduced-price meals remains approved for the entire school year (and up to 30 days in the next school year). This is true for foster children even if they return to their birth family or move to another foster home. It is also true for your own children even if a foster child leaves your home or your income changes.

If you have any questions or need assistance accessing free or reduced meals, please contact the foster child's social worker.

## **Make Applications Consistent with New Policies for Children in Foster Care**

Although the new policies for children in foster care went into effect in December 2010 and were communicated to school districts and states in early 2011, a number of applications for the school year 2011-2012 still did not reflect these changes.

As a result, many applications request unnecessary information from households who are applying only for children in foster care. Table 3 summarizes how many applications ask for the personal-use income of foster children, household income, or information on a Social Security number even when a household is submitting an application only for children in foster care. Continuing to ask for the personal-use income of children in foster care is particularly common; only 14 of the 41 large district applications we reviewed have correctly eliminated the request for such information on applications only for children in foster care. In addition, a few large school districts still require separate applications for children in foster care. Special efforts to ensure that applications reflect current policies regarding school meals for children in foster care will improve access to free school meals for this vulnerable population and simplify the application process for foster parents and school food administrators.

## **Explain the Process and Consequences of Applying for Children in Foster Care and Non-Foster Children Jointly or Separately**

Applications need to make clear that foster parents may choose to include children in foster care as members of the household on applications that include non-foster children or may submit a separate application for a foster child. (This is true even if a child in foster care has already been directly certified.) Likewise, it is important for states and school districts to explain the ramifications of applying jointly or separately for foster and non-foster children:

- Children in foster care are eligible for free school meals regardless of whether they are included on an application with non-foster children.
- Including children in foster care as household members may help other children in the household qualify for free or reduced-price meals.

Unfortunately, USDA's prototype application does not provide this information; nor do many of the applications we reviewed. The letter the Massachusetts' Department of Children and Families sent to foster families offers an example of how to explain these points clearly. The letter, shown on the previous page, states that including foster children in the household "will make the application process easier and may enable your non-foster children to become eligible for free or reduced-price meals by increasing the household size." By including similar language in their application materials, states and school districts can make it easier for foster parents to choose whether to complete a single application or separate applications for their foster and non-foster children.

Also, applications that include both foster and non-foster children must ask for the foster child's personal-use income, the household income, and the information on the Social Security number of the form's signer. There are a number of ways to convey this information.

USDA's prototype application, for example, conveys this information through its detailed instructions, which provide one set of instructions if a household is applying only for children in

foster care and another set of instructions if a household is applying for both foster and non-foster children. Households who follow the directions will include the correct information if applying for both foster and non-foster children and do not provide unnecessary information if they are applying only for children in foster care.

**USDA's Prototype Instructions Explain  
How Households That Include Foster Children May Apply**

**IF YOU ARE APPLYING FOR A FOSTER CHILD, FOLLOW THESE INSTRUCTIONS:**

**If all children in the household are foster children:**

**Part 1:** List all foster children and the school name for each child. Check the box indicating the child is a foster child.

**Part 2:** Skip this part.

**Part 3:** Skip this part.

**Part 4:** Skip this part.

**Part 5:** Sign the form. The last four digits of a Social Security Number are **not** necessary.

**Part 6:** Answer this question if you choose to.

**If some of the children in the household are foster children:**

**Part 1:** List all household members and the name of school for each child. For any person, including children, with no income, you must check the "No Income" box. Check the box if the child is a foster child.

**Part 2:** If the household does not have a case number, skip this part.

**Part 3:** If any child you are applying for is homeless, migrant, or a runaway check the appropriate box and call **[your school, homeless liaison, migrant coordinator]**. If not, skip this part.

**Part 4:** Follow these instructions to report total household income from this month or last month.

- **Box 1—Name:** List all household members with income.
- **Box 2—Gross Income and How Often It Was Received:** For each household member, list each type of income received for the month. You must tell us how often the money is received—weekly, every other week, twice a month or monthly. For earnings, be sure to list the **gross income**, not the take-home pay. Gross income is the amount

Massachusetts' application, in contrast, accomplishes this task through the format of the paper application itself.<sup>70</sup> The section where a household lists children (both foster children, who are indicated by checking a box, and non-foster children) is separate from the section where a household provides income information (including that of children, if necessary). If a household contains only foster children, the household is directed to skip the income section; a household that contains both foster and non-foster children would fill out the income section. In the Social Security number section, households are told that they only need to provide information about the signer's Social Security number if they completed the household income section.

<sup>70</sup> Massachusetts' application is available at [http://www.doe.mass.edu/cnp/free\\_red/eligibilitypacket.pdf](http://www.doe.mass.edu/cnp/free_red/eligibilitypacket.pdf).

## Massachusetts' Application Provides Clear Instructions To Families With Children in Foster Care and Other Children

### MASSACHUSETTS FREE OR REDUCED PRICE SCHOOL MEALS FAMILY HOUSEHOLD MEAL BENEFIT APPLICATION SY 2011 - 2012



If you have received a NOTICE OF DIRECT CERTIFICATION from the school district for free meals, do not complete this application. But do let the school know if any children in the household are not listed on the Notice of Direct Certification letter you received.

**PART 1:** List all household members including children seeking school meals, siblings and both parents of children living in home. Also, include other relatives and friends living in home if you live as a single economic unit. (See instructions)

NAME OF ALL HOUSEHOLD MEMBERS (FIRST, MI, LAST)	SCHOOL NAME FOR EACH CHILD ATTENDING A SCHOOL	CHECK IF A FOSTER CHILD (LEGAL RESPONSIBILITY OF WELFARE AGENCY OR COURT)  * IF ALL CHILDREN LISTED BELOW ARE FOSTER CHILDREN, SKIP TO PART 5.	CHECK IF NO INCOME
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>

**PART 5: SIGNATURE.** A parent or caretaker adult must sign the application (see Privacy Act Statement on the back of this page). I certify (promise) that all information on this application is true and that all income is reported. I understand that the school will get Federal funds based on the information that I give. I understand that school officials may verify (check) the information. I understand that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted. ~~An adult household member~~ must sign the application. If Part 4 is completed, the adult signing the form also must list the last 4 digits of his or her Social Security Number or mark the "Check here if you do not have a Social Security Number" box. (See Privacy Act Statement on the back of this page.)

SIGN HERE: \_\_\_\_\_ PRINT NAME \_\_\_\_\_ DATE: \_\_\_\_\_

STREET ADDRESS: \_\_\_\_\_ CITY: \_\_\_\_\_ STATE \_\_\_\_\_ ZIP: \_\_\_\_\_

PHONE #: \_\_\_\_\_

LAST 4 DIGITS OF SOCIAL SECURITY NUMBER: \*\*\* - \*\* - \_\_\_\_ \_  Check here if you do not have a Social Security Number

A third approach is to provide a thorough explanation regarding children in foster care in the *parent letter*. The Aldine (TX) school district's paper application exemplifies this approach.<sup>71</sup> Aldine's parent letter states, "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.... In processing the application we would certify the foster child eligible 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 any other information reported on the application.... Note: The presence of a foster child in the household does not convey eligibility for free meals to all children in the household."

<sup>71</sup> Aldine (TX) school district's application is available at <http://www.aldinecafe.com/LinkClick.aspx?fileticket=XDgyNk%2b9n4I%3d&tabid=1160>.

Table 3 Summary of Findings: Updating and Clarifying Applications for Children in Foster Care	
Does not ask for personal income of foster children when the application is only for foster children	<b>32 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>14 out of 41 large districts</b> for which relevant printable materials were available adopt this practice
	<b>26 out of 50 online applications</b> for which relevant materials were available adopt this practice
Does not ask for information about the Social Security number of the signer when the application is only for foster children	<b>36 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>27 out of 42 large districts</b> for which relevant printable materials were available adopt this practice
	<b>45 out of 50 online applications</b> for which relevant materials were available adopt this practice
Does not ask for household income information when the application is only for foster children	<b>38 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>27 out of 40 large districts</b> for which relevant printable materials were available adopt this practice
	<b>47 out of 50 online applications</b> for which relevant materials were available adopt this practice <sup>A</sup>
Does not require separate applications for foster children	<b>43 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>37 out of 40 large districts</b> for which relevant materials were available adopt this practice <sup>B</sup>
	<b>50 out of 50 online applications</b> for which relevant materials were available adopt this practice

Notes for table:

<sup>A</sup> Oregon's online application requires household income information on applications solely for children in foster care only when the household does not receive SNAP or TANF. In this table Oregon is counted as asking for this information.

<sup>B</sup> The three school districts that require separate applications are Los Angeles (CA), Gwinnett County (GA), and Henrico County (VA). Los Angeles's application states in the accompanying brochure that foster children must have separate applications. The online video on how to complete an application does not repeat that statement. In this table, Los Angeles is counted as requiring separate applications.

## Explaining Eligibility Clearly and Simply

One of the challenges of designing school meals applications is conveying the categorical eligibility rules in a manner that all households can understand. Anne Arundel's (MD) application instructions (depicted to the right) contain a useful example of how to convey the various ways that children can qualify for free or reduced-price meals.\* The text box below is easy to read and conveys a lot of information in a small amount of space.

\*The instructions are available at <http://www.aacps.org/nutrition/overview.pdf>. For more information on the officials who can certify children as homeless, migrant, or runaway, see section 4 of this report.

### Does your child qualify for free or reduced-priced meals?

(You and the children in your household **do not** have to be U.S. Citizens to qualify.)

A child qualifies for free meals if he or she:

- is a **foster child**
- lives in a household receiving benefits from **Food Supplement Program** (formerly *Food Stamps*) or **Temporary Cash Assistance (TCA)**
- is certified as **homeless, runaway or migrant**
- lives in a household whose **total household income** is the same or less than the amounts in the income chart below

A child may also qualify for free or reduced-price meals if he or she:

- is in a household participating in **WIC**

## 4. Clarify Procedures for Homeless, Migrant, and Runaway Students

### Features Reviewed

In order to clarify applications for homeless, migrant, and runaway students, states and school districts need to:

- State in the parent letter that homeless, migrant, and runaway children qualify for free meals (recommended)
- Clearly explain the steps parents need to take if their children have not been directly certified and they believe they are homeless, migrant, or runaway (recommended)
- Clarify whether and when households must provide income information and information about a Social Security number (recommended)

Children who meet the statutory definitions of homeless, migrant, or runaway are categorically eligible for free meals.<sup>72</sup> Once certified for free meals, these students remain eligible for the remainder of the school year, even if their status changes.<sup>73</sup> Unfortunately, our review of household materials revealed that the instructions for parents of homeless, migrant, or runaway children are confusing. To ensure that these vulnerable children receive free school meals, states and school districts can simplify and clarify the certification process.

States and school districts can bypass the application altogether by directly certifying homeless, migrant, and runaway students for free meals. Direct certification of these children is especially important because there are *no simplifications* in the paper application process for these groups.<sup>74</sup> Though school districts are not required to establish systems to directly certify homeless, migrant, and runaway students, many do and USDA strongly encourages direct certification of these children.<sup>75</sup> Moreover, school food administrators who receive information from a qualified liaison that a child is homeless, migrant, or runaway are required to certify the child for free meals without further application by the household.<sup>76</sup>

Nonetheless, some school districts still rely on household applications to certify these children for free school meals, and even in school districts that have strong direct certification systems, some children will be missed. Developing a clear process for certifying homeless, migrant, or runaway children who are not directly certified would help ensure that these children do not miss out on free meals for which they are eligible.

For a child to be certified for free meals based on homeless, migrant, or runaway status, the child must be identified by an appropriate program administrator as meeting the statutory definition. School food administrators must not make this determination; instead, documentation of homeless

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<sup>72</sup> See 42 U.S.C. 1758 (b)(5).

<sup>73</sup> See 7 C.F.R. 245.6(c)(1). Note that full-year eligibility applies to all children.

<sup>74</sup> These rules differ from the simplifications discussed in the previous two sections for children who are categorically eligible based on receipt of public benefits or foster care status.

<sup>75</sup> Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, p 56, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf).

<sup>76</sup> See 7 C.F.R. 245.6(b)(5)(B)(iii).

status is typically provided by the director of a homeless shelter or the local educational liaison for homeless children and youth. Documentation of migrant status is provided by a state, regional, or local Migrant Education Program director or coordinator, the local educational liaison, or another individual approved by FNS or the state. Documentation of runaway status is typically provided by the Runaway and Homeless Youth Act coordinator.<sup>77</sup>

It is not sufficient for a parent to identify a child as homeless, migrant, or runaway.<sup>78</sup> (This documentation requirement is different than the procedure for children in foster care, who can be identified by a foster parent.) Absent information from a qualified liaison, school food administrators may not approve a household for free or reduced price meals without income information, even if a box is checked to designate homeless, migrant, or runaway status. Therefore, we recommend that to ensure timely certification, parents completing an application for these children be encouraged to provide income information and information about the Social Security number of the signer (or an indication that he or she does not have one), just like households applying for children who are not categorically eligible.

USDA gives school food administrators flexibility with regard to how to instruct parents to navigate the application process for homeless, migrant, and runaway children. As a result, applications and the accompanying instructions vary with regard to how they instruct parents who believe their child is homeless, runaway, or migrant to proceed. For example, some applications instruct parents to check a box if they believe their child is homeless, migrant, or runaway, some say to call a designated school official, and others direct parents to complete the application.

Based on consultation with national organizations that work with homeless, migrant, and runaway children and their families, we recommend that school districts adopt the following procedures to help connect such children with free school meals as effectively as possible.<sup>79</sup>

- Include check boxes on the application for homeless, migrant, and runaway children to identify their status.<sup>80</sup> Ensure that the check boxes describe the living situations of homeless and runaway children, rather than simply using those terms; many parents and youth who are homeless do not know that they meet the definition, or are embarrassed by the term. Phrases like “lack a permanent address” or “staying in temporary housing, including shelters, motels, or staying with others” are non-stigmatizing, so homeless families are more likely to check them.
- Explain in both the parent letter and instructions that parents who believe their children are migrants or lack a permanent address must check the relevant box, call a designated individual, *and*

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<sup>77</sup> For the sake of brevity, this paper refers to all individuals who may document homeless, migrant, or runaway status as qualified liaisons.

<sup>78</sup> A child may also be certified based on third-party documentation of homeless, migrant, or runaway status submitted by a parent, such as a letter from the director of a homeless shelter, but families rarely have such documentation. Note that this documentation must initially have been provided to the parent by an individual who is authorized to certify homeless, migrant, or runaway status.

<sup>79</sup> In developing these recommendations, we consulted with the Food Research and Action Center, the Migrant Legal Action Project, and the National Association for the Education of Homeless Children and Youth.

<sup>80</sup> Currently, most applications that have these boxes follow USDA’s prototype application, which has three separate boxes (one each for homeless, migrant, and runaway) and groups these boxes together after the request for a SNAP or TANF case number. To avoid confusion about whether to complete the application, states and school districts may want to consider moving this box to the end of the application, near where households write their home addresses.

continue completing the application.

- Encourage, on the application, parents who believe their children are homeless, migrant, or runaway to complete and submit the application (including information about income and about the Social Security number of the signer) if the children have not yet been directly certified. (Language such as “If you want to speed up the application process for your children, or if you are not sure if your children qualify as homeless, migrant, or runaway, fill in the application” may help.)
- Certify the children for free meals if the household is eligible under the income criteria (if income information is provided).
- For every application with a checked box, reach out immediately to the relevant qualified liaisons. If the children on the application have already been determined to be homeless, migrant, or runaway, the qualified liaison can provide documentation so they can be directly certified.<sup>81</sup> If the children have not already been identified as homeless, migrant, or runaway, the liaison can assess whether they qualify for such designation.
- Accept third-party documentation of homeless, migrant, or runaway status if provided by a parent and directly certify the child. (Note that this documentation must originally have come from an individual who is legally authorized to make the determination regarding homeless, migrant, or runaway status.)

These procedures will ensure that homeless, migrant, and runaway children are certified expeditiously for free school meals even if they have not yet been identified to receive other services. Moreover, these procedures will help identify children who could qualify for services beyond free school meals. Asking for income information from households and certifying children on that basis when the children could be directly certified entails some duplicative work for households and school food administrators. However, we believe encouraging households to submit this information is important to make sure that no eligible child is missed as a result of gaps in the direct certification process.<sup>82</sup>

Whatever process a school district chooses to follow, it is extremely important to explain that process clearly to school food staff and households and reflect it in the household application materials. We found that many applications do not contain clear instructions on how parents need to proceed if the children were not directly certified. There are several steps states and school districts can take to clarify their applications and instructions to ensure homeless, migrant, and runaway children who are not directly certified are nonetheless certified expeditiously for free school meals.

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<sup>81</sup> Under USDA policy, a child who is both certified on the basis of a paper application *and* directly certified must be treated as directly certified. See Food and Nutrition Service memorandum, *General Follow-up of Provisions - Reauthorization 2004: Implementation Memo - SP 21*, USDA, September 26, 2005, [http://www.fns.usda.gov/cnd/governance/Reauthorization\\_Policy\\_04/Reauthorization\\_04/2005-09-26.pdf](http://www.fns.usda.gov/cnd/governance/Reauthorization_Policy_04/Reauthorization_04/2005-09-26.pdf). Directly certifying the child removes the application from the verification sample pool, which reduces the administrative burden for the school district as well as the household. Verification is discussed in section 7 of this paper.

<sup>82</sup> The disadvantage of encouraging households to complete the entire application is that the request for income information and the last four digits of the Social Security number of the form’s signer (or an indication that he or she does not have one) could become a barrier to households submitting an application. School food administrators need to consider this when setting their own procedures.

