

## **Free and Reduced Price Policy Certification of Acceptance Submission**

This policy is effective when it has been signed by an authorized Local Education Authority representative and upon State Agency approval.

Early Light Academy (Local Education Agency or governing body) responsible for administration of one or more schools referred to as the School Food Authority (SFA), has entered into an agreement to participate in the National School Breakfast Program, National School Lunch Program, and/or Special Milk Program and accepts responsibility for providing free and reduced price meals and/or free milk to eligible children in the schools under its jurisdiction.

The SFA assures the Utah State Board of Education-Child Nutrition Programs it will uniformly implement the following policy with respect to determining the eligibility of children for free and reduced price meals in each school building under its jurisdiction participating in the programs mentioned above. Program participation is captured on the site information sheet in CNPweb.

In fulfilling its responsibilities, the LEA agrees to the following:

- A. Primary Free and Reduced Price Eligibility Contact
  - a. The LEA will update the sponsor information sheet in CNPweb with the primary contact designated to make free and reduced price eligibility determinations.
  - b. The determining official will make free and reduced price eligibility determinations using the criteria outlined by USDA regulations, policy and the current year Eligibility Guidance for School Meals guidance.
- B. Nondiscrimination
  - a. That there will be no physical segregation of, or any other discrimination against, any child because of his/her inability to pay the full price of the meal or milk [7 CFR 245.8].
  - b. LEAs selling competitive foods during a meal service are encouraged to include in the description of how the cafeteria and meal service prevents overt identification of the children receiving free and reduced price meals or free milk.
  - c. The names of children eligible to receive free or reduced price meals or free milk shall not be published, posted, or announced in any manner, and there shall be no overt identification of any such children by use of special tokens or tickets, or by any other means.
  - d. Further assurance is given that children eligible for free or reduced price meals or free milk shall not be required to:
    - i. Work for their meals or milk.
    - ii. Use a separate lunchroom.
    - iii. Go through a separate serving line.

- iv. Enter the lunchroom through a separate entrance.
  - v. Eat meals or drink milk at a different time.
  - vi. Eat a meal different from the meal sold to children paying the full price for the same meal or drink milk different from that sold to children paying the full price.
  - e. That in the operation of Child Nutrition Programs, no child shall be discriminated against because of his or her race, sex, age, color, disability, national origin, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA (7 CFR 210 and 7 CFR 245) [7 CFR 15.1].
  - f. The State agency and LEA will ensure there are no barriers for participation in Child Nutrition Programs for Limited English Proficient (LEP) families and the State agency and LEA is required to communicate with parents and guardians in a language they can understand throughout the certification and verification processes.
- C. Income Eligibility Guidelines (IEGs)
- a. The LEA certifies the current school year Income Eligibility Guidelines (IEGs) are used to determine free, reduced or paid meal benefits. .
- D. Public Notification
- a. Near the beginning of each school year, a public *Media Release* will be distributed statewide by the Utah State Board of Education on behalf of all current National School Breakfast and/or National School Lunch Program sponsors.
  - b. LEAs entering into an agreement after the statewide public release will provide a public media release to the local newspaper, local unemployment office and any major employers contemplating large layoffs in the areas from which the school draws attendance [7 CFR 245.5].
- E. Free and Reduced Price Meal Applications
- a. The LEA may use the USDA or Utah State Board of Education *Free and Reduced Price Application* and letter templates.
  - b. The LEA will submit a copy of current year templates if the USDA or Utah State Board of Education Free and Reduced Price templates are not used [7 CFR 245.10(b)]. The state agency will review the forms and templates prior to the LEA sending to households.
- F. Informing Households
- i. To inform families about the availability of free and reduced price meals or free milk, the LEA will distribute *Information Letters to Households* of children attending the school [7 CFR 245.5(a)(1)]. CNPs. The information letter must be sent to households before children begin attending school.
    - 1. The information letters must include information as outlined in 7 CFR 245.5(a) including: Income Eligibility Guidelines, instructions on how to apply, general application information,

an explanation of assistance programs (SNAP, FDPIR, FEP) household eligibility, an explanation of Other Source Categorically Eligibility, an explanation of eligibility determinations, an explanation of the carryover policy and the full USDA Nondiscrimination Statement.

