

Child Income Eligibility Application

The Nutrition Training and Policy Team

Welcome

This training module will help you identify child income eligibility **regulations, requirements, and, best practices** as well as provide you specific instructions on how to properly complete the NC CACFP *Child Income Eligibility Application, or IEA*. This training is important because missing or incomplete IEAs could cost the center money. So, as you complete this training, keep in mind that reimbursement is disallowed for participants without a proper IEA.

The Code of Federal Regulations

There are various regulations concerning Child income eligibility. The following regulations are found in 7 CFR PART 226:

7 CFR 226.15(e) explains proper recordkeeping practices applicable to child *income eligibility* and warns of potential financial consequences resulting from improper maintenance of that information.

7 CFR 226.15(e)(2) states that all types of centers, except for emergency shelters and at-risk afterschool care centers, must maintain *information used to determine eligibility for free or reduced-price meals*.

7 CFR 226.23 (e)(1) explains that it is the institution's responsibility to distribute applications for free and reduced-price meals to all families of enrolled participants.

What we mean when we refer to the "**regulations**" is the Code of Federal Regulations or CFR. The CFR is a codification of general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government.

NC CACFP Child Income Eligibility Application Requirements

The NC CACFP has developed a single form that captures all required information for children participating in the CACFP. The Child Income Eligibility Application can be downloaded from the NC CACFP website and must meet the following requirements to be used to determine free or reduced meals:

- Be complete
- Be available
- Include the names of all household members
- Include the income of each household member
- Include last 4 digits of parent's or guardian's Social Security Number
- Be signed by a parent or guardian
- Be classified by the institution
- Be signed by the institution
- Be retained for three years plus the current year
- Be treated as confidential information
- Be updated annually

If a family does not return an application or returns an incomplete application, children on that application will automatically be classified as denied or paid.

Your institution indicates on the Annual Information Certification for Institutions whether applications are valid one year from the date that the parent signs or the date your institution signs

Exemptions from the Requirements

Here are three exemptions to IEA requirements:

1. At-risk afterschool care centers and emergency shelters are exempt from collecting Income Eligibility Applications.
2. A child participant is automatically eligible for free meals if *they are a foster child, receive SNAP, TANF, or FDPIR benefits, or are a Head Start participant.*
3. No Social Security Number is required if the parent or guardian indicates on the application that they don't have one.

Note: Head Start participants need only have a Head Start statement of income eligibility, or a statement of Head Start enrollment from an authorized Head Start representative. If you would like more information, CACFP Policy Memo 13-08 details Head Start eligibility for free meals in CACFP.

Using Our Child Income Eligibility Application

Please ensure that you are using the application for the current fiscal year when you enroll children in your program.

We recommend that you fill in the Institution Name, Agreement Number, and Facility Name found at the top of the form before making copies.

Under number 1, the participant's name and date of birth should be entered. There are two lines available if there are siblings applying for eligibility. If the family has more than two enrolled children, please attach a separate IEA with the additional children's names and dates of birth entered in question 1.

Under number 2, eligibility can be documented categorically, and an institution will receive the free rate of reimbursement for CACFP Meal benefits, if they participate in:

SNAP or Supplemental Nutrition Assistance Program;
TANF or Temporary Assistance to Needy Families; or
FDPIR or Food Distribution Program on Indian Reservations.

Under number 3, eligibility can be documented categorically if the participant qualifies as a foster child. Children can also categorically qualify if they are homeless. Certification from the agency that assisted with the evacuation, or that is providing shelter, is required to be kept on file. If this is the case, then the parent or guardian can skip number 4 and proceed to number 5.

Number 4 uses income to assess program eligibility. Again, this section can be skipped if categorical eligibility has been determined within number 2 or 3. If section 4 is used to classify an application, all household members names should be listed in this section and their gross income must be listed on the application.

If the parent or guardian refuses to provide the names of household members and their earnings for the month, the application is classified as "denied". In cases for which there is no income, a "0" must be written in. If they choose to write down N/A or leave the area blank the application is classified as "denied", even if you know the child qualifies. Remember, parents or guardians are not required to provide income information.