## State in the Parent Letter That Homeless, Migrant, and Runaway Children Qualify for Free Meals

It is important to notify households that children who meet the statutory definition of homeless, migrant, or runaway qualify for free meals regardless of household income. The parent letter is an ideal location to convey this information.

USDA's prototype application gives an example of this type of statement. It places the following statement on its parent letter:

CAN HOMELESS, RUNAWAY, AND MIGRANT CHILDREN GET FREE MEALS? Yes, children who meet the definition of homeless, runaway, or migrant qualify for free meals. If you haven't been told your children will get free meals, please call or e-mail **[school, homeless liaison or migrant coordinator information]** to see if they qualify.

A household that cannot connect quickly with a qualified liaison might neglect to submit an application and fail to gain access to school meals. As a result, we recommend also writing in the parent letter, "If you are not told that your child(ren) will be directly certified (automatically enrolled) for free school meals, complete and submit an application."

Our review found that while some state materials indicate the homeless, migrant, and runaway children qualify for free meals, many large districts and online applications do not state this on their materials.

We also found that some online applications stated that homeless, migrant, and runaway students are *not* categorically eligible for free meals. These statements are incorrect and must not appear on any application materials.

## Clearly Explain the Steps Parents Need to Take if Their Children Have Not Been Directly Certified and They Believe They Are Homeless, Migrant, or Runaway

In particular, applications must both:

- Allow parents who believe their children are homeless, migrant, or runaway to indicate this on the application and
- Make clear whether and how households with homeless, migrant, and runaway children need to complete an application (according to the procedure adopted by the school district).

Most applications allow parents who believe their children are homeless, migrant, or runaway to indicate this by checking a box on the application. The check box enables school food administrators to reach out to the relevant qualified liaisons in an attempt to directly certify any child for whom a box is checked. (Again, note that checking the box does not mean the child will necessarily receive free meals.) But a check box and the phone number of a qualified liaison alone are insufficient because they do not explain whether the parent must also complete the application. If a parent leaves a message for the designated school official and believes that his or her child will be certified as a result, but the child is not certified by the official, the child will miss out on free meals.

Thus, applications should provide clear instructions to these households on whether they need to submit an application in order to ensure that they follow the necessary procedures to apply for meals. Boston (MA)'s application offers an example. It states, "If the child you are applying for is homeless, migrant, or a runaway check the appropriate box and call [the relevant school official] for further assistance. In addition, you must fill out this application completely to be considered for benefits."<sup>83</sup> Note that this application allows that parents who believe their children are homeless, migrant, or runaway to indicate this *and* makes clear that they need to complete an application.

The instructions for USDA's prototype application offer another example. They inform households that they need to check a box on the application indicating that the household contains a homeless, migrant, or runaway student and call the school's homeless liaison or migrant coordinator to determine whether the student qualifies. If the student qualifies, the parent is instructed to sign the form and submit it; if the student does not qualify, the parent is also instructed to complete the income information and Social Security number sections of the application. The prototype application both enables households to identify their child's status and informs them when they must complete an application for school meals.

### USDA's Prototype Provides Clear Instructions for Households That Contain Homeless, Migrant, or Runaway Students

IF NO ONE IN YOUR HOUSEHOLD GETS [State SNAP] OR [State TANF] BENEFITS AND IF ANY CHILD IN YOUR HOUSEHOLD IS HOMELESS, A MIGRANT OR RUNAWAY, FOLLOW THESE INSTRUCTIONS:

**Part 1:** List all household members and the name of school for each child.

**Part 2:** Skip this part.

**Part 3:** If any child you are applying for is homeless, migrant, or a runaway check the appropriate box and call [your school, homeless liaison, migrant coordinator].

**Part 4:** Complete only if a child in your household isn't eligible under Part 3. See instructions for All Other Households.

**Part 5:** Sign the form. The last four digits of a Social Security Number are not necessary if you didn't need to fill in Part 4.

**Part 6:** Answer this question if you choose to.

Some states or school districts may not require households that include homeless, migrant, or runaway children to submit any application if the designated qualified liaison tells the parent that an application is not necessary. However, clarity on whether and when these households need to submit applications can help ensure that these children do not miss out on the free meals for which they are eligible.

USDA requires school districts to accept third-party documentation from households as well from qualified liaisons.<sup>84</sup> However, few households will have documentation of their status. To avoid burdening households that likely are already in turmoil, we urge school districts to develop a process that does not place the burden of documentation on households. Instead, school food administrators can work with qualified liaisons to obtain the necessary eligibility documentation. Nonetheless, if a school district expects households to play a role in obtaining eligibility documentation, the application must clearly convey this fact.

<sup>83</sup> Boston (MA)'s application is available at [http://www.bostonpublicschools.org/files/english\\_and\\_spanish\\_application\\_and\\_instructions.pdf](http://www.bostonpublicschools.org/files/english_and_spanish_application_and_instructions.pdf).

<sup>84</sup> Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, pp. 47-48, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf). Also, note 76 explains acceptable kinds of third-party documentation.

The states and large school districts whose materials we reviewed commonly follow the USDA's prototype procedure, but we found considerable variation with regard to instructions for parents who believe their children are homeless, migrant, or runaway (see Table 4). A number of applications do not explain whether parents need to complete the application but include boxes to indicate that child is homeless, migrant, or runaway. Such a box is an important component of applications, enabling households to be referred to a qualified liaison, but alone it does not explain to parents whether they need to complete the application.

Furthermore, many applications have neither a box that households can check to indicate that they contain a homeless, migrant, or runaway child *nor* clear directions on whether to complete an application. These applications will not help identify homeless, migrant, or runaway children and may confuse parents.

### **Clarify Whether and When Households Must Provide Income Information and Information on a Social Security Number**

Our review revealed that some applications that directed households with homeless, migrant, or runaway children to complete the application were not clear with regard to whether these households need to provide information about income and a Social Security number (or indicate that the form's signer does not have one). As explained above, this information is not needed if the child is directly certified by an appropriate official, but this information is useful as a basis for certifying homeless, runaway, or migrant children in the absence of direct certification.

Boston's application provides clear instructions on this issue, directing parents who check a homeless, migrant, or runaway box to also complete the entire application. Boston's application is especially noteworthy because this information appears on the application rather than in the instructions, where parents may miss it.

The instructions for USDA's prototype application also provide clear directions for when households must provide information about income and a Social Security number. They direct parents to complete the income information and Social Security number sections of the application if a qualified liaison tells them that they do not automatically qualify for school meals. (However, note that our recommended procedure differs from the procedure described in the USDA prototype. We recommend encouraging households to provide information about their income and the Social Security number of the form's signer, and we do not recommend that households wait until they talk with a qualified liaison before submitting an application.)

Our review revealed variation in practices among states and large school districts (see Table 4). We also found another issue that is unique to online applications. Some online applications *functionally* require households to provide income and Social Security number information when applying, even if the instructions do not indicate that it is needed. Specifically, they include an alert to those who apply for homeless, migrant, or runaway students that their applications are incomplete if they do not enter their income and Social Security number information.

Table 4 Summary of Findings on Certifying Homeless, Migrant, and Runaway Students	
Follows the USDA prototype application's procedure for certifying homeless, migrant, and runaway children <sup>A</sup>	<b>18 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>6 out of 39 large districts</b> for which relevant printable materials were available adopt this practice
	<b>0 out of 50 online applications</b> for which relevant materials were available adopt this practice
Provides clear instructions on whether and when households with homeless, migrant, and runaway children need to complete the application (includes applications that followed USDA's prototype) <sup>B</sup>	<b>23 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>20 out of 42 large districts</b> for which relevant printable materials were available adopt this practice
	<b>15 out of 50 online applications</b> for which relevant materials were available adopt this practice
Allows parents who believe their children are homeless, migrant, or runaway to indicate this on the application <sup>C,D</sup>	<b>32 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>30 out of 38 large districts</b> for which relevant printable materials were available adopt this practice
	<b>19 out of 43 online applications</b> for which relevant materials were available adopt this practice
States that homeless, migrant, and runaway children qualify for free meals	<b>33 out of 43 states</b> for which relevant printable materials were available adopt this practice
	<b>17 out of 44 large districts</b> for which relevant printable materials were available adopt this practice
	<b>6 out of 40 online applications</b> for which relevant materials were available adopt this practice <sup>E</sup>
Explicitly asks for income information and last four digits of signer's Social Security number when applying for homeless, migrant, and runaway students	<b>4 out of 43 states</b> for which relevant printable materials were available adopt this practice <sup>F</sup>
	<b>11 out of 39 large districts</b> for which relevant printable materials were available adopt this practice <sup>G</sup>
	<b>6 out of 41 online applications</b> for which relevant printable materials were available adopt this practice
Functionally requires (without explicitly asking for) income and Social Security number information from applicants for homeless, migrant, and runaway children	<b>17 out of 50 online applications</b> for which relevant materials were available adopt this practice

Notes for table:

<sup>A</sup> USDA's prototype informs parents who suspect their children are homeless, migrant, or runaway to check the relevant box on the application, call the school's designated official, and submit the application. Additionally, if the official tells the parents that their children do not qualify, they are directed to provide information about income and a Social Security number. All of the applications that follow this procedure state the procedure in the instructions, not on the application itself.

<sup>B</sup> Among applications that contain clear instructions on whether to complete the application, some convey this information only on the parent letter or instructions for the application, not on the application itself. Specifically, 21 out of 23 states, 13 out of 20 large school districts, and 5 out of 15

online applications that include instructions do not place them on the application. Placing this information directly on the application makes it less likely that parents will miss it.

<sup>C</sup> Some applications contain a box for households with homeless, migrant, or runaway children to check but lack clear instructions on whether to complete the application. We found that 10 out of 32 states, 12 out of 30 large districts, and 15 out of 19 online applications have this shortcoming. Nonetheless, in this table these materials are counted as allowing parents to indicate that their children are homeless, migrant, or runaway.

<sup>D</sup> Some applications neither explain clearly whether households need to complete the application nor have boxes that households can check to indicate a homeless, migrant, or runaway child. We found that 10 out of 43 states, 7 out of 38 large districts, and 14 out of 43 online applications have this shortcoming.

<sup>E</sup> In addition, 5 out of 42 online applications state that these children are not categorically eligible for free meals. This statement is contrary to 42 U.S.C. § 1758(b)(12)(A).

<sup>F</sup> Arizona's printable application requests the last four digits of the signer's Social Security number or an indication that the signer does not have one when applying for homeless, migrant, and runaway students but does not request household income information. In this table, Arizona is treated as asking for both.

<sup>G</sup> Fairfax County (VA) asks *on the application* for the income of households applying for homeless, migrant, and runaway children. This request, however, is contradicted by the application's instructions, which do not direct these households to provide income information. In this table, the application is treated as requesting this information.

## **Certifying Unaccompanied Youth and Teenagers**

Unaccompanied youth and teenagers face a unique barrier when applying for school meals. Under program regulations, applications must contain the signature of an adult household member, unless the applicant is legally emancipated. As a result, unaccompanied youth and teenagers cannot apply for school meals for themselves, even though almost all would qualify for free school meals (either by income criteria or because they meet the definitions of homeless, migrant, or runaway).

It is important for school districts to be aware that school officials are permitted to complete applications on behalf of children known to be eligible for school meals who have failed to apply. School officials may complete an application on behalf of the child based on the best available information on household size and income. Given the hardship faced by unaccompanied youth and teens, we encourage school food administrators to try to identify eligible teens who have not been directly certified and who have failed to apply — including through forming partnerships with organizations that work with this group — and to be vigilant in submitting applications on their behalf.

## 5. Reduce Math Errors

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### Features Reviewed

In order to reduce the likelihood of households making math errors, states and school districts need to:

- Provide options on the application to note the frequency with which the household receives income without doing calculations (recommended)

Households often have multiple sources of income that arrive at different frequencies, such as weekly or bi-weekly wages combined with monthly Social Security benefits. Asking families to convert all of these sources into a single measure of income can be confusing. For example, many individuals may not understand that being paid every two weeks and twice a month require different conversions to calculate annual income (multiplying by 26 versus multiplying by 24).

While most state and school district applications we reviewed do not ask households to calculate income conversions, the remaining states and school districts can improve program access and accuracy by doing the conversion calculations themselves.<sup>85</sup> The USDA prototype application provides spaces for households to fill in the income amount and how often they receive it, a technique that many states and districts have adopted. There are several alternative ways states can gather the necessary information without requiring the family to convert all forms of income into a single frequency:

- Provide a space for the amount of different types of income and then ask the household to check a box indicating the frequency. Indiana's application provides an example.<sup>86</sup>

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<sup>85</sup> For an explanation of the appropriate methodology for making conversion calculations, see Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, pp. 23-24, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf) and Food and Nutrition Service memorandum, *Statutory Changes in the Free and Reduced Price Eligibility Determination Process and Revised Prototype Application Implementation Memo*, USDA, March 7, 2005, <http://www.fns.usda.gov/cnd/Application/2005-03-07.pdf>.

<sup>86</sup> Indiana's application is available at <http://www.doe.in.gov/sites/default/files/nutrition/nsfp-fr-forms-01sp-meals-application.doc>.

## Indiana's Application Allows Households to Check a Box To Indicate the Frequency with Which They Receive Income

Part 4. LIST ALL HOUSEHOLD MEMBERS		ALL OTHER HOUSEHOLD TYPES GROSS (before deductions) HOUSEHOLD INCOME FROM ALL SOURCES <i>Examples: \$100 / monthly or \$100 / every 2 weeks or \$100 / twice a month or \$100 / weekly</i>																							
NAME	Earnings from Work Before Deductions	Weekly	Every 2 Weeks	Twice A Month	Monthly	Yearly	Welfare Payment Child Support, Alimony	Weekly	Every 2 Weeks	Twice A Month	Monthly	Yearly	Pension, Retirement, Social Security	Weekly	Every 2 Weeks	Twice A Month	Monthly	Yearly	All Other Income	Weekly	Every 2 Weeks	Twice A Month	Monthly	Yearly	Check if NO income
<i>Example: Jane Smith</i>	\$ 200	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 150	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$ 100	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 50	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1.	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- Provide a space for the amount of different types of income and then ask the household to circle the word that corresponds to the frequency. Michigan's application provides an example.<sup>87</sup>

## Michigan's Application Allows Households to Circle Words To Indicate the Frequency of Their Income

Part 4 - Total Household Gross Incomes - Include the amount of money and circle how often it is received. If the person does not receive any income "\$0" must be circled in the column Circle if NO income. If you listed a FAP/FIP/FDPIR number in Part 2, skip to Part 5.

Circle if NO Income	Earnings from Work (before any deductions and taxes)	Welfare, Child Support, Alimony		Pensions, Retirement, Social Security		All Other Income				
		weekly	every 2 weeks	weekly	every 2 weeks	weekly	every 2 weeks			
\$0	\$600	twice a month	monthly	twice a month	monthly	\$250	twice a month	monthly	twice a month	monthly
\$0		weekly	every 2 weeks	weekly	every 2 weeks		weekly	every 2 weeks	weekly	every 2 weeks
\$0		twice a month	monthly	twice a month	monthly		twice a month	monthly	twice a month	monthly
\$0		weekly	every 2 weeks	weekly	every 2 weeks		weekly	every 2 weeks	weekly	every 2 weeks
\$0		twice a month	monthly	twice a month	monthly		twice a month	monthly	twice a month	monthly

<sup>87</sup> See [http://www.michigan.gov/documents/mde/F- R Price School Meals Family App Packet\\_SY 11-12\\_351250\\_7.pdf](http://www.michigan.gov/documents/mde/F- R Price School Meals Family App Packet_SY 11-12_351250_7.pdf).

Table 5

**Summary of Findings on Reducing Math Errors**

Provides options on the application to note different frequencies of income without doing calculations	<b>41 out of 43 states</b> for which relevant materials were available adopt this practice
	<b>30 out of 33 large districts</b> for which relevant materials were available adopt this practice
	<b>47 out of 50 online applications</b> for which relevant materials were available adopt this practice

## 6. Encourage Eligible Families to Apply

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### Features Reviewed

In order to encourage eligible families to apply, states and school districts must:

- Encourage applications throughout the school year (recommended)
- Reach out to parents who become unemployed (statement is required; outreach is recommended)
- Avoid multiple, unnecessary applications (required)
- Reassure non-citizens (recommended)
- Assure families they will be treated fairly (required)
- Highlight reduced-price eligibility limit (required)

USDA, states, and school districts share the goal of certifying all eligible low-income children for free or reduced-price meals. Application materials are an important means of expressing that goal to potentially eligible families. In the context of the SNAP program, USDA has explained the importance of the tone of application materials:

Many people who use social services have an image of an uncaring, bureaucratic system filled with impediments and unnecessary delays. When applicants get a form that is filled with a tone that matches that image, they may be intimidated and may even decide that it's not worth the effort to complete the form.<sup>88</sup>

Materials that welcome applications will encourage eligible families to apply. The following statements offer examples of inviting language.<sup>89</sup>

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<sup>88</sup> Food and Nutrition Service, *Guide to Assessing Food Stamp Application Forms*, USDA, July 2003, p. 22, <http://www.fns.usda.gov/snap/government/pdf/assessment-guide.pdf>.

<sup>89</sup> The banner on the Aldine Independent School District (TX) website is at <http://www.aldinecafe.com/FreeReduced/tabid/1160/Default.aspx>. The parent letter on the Atlanta Public Schools (GA) website is [http://www.atlantapublicschoolsnutrition.us/schools/aps\\_0707092223267041/mealapps/Letter\\_to\\_Household.pdf](http://www.atlantapublicschoolsnutrition.us/schools/aps_0707092223267041/mealapps/Letter_to_Household.pdf). The Washoe County School District (NV) website is <http://www.washoecountyschools.org/parents/nutrition-services/nslp>.