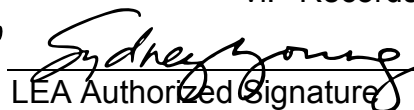
2. The letters may be distributed by the postal service, e-mailed to the parent or guardian, or included in information packets provided to students.
  - ii. The LEA understands information letters may not be sent to households at the end of the school year for the subsequent school year.
  - iii. The LEA does not accept and process applications before the federally defined school year, which begins on July 1 (year-round schools, however, may distribute the letters in June).
  - iv. The LEA enrolling new students after the start of the school year are provided an *Information Letter to Households, Free and Reduced Price Application*, and materials when they enroll.
- b. Direct Certification
- i. Direct certification allows LEAs to establish student eligibility using participating data from another approved program eliminating the need for an application from the household.
    1. During the duration of the USDA FNS Medicaid Demonstration project, the LEA will directly certify students identified as eligible for free or reduced price meals through Medicaid. The LEA will track and report Medicaid direct certification information by free and reduced categories as part of the demonstration project.
  - ii. The LEA ensures all households receive either a *Direct Certification Notice of Eligibility* of their child's approval or, for those not directly certified, an application for free and reduced price meal benefits [7 CFR 245.6].
  - iii. At a minimum, the LEA will utilize CNPweb direct certification matching system to identify exact and potential match students. Students may be directly approved based on their participation in a USDA/state approved assistance program.
  - iv. The CNPweb direct certification matches will occur a minimum of the first, third and sixth operating month of the school year.
- c. Other Source Categorically Eligible
- i. The LEA will provide an explanation to households with children who are categorically eligible under *Other Source Categorically Eligible* Programs to contact the school for assistance in receiving benefits and indicate the source of their status on the application.

- ii. Other Source Categorical Eligibility of a child does not convey eligibility to other children in the household.
  - 1. Homeless/Migrant/Runaway Children
    - a. The SFA will work with the migrant coordinator, homeless liaison or runaway provider to obtain a list or free and reduced price meal application for children determined to meet the established criteria for homeless, migrant or runaway. The list must include a child's name, effective date of eligibility determination, be dated and signed by the coordinator, liaison or provider. These children are directly certified for free meals for the school year.
  - 2. Foster Children
    - a. The LEA will notify households a *foster child* is categorically eligible for free meals and may be included as a member of the foster family if the foster family chooses to also apply for benefits for other children and an explanation that including children in foster care as household members can help other children in the household qualify for free or reduced price meals. If the foster family is not eligible for free or reduced price meal benefits, this does not prevent a foster child from receiving free meal benefits.
  - 3. Head Start or Eligible Pre-Kindergarten Program
    - a. Federal Head Start and any State-funded pre-kindergarten program that use eligibility criteria that are identical or more stringent than Federal Head Start [7 CFR 245.2].
    - b. A complete application will document the child's status with the Head Start or eligible pre-kindergarten program officials. Information must include children's names, indication of child's categorical eligibility status and signature of adult household member.
    - c. Eligibility of all Head Start enrollees through documentation provided by the Head Start program may include:
      - i. an approved Head Start application,
      - ii. a statement of Head Start enrollment, or
      - iii. a list of participants from a Head Start official.

G. Prevent Overt Identification

- a. The LEA will establish a procedure to collect money which prevents over identification.

- b. Point of service meal counting procedures will prevent overt identification of children receiving free or reduced priced meals, milk or a la carte foods (competitive foods). Payment collection methods are identified on the site information sheet in CNPweb.
  - c. The LEA will take steps to prevent disclosure of confidential free and reduced price eligibility information as required under 7 CFR 245.6(f-k).
- H. Hearing Procedures
- a. The LEA assures adherence to the hearing procedures outlined in the most current Eligibility Manual for School Meals and regulations (7 CFR 210 and 7 CFR 245.7).
  - b. The hearing official may not be the same person as the reviewing and/or the verification official.
- I. Verification of Applications
- a. Verification procedures and reporting will be in accordance with program regulations [7 CFR 245.6a]. All verification efforts must be completed no later than November 15<sup>th</sup> annually. The verification reports are entered and certified by the SFA no later than November 20<sup>th</sup> annually in CNPweb.
- J. Recordkeeping
- a. Program records documenting program benefits and meal counts are preserved for a minimum period of three years plus the current year, or three years plus the current year after a closed audit, and shall be made available for audits or program reviews.
  - b. Maintain a file of the following records to which they pertain:
    - i. Public media release identifying where the information was distributed;
    - ii. All eligibility determinations obtained through the Direct Certification Matching Process;
    - iii. All applications and documents to support homeless, migrant, head start, runaway;
    - iv. Records of all appeals
    - v. All notifications of eligibility determinations, including denial letters;
    - vi. Records of all verification efforts and resulting eligibility changes.

	Director
LEA Authorized Signature	Title

Sydney Young	8/2/2018
LEA Signee (Type or Print)	Date

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State Agency Signature	Title	Date
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**State Agency:**  Information updated in CNPweb  Final copy in permanent agreement file  
 Signed copy sent to LEA