



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of all School Child Nutrition Programs

FROM: Cheryl Resha, Education Manager
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: October 14, 2010

SUBJECT: Operational Memorandum #3-11
Questions Pertaining to the Processing of Free and Reduced Price Meal Applications

Recently, during a Child Nutrition Program Application Certification and Verification training, questions were raised regarding specifics to approving free and reduced price meal applications. The United States Department of Agriculture's Food and Nutrition Service (FNS) in Boston was contacted and below are FNS's responses. Please share this information with appropriate staff members.

- 1. In split-custody or joint-custody situations, where a child is living in two households during the week, if the child is directly certified or the child is categorically eligible because one of the parent/guardians completed an application and indicated that the child is receiving SNAP/TFA benefits, would the child's free benefit status be extended to all children in both households where he/she is residing if they are considered a family as defined by 7 CFR 245.2?**

Yes. If a child is determined eligible for free meals because he/she receives assistance benefits in one parent's household, he/she retains eligibility for free meals regardless of where the child is living for the remainder of the school year or certification period. When that child is residing in the second parent's household, they are members of that household/economic unit and because they were determined eligible for free meals based on their own receipt of assistance benefits, their free status extends to other children in that household. As a reference, attached are Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household.

- 2. On Connecticut's current free/reduced meal/milk application (as well as on USDA's prototype which may be found at <http://www.fns.usda.gov/cnd/frp/frp.process.htm>), there is a box that the person completing the application should check off indicating if the person in the household has no income. Many applications come in with income listed; however, not all of the boxes are checked indicating "no income." This could**

be because they are the children, or the parent/guardian forgot to check the box. Should the determining officials consider this an incomplete application if the “no income” box is checked for each person listed in the household? Page 19 in the *Eligibility Manual for School Meals* addresses this in Section E.

Technically, this is an incomplete application. However, if the determining official can reasonably conclude all income information has been obtained, then the application may be considered complete. Accordingly, the determining official should initial, date and record the reason for concluding that an individual listed has no income as well as include any written documentation that was used for his/her decision.

- 3. Can a determining official accept a faxed copy of the application from a parent/guardian? Determining officials can accept faxed copies of applications from other districts; however, attendees wanted to know if parents/guardians could fax the application in lieu of sending the original.**

No, there is no regulatory allowance for this. FNS suggests the LEA accept the faxed copy as a temporary measure until the original copy is received from the parent. Only the original signature will be considered legally binding. Since routine faxing measures do not include mechanisms to provide for legally binding electronic signatures on electronic transactions, FNS recommends that free and reduced price meal applications faxed directly from households not be accepted.

Questions pertaining to this memorandum may be directed to:

<i>COUNTY</i>	<i>CONSULTANT</i>	<i>EMAIL</i>	<i>PHONE</i>
Hartford and Windham	Teri Dandeneau	teri.dandeneau@ct.gov	860-807-2079
Litchfield and Middlesex	Fionnuala Brown	fionnuala.brown@ct.gov	860-807-2129
Fairfield and New London	Jackie Schipke	jackie.schipke@ct.gov	860-807-2123
New Haven and Tolland	Bob Zwack	robert.zwack@ct.gov	860-807-2081

CR:tdd

Attachment