## Aldine Independent School District's (Texas) Website Offers Inviting Language



The screenshot shows a website header with a blue globe icon and the text "Help us get the word out! We want everyone to participate in our free and reduced meal program." Below this is a navigation bar with links for Home, Nutrition, Free/Reduced, Parents, Links, and About Us. The main content area features the heading "Free and Reduce Meal Program Information" and a paragraph explaining the application process. To the right of the text is a photograph of a young boy eating a red apple.

**Help us get the word out!**  
**We want everyone to participate in our free and reduced meal program.**

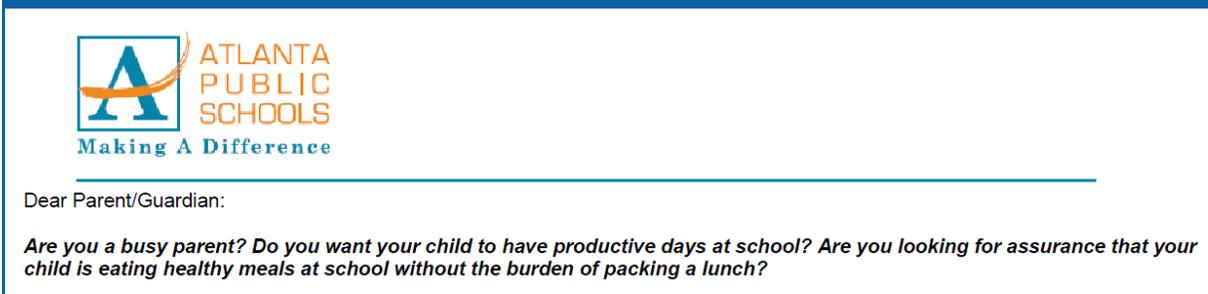
Home Nutrition > Free/Reduced Parents Links About Us

### Free and Reduce Meal Program Information

At the beginning of each school year all students are provided an application for participation in the free or reduced-price breakfast and lunch program. Families choosing to complete an application must do so each school year. Please complete only one application per family.



## Atlanta Public Schools' (Georgia) Parent Letter Invites Parents to Apply



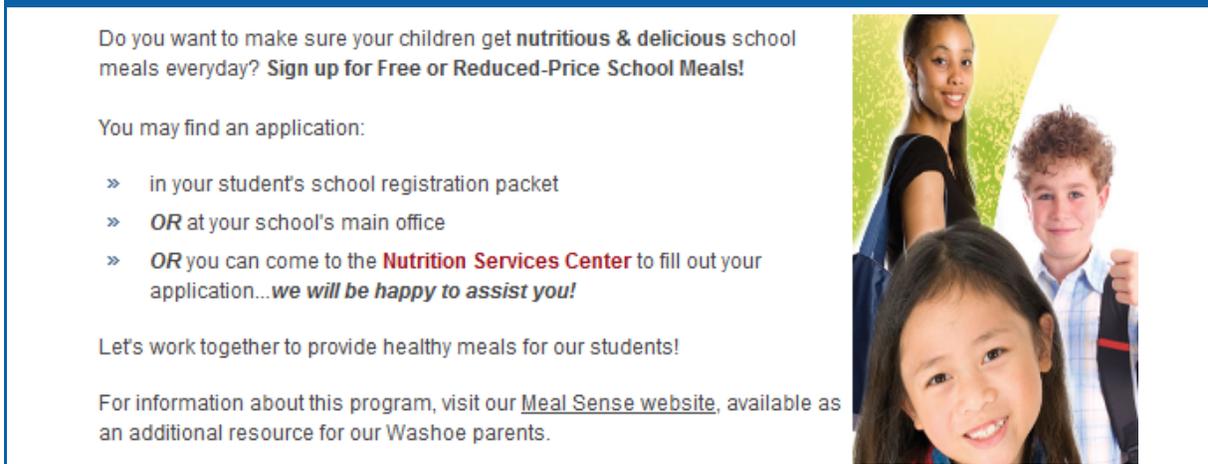
The screenshot shows the Atlanta Public Schools logo, which includes a stylized 'A' and the text "ATLANTA PUBLIC SCHOOLS Making A Difference". Below the logo is a salutation "Dear Parent/Guardian:" followed by a paragraph of text in italics.

  
ATLANTA PUBLIC SCHOOLS  
Making A Difference

Dear Parent/Guardian:

*Are you a busy parent? Do you want your child to have productive days at school? Are you looking for assurance that your child is eating healthy meals at school without the burden of packing a lunch?*

## Washoe County School District's (Nevada) Website Sets a Positive Tone



The screenshot shows a website page with text about school meals and a photograph of three children. The text includes a question about nutritious meals, a list of where to find applications, and a closing statement about working together.

Do you want to make sure your children get **nutritious & delicious** school meals everyday? **Sign up for Free or Reduced-Price School Meals!**

You may find an application:

- » in your student's school registration packet
- » **OR** at your school's main office
- » **OR** you can come to the **Nutrition Services Center** to fill out your application...*we will be happy to assist you!*

Let's work together to provide healthy meals for our students!

For information about this program, visit our [Meal Sense website](#), available as an additional resource for our Washoe parents.



School districts may also wish to consider posting videos or other outreach and informational materials on their website to encourage eligible families to apply or help them complete an application. For example, the District of Columbia Public Schools’ website has a one-minute video emphasizing the school district’s commitment to providing healthy meals and encouraging parents to complete an application to help “ensure that next year DCPS has the resources we need to provide healthy and appetizing meals and that students in need will receive meals at little or no cost.”<sup>90</sup> The Los Angeles Unified School District’s website includes an instructional video in English and Spanish explaining how to complete a school meals application.<sup>91</sup>

There are several other concrete steps states and school districts can take to encourage eligible families to complete an application. Table 6 documents the extent to which states and school districts have already taken these steps.

- **Encourage applications throughout the school year.** While the program rules allow families to apply for free or reduced-price meals at any point during the school year — and almost all the materials we reviewed reflect this rule — an emphasis on applying at the start of the school year can give some parents the impression that they may not apply later. School districts can take steps to encourage applications throughout the year: the application could include a prominent notice explaining that applications are accepted at any time during the year; household materials could be made available at school events throughout the school year; and reminders could be included in meal calendars or parent newsletters. Once certified for free or reduced-price meals, a child remains eligible for the remainder of the year and for up to 30 operating days into the following school year regardless of changes in household circumstances.<sup>92</sup>
- **Reach out to parents who become unemployed.** Understanding that they may apply at any time is especially important for parents who become unemployed during the school year after household materials have been sent home. Program regulations require that the letter or notice sent to parents at the start of the school year with information about the school meals programs include “A statement to the effect that children having parents or guardians who become unemployed are eligible for free or reduced price meals or for free milk during the period of unemployment, *Provided*, that the loss of income causes the household income during the period of unemployment to be within the eligibility criteria.”<sup>93</sup> Some state and local materials do not include this statement.

Providing the required statement is an important starting point, but outreach to parents who may become unemployed or otherwise face a decline in income during the school year is also important — especially now, given the high unemployment rate. Any website where information about school meals is posted could include a prominent notice explaining that applications are accepted at any time during the year and if a parent has become unemployed or household income has declined for other reasons, the children may be eligible for free or reduced-price meals. In addition, states or school districts could work with workforce agency administrators to notify

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<sup>90</sup> The video may be viewed at <http://1.usa.gov/NH0BOs>.

<sup>91</sup> The video may be viewed at [http://cafe-la.lausd.net/Meal\\_Programs/Meal\\_Applications](http://cafe-la.lausd.net/Meal_Programs/Meal_Applications).

<sup>92</sup> See 7 C.F.R. § 245.6(c).

<sup>93</sup> See 7 C.F.R. § 245.5(a)(1).

applicants for unemployment compensation about the availability of free and reduced-price meals. USDA has made a model letter available.<sup>94</sup>

- **Avoid multiple, unnecessary applications.** School districts are required to accept a single application for all children in the household attending schools in the same district.<sup>95</sup> Completing separate applications for children in the same household places an unnecessary burden on parents and could create confusion for school district staff. It is important for every application package to clearly explain that every child in the household who attends school in that district can be approved based on a single application, and we found that nearly all do.
- **Reassure non-citizens.** Neither children nor their household members must be U.S. citizens to apply for free or reduced-price school meals. Explaining this rule in the parent letter could alleviate the concerns of low-income parents in households in which not all members are citizens. USDA's prototype parent letter for the 2011-2012 school year explains this rule:

12. MAY I APPLY IF SOMEONE IN MY HOUSEHOLD IS NOT A U.S. CITIZEN? Yes. You or your child(ren) do not have to be U.S. citizens to qualify for free or reduced price meals.

Some states and school districts, however, do not include this information in their parent letters. It would also be helpful to explain that receiving free or reduced-price school meals does not interfere in any way with an application for citizenship.

- **Assure families they will be treated fairly.** The parent letter must also include a non-discrimination statement with an explanation of how to file a discrimination complaint.<sup>96</sup> USDA has recently updated its Non-discrimination Statement. Currently, it states:

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (800) 795-3272 or (202) 720-6382 (TDD).<sup>97</sup>

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<sup>94</sup> The letter is available at <http://1.usa.gov/N3DSjW>

<sup>95</sup> See 7 C.F.R. § 245.6(a)(1).

<sup>96</sup> Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, pp. 12-13, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf).

<sup>97</sup> The statement is available at <http://www.fns.usda.gov/fns/non-discrimination.htm>.

It is extremely important that families know that they will be treated fairly if they apply for free or reduced-price meals. To comply with federal rules, the few states and school districts that do not currently include a non-discrimination statement must add one.

- **Highlight reduced-price eligibility limit.** The parent letter must include the eligibility criteria for reduced-price school meals with an explanation that households with incomes at or below the reduced-price limit would be eligible for either free or reduced-price meals.<sup>98</sup> This information is important so that parents who may not realize they are eligible but are struggling to feed their families will consider completing an application.

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<sup>98</sup> See 42 U.S.C. § 1758(b)(2)(B)(i) and 7 C.F.R. § 245.5(a)(1).

Table 6

### Summary of Findings on Encouraging Eligible Families to Apply

States clearly that a household may apply for benefits at any time during the school year	<b>43 out of 43 states</b> for which relevant materials were available adopt this practice
	<b>36 out of 39 large districts</b> for which relevant materials were available adopt this practice
	<b>42 out of 42 online applications</b> for which relevant materials were available adopt this practice
States clearly on the parent letter that children of parents who become unemployed may become eligible for free or reduced-price meals	<b>39 out of 43 states</b> for which relevant materials were available adopt this practice
	<b>28 out of 39 large districts</b> for which relevant materials were available adopt this practice
	<b>31 out of 42 online applications</b> for which relevant materials were available adopt this practice
Explains clearly that a single application will be accepted for all children in the household attending schools in the same district	<b>41 out of 43 states</b> for which relevant materials were available adopt this practice
	<b>38 out of 39 large districts</b> for which relevant materials were available adopt this practice
	<b>41 out of 42 online applications</b> for which relevant materials were available adopt this practice
Indicates on the parent letter that household members do not have to be U.S. citizens for children to qualify for free or reduced-price meals	<b>40 out of 43 states</b> for which relevant materials were available adopt this practice
	<b>30 out of 39 large districts</b> for which relevant materials were available adopt this practice
	<b>33 out of 42 online applications</b> for which relevant materials were available adopt this practice
Includes the required non-discrimination statement on the parent letter or application <sup>A</sup>	<b>42 out of 43 states</b> for which relevant materials were available adopt this practice
	<b>38 out of 39 large districts</b> for which relevant materials were available adopt this practice
	<b>38 out of 45 online applications</b> for which relevant materials were available adopt this practice
Includes the reduced-price eligibility limits on the parent letter or application <sup>B</sup>	<b>42 out of 43 states</b> for which relevant materials were available adopt this practice
	<b>32 out of 37 large districts</b> for which relevant materials were available adopt this practice
	<b>36 out of 44 online applications</b> for which relevant materials were available adopt this practice

Notes for table:

<sup>A</sup> While the requirement is that the non-discrimination statement be in the parent letter, we believe it is equally effective for it to be on the application itself and therefore reviewed whether it was in either place.

<sup>B</sup> While the requirement is that the reduced-price eligibility limits be on the parent letter itself, we reviewed whether the information was on the parent letter, application instructions, or application.

## Financial Aid for College

Receiving a free or reduced-price lunch can make it easier for students and their families to apply for financial aid for college. Students who recently received free or reduced-price lunches (or other federal means-tested benefits) may qualify for a simplified calculation of their family contribution for college financial aid that does not require the families to report assets. In addition, if the household income is under \$23,000, the federal formula for financial aid will not expect the family to pay anything up front for college. The student can receive a Pell Grant, which may be worth up to \$5,550 for the 2012-13 school year, and subsidized student loans.

These benefits also apply to other members of the student's household – including parents and older siblings. Early information about the availability of financial aid may encourage low-income students and their parents to consider college as an option, rather than assuming that they will not be able to pay. School districts have an opportunity to promote higher education by including information about the link between free or reduced-price school meals and financial aid in household school meals materials.

Approval letters and direct certification notices could include a statement such as:

Money for college: If any member of your household is attending college this year or next, he or she may be eligible for financial aid to help pay the costs of college. If any member of the household receives free or reduced-price school lunches and the family income is under certain limits, the process of applying for student aid is simplified and you may qualify for the maximum amount of federal student aid. Be sure to check the box on the Free Application for Federal Student Aid (FAFSA) that asks if you or a household member received free or reduced-price lunches. You can find the application at [www.fafsa.com](http://www.fafsa.com) or at the college nearest you.

The Q and A in the parent letter could include a question and answer such as:

*Is there any other benefit to filling out this application?* If a student receives free or reduced-price school lunches, the student and other household members may have easier access to federal student aid for college. By checking the free or reduced-price lunch box on the Free Application for Federal Student Aid (FAFSA), the student can more easily access financial aid. If family income is under \$23,000, the federal formula for financial aid will not expect the family to pay anything up front for college. The student should be able to receive the maximum Pell Grant, which may be worth up to \$5,550 for the 2012-13 school year, and subsidized student loans.

Information from the U.S. Department of Education about financial aid, which includes an explanation of the simplifications and additional aid for students with a family member receiving free or reduced-price lunches, is available at: <http://www.ifap.ed.gov/efcformulaguide/attachments/010512EFCFormulaGuide1213.pdf>.

## 7. Encourage Eligible Families Selected for Verification to Respond

### Features Reviewed

In order to encourage families selected for verification to respond, states and school districts need to:

- Include a no-charge phone number for assistance and specify that it is cost-free to families (providing a no-charge number and informing families of it are required; stating it is no-charge is recommended)
- Explain the timeframe for which information may be provided (practice is required; explanation is recommended)
- Explain how families with homeless, runaway, or migrant children may verify eligibility (required)
- Explain how households with no income can verify their eligibility (recommended)
- Remove any request for Social Security numbers (required)

Once applications for school meals have been processed and eligible students have been certified for free or reduced-price meals, school districts select a small sample of applications for eligibility verification. These applicants are sent a notice requesting more robust documentation of their eligibility. (Appendix D summarizes the required elements of the verification notice.) There are two reasons why it is critical that these verification notices be understandable.

- The verification process is designed to strengthen program integrity by identifying students who are ineligible for the benefits they are receiving and by encouraging all families to provide accurate information on their application. Parents must understand what is being asked of them in order to provide accurate information during the verification process.
- When parents do not respond to the verification notice, their children stop receiving free or reduced-price meals. In school year 2008-2009, 32 percent of households selected for verification did not respond.<sup>99</sup> Research shows that substantial portions of the children who lose benefits as a result of non-response are eligible for free or reduced-price meals.<sup>100</sup>

The 2010 reauthorization legislation eliminated the requirement that households provide a Social Security number for each adult (or an indication that the adult does not have one) as part of documenting eligibility during the verification process. This policy change removed a significant barrier to responding for families that have privacy concerns or are reluctant to reveal that an adult does not have a Social Security number.<sup>101</sup>

<sup>99</sup> Food and Nutrition Service, *Analysis of Verification Summary Data School Year 2008-2009*, USDA, March 2011, Figure 5, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/VerificationSummaryReport.pdf>.

<sup>100</sup> See Zoë Neuberger and Robert Greenstein, *What Have We Learned From FNS' New Research Findings About Overcertification in the School Meals Programs?* Center on Budget and Policy Priorities, November 13, 2003, <http://www.cbpp.org/archiveSite/11-11-03fa.pdf>.

<sup>101</sup> See P.L. 111-296 § 301 amending 42 U.S.C. § 1758(d)(1) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Privacy Protection and the Use of Social Security Numbers in Child Nutrition Programs*, USDA,

The requirement to communicate with parents in a language they can understand applies to communications regarding the verification process as well as the application process.<sup>102</sup> Families that do not understand what is being asked of them, or fear that providing the required information will have negative consequences, may not respond to the verification notice, which results in the loss of meal benefits. Providing written or oral translations of the verification requirements is especially important in this context so that eligible children won't lose out on free or reduced-price meals. USDA's packet of materials translated into 33 languages includes verification materials, which states or school districts could send to parents if they have identified the home language.<sup>103</sup> By keeping records of the households who have utilized translated applications or who are known to have limited English proficiency, schools can conduct verification in a language that households understand.

We were able to locate verification materials (an initial verification notice and notice to the household of the results of the verification process) on the Internet for 35 states. These are generally model forms for use by school districts. Twenty-eight of those 35 states used the USDA prototype form with few or no changes.<sup>104</sup> The school district websites we reviewed did not include verification materials. Based on our review of these materials, there are a few key changes that would make verification materials more likely to elicit an accurate response.