Number 5 requests ethnic identity and racial data. This data must be collected by all institutions annually. The parent or guardian should identify their child's ethnicity and race by checking the appropriate box or boxes in each category. Please remember, that a participant may only have one ethnicity, but may identify multiple races.

For section number 6, a household adult must sign this form whether the participant is classified by income or is categorically eligible. If the participant is being classified by income, the person who signs this form should be listed in number 4 as well.

If you are using the date the parent or guardian signed the application to determine the effective date of eligibility for the program, then the form must be dated. If the application is classified on income, the last four digits of the parent's or guardian's social security number are required. If the parent or guardian does not have a social security number, they may check the box where indicated "Check if no SSN". The line for the last four digits of the social security number should not be left empty unless the box is checked to indicate no SSN.

Please note that applications classified based on categorical eligibility do not require a social security number at all. Printed name and telephone number are nice to have but are not required to establish eligibility.

The section of the IEA labeled "For institution to be classified and completed by institution/sponsor" must be completed by the institution's Eligibility Official. Eligibility officials are designated representatives from the institution who are responsible for verifying and classifying Income Eligibility Applications. They must ensure all forms are accurately completed whether the application lists eligibility by income or category by selecting the appropriate free, reduced, or denied box.

When selecting by income, the Eligibility Official uses the Income Eligibility Guidelines provided by the USDA's Food and Nutrition Service. When an eligibility application is classified as denied, the official must document, on the application, the "Reason for Denial." The official would simply check the box that corresponds with the reason for the denial.

The eligibility official must sign and date the application. If the application is missing the eligibility official's signature and date, the center will be reimbursed at the denied rate for this application until the error is corrected.

The box in the right corner is for use by the State agency during the administrative review. Please leave this area blank.

Best Practices

It is recommended that institutions have policies and procedures on how they will collect, verify and maintain CACFP income eligibility documentation. A CACFP income eligibility policy should include the following:

- When the institution will collect IEAs
- Who is responsible for verifying IEAs
- Where the IEAs will be kept
- How the institution will retain the records for the required 3 years, plus the current year
- And how the institution will ensure that IEAs are kept confidential

Consider organizing IEAs alphabetically in a binder at the center.

Staff should know where IEAs are stored and should follow confidentiality policies to keep the documents secure.

When a child withdraws, write the participant's withdrawal date on the IEAs then re-file the documentation.

We do not recommend copying the IEA on the back side of the enrollment form. Although this seems convenient, if the parent or guardian does not return the IEA, you run the risk of not receiving enrollment documentation as well.

Before filing your monthly claim, ensure that all IEAs are up to date and complete.

Consider having an annual date when all IEAs are updated by parents or guardians and the Eligibility Official. The IEAs should be verified for accuracy by a center representative. We recommend that you have a second party person review the IEAs to ensure accuracy.

Penalties for Fraud

The Penalties for Fraud statement is included in the Permanent Agreement. Be mindful that all documents completed that represent your CACFP operation are reviewed for accuracy and completeness. It is also recommended to have a second party review your documents.

CFDA and the Federal Awarding Agency

The U.S. Government requires that the State agency informs all institutions of our Catalog of Federal Domestic Assistance or CFDA Title and Number and the Federal Awarding Agency.

- The CFDA Title is the Child and Adult Care Food Program
- The CFDA Number is 10.558

And the Federal Awarding Agency is the U.S. Department of Agriculture or USDA, Food and Nutrition Service or FNS

The Non-Discrimination Statement

This training includes the Non-Discrimination Statement. We include it in all our trainings. *This institution is an equal opportunity provider.*

Contact Information

Thank you for participating in this training. We hope that the information will assist in the operation of a successful CACFP. If you have any questions or concerns about this training or any other CACFP training, please contact the CACFP Programmatic Training Team by telephone at 919-707-5800 or by email at CACFPtraining@dhhs.nc.gov.