- **Include a no-charge phone number for assistance and specify that it is cost-free to families.** Since 2005, school districts have been required to include in the verification notice a no-charge phone number that parents can call for help with the verification process.<sup>105</sup> It is helpful for the notice to explain that the family will not be charged for the call. All 35 state verification notices we reviewed included a phone number to call for assistance, but seven of the notices did not explain that the call would be cost-free to families.
- **Explain the timeframe for which information may be provided.** Households may provide documentation of their income for any period between the month prior to application and the time at which the household is required to provide documentation (generally July or August through October or November).<sup>106</sup> It is especially important for households whose income has changed since the time they applied to understand this timeframe.

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February 15, 2011, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19\\_CACFP09\\_SFSP06-2011\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19_CACFP09_SFSP06-2011_os.pdf).

<sup>102</sup> For a more detailed discussion of this requirement and how to obtain translated materials, see section 1.

<sup>103</sup> It is important to note that in the context of verification, simply providing a link to USDA's materials is likely to be insufficient because parents may not have access to the web or would not think to check the school meals website when they receive an English letter.

<sup>104</sup> Additionally, two states used outdated USDA prototype verification materials. They are not included in this number.

<sup>105</sup> See 7 C.F.R. § 245.6a, NT, (f)(5) and Food and Nutrition Service memorandum, *Verification Activities – Reauthorization 2004 Implementation Memo SP-13*, USDA, March 10, 2005, [http://www.fns.usda.gov/cnd/governance/Reauthorization\\_Policy\\_04/Reauthorization\\_04/2005-03-10.pdf](http://www.fns.usda.gov/cnd/governance/Reauthorization_Policy_04/Reauthorization_04/2005-03-10.pdf).

<sup>106</sup> See 7 C.F.R. § 245.6a, NT, (f)(2) and Food and Nutrition Service Memorandum, *Verification of Income Eligibility – Reauthorization 2004 Implementation Memo SP-5*, USDA, August 25, 2004, [http://www.fns.usda.gov/cnd/governance/Reauthorization\\_Policy\\_04/Reauthorization\\_04/2004-08-25.pdf](http://www.fns.usda.gov/cnd/governance/Reauthorization_Policy_04/Reauthorization_04/2004-08-25.pdf).

The USDA prototype verification notice addresses this issue in two places. First, the notice explains what kind of information to submit if the household was receiving SNAP, TANF, or FDPIR benefits “when you applied for free or reduced price meals, or at any time since then.” Second, when describing the kinds of documents that can be submitted to verify income, the notice states, “Timeframe of Acceptable Income Documentation: Please submit proof of one month’s income; you could use the month prior to application, the month you applied, or any month after that.”

Of the 35 state verification notices we reviewed, only one did not provide any information about the timeframe for acceptable documentation. But five additional states did not explain that the documentation could be from the month *prior to* application as well as from the month of application or subsequent months.

- **Explain how families with homeless, runaway, or migrant children may verify eligibility.**

Homeless, runaway, and migrant children are categorically eligible for free meals and may be directly certified based on documentation provided by a relevant third party, such as a school district’s homeless liaison or migrant education coordinator, without having to complete an application.<sup>107</sup> Children who are directly certified are not subject to verification.

Unfortunately, some of these children are missed in the direct certification process and are required to complete an application; children in this group may be selected for verification. These families do not have to provide documentation of income or receipt of benefits to verify eligibility (although they may also qualify based on these criteria). Such families can be spared a substantial burden, or loss of benefits, if the district’s homeless liaison, migrant education coordinator, or another qualified liaison verifies the child’s status for school meal administrators.<sup>108</sup>

Ideally, districts would first attempt to directly verify homeless, runaway, and migrant children without involving the household, by asking the homeless liaison, migrant education coordinator, or another qualified liaison whether any of the children selected for verification are homeless, runaway, or migrant. For children who are not directly verified, it is important that the verification notice explain to parents how to proceed if their child is homeless, runaway, or migrant. USDA’s model verification notice states, “If you get this letter for a homeless, migrant, or runaway child, please contact [school, homeless liaison, or migrant coordinator] for help.” Of the 35 notices we reviewed, nine did not include such an explanation. If verification notices do not include any instructions regarding homeless, runaway, or migrant children, families will have no way of knowing that they have an alternative to providing documentation of income or benefit receipt.

- **Explain how households with no income can verify their eligibility.** There are many situations in which a family can manage on a temporary basis without any of the forms of income requested on the school meals applications. The family might be living with relatives, behind on rent or doubled up, getting food provisions at a food pantry, eating meals at a soup kitchen,

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<sup>107</sup> The certification process for homeless, migrant, and runaway children is described in more detail in the subsection above titled, “Clarify Procedures for Homeless, Migrant, and Runaway Students.”

<sup>108</sup> The same officials who are qualified liaisons for purposes of direct certification are qualified liaisons for purposes of direct verification. A description of these officials is in section 4.

and/or relying on temporary loans from friends or family. When an adult in the household loses a job, the household may live off their savings and postpone expenses for several months before applying for public benefits; also, many people who lose jobs do not qualify for unemployment compensation. It is not very unusual for poor households to have periods in which they have no income. In a typical month, 2.8 percent of individuals receiving SNAP benefits are school-age children in households with zero gross income. We estimate that in February 2012, that would have represented about 1.3 million school-age children.<sup>109</sup>

Unfortunately, USDA's regulations suggest that households that report no income may be subject to "verification for cause," which means that these vulnerable families may be more likely to be verified than other families.<sup>110</sup> To help prevent poor families with no income from losing free school meals, the verification notice should explain how to document their lack of income. It would be extremely unfortunate for school meals programs to take away food from the poorest children because their parents have no documentation of the income they do not receive.

USDA's prototype verification notice explains that families with no income may provide "a brief note explaining how you provide food, clothing and housing for your household, and when you expect an income." Verification notices should include a similar statement so that they do not leave extraordinarily vulnerable families in the dark about how to verify their eligibility for free school meals. Nearly all the verification notices we reviewed include a similar explanation.

- **Remove any request for Social Security numbers.** Households are no longer required to provide Social Security information as part of the verification process. To comply with federal law, states and school districts must remove any request for Social Security numbers from their verification materials.

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<sup>109</sup> Center on Budget and Policy Priorities analysis of SNAP Quality Control (QC) data for fiscal year 2010. The fiscal year 2010 share of participants who are school-age children in households with zero gross income in the QC data was applied to the SNAP caseload for February 2012.

<sup>110</sup> See 7 C.F.R. § 245.6a, NT, (c)(7).

Table 7 Summary of Findings on Encouraging Eligible Families Selected for Verification to Respond	
Includes a toll-free number for assistance and an explanation that families will not be charged	<b>35 out of 35 state verification notices</b> included a phone number, but seven notices did not explain that the call would be cost-free to families
Clarifies that documentation may be provided for any point in time between the month prior to application and the time of verification	<b>34 out of 35 state verification notices</b> provided information about the timeframe for acceptable documentation, but five notices did not explain that the documentation could be from the month <i>prior to</i> application as well as from the month of application or subsequent months
Provides instructions about how households with homeless, runaway, or migrant children can verify their eligibility	<b>27 out of 35 state verification notices</b> adopt this practice
Provides instructions about how households with no income can verify their eligibility	<b>34 out of 35 state verification notices</b> adopt this practice
Does not request information about Social Security numbers from household members	<b>33 out of 35 state verification notices</b> adopt this practice*

\* Several states requested Social Security number information on their verification materials in September 2011, but most have since updated their forms to remove these requests. This table reflects the states that still requested this information as of April 2012. In this table, Utah's forms are counted as requesting this information. These forms were reviewed in September 2011 but have since been removed from the Internet. Kentucky has two verification notices posted on its website. The up-to-date verification notice does not request information about Social Security numbers, but the other notice does. In this table, Kentucky is not counted as requesting information about Social Security numbers.

## Conclusion

Last summer, every school district had to revise the application materials it provides to households regarding the federal school meals programs to implement the changes resulting from reauthorization legislation. We reviewed 87 sets of printable household materials (43 from states and 44 from large school districts) and 50 online applications to assess the extent to which they incorporated the required changes. While this is a small subset of the materials in use by school districts around the country, our results may provide an indicator of areas worthy of attention when materials are revised. While the majority of the new materials we reviewed correctly incorporate the changes, some states and school districts failed to incorporate the changes or did so incorrectly.

Apart from the changes in law, important opportunities remain to encourage eligible families to apply and provide materials that are understandable to all parents (including those with limited literacy or English skills), are simple to complete, and meet all program requirements. Moreover, applications that are submitted electronically, which are becoming more prevalent, could be redesigned to offer the simplifications that are uniquely available in an online format. This paper provides a guide to selected features that could facilitate the application process for eligible low-income families. Below is a checklist of key features for states and school districts to consult when revising their household materials, including both printable and online applications. In addition, many states now post their household materials on the web (see Appendices F and G for links), which will make it easier for states and school districts to find models of features to incorporate into their own materials.

## Checklist of Key Features of School Meals Application Materials to Improve Program Access

### Provide materials in a language and at a level that parents can understand by

- Identifying the primary language of each household
- Conducting all communications in the household's primary language by providing written and oral translations of all eligibility-related communication, including verification materials
- Using language that parents with limited literacy can understand and providing application assistance

### Simplify applications for categorically eligible children by

- Providing in the direct certification notice instructions to parents about how to make other children in the household known to the school district
- Requesting only one case number, clearly describing which number to use, and explaining that it can be for SNAP, TANF cash assistance, or FDPIR
- Not requesting unnecessary information (income information for adults or children or information about a Social Security number) from households that receive assistance
- Omitting from online applications the request for income information or information about a Social Security number if the household has provided a SNAP/TANF cash assistance/FDPIR case number or is applying only for foster children
- Clearly conveying that children in foster care are categorically eligible for free meals
- Making applications consistent with policies for children in foster care
- Explaining the process and consequences of including children in foster care as members of the household
- Stating in the parent letter that homeless, migrant, and runaway children qualify for free meals
- Clearly explaining the steps parents need to take if their children have not been directly certified and they believe they are homeless, migrant, or runaway

### **Reduce math errors by**

- Providing options on the application to note different frequencies of income without doing calculations

### **Encourage families that may be eligible to apply by stating clearly on the website and application**

- That a household may apply for benefits at any time during the school year
- That children of parents who become unemployed may become eligible for free or reduced-price meals
- That a single application will be accepted for all children in the household attending schools in the same district
- That household members do not have to be U.S. citizens for children to qualify for free or reduced-price meals
- The required non-discrimination statement
- The income eligibility limit for reduced-price meals

### **Encourage eligible families selected for verification to respond by including in the verification notice**

- A toll-free number for assistance and an explanation that families will not be charged
- Clarification that documentation may be provided for any point in time between the month prior to application and the time of verification
- Instructions about how households with homeless, runaway, or migrant children can verify their eligibility
- Instructions about how households with no income can verify their eligibility
- No requests for information about Social Security numbers

## Appendix A

State Materials Reviewed		
Feature	States	Total Number of States
School meals website	AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY	51
Online application	DC, OR, PA	3
<b>Printable materials:</b>		
Application	AL, AK, AZ, AR, CO, CT, DE, DC, FL, GA, HI, ID, IL, IN, IA, KS, KY, LA, ME, MA, MI, MN, MS, MO, MT, NE, NV, NH, NY, NC, ND, OH, OK, OR, SC, SD, TX, UT, VT, WA, WV, WI, WY	43
Household materials (parent letter, FAQ, instructions)	AL, AK, AZ, AR, CO, CT, DE, DC, FL, GA, HI, ID, IL, IN, IA, KS, KY, LA, ME, MA, MI, MN, MS, MO, MT, NE, NV, NH, NY, NC, ND, OH, OK, OR, SC, SD, TX, UT, VT, WA, WV, WI, WY	43
Verification materials	AL, AK, AZ, AR, FL, GA, IL, IN, IA, KS, KY, LA, ME, MA, MI, MN, MO, MT, NE, NV, NH, NJ, NY, NC, ND, OH, OK, OR, SC, SD, TX, UT, VT, WI, WY	35
Direct certification materials	AL, AK, AZ, CT, FL, GA, IL, IN, IA, KS, KY, LA, MA, MI, MN, MO, MT, NV, NY, NC, ND, OH, OK, OR, SC, TX, UT, VT, WI, WY	30
Printable materials available in translations	AZ, AR, CO, DE, DC, GA, ID, IL, IN, IA, KS, ME, MI, MN, NE, NY, OR, TX, UT, WI	20
Printable materials available in languages other than Spanish or English	DC, ME, MN, OR, WI	5
Link to USDA translations	CO, CT, DE, GA, HI, IL, IN, IA, KS, LA, ME, MA, MN, MS, NE, OH, SC, TX, UT, VT, WI	21

## Appendix B

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School District Materials Reviewed	
Feature	Number of Large School Districts
School meals website	100
Online application only	37
Printable application only	23
Both online and printable application	10
Household materials (i.e. parent letter, instructions), but no application	11

### Required Elements of Application Materials<sup>111</sup>

#### Information to Be Contained in a Letter or Notice to Households Distributed at the Beginning of the School Year (7 C.F.R. § 245.5(a)(1))

- In schools participating in a meal service program, the eligibility criteria for *reduced-price* benefits with an explanation that households with incomes less than or equal to the reduced-price criteria would be eligible for either free or reduced-price meals.
- How a household may make application for free or reduced-price meals or for free milk for its children (free milk may be offered by schools that do not operate a federal lunch program).
- An explanation that an application for free or reduced-price benefits on the basis of income and household size cannot be approved unless it contains:
  - names of all household members;
  - income received by each household member, identified by the source of the income;
  - the signature of an adult household member; and
  - the Social Security number of the adult household member who signs the application or an indication that he/she does not possess a Social Security number (as a result of the reauthorization legislation only the last 4 digits of the Social Security number may be requested).
- An explanation that households with children who are members of households currently certified to receive Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families cash assistance (TANF), or Food Distribution on Indian Reservations Program (FDPIR) benefits may submit applications for these children with abbreviated information:
  - the child's name and appropriate SNAP, TANF, or FDPIR case number or other identifier and
  - signature of an adult household member.
- An explanation that the information on the application may be verified at any time during the school year.
- How a household may apply for benefits at any time during the school year as circumstances change.
- A statement to the effect that children having parents or guardians who become unemployed are eligible for free or reduced-price meals or for free milk during the period of unemployment, provided that the loss of income causes the household's income during the period of unemployment to be within the eligibility criteria.
- The statement: "In the operation of child feeding programs, no child will be discriminated against because of race, sex, color, national origin, age or disability."
- How a household may appeal the decision of the school district with respect to the application under the hearing procedure set forth in 7 C.F.R. § 245.7.

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<sup>111</sup> Provisions related to foster children that were made obsolete by the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296) are not included. Where other provisions were altered by P.L. 111-296, a note is included.

- The letter or notice shall be accompanied by a copy of the application form required under 7 C.F.R. § 245.6.
- A statement to the effect that Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) participants may be eligible for free or reduced-price meals.

### **Specifications Regarding Free and Reduced-Price School Meal Applications (7 C.F.R. § 245.6(a))**

- The state agency or local education agency must provide a form that permits a household to apply for all children in that household who attend schools in the same local education agency.
- The local educational agency must provide newly enrolled students with an application and determine eligibility promptly.<sup>112</sup>
- The application shall be clear and simple in design.
- The information requested on the application shall be limited to that required to demonstrate whether the family meets the eligibility criteria for free or reduced-price meals.
- Any communication with households for eligibility determination purposes must be in an understandable and uniform format and to the maximum extent practicable, in a language that parents and guardians can understand.<sup>113</sup>
- The local educational agency may establish a system for executing household applications electronically and using electronic signatures.
- When a student transfers to another school district, the new local education agency may accept the eligibility determination from the student's former local educational agency without incurring liability for the accuracy of the initial determination.

### **Information That Must Be Requested on Free and Reduced-Price School Meal Applications (7 C.F.R. § 245.6(a))**

- Names of all household members.
- Income received by each member (identified by the household member who received the income).
- Source of income.
- Social Security number of the adult household member who signs the application or an indication that the adult does not have a Social Security number.
- SNAP, FDPIR, or TANF case number in lieu of names of all household members, household income information, and Social Security number or indication that the adult has none.
- Signature of the adult household member.

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<sup>112</sup> This statement was added since the passage of the Healthy, Hunger-Free Kids Act of 2010. See Food and Nutrition Service, "Final Rule: Applying for Free and Reduced Price Meals in the National School Lunch Program and School Breakfast Program and for Benefits in the Special Milk Program, and Technical Amendments," USDA, October 28, 2011, <http://www.fns.usda.gov/cnd/governance/final/2011-10-28.pdf>.

<sup>113</sup> USDA recently clarified its expectations regarding language access. See Food and Nutrition Service, *Applications and Other Household Materials for Limited English Proficient Households*, USDA, December 2011, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

## Free and Reduced-Price School Meal Application Materials Must also Include Substantially the Following Statements (7 C.F.R. § 245.6(a))

- The application must contain the “Use of Information Statement,” which states, “The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the last four digits of the social security number of the adult household member who signs the application. The social security number is not required when you apply on behalf of a foster child or when you list a Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs. We MAY share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.”<sup>114</sup>
- When the state agency or local educational agency, as appropriate, plans to use or disclose children’s eligibility information for non-program purposes, additional information must be added to the above section to the effect of, “We may share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs; auditors for program reviews, and law enforcement officials to help them look into violation of program rules.” (See 7 C.F.R. § 245.6(h))
- The application shall also include a statement, immediately above the space for signature, that the person signing the application certifies that all information furnished in the application is true and correct, that the application is being made in connection with the receipt of Federal funds, that school officials may verify the information on the application, and that deliberate misrepresentation of the information may subject the applicant to prosecution under applicable state and federal criminal statutes.

## Changes Needed to Application Materials Resulting from Recent Policy Changes

As a result of new provisions included in the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296), certain changes have to be made to application materials. USDA has implemented these provisions through guidance, which is cited below, but has not yet issued regulations.

- Foster children are now categorically eligible for free meals regardless of personal income or the household income of their foster family and a separate application will no longer be required for foster children. Foster children may be certified without an application based on documentation from an appropriate agency indicating that the child’s care and placement are

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<sup>114</sup> USDA recently clarified that applications no longer must contain the Privacy Act statement. (This is due to the statutory change requiring only four digits of a Social Security number.) Instead, the Use of Information Statement must be provided on the application. See Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, October 2011, p.14, [www.fns.usda.gov/cnd/guidance/EliMan.pdf](http://www.fns.usda.gov/cnd/guidance/EliMan.pdf).

the responsibility of the state or that the foster child has been placed with a caretaker household by a court. Regardless of whether a foster child has already been certified for free meals, the foster child may be included on the same application as other children in the household and the larger household size may help the foster family's non-foster children qualify for free or reduced-price meals. See P.L. 111-296 § 102 amending 42 U.S.C. § 1758(b) and (d) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Categorical Eligibility of Foster Children*, USDA, revised March 16, 2011, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP17\\_CACFP08\\_SFSP05-2011\\_osr.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP17_CACFP08_SFSP05-2011_osr.pdf).

- The application may ask only for the last four digits of the Social Security number of the adult signing the application or an indication that he or she does not have one. As was previously the case, information about the Social Security number or lack of one is required only for households that are required to provide income information on the application. Households that list a case number or contain only foster children do not have to complete income information and do not have to provide any information about a Social Security number. See P.L. 111-296 § 301 amending 42 U.S.C. § 1758(d)(1) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Privacy Protection and the Use of Social Security Numbers in Child Nutrition Programs*, USDA, February 15, 2011, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2011/SP19\\_CACFP09\\_SFSP06-2011\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2011/SP19_CACFP09_SFSP06-2011_os.pdf)

An additional policy change that was implemented by USDA in August 2009 — referred to as extended categorical eligibility — also required changes to household materials. Under the revised policy, all children in a household are eligible for free school meals if anyone in the household is receiving SNAP, TANF, or FDPIR benefits. The notice to parents informing them that a child has been directly certified is now required to include directions for making other children in the household known to the school district. In addition, application materials may now indicate that only one SNAP, FDPIR, or TANF case number must be provided in order to qualify all of the children in the household for free school meals and may explain that the case number may be for any member of the household, including an adult. See Food and Nutrition Service memorandum, *Extending Categorical Eligibility to Additional Children in a Household*, USDA, August 27, 2009, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf) and Food and Nutrition Service memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACFP\\_11\\_SFSP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf).<sup>115</sup>

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<sup>115</sup> For a more detailed discussion of this policy change and how it can allow more eligible children to be automatically enrolled, see Zoë Neuberger and Tina Fritz Namian, *Enrolling All Children in a Household for Free School Meals*, Center on Budget and Policy Priorities, June 2010, <http://www.cbpp.org/files/6-16-10fa.pdf>.

### Required Elements of Verification Materials<sup>116</sup>

#### Specifications Regarding Free and Reduced-Price School Meal Applications Under Program Regulations (7 C.F.R. § 245.6a(f)(1) and 7 C.F.R. § 245.6a(f)(2))

- Any communications with households concerning verification must be in an understandable and uniform format and, to the maximum extent practicable, in a language that parents and guardians can understand.
- Households notified of their selection for verification must provide documentation of income (indicating source, amount, and frequency) from any point in time between the month prior to the application for school meal benefits and the time the household is requested to provide income documentation.

#### Information Required to Be Provided to Households Selected for Verification Under Program Regulations (7 C.F.R. § 245.6a(f)(1))

- Written notice that their application has been selected for verification and that the household is required to provide the requested verification information by a specified date.
- A telephone number for assistance that is free of charge. This information must be prominently displayed on the letter to households selected for verification. (See 7 C.F.R. § 245.6a(f)(5) for more information.)
- An explanation of the types of information and/or documents that are required to confirm eligibility for free or reduced-price meals.
- The name and no-charge phone number of a school official who can assist in the verification effort.
- An explanation that:
  - In lieu of any information that would otherwise be required, the household can submit proof of current SNAP, FDPIR, or TANF certification to verify the eligibility of a child who is a member of a SNAP, FDPIR, or TANF household;
  - In lieu of any information that would otherwise be required, they may request that the local educational agency contact the appropriate officials to confirm that their children are homeless, as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 5701 *et seq.*), or are migratory as defined in section 1309 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. § 6399).
- An explanation that verification efforts may be carried out through program reviews, audits, and investigations and may include contacting a SNAP, FDPIR, or TANF office to determine current certification for receipt of these benefits, contacting employers to determine income, contacting the state employment security office to determine the amount of benefits received, and checking documentation produced by household members to prove the amount of income received.

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<sup>116</sup> Provisions related to the collection of information about Social Security numbers that were made obsolete by the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296) are not included.

- An explanation that not cooperating with the verification efforts will result in termination of benefits.

### **Changes Needed to Verification Materials Resulting from Reauthorization**

As a result of a new provision included in the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296), information about Social Security numbers may not be collected for any household member as part of the verification process. See P.L. 111-296 § 301 amending 42 U.S.C. § 1758(d)(1) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Privacy Protection and the Use of Social Security Numbers in Child Nutrition Programs*, USDA, February 15, 2011, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19\\_CACFP09\\_SFSP06-2011\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP19_CACFP09_SFSP06-2011_os.pdf).



## I Speak Statements

- أنا أتكلم اللغة العربية. (Arabic)
- Ես խոսում եմ հայերեն (Armenian)
- 我说中文 (Chinese Simplified)
- 我說中文 (Chinese Traditional)
- Ja govorim **hrvatski**. (Croatian)
- اینجانب به زبان فارسی صحبت می کنم. (Farsi)
- Je parle **français**. (French)
- Μιλάω ελληνικά. (Greek)
- འོ འུ་གཤམ་ལོ་གྲུ་ལུ་ ལུ་ ལུ་ (Gujarati)
- Mwen pale **Kreyòl**. (Haitian Creole)
- मैं हिंदी बोलता हूँ (Hindi)
- Kuv hais **lus hmoob**. (Hmong)
- 私は日本語を話します。 (Japanese)
- ខ្ញុំនិយាយភាសាខ្មែរ (Khmer)
- 본인의 모국어는 한국어입니다. (Korean)
- ئە ز زمانى كوردى ده ئاخفم. (Kurdish)
- ຂ້າພະເຈົ້າເວົ້າ ພາສາລາວ. (Lao)
- Yie gorngv **Mienh** waac. (Mien)
- Mówię **po polsku**. (Polish)
- Eu falo **Português**. (Portuguese)
- ਇ ਸ੍ਰਮਾਕ ਪੰਜਾਬੀ (Punjabi)
- Я говорю **по-русски**. (Russian)
- Ou te tautala **faaSamoa**. (Samoan)
- Govorim **srpski**. (Serbian)
- Waxaan ku hadlaa **Somali**. (Somali)
- Yo hablo **español**. (Spanish)
- أتحدث السودانية (لغوي سوداني) (Sudanese)
- Marunong po akong magsalita ng **Tagalog**. (Tagalog)
- ข้าพเจ้าพูด ภาษาไทย (Thai)
- ኣነ ተግርኛ ይዘረብ እየ. (Tigrinya)
- Я розмовляю **українською**. (Ukrainian)
- میں اردو بولتا/بولتی ہوں۔ (Urdu)
- Tôi nói tiếng **Việt**. (Vietnamese)

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## Appendix F

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### State School Meals Program Web Sites<sup>117</sup>

USDA Model Application

School Meals Homepage: <http://www.fns.usda.gov/cnd/>

Forms: <http://www.fns.usda.gov/cnd/FRP/frp.process.htm>

- For school year 2011-2012
- Application, parent/household letter, instructions, disclosure forms, verification notices, notice of direct certification, income eligibility guidelines
- Translations (33 languages including English; updated July 2011): Arabic, Armenian, Cambodian, Chinese (Traditional), Chinese (Simplified), Croatian, Farsi, French, Greek, Gujarati, Haitian Creole, Hindi, Hmong, Japanese, Korean, Kurdish, Laotian, Mien, Polish, Portuguese, Punjabi, Russian, Samoan, Serbian, Somali, Spanish, Sudanese, Tagalog, Thai, Tigrinya, Ukrainian, Urdu, and Vietnamese.
- “I Speak” form

Reauthorization Policy Memoranda:

[http://www.fns.usda.gov/cnd/Governance/Legislation/CNR\\_2010.htm](http://www.fns.usda.gov/cnd/Governance/Legislation/CNR_2010.htm)

### State School Meals Information

#### Alabama

School Meals Homepage:

[http://www.alsde.edu/html/sections/section\\_detail.asp?section=53&footer=sections](http://www.alsde.edu/html/sections/section_detail.asp?section=53&footer=sections)

Forms:

<http://www.alsde.edu/html/sections/documents.asp?section=53&sort=44&footer=sections>

- For school year 2011-2012
- Parent/household letter, instructions, application, disclosure forms, verification notices, notification of approval/denial, notice of direct certification, income eligibility guidelines, sample public release (2009)

#### Alaska

School Meals Homepage: <http://bit.ly/O1isW5>

Forms: <http://bit.ly/S5JAoL>

- For school year 2011-2012

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<sup>117</sup> The materials described in this appendix were available between September 2011 and March 2012 when we conducted our review.

- Parent/household letter, instructions, application, disclosure forms, verification notices, notification of approval/denial, notice of direct certification, sample public release.

## Arizona

School Meals Homepage: <http://bit.ly/S5JKfE>

Forms: <http://bit.ly/RwulCw>

- For school year 2011-2012
- Parent/household letter, application, information sharing, income eligibility guidelines, notification of approval/denial letter, notification of verification
- English and Spanish

Policy guidance manuals: <http://bit.ly/PSknLj>

- Link to USDA's October 2011 eligibility manual

## Arkansas

School Meals Homepage: <http://cnn.k12.ar.us/>

Forms: <http://cnn.k12.ar.us/documents/forms.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, application, notice of approval/denial, verification notices, notice of direct certification, income eligibility guidelines
- English and Spanish

## California

School Meals Homepage: <http://www.cde.ca.gov/ls/nu/sn/>

Forms: <http://www.cde.ca.gov/ls/nu/sn/eligmaterials.asp>

- 2011-2012 eligibility guidelines, sample public release (updated 2005)

## Colorado

School Meals Homepages: [http://www.cde.state.co.us/index\\_nutrition.htm](http://www.cde.state.co.us/index_nutrition.htm),  
<http://www.cde.state.co.us/cdenutritran/nutriprograms.htm>

Forms: <http://www.cde.state.co.us/cdenutritran/nutriformsbook.htm>

- For school year 2011-2012
- Parent/household letter, instructions, application, eligibility guidelines, notification of approval/denial, sharing information form, sample public release
- English, Spanish, and link to USDA translations of application packets

Policy Memorandum: <http://www.cde.state.co.us/cdenutritran/nutripdfdocs.htm>

## Connecticut

School Meals Homepage: <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320676>

Forms: <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320680>

- For school year 2011-2012
- Parent/household letter, application, instructions, notification letter, notification of direct certification, income eligibility guidelines, sharing information forms, sample public release
- Link to USDA translations

## Delaware

School Meals Homepage: [http://www.doe.k12.de.us/infosuites/students\\_family/nutrition/](http://www.doe.k12.de.us/infosuites/students_family/nutrition/)

Forms: [http://www.doe.k12.de.us/infosuites/students\\_family/nutrition/](http://www.doe.k12.de.us/infosuites/students_family/nutrition/)

- For school year 2011-2012
- Letter, instructions, application, sharing information form, FAQ
- English, Spanish, and link to USDA translations

## District of Columbia

School Meals Homepage: <http://1.usa.gov/O9sSP4>

Forms: <http://1.usa.gov/NH0BOs>

- For school year 2011-2012
- Parent/household letter, application
- English, Spanish, French, Chinese, Vietnamese, and Amharic

Online application: <https://mealapps.dcps.dc.gov/lfserver/eform>

## Florida

School Meals Homepage: <http://bit.ly/Q7RKt2>

Florida's forms have been removed from the internet. In September 2011, we reviewed Florida's 2011-2012 English-language parent/household letter, instructions, application, income eligibility guidelines, notice of eligibility, notification of direct certification, and notification of verification.

## Georgia

School Meals Homepage: [http://www.doe.k12.ga.us/fbo\\_nutrition.aspx](http://www.doe.k12.ga.us/fbo_nutrition.aspx)

Forms: <http://www.doe.k12.ga.us/Finance-and-Business-Operations/School-Nutrition/Pages/Free-and-Reduced-Price-Policy.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of direct certification, information sharing, notification of approval/denial, notification of verification, income eligibility guidelines, sample public release
- English, Spanish, and link to USDA translations

## Hawaii

School Breakfast Homepage: <http://ohcnp.k12.hi.us/programs/breakfast.html>

School Lunch Homepage: <http://ohcnp.k12.hi.us/programs/lunch/index.html>

Forms: <http://ohcnp.k12.hi.us/programs/lunch/index.html>

- For school year 2011-2012
- Parent/household letter, instructions, application, sharing information form, income eligibility guidelines
- Link to USDA translation

## Idaho

School Meals Homepage: <http://www.sde.idaho.gov/site/cnp/nslp/>

Forms: <http://www.sde.idaho.gov/site/cnp/nslp/freeReducedApp.htm>

- Parent/household letter, instructions, applications, income eligibility guidelines, sample public release
- English and Spanish

## Illinois

School Meals Homepage: [http://www.isbe.state.il.us/nutrition/htmls/national\\_school\\_lunch.htm](http://www.isbe.state.il.us/nutrition/htmls/national_school_lunch.htm)

Forms: [http://www.isbe.state.il.us/nutrition/htmls/household\\_eligibility.htm](http://www.isbe.state.il.us/nutrition/htmls/household_eligibility.htm)

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, notification of direct certification, income eligibility guidelines, sharing information form
- English, Spanish, and link to USDA translations

Administration Resources and Verification Forms:

[http://www.isbe.state.il.us/nutrition/htmls/forms\\_sbn.htm](http://www.isbe.state.il.us/nutrition/htmls/forms_sbn.htm)

- Also includes link to USDA's October 2011 eligibility manual

## Indiana

School Meals Homepage: <http://1.usa.gov/PSlg6G>

Forms: <http://www.doe.in.gov/student-services/nutrition/snp-free-and-reduced-price-forms>

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, notification of direct certification, notification of error found on submitted application, sharing information form
- English, Spanish, and link to USDA translations

Verification forms: <http://www.doe.in.gov/student-services/nutrition/snp-verification>

Free and Reduced Price information: <http://www.doe.in.gov/student-services/nutrition/snp-free-and-reduced-information>

- Includes link to USDA's October 2011 eligibility manual

## Iowa

School Lunch Homepage:

[http://educateiowa.gov/index.php?option=com\\_content&view=article&id=369&Itemid=402](http://educateiowa.gov/index.php?option=com_content&view=article&id=369&Itemid=402)

Forms:

[http://educateiowa.gov/index.php?option=com\\_content&view=article&id=369&Itemid=402](http://educateiowa.gov/index.php?option=com_content&view=article&id=369&Itemid=402)

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, notification of verification, income eligibility guidelines
- English, Spanish, and link to USDA translations
- Link to USDA's October 2011 eligibility manual

## Kansas

School Meals Homepage: [http://www.kn-eat.org/SNP/SNP\\_Menus/SNP\\_Home.htm#top](http://www.kn-eat.org/SNP/SNP_Menus/SNP_Home.htm#top)

Forms: [http://www.kn-eat.org/SNP/SNP\\_Menus/SNP\\_Admin\\_Program\\_Renewal\\_2012.htm](http://www.kn-eat.org/SNP/SNP_Menus/SNP_Admin_Program_Renewal_2012.htm)

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, notification of direct certification, notification of verification, notification of benefit decrease, income eligibility guidelines, sample public release, guidance for administrators

Forms Translations: [http://www.kn-](http://www.kn-eat.org/SNP/SNP_Menus/SNP_Admin_Foreign_Language_Translations.htm)

[eat.org/SNP/SNP\\_Menus/SNP\\_Admin\\_Foreign\\_Language\\_Translations.htm](http://www.kn-eat.org/SNP/SNP_Menus/SNP_Admin_Foreign_Language_Translations.htm)

- Spanish and link to USDA translations

## Kentucky

School Meals Homepage: <http://scn.ky.gov/nslp.htm>

Forms: <http://scn.ky.gov/nslp.htm> (Updated forms are under "What's new," titled "2011-2012 Prototype Household Application")

- For school year 2011-2012 (as well as old material still posted)
- Letter, instructions, application, income eligibility guidelines, sharing information form, notification of verification, notification of approval/denial, notification of direct certification
- Resources for administrators, school meals brochures, 2008 (outdated) USDA eligibility manual

## Louisiana

School Meals Homepage: <http://www.doe.state.la.us/offices/nutritionsupport/nslp.html>

Forms: <http://cnp.doe.state.la.us/DNAMemos/DNAResources.asp>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sharing information form, notification of verification, notification of approval/denial, notification of direct certification, sample public release
- Resources for administrators and link to USDA translations

## Maine

School Meals Homepage: <http://www.maine.gov/education/sfs/>

Forms: [http://www.maine.gov/education/sfs/forms\\_tab.html](http://www.maine.gov/education/sfs/forms_tab.html)

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of eligibility, income eligibility guidelines, sharing information form
- English, French (letter and instructions only), and link to USDA translations (titled “Somali Packet”)

Verification Forms: <http://www.maine.gov/education/sfs/verif.html>

## Maryland

School Meals Homepage: <http://bit.ly/O9tkgg>

- Income eligibility guidelines

## Massachusetts

School Lunch Program Homepage: <http://www.doe.mass.edu/cnp/nprograms/nslp.html>

School Breakfast Program Homepage: <http://www.doe.mass.edu/cnp/nprograms/sbp/>

Forms: [http://www.doe.mass.edu/cnp/free\\_red/](http://www.doe.mass.edu/cnp/free_red/)

- For school year 2011-2012
- Parent/household letter, application, notification of direct certification, income eligibility guidelines, sharing information form, notification of approval/denial, notification of

- verification, hearing procedure guidelines
- Link to USDA translations

## Michigan

Homepage: <http://1.usa.gov/N3F3A1>

Forms: <http://1.usa.gov/T0hTwH>

- For school year 2011-2012
- Parent/household letter, instructions, application, eligibility criteria, notification of approval/denial, notification of direct certification, sharing information form
- English and Spanish

Verification information: <http://1.usa.gov/OyEYCc>

## Minnesota

School Meals Homepage: <http://education.state.mn.us/MDE/SchSup/FNS/SNP/index.html>

Forms: <http://education.state.mn.us/MDE/SchSup/FNS/SNP/AppStuMeals/index.html>

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, eligibility criteria
- Memos to administrators
- English, Hmong, Somali and Spanish; link to USDA translations

Direct Certification Forms:

<http://education.state.mn.us/MDE/SchSup/FNS/SNP/AppStuMeals/DirectCert/index.html>

Verification Forms:

<http://education.state.mn.us/MDE/SchSup/FNS/SNP/AppStuMeals/Verif/index.html>

## Mississippi

National School Lunch Homepage: [http://www.healthyschoolsms.org/nutrition\\_services/nslp.htm](http://www.healthyschoolsms.org/nutrition_services/nslp.htm)

- Link to USDA translations

School Breakfast Homepage: [http://www.healthyschoolsms.org/nutrition\\_services/nsbp.htm](http://www.healthyschoolsms.org/nutrition_services/nsbp.htm)

Forms: [http://www.healthyschoolsms.org/nutrition\\_services/MealApplications.htm](http://www.healthyschoolsms.org/nutrition_services/MealApplications.htm)

- For school year 2011-2012
- Parent/household letter, instructions, applications, income eligibility guidelines

## Missouri

National School Lunch Homepage: [http://dese.mo.gov/divadm/food/Lunch\\_Program.html](http://dese.mo.gov/divadm/food/Lunch_Program.html)

School Breakfast Homepage: [http://dese.mo.gov/divadm/food/Breakfast\\_Program.html](http://dese.mo.gov/divadm/food/Breakfast_Program.html)

Forms: <http://dese.mo.gov/divadm/food/Handbooks.htm>

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of direct certification, notification of approval/denial, sharing information form, notification of verification (in “Verification guidance” document)
- Sample public release, income eligibility guidelines, guidance for administrators, USDA eligibility manual (October 2011)

## Montana

School Meals Homepage: <http://www.opi.mt.gov/schoolfood/index.html>

Forms:

[http://www.opi.mt.gov/Programs/SchoolPrograms/School\\_Nutrition/index.html#gpm1\\_4](http://www.opi.mt.gov/Programs/SchoolPrograms/School_Nutrition/index.html#gpm1_4) (under “Free and Reduced School Meals”)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, notification of approval/denial, notification of change in eligibility, notification of direct certification
- Memos to administrators, sample public release

## Nebraska

School Lunch Homepage: <http://www.education.ne.gov/ns/nslp/>

Forms: <http://www.education.ne.gov/ns/forms/nslpforms/index.html>

(Click “Application - Income eligibility guidelines” to see application forms and “Application – Verification” to see verification forms)

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, notice of change in benefits, notification of selection for verification, sharing information form, income eligibility guidelines
- Resources for administrators, link to USDA eligibility manual (October 2011)

Translated forms: <http://www.education.ne.gov/ns/forms/nslpforms/usda.html>

- Spanish and link to USDA translations

## Nevada

School Meals Homepages: <http://www.doe.nv.gov/CNSH.htm>,  
<http://www.doe.nv.gov/NSLP.htm>

Application packet: [http://www.doe.nv.gov/PDFs/1-NumberedMemos/2010-2011/2011-03-25\\_NSLP-2011-44\\_SY2012\\_FRLApplication.pdf](http://www.doe.nv.gov/PDFs/1-NumberedMemos/2010-2011/2011-03-25_NSLP-2011-44_SY2012_FRLApplication.pdf) (available on  
[http://www.doe.nv.gov/NumberedMemos\\_2010-2011.htm](http://www.doe.nv.gov/NumberedMemos_2010-2011.htm))

- For school year 2011-2012
- Parent/household letter, instructions, application, sharing information form, notification of verification, notification of approval/denial, notification of direct certification

2011-2012 memos (including memo about USDA translations):

[http://www.doe.nv.gov/NumberedMemos\\_2011-2012.htm](http://www.doe.nv.gov/NumberedMemos_2011-2012.htm)

## New Hampshire

School Meals Homepage:

[http://www.education.nh.gov/program/nutrition/school\\_lunch.htm](http://www.education.nh.gov/program/nutrition/school_lunch.htm)

- Link to October 2011 eligibility manual

Forms: [http://www.education.nh.gov/program/nutrition/nslp\\_application.htm](http://www.education.nh.gov/program/nutrition/nslp_application.htm)

<http://www.education.nh.gov/program/nutrition/verification.htm>

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, sharing information form, income eligibility guidelines, notification of direct certification, notification of verification

## New Jersey

School Meals Homepage: <http://www.nj.gov/agriculture/divisions/fn/childadult/school.html>

School Lunch Homepage:

[http://www.nj.gov/agriculture/divisions/fn/childadult/school\\_lunch.html](http://www.nj.gov/agriculture/divisions/fn/childadult/school_lunch.html)

School Breakfast Homepage:

[http://www.nj.gov/agriculture/divisions/fn/childadult/school\\_breakfast.html](http://www.nj.gov/agriculture/divisions/fn/childadult/school_breakfast.html)

Forms: <http://www.nj.gov/agriculture/applic/forms/> (under “Food and Nutrition”)

- Notification of verification (English and Spanish), income eligibility guidelines, notification of incomplete application (English and Spanish), notification of approval/denial, sharing information form

## New Mexico

School Meals Homepage: <http://www.ped.state.nm.us/nutrition/index.html>

- Link to 2008 USDA eligibility manual

## New York

Child Nutrition Homepage: <http://portal.nysed.gov/portal/page/pref/CNKC>

- Link to USDA eligibility manual (October 2011)

Forms: <http://portal.nysed.gov/portal/page/pref/CNKC/Eligibility/2012-2013PolicyBooklet.htm>  
(or see “Need to Know” or “Eligibility” section on homepage)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sample public release
- English and Spanish

Verification Information:

- Notification of direct certification prototype: <http://bit.ly/T2Un0D>

## North Carolina

School Meals Homepage: <http://childnutrition.ncpublicschools.gov/programs/>

Forms: <http://childnutrition.ncpublicschools.gov/free-reduced-school-meals/2011-12>

- For school year 2011-2012
- Parent/household letter, instructions, application, notification of approval/denial, notification of direct certification, notification of verification, income eligibility guidelines, sharing information form

## North Dakota

National School Lunch Homepage: <http://www.dpi.state.nd.us/child/snp/nslp/index.shtm>

- Link to USDA eligibility manual (October 2011), guidance for administrators

School Breakfast Homepage: <http://www.dpi.state.nd.us/child/snp/sbp/index.shtm>

Forms: <http://www.dpi.state.nd.us/child/snp/tools/index.shtm>

- For school year 2011-2012
- Parent/household letter, application, notification of direct certification, notification of approval/denial, notification of change in benefits, notification of verification, income eligibility guidelines

## Ohio

School Meals Homepage:

<http://www.ode.state.oh.us/GD/Templates/Pages/ODE/ODEPrimary.aspx?page=2&TopicID=828&TopicRelationID=485>

Forms:

<http://www.ode.state.oh.us/GD/Templates/Pages/ODE/ODEDetail.aspx?page=3&TopicRelationID=828&ContentID=1113&Content=110702>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, notification of approval/denial, sharing information form, sample flier, notification of verification, notification of direct certification,
- Link to USDA translations, materials for administrators

## Oklahoma

School Meals Homepage: <http://ok.gov/sde/node/20>

Forms: <http://ok.gov/sde/child-nutrition-documents> (Under “Policy Statement/Attachments”)

- For school year 2011-2012
- Parent/household letter, application, notification of approval/denial, notification of direct certification, notification of verification, sample public release, income eligibility guidelines
- 2008 USDA eligibility manual, materials for administrators

## Oregon

School Meals Homepage: <http://www.ode.state.or.us/search/results/?id=207>

Forms: <http://www.ode.state.or.us/search/page/?=3316>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, notification of approval/denial, sharing information form, notification of direct certification, online application instructions
- 2008 USDA eligibility manual
- English, Spanish, Russian, Chinese, and Vietnamese

Verification Forms: <http://www.ode.state.or.us/search/page/?=3315>

Administrator Resources: <http://www.ode.state.or.us/search/page/?id=1997>

Online Application: <https://district.ode.state.or.us/apps/frlapp/>

- Parent/household letter precedes the application
- English and Spanish

## Pennsylvania

School Lunch Homepage:

[http://www.education.state.pa.us/portal/server.pt/community/national\\_school\\_lunch/7487](http://www.education.state.pa.us/portal/server.pt/community/national_school_lunch/7487)

Online Application: <https://www.humanservices.state.pa.us/COMPASS.Web/CMHOM.aspx>

- COMPASS allows households to apply for numerous benefits. Click “Apply for Benefits” on the left hand side and select “Free and Reduced Price Meal Applications” once in the system
- English and Spanish

## Rhode Island

School Meals Homepage: <http://www.ride.ri.gov/Finance/Nutrition/>

School Lunch Homepage: <http://www.ride.ri.gov/Finance/Nutrition/national.aspx>

## South Carolina

Health and Nutrition Homepage: <http://ed.sc.gov/agency/os/Health-and-Nutrition/>

Forms: <http://ed.sc.gov/agency/os/Health-and-Nutrition/documents/FoodServiceProgramManual2010rev043012.pdf> (sample forms are found in section 3c of this document; this document is available on the above homepage)

- For school year 2011-2012
- Parent/household letter, instruction, application, income eligibility guidelines, notification of approval/denial, notification of direct certification, notification of verification, sample public release
- Link to USDA translations (in section 4 of this document)

## South Dakota

School Meals Homepage: <http://doe.sd.gov/cans/nslp.asp>

Forms: <http://doe.sd.gov/cans/nslp.asp> (Click “Attachments” under “2011-12 NSLP/SBP Applications for Renewing Agencies”)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, notification of approval/denial

For verification forms, click “51.4 Verification Guidance of Application for Meal Benefits” or use this link: [http://www.doe.sd.gov/cans/documents/NSLP\\_Verificationguidance.doc](http://www.doe.sd.gov/cans/documents/NSLP_Verificationguidance.doc)

## Tennessee

School Meals Homepage: <http://www.tennessee.gov/education/support/nutrition.shtml>

## Texas

Food and Nutrition Homepage: <http://www.squaremeals.org/>

School Breakfast Program: <http://www.squaremeals.org/Programs/SchoolBreakfastProgram.aspx>

School Lunch Program:

<http://www.squaremeals.org/Programs/NationalSchoolLunchProgram.aspx>

Forms: <http://bit.ly/O9uGHX>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, notification of direct certification, notification of approval/denial, notification of verification, other verification forms
- English, Spanish, and link to USDA translations

Texas NSLP policies (updated for 2011-2012):

<http://www.squaremeals.org/Programs/NationalSchoolLunchProgram/NSLPPolicyampARM.aspx>

- Link to October 2011 USDA eligibility manual

## Utah

School Meals Homepage: <http://www.schools.utah.gov/cnp/>

School Lunch Homepage: <http://www.schools.utah.gov/cnp/National-School-Lunch-Program.aspx>

School Breakfast Homepage: <http://www.schools.utah.gov/cnp/National-School-Breakfast-Program.aspx>

Forms: <http://www.schools.utah.gov/cnp/National-School-Lunch-Program/applications.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sharing information form, guide to children with special dietary needs
- English, Spanish, and link to USDA translations
- We reviewed Utah's notification of verification, notification of approval/denial, and notification of direct certification in September 2011, but these forms are no longer online

## Vermont

School Meals Homepage:

[http://education.vermont.gov/new/html/pgm\\_nutrition/school\\_nutrition.html](http://education.vermont.gov/new/html/pgm_nutrition/school_nutrition.html)

Forms:

[http://education.vermont.gov/new/html/pgm\\_nutrition/school\\_nutrition/program\\_info.html](http://education.vermont.gov/new/html/pgm_nutrition/school_nutrition/program_info.html)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, notification of approval/denial, notification of direct certification, notification of verification, notification of changes in benefits
- Link to USDA translations

- Link to October 2011 USDA eligibility manual

## Virginia

School Meals Homepage: <http://www.doe.virginia.gov/support/nutrition/programs/index.shtml>

## Washington

School Meals Homepage: <http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/default.aspx>

Forms: <http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/default.aspx> (Under “Resources”)

- For school year 2011-2012
- Parent/household letter, instructions (“What must be on the application?”), application, income eligibility guidelines

Policy memos: <http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/Bulletins.aspx>

Training materials on NSLP:

<http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/TrainingMaterials.aspx>

## West Virginia

School Nutrition Homepage: <http://wvde.state.wv.us/nutrition/snp.html>

Forms: <http://bit.ly/TEV6Cs>

- For school year 2011-2012
- Parent/household letter, instructions, application, notice of approval/denial, income eligibility guidelines

## Wisconsin

School Meals Homepage: <http://dpi.wi.gov/fns/>

School Lunch Homepage: <http://dpi.wi.gov/fns/nslp1.html>

School Breakfast Homepage: <http://dpi.wi.gov/fns/sbp1.html>

Forms: <http://dpi.wi.gov/fns/fincou1.html>

- For school year 2011-2012
- Parent/household letter, instructions, application, sharing information form, notification of verification, notification of approval/denial, notification of direct certification, income eligibility guidelines, sample public release, fair hearing procedures, policy memos for administrators
- English, Spanish, Hmong, and link to USDA translations
- October 2011 USDA Eligibility Manual

## Wyoming

School Nutrition Homepage: <http://edu.wyoming.gov/Programs/nutrition.aspx>

School Lunch and Breakfast Homepage:

[http://edu.wyoming.gov/Programs/nutrition/national\\_school\\_lunch\\_program.aspx](http://edu.wyoming.gov/Programs/nutrition/national_school_lunch_program.aspx)

Forms: [http://edu.wyoming.gov/Programs/nutrition/national\\_school\\_lunch\\_program.aspx](http://edu.wyoming.gov/Programs/nutrition/national_school_lunch_program.aspx) (Under “Local Education Agency (LEA) Forms”)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sharing information form
- USDA tools for administrators, October 2011 USDA eligibility manual

## Appendix G

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### School District School Meals Program Web Sites<sup>118</sup>

Alphabetically by State for the 100 Largest Districts

#### Mobile County Schools, AL

School Meals Homepage:

<http://www.mcpss.com/Default.asp?DivisionID=2139&DepartmentID=2307&SubDepartmentID=0&keyword=lunch>

Policy Handbook (click “CNP student info”):

<http://www.mcpss.com/Default.asp?PN=DocumentUploads&L=2&DivisionID=2139&DepartmentID=2307&LMID=90512&ToggleSideNav=ShowAll>

Online application: <https://mealapplication.mcpss.com/>

- Letter precedes the application
- English and Spanish

#### Anchorage School District, AK

School Meals Homepage: <http://www.asdk12.org/menus/>

Forms: <http://www.asdk12.org/menus/frp.asp>

- For school year 2011-2012
- Parent/household letter, instructions, application, FAQ, income eligibility guidelines
- English, Spanish, Hmong, Korean, Samoan, and Tagalog

#### Mesa Unified, AZ

School Meals Homepage: <http://www.mpsaz.org/food/>

#### Tucson Unified, AZ

School Meals Homepage: <http://www.tusd.k12.az.us/contents/depart/food/index.asp>

School Lunch Homepage: <http://www.tusd.k12.az.us/contents/depart/food/lunch.asp>

Forms: <http://www.tusd.k12.az.us/contents/depart/food/freereduced.asp>

#### Capistrano Unified, CA

School Meals Homepage: <http://nutrition-capousd-ca.schoolloop.com/>

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<sup>118</sup> The materials described in this appendix were available between September 2011 and March 2012 when we conducted our review.

Forms: [http://nutrition-capousd-ca.schoolloop.com/cms/page\\_view?d=x&piid=&vpid=1274164544873](http://nutrition-capousd-ca.schoolloop.com/cms/page_view?d=x&piid=&vpid=1274164544873)

- For school year 2011-2012
- Parent/household letter, application, income eligibility guidelines
- English and Spanish

Online Application: [www.lunchapplication.com](http://www.lunchapplication.com)

- Letter precedes the application
- English and Spanish

### **Corona-Norco Unified, CA**

Child Nutrition Homepage: <http://www.cnusd.k12.ca.us/page/94>

### **Elk Grove Unified, CA**

Breakfast and Lunch Homepage: [http://www.egusd.net/students\\_parents/menus.cfm](http://www.egusd.net/students_parents/menus.cfm)

Forms: <http://www.egusd.net/nutrition/applications.html>

- For school year 2011-2012
- Parent/household letter, instructions (from 2010-2011), income eligibility guidelines, FAQ

### **Fresno Unified, CA**

School Meals Homepage:

<http://www.fresnounified.org/dept/operations/food/Menus/Forms/AllItems.aspx>

Garden Grove Unified, CA

School Meals Homepage: [http://www.ggusd.k12.ca.us/departments/food\\_services/index.htm](http://www.ggusd.k12.ca.us/departments/food_services/index.htm)

Forms: <http://www.ahigherlevel.com/healtheliving/gardengrove/documentassignments/index/>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English, Spanish, Vietnamese, Korean

### **Long Beach Unified, CA**

School Meals Homepage:

[http://www.lbusd.k12.ca.us/Main\\_Offices/Business\\_Services/Nutrition\\_Services/](http://www.lbusd.k12.ca.us/Main_Offices/Business_Services/Nutrition_Services/)

Forms:

[http://www.lbusd.k12.ca.us/Main\\_Offices/Business\\_Services/Nutrition\\_Services/meal\\_app.cfm](http://www.lbusd.k12.ca.us/Main_Offices/Business_Services/Nutrition_Services/meal_app.cfm)

- For school year 2011-2012
- Parent/household letter, application checklist, public release, income eligibility guidelines, meal

- application help center flyer, FAQ online
- English, Spanish, and Khmer

### **Los Angeles Unified, CA**

School Meals Homepage: <http://cafe-la.lausd.net/>

Forms: [http://cafe-la.lausd.net/Meal\\_Programs/Meal\\_Applications](http://cafe-la.lausd.net/Meal_Programs/Meal_Applications)

- For school year 2011-2012
- Application (Armenian, Chinese, Korean, Russian, and Vietnamese), sample application brochure (English and Spanish), how to apply video (English and Spanish)

### **Sacramento City Unified, CA**

School Meals Homepage: <http://www.scusd.edu/nutrition-services>

Menus: <http://www.scusd.edu/school-menus>

Online Application: <http://mealapp.scusd.edu/fma/>

- Letter precedes the application

### **San Bernardino City Unified, CA**

School Meals Homepage: <http://www.sbcusd.k12.ca.us/index.aspx?NID=437>

### **San Diego Unified, CA**

Homepage: <http://www.sandi.net/food>

Forms website: <http://www.sandi.net/site/Default.aspx?PageID=1020>

- 2010-2011 parent/household letter, 2011 news release
- English and Spanish

Online application: [https://www.applyforlunch.com/Home/DistrictRedirect/SAN\\_DIEGO](https://www.applyforlunch.com/Home/DistrictRedirect/SAN_DIEGO) (select state and school district)

- Letter precedes the application
- English and Spanish

### **San Francisco Unified, CA**

School Meals Homepage: <http://bit.ly/NH1AOL>

- FAQ

Online Application: <https://schoolmealapp.sfusd.edu/>

- Letter appears in FAQ section

- English, Spanish, and Chinese

### **San Juan Unified, CA**

School Meals Homepage: <http://www.sanjuan.edu/departments.cfm?subpage=8282>

Online Application: <https://mealapps.sanjuan.edu/default.aspx>

- Letter precedes the application
- English and Spanish

### **Santa Ana Unified, CA**

School Meals Homepage:

<http://www.schoolnutritionandfitness.com/index.php?sid=2111071947262188>

Forms:

<http://www.schoolnutritionandfitness.com/index.php?page=lunchapps&sid=2111071947262188>

- For school year 2011-2012
- Parent/household letter (English and Spanish), instructions, FAQ (English and Spanish), income eligibility guidelines

### **Cherry Creek, CO**

School Meals Homepage: <http://www.ccsdcafe.org/>

Online Application: <http://rocketscan.cherrycreekschools.org/fma>

- Letter precedes the application

### **Denver County Public Schools, CO**

School Meals Homepage: <http://foodservices.dpsk12.org/nutrition.html>

Free and Reduced Price Information: <http://foodservices.dpsk12.org/freereducedinfo.html>

- FAQ

### **Douglas County, CO**

School Meals Homepage: <https://www.dcsdk12.org/nutritionservices/index.htm>

### **Jefferson County, CO**

School Meals Homepage: [http://www.jeffcopublicschools.org/food\\_services/index.html](http://www.jeffcopublicschools.org/food_services/index.html)

- Eligibility information, instructions (Russian and Vietnamese)

Online application: <https://www.applyforlunch.com/Home/PickDistrict> (select state and school district)

- Letter precedes the application
- English, Spanish, and Russian

### **Brevard County School District, FL**

School Meals Homepage: <http://foodservices.brevard.k12.fl.us/>

Forms: <http://bit.ly/N3GcaG>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, notice to pre-K and kindergarten students

Online application: <http://bit.ly/NBA1Mv>

- Letter appears on forms webpage (above)

### **Broward County School District, FL**

School Meals Homepage: <http://www.broward.k12.fl.us/foodservice/>

Forms: <http://www.broward.k12.fl.us/foodservice/freereduced.htm>

- Parent/household letter (“notice of policy”), FAQ, flyer
- English, Spanish, Creole, and Portuguese applications are available at schools (not online)

Online application:

[https://www.applyforlunch.com/Home/DistrictRedirect/BROWARD\\_COUNTY](https://www.applyforlunch.com/Home/DistrictRedirect/BROWARD_COUNTY) (select state and school district)

- Letter precedes the application
- English, Spanish, Creole, and Portuguese

### **Dade County School District, FL**

Meals page: <http://nutrition.dadeschools.net/freereduced.html>

- FAQ

School Lunch Homepage: <http://nutrition.dadeschools.net/lunchpgm.html>

School Breakfast Homepage: <http://nutrition.dadeschools.net/brkfstpgm.html>

Forms for Administrators: <http://nutrition.dadeschools.net/documents.asp>

### **Duval County School District, FL**

School Meals Homepage: <http://www.duvalschools.org/static/students/lunch/index.asp>

Forms (click on “Free and Reduced Lunch Info” on homepage, or use this link):  
[http://www.duvalschools.org/static/students/lunch/downloads/Application\\_Package.pdf](http://www.duvalschools.org/static/students/lunch/downloads/Application_Package.pdf)

- For school year 2011-2012
- Parent/household letter, instructions, application

Online Application: <https://free-reduced-lunch.duvalschools.org/>

- Click “General Instructions” at top of page for letter

### **Hillsborough County School District, FL**

School Meals Homepage: <http://www.sdhc.k12.fl.us/sns/>

Online Application: [http://www.sdhc.k12.fl.us/sns/Application\\_Info\\_Eng.asp](http://www.sdhc.k12.fl.us/sns/Application_Info_Eng.asp)  
<http://frapp.sdhc.k12.fl.us/> (English direct link)  
[http://frapp.sdhc.k12.fl.us/lfserver/FRApplcation\\_SPA](http://frapp.sdhc.k12.fl.us/lfserver/FRApplcation_SPA) (Spanish direct link)

- FAQ
- English, Spanish, link to USDA translations

### **Lee County School District, FL**

School Meals Homepage: <http://nutrition.leeschools.net/>

Forms: [http://nutrition.leeschools.net/lunch\\_menu.htm](http://nutrition.leeschools.net/lunch_menu.htm)

- FAQ, income eligibility guidelines

Online Application (direct link): <https://rocketscan.leeschools.net/>

- Letter precedes the application
- English and Spanish

### **Orange County School District, FL**

School Meals Homepage: <https://www.ocps.net/op/food/Pages/default.aspx>

Forms: <https://www.ocps.net/op/food/Pages/FreeandReduced.aspx>

- Application instructions, FAQ (English and Spanish)

Online Application: <https://mealapps.ocps.net/lfserver/FRAppl>

- Clicking “General Instructions” yields a letter to parents from Duval County, FL

### **Osceola County, FL**

School Meals Homepage: <http://www.osceola.k12.fl.us/depts/cg/Index.asp>

Online Application: [http://www.osceola.k12.fl.us/depts/cg/OnlineFree\\_Reduced.asp](http://www.osceola.k12.fl.us/depts/cg/OnlineFree_Reduced.asp),  
[https://mealapps.osceola.k12.fl.us/lfserver/EFORM\\_English\\_2012](https://mealapps.osceola.k12.fl.us/lfserver/EFORM_English_2012) (direct link)

### **Palm Beach School District, FL**

School Meals Homepage: <http://www.palmbeach.k12.fl.us/sfs/parent/>

Online Application: <http://www.palmbeachschools.org/sfs/MealApplicationInformation.asp>  
<https://mealapps.palmbeach.k12.fl.us/> (direct link)

- Income eligibility guidelines, FAQ
- Letter precedes the application
- Online application in English and Spanish
- Printed application in English, Spanish, and Creole is available at school sites

### **Pasco County Schools, FL**

School Meals Homepage: <http://www.pasco.k12.fl.us/nutrition/>

- Information for households, income eligibility guidelines

Online Application: [http://www.pasco.k12.fl.us/nutrition/free\\_reduced](http://www.pasco.k12.fl.us/nutrition/free_reduced),  
[http://www.pasco.k12.fl.us/nutrition/free\\_reduced/application/](http://www.pasco.k12.fl.us/nutrition/free_reduced/application/) (direct link)

- Letter precedes the application
- FAQ
- English and Spanish

### **Pinellas County Schools, FL**

Food Service Homepage:

[https://www.pcsb.org/index.php?option=com\\_content&view=article&id=111&Itemid=713](https://www.pcsb.org/index.php?option=com_content&view=article&id=111&Itemid=713)

Online Application:

[https://www.applyforlunch.com/Home/DistrictRedirect/PINELLAS\\_COUNTY](https://www.applyforlunch.com/Home/DistrictRedirect/PINELLAS_COUNTY) (select state and school district)

- Letter precedes the application
- English and Spanish

### **Polk County Public Schools, FL**

Student Nutrition Homepage: <http://www.polk-fl.net/parents/generalinformation/nutrition.htm>

### **Seminole County Public Schools, FL**

Food Services Homepage: <http://foodservice.scps.k12.fl.us/>

Online Application: [http://foodservice.scps.k12.fl.us/applicacion/10-11/free\\_reduced.html](http://foodservice.scps.k12.fl.us/applicacion/10-11/free_reduced.html)

## Volusia, FL

Free and Reduced Price Homepage (click “Free & Reduced Meals”):

<http://blackboard.volusia.k12.fl.us/webapps/portal/frameset.jsp>

Forms (click “Free & Reduced Meals”): <http://myvolusiaschools.org/schoolwaycafe/Pages/Free-and-Reduced-Meal-Applications.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English and Spanish

Online Application: [https://mealapps.volusia.k12.fl.us/lfserver/VCS\\_FRAAPP\\_ENG\\_11-12](https://mealapps.volusia.k12.fl.us/lfserver/VCS_FRAAPP_ENG_11-12)  
(English direct link), [https://mealapps.volusia.k12.fl.us/lfserver/VCS\\_FRAAPP\\_SPA\\_12-13](https://mealapps.volusia.k12.fl.us/lfserver/VCS_FRAAPP_SPA_12-13)  
(Spanish direct link)

- Letter on Forms page (above)
- English and Spanish

## Atlanta Public Schools, GA

School Meals Homepage: <http://www.atlantapublicschoolsnutrition.us/>

Forms:

<http://www.atlantapublicschoolsnutrition.us/index.php?page=lunchapps&sid=0707092223267041>

- Parent/household letter, instructions, FAQ, income eligibility guidelines

Online Application:

<https://www.schoollunchapp.com/Terms.aspx?host=atlantapublic.schoollunchapp.com&apply=1>

- Letter precedes the application
- English and Spanish

## Clayton County Public Schools, GA

School Meals Homepage: <http://www.clayton.k12.ga.us/departments/schoolnutrition/>

Forms: <http://www.clayton.k12.ga.us/departments/schoolnutrition/frlunchforms.asp>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English and Spanish

## Cobb County Schools, GA

Food and Nutrition Homepage: <http://www.cobbk12.org/centraloffice/foodservices/index.htm>

Online Application: <http://www.cobbk12.org/centraloffice/foodservices/freeRed.htm>,

<http://mealapps.cobbk12.org/> (direct link)

- Letter precedes the application
- FAQ
- English, Spanish, and link to USDA translations

### **DeKalb County Schools, GA**

School Meals Homepage: <http://www.dekalb.k12.ga.us/instruction/foodservices>

Forms: <http://www.dekalb.k12.ga.us/instruction/foodservices> (click “application” under “Free and Reduced Meals”)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English and Spanish

### **Fulton County Schools, GA**

School Meals Homepage: <http://fultonschools.org/dept/schoolnutrition/Default.aspx>

Free and Reduced Information:

[http://fultonschools.org/dept/schoolnutrition/free\\_reduced\\_fre.aspx](http://fultonschools.org/dept/schoolnutrition/free_reduced_fre.aspx)

- FAQ, application cover page, and income eligibility guidelines

Online Application:

<https://www.schoollunchapp.com/Terms.aspx?host=fulton.schoollunchapp.com&apply=1>

- Letter precedes the application
- English and Spanish

### **Gwinnett County Schools, GA**

Forms: <http://www.gwinnett.k12.ga.us/gcsnp.nsf/pages/FreeandReducedInfo1~About>

- For school year 2011-2012
- Parent/household letter, instructions, FAQ
- English, Spanish, and link to USDA

Online Application: <http://gwinnett.schoollunchapp.com/>

- Letter precedes the application
- English and Spanish

### **Hawaii Department of Education, HI**

Food Services Homepages: <http://doe.k12.hi.us/schooloffice/foodservices.htm>,  
<http://ohcnp.k12.hi.us/>

### **Chicago Public School District, IL**

School Meals Homepage:

[http://www.cps.edu/Programs/Wellness\\_and\\_transportation/Pages/NutritionProgram.aspx](http://www.cps.edu/Programs/Wellness_and_transportation/Pages/NutritionProgram.aspx)

### **Jefferson County Schools, KY**

School Meals Homepage: <http://www.jefferson.k12.ky.us/Departments/NutritionServices/>

Forms: <http://www.jefferson.k12.ky.us/Departments/NutritionServices/frlunch/index.html>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English and Spanish

### **Boston Public Schools, MA**

School Meals Homepage: <http://www.bostonpublicschools.org/meals>

Forms: <http://www.bostonpublicschools.org/meals> (scroll down to “Applications for Free and Reduced Price Meals”)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English, Cape Verdean Creole, Chinese, Haitian Creole, Portuguese, Somali, Spanish, Vietnamese (view from school district “Welcome” page by selecting language and then navigating to school meals page)

### **Anne Arundel County, MD**

School Meals Homepage: <http://www.aacps.org/nutrition/>

Forms: <http://www.aacps.org/nutrition/meal.asp>

- For school year 2011-2012
- Instructions, FAQ, income eligibility guidelines
- English and Spanish

### **Baltimore City Public Schools, MD**

Food and Nutrition Homepage: <http://www.baltimorecityschools.org/Page/255>

Forms: <http://www.baltimorecityschools.org/Page/15020>

- For school year 2011-2012
- Parent/household letter, instructions, income eligibility guidelines

Online Application: <http://mealapp.bcps.k12.md.us/>

## Baltimore County Public Schools, MD

School Meals Homepage: <http://www.bcps.org/offices/ofns/>

Forms: [http://www.bcps.org/offices/ofns/free\\_reduced\\_program.html](http://www.bcps.org/offices/ofns/free_reduced_program.html)

- For school year 2011-2012
- Parent/household letter, instructions
- Spanish or Chinese translations available by calling the school district

## Howard County Public Schools, MD

School Meals Homepage: <http://www.hcpss.org/foodservice/>

Free and Reduced Homepage: <http://www.hcpss.org/foodservice/free2.shtml>

- Income eligibility guidelines

Online Application:

[https://www.applyforlunch.com/Home/DistrictRedirect/HOWARD\\_COUNTY](https://www.applyforlunch.com/Home/DistrictRedirect/HOWARD_COUNTY) (select state and school district)

- Letter precedes the application

## Montgomery County Public Schools, MD

School Meals Homepage: <http://www.mcps.k12.md.us/departments/foodserv/farms/intro.shtm>

Forms: <http://www.montgomeryschoolsmd.org/departments/foodserv/farms/application.shtm>

- For school year 2011-2012
- Parent/household letter, application, sharing information form
- English, Spanish, French, Korean, Chinese, Vietnamese, and Portuguese
- FAQ and income eligibility guidelines (click links on left under “Free & Reduced Price Meals Information”)

Application Instructions:

<http://www.montgomeryschoolsmd.org/departments/foodserv/farms/engage.html>

## Prince George’s County Public Schools, MD

School Meals Homepage: <http://www.pgcps.org/~lunch/index.html>

## Detroit City Schools, MI

School Meals Homepage: <http://detroitk12.org/admin/ppo/foodservice/>

- Letter explaining universal eligibility of students for meals

## Omaha Public Schools, NE

Nutrition Services Homepage: <http://bit.ly/QJTH0C>

### **Clark County School District, Las Vegas, NV**

School Meals Homepage: <http://www.ccsd.net/departments/food-service/>

School Lunch Program Homepage: <http://www.ccsd.net/departments/food-service/national-school-lunch-program>

Online Application: <http://www.ccsd.net/departments/food-service/free-reduced-online-application>, [https://www.applyforlunch.com/Home/DistrictRedirect/CLARK\\_COUNTY](https://www.applyforlunch.com/Home/DistrictRedirect/CLARK_COUNTY) (direct link, select state and school district)

- Letter precedes the application
- Instructions, income eligibility guidelines
- English and Spanish

### **Washoe County School District, NV**

School Meals Homepage: <http://www.washoecountyschools.org/parents/nutrition-services>

School Lunch Homepage: <http://www.washoecountyschools.org/parents/nutrition-services/nslp>

- FAQ
- Link to Aramark “Meal Sense” website: <http://www.mealsense.org/washoe/default.aspx>
  - The mealsense website contains a link to USDA’s translated applications

### **Albuquerque Public Schools, NM**

Food and Nutrition Services Homepage: <http://www.aps.edu/food-and-nutrition-services>

Online application: <http://www.aps.edu/food-and-nutrition-services/free-and-reduced-price-meals>

- Letter precedes the application
- English and Spanish

### **New York City Department of Education, NY**

School Meals Homepage: <http://www.opt-osfns.org/osfns/meals/default.aspx>

Forms: <http://www.opt-osfns.org/osfns/meals/default.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, sample application, income eligibility guidelines
- Eligibility guidelines (for administrators; English)
- English, Spanish, Arabic, Bengali, Chinese, French, Greek, Haitian-Creole, Hebrew, Italian, Korean, Russian, Hindi, Polish, and Urdu

Online Application: <http://www.nyc.gov/accessnyc> (Access NYC, which has applications for many programs)

Online Application #2: <http://nyc.applyforlunch.com/> (select state and school district)

- Note that this application was treated as NYC's online application for the purposes of this paper
- Letter precedes the application

### **Charlotte-Mecklenburg Schools, NC**

School Meals Homepage:

<http://www.cms.k12.nc.us/cmsdepartments/cns/Pages/BreakfastandLunchPrograms.aspx>

Forms: <http://www.cms.k12.nc.us/cmsdepartments/cns/Pages/documents.aspx> (scroll down to "other forms")

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, school meals flier
- English and Spanish

### **Cumberland County Schools, NC**

School Meals Homepage: <http://cn.ccs.k12.nc.us/information/>

Free and Reduced Information: <http://cn.ccs.k12.nc.us/lunch-application-information/>

### **Guilford County, Greensboro, NC**

School Meals Homepage: <http://www.gcsnc.com/education/school/school.php?sectionid=33963&>

Forms:

<http://www.gcsnc.com/education/components/scrapbook/default.php?sectiondetailid=266552&>

- For school year 2011-2012
- Parent/household letter, instructions, sample application, income eligibility guidelines
- English and Spanish

### **Wake County Public Schools, NC**

School Meals Homepage: <http://www.wcpss.net/child-nutrition/>

Forms: [http://www.wcpss.net/child-nutrition/free\\_reduced\\_process.html](http://www.wcpss.net/child-nutrition/free_reduced_process.html)

- For school year 2011-2012
- Parent/household letter, instructions, sample application, income eligibility guidelines
- English and Spanish

### **Winston-Salem /Forsyth County Public Schools, NC**

Child Nutrition Homepage: <http://wsfcs.k12.nc.us/Domain/18>

### **Cleveland Public Schools, OH**

School Meals Homepage: <http://www.cmsdnet.net/Resources/Students/LunchMenus.aspx>

### **Columbus City Schools, OH**

School Meals Homepage: <http://www.columbus.k12.oh.us/index.html>

Online Application: <http://www.schoollunchapp.com/> (select state and school district)

- Letter precedes the application
- English and Spanish

### **Philadelphia City School District, PA**

School Meals Homepage: <http://webgui.phila.k12.pa.us/offices/f/foodservices>

- Philadelphia has a Universal Feeding Program

### **Greenville County Schools, SC**

School Meals Homepage:

<http://www.schoolnutritionandfitness.com/index.php?sid=0511081654589176>

Free and Reduced:

<http://www.schoolnutritionandfitness.com/index.php?page=lunchapps&sid=0511081654589176>

- Income eligibility guidelines, FAQ

Online application: <http://greenville.schoollunchapp.com/>

- Letter precedes the application
- English and Spanish

### **Davidson County (Metropolitan Nashville Public Schools), TN**

School Meals Homepage: <http://www.mnps.org/Page56795.aspx>

### **Knox County Schools, TN**

School Meals Homepage:

[http://fs.knoxschools.org/modules/groups/integrated\\_home.phtml?gid=514283&sessionid=2021d18b8f024e22ff961beb1f495253](http://fs.knoxschools.org/modules/groups/integrated_home.phtml?gid=514283&sessionid=2021d18b8f024e22ff961beb1f495253)

Free and Reduced Homepage:

<http://fs.knoxschools.org/modules/cms/pages.phtml?pageid=122484&&sessionid=2021d18b8f024e22ff961beb1f495253>

- FAQ

Online Application: <http://knox.schoollunchapp.com/>

- Letter precedes the application
- English and Spanish

### **Memphis City School District, TN**

School Meals Homepage: [http://www.mcsk12.net/aboutmcs\\_nutrition\\_services.asp](http://www.mcsk12.net/aboutmcs_nutrition_services.asp)

Forms: [http://www.mcsk12.net/aboutmcs\\_nutrition\\_services\\_la.asp](http://www.mcsk12.net/aboutmcs_nutrition_services_la.asp)

- For school year 2011-2012
- Parent/household letter/instructions, application, income eligibility guidelines

### **Shelby County School District, TN**

School Meals Homepage: <http://www.scscafe.com/>

Forms: <http://www.scscafe.com/FreeReduced/tabid/1114/Default.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, sample application, income eligibility guidelines

Online application: <http://nutrition.scsk12.org/Register.aspx>

- Letter precedes the application
- English and Spanish

### **Aldine Independent School District, TX**

School Meals Homepage: <http://www.aldinecafe.com/>

Forms: <http://www.aldinecafe.com/FreeReduced/tabid/1160/Default.aspx>

- For school year 2011-2012
- Parent/household letter/instructions, application, income eligibility guidelines
- English and Spanish

Online Application: <http://freereduced.aldine.k12.tx.us/>

- Letter in FAQ section
- English and Spanish

### **Arlington Independent School District, TX**

School Meals Homepage: <http://www.aisd.net/aisd/Default.aspx?alias=www.aisd.net/aisd/fns>

Forms: <http://www.aisd.net/aisd/FreeReduced/tabid/9578/Default.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, FAQ, “What do I need to know?” document
- English, Spanish, and Vietnamese

Online Application:

<https://www.schoollunchapp.com/Terms.aspx?host=arlingtonisd.schoollunchapp.com&apply=1>

- Letter precedes the application
- English and Spanish

### **Austin Independent School District, TX**

School Meals Homepage: <http://www.austinisd.org/schools/menus/index.phtml>

Online Application: <http://www.austinisd.org/schools/menus/benefits.phtml>,  
[https://mealapps.austinisd.org/lfserver/FRA\\_Application](https://mealapps.austinisd.org/lfserver/FRA_Application) (direct link)

### **Brownsville Independent School District, TX**

School Meals Homepage: <http://www.bisd.us/FoodServices/>

Forms: <http://www.bisd.us/FoodServices/> (Select “Letter to Parents”)

- For school year 2011-2012
- Letter explaining that all households receive free school meals
- English and Spanish

### **Conroe Independent School District, TX**

School Meals Homepage: <http://childnutrition.conroeisd.net/>

Free and Reduced Information:

<http://childnutrition.conroeisd.net/Free%20and%20Reduced%20Information>

Online Application: <https://www.applyforlunch.com/Home/PickDistrict?zipCode=&state=TX>  
(select state and school district)

- Letter precedes the application

### **Cypress-Fairbanks Independent School District, TX**

School Meals Homepage: <http://www.cfsd.net/dept2/food/default.htm>

Free and reduced FAQ: <http://www.cfsd.net/dept2/food/html/faq.htm>

- English and Spanish

Online Application: <http://freeandreduced.cfishd.net/>

- Letter precedes the application
- English and Spanish

### **Dallas Independent School District, TX**

Food & Child Nutrition Services Homepage: <http://www.dallasisd.org/Page/929>

Free/Reduced Meals Page: <http://www.dallasisd.org/site/Default.aspx?PageID=931>

Online Application: <http://foodapp.dallasisd.org/welcome.aspx>

- Letter in FAQ section
- English and Spanish

### **El Paso Independent School District, TX**

School Meals Homepage: [http://www.episd.org/\\_departments/food\\_services/](http://www.episd.org/_departments/food_services/)

Free and Reduced Information: [http://www.episd.org/\\_departments/food\\_services/meal-programs.php](http://www.episd.org/_departments/food_services/meal-programs.php)

### **Fort Bend Independent School District, TX**

Child Nutrition Homepage: <http://www.fortbendisd.com/departments/auxiliary/child-nutrition/child-nutrition>

Free and Reduced Meals Homepage: <http://www.fortbendisd.com/departments/auxiliary/child-nutrition/free-reduced-meals>

- FAQ

### **Fort Worth Independent School District, TX**

School Meals Homepage: <http://www.fwisd.org/nutrition/Pages/default.aspx>

Online Application: [http://www.fwisd.org/nutrition/Pages/free\\_reduced.aspx](http://www.fwisd.org/nutrition/Pages/free_reduced.aspx),  
[https://nutrition.fwisd.org/lfserver/EFORM\\_ENG](https://nutrition.fwisd.org/lfserver/EFORM_ENG) (English direct link),  
[https://nutrition.fwisd.org/lfserver/EFORM\\_SPA](https://nutrition.fwisd.org/lfserver/EFORM_SPA) (Spanish direct link)

- English and Spanish

### **Garland Independent School District, TX**

School Meals Homepage: [http://www.garlandisd.net/departments/food\\_services/index.asp](http://www.garlandisd.net/departments/food_services/index.asp)

Forms: [http://www.garlandisd.net/departments/food\\_services/freeandreducedmeals.asp](http://www.garlandisd.net/departments/food_services/freeandreducedmeals.asp)

- For school year 2011-2012
- Instructions, application, FAQ

- English and Spanish

### **Houston Independent School District, TX**

School Meals Homepage: <http://www.houstonisd.org/portal/site/FoodServices>

FAQ:

<http://www.houstonisd.org/portal/site/FoodServices/menuitem.e2ca66b4b41359371a9c5010e041f76a/?vgnnextoid=669d7c67493ff010VgnVCM10000028147fa6RCRD>

Online Application: <http://www.mealapps.houstonisd.org>

- Letter precedes the application
- English and Spanish

### **Katy Independent School District, TX**

Homepage: <http://www.schoolnutritionandfitness.com/index.php?sid=1406111853310257>

Forms:

<http://www.schoolnutritionandfitness.com/index.php?page=lunchapps&sid=1406111853310257>

- For school year 2011-2012
- Application, income eligibility guidelines, FAQ
- English and Spanish

Online Application: <https://freereduced.katyisd.org/>

- Letter in “FAQ” section
- English and Spanish

### **Lewisville Independent School District, TX**

Homepage:

[http://www.lisd.net/apps/pages/index.jsp?uREC\\_ID=128782&type=d&termREC\\_ID=&pREC\\_ID=254984](http://www.lisd.net/apps/pages/index.jsp?uREC_ID=128782&type=d&termREC_ID=&pREC_ID=254984)

Forms:

[http://www.lisd.net/apps/pages/index.jsp?uREC\\_ID=128782&type=d&termREC\\_ID=&pREC\\_ID=315523](http://www.lisd.net/apps/pages/index.jsp?uREC_ID=128782&type=d&termREC_ID=&pREC_ID=315523)

- For school year 2011-2012
- Instructions, application, link to Aramark “Meal Sense” website (<http://mealsense.org/Lewisville>)
- Meal Sense website contains a link to USDA’s translations
- English and Spanish

### **North East Independent School District, TX**

School Nutrition Homepage: <http://www.neisd.net/foodserv/HTML/overview.html>

Forms: [http://www.neisd.net/foodserv/HTML/Free\\_Reduced\\_Meals.html](http://www.neisd.net/foodserv/HTML/Free_Reduced_Meals.html)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English and Spanish

Online Application: <http://www.neisd.net/foodserv/HTML/MealApplicationGuidelines.htm>,  
[https://mealapps.neisd.net/lfserver/NEISD\\_FRAAPP\\_ENG\\_2012-2013](https://mealapps.neisd.net/lfserver/NEISD_FRAAPP_ENG_2012-2013) (direct link)

- Parent/household letter, instructions, and income eligibility guidelines appear on page leading up to online application (not direct link)
- English and Spanish

### **Northside Independent School District, TX**

School Meals Homepage: <http://www.nisd.net/business/child-nutrition>

Forms: <https://mealapp.nisd.net/Register.aspx>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English and Spanish

### **Pasadena Independent School District, TX**

School Meals Homepage:

<http://pasadena.tx.schoolwebpages.com/education/school/school.php?sectionid=1255&>

Free and Reduced Homepage:

<http://pasadena.tx.schoolwebpages.com/education/components/scrapbook/default.php?sectionid=85571&>

- FAQ, income eligibility guidelines

Online Application: <https://www.schoolunchapp.com/> (select state and school district)

- Letter precedes the application
- English and Spanish

### **Plano Independent School District, TX**

School Meals Homepage: <http://www.pisd.edu/parents/nutrition/index.shtml>

San Antonio Independent School District, TX

School Meals Homepage: <http://www.saisd.net/dept/foodnutrition/>

Forms: <http://www.saisd.net/dept/foodnutrition/2-free-a-reduced>

- For school year 2011-2012
- Parent/household letter, FAQ, income eligibility guidelines
- English and Spanish

Online application: <https://fsapps.saisd.net/>

- Two parent/household letters are available (one in FAQ and the other in “Instructions/Letter”); note that they contradict each other on certain points (such as migrant, homeless, and runaway students)
- English and Spanish

### Alpine School District, UT

Homepage: <http://alpineschools.org/departments/nutrition-services-lunch>

Forms: <http://alpineschools.org/departments/nutrition-services-lunch> (Click “Free & Reduced Printable Application”)

- For school year 2011-2012
- Instructions, application, income eligibility guidelines, sharing information form
- English and Spanish

### Davis School District, UT

School Meals Homepage:

<http://www.davis.k12.ut.us/21381016112139957/site/default.asp?21381016112139957Nav=|&NoDeID=576>

Forms:

<http://www.davis.k12.ut.us/21381016112139957/blank/browse.asp?a=383&BMDRN=2000&BCOB=0&c=56389&21381016112139957Nav=|&NodeID=577>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sharing information form
- English and Spanish

### Granite School District, UT

School Foods Homepage:

<http://www.graniteschools.org/depart/businessservices/schoolfoods/Pages/default.aspx>

Forms: <http://bit.ly/UgH50a>, <https://www.applyforlunch.com/Home/PickDistrict/> (online application, select state and school district)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sharing information form
- English and Spanish

## Jordan School District, UT

School Meals Homepage: <http://departments.jordandistrict.org/nutritionservices/>

Forms: <http://departments.jordandistrict.org/nutritionservices/application.html>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sharing information form
- English and Spanish

## Chesterfield County Public Schools, VA

Food and Nutrition Homepage: <http://mychesterfieldschools.com/about/food-and-nutrition-services/>

Forms: <http://mychesterfieldschools.com/about/food-and-nutrition-services/food-forms/>

- For school year 2011-2012
- Instructions, application
- English and Spanish

## Fairfax County Public Schools, VA

Food and Nutrition Homepage: [http://www.fcps.edu/fs/food/food\\_at\\_school/index.shtml](http://www.fcps.edu/fs/food/food_at_school/index.shtml)

Forms: [http://www.fcps.edu/fs/food/food\\_at\\_school/free\\_reduced.shtml](http://www.fcps.edu/fs/food/food_at_school/free_reduced.shtml)

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines, sharing information form (English)
- English, Arabic, Farsi, Korean, Spanish, Urdu, and Vietnamese

## Henrico County Public Schools, VA

School Meals Homepage:  
<http://www.henrico.k12.va.us/HealthNutrition/NutritionServices/index.html>

Forms:  
<http://www.henrico.k12.va.us/HealthNutrition/NutritionServices/ApplicationInformation.html>

- For school year 2011-2012
- Parent/household letter, application, instructions, income eligibility guidelines
- English. Spanish applications available by calling district

## Loudoun County Public Schools, VA

School Meals Home: <http://www.lcps.org/Page/68376>

Forms: <http://cmsweb1.lcps.org/Page/73936>

- For school year 2011-2012
- Parent/household letter, instructions, application, income eligibility guidelines
- English and Spanish

### Prince William County Public Schools, VA

School Meals Homepage: <http://pwcs.menus.schoolfusion.us/>

Forms: <http://pwcs.menus.schoolfusion.us/> (on the menu on the left side, click on “Meal Applications” then “English applications”)

- For school year 2011-2012
- Parent/household letter, instructions, FAQ
- Link to online application is at very bottom of letter/instructions

Online Application: [https://mealapp.pwcs.edu/lfserver/EFORM\\_ENG](https://mealapp.pwcs.edu/lfserver/EFORM_ENG)

- Instructions available both at the “Forms” website and by clicking “View Instructions” on the online application

### Virginia Beach City Schools, VA

School Meals Homepage: [http://www.vbschools.com/food\\_services/](http://www.vbschools.com/food_services/)

Free and Reduced Information: [http://www.vbschools.com/food\\_services/free\\_meals.asp](http://www.vbschools.com/food_services/free_meals.asp)

- Income eligibility guidelines

### Milwaukee Public Schools, WI

School Nutrition Home:

[http://mpsportal.milwaukee.k12.wi.us/portal/server.pt/comm/nutrition\\_services/385](http://mpsportal.milwaukee.k12.wi.us/portal/server.pt/comm/nutrition_services/385)

Forms:

[http://mpsportal.milwaukee.k12.wi.us/portal/server.pt/comm/nutrition\\_services/385/forms/43635](http://mpsportal.milwaukee.k12.wi.us/portal/server.pt/comm/nutrition_services/385/forms/43635)

- For school year 2011-2012
- Instructions, application, FAQ, parent flyer, income eligibility guidelines
- English and Spanish

Online Application: <http://www.sns.milwaukee.k12.wi.us/>

- Letter precedes the application
- English and Spanish

