

Section 4: The School Meal Application

In this section, you will find information on:

- Required content for the school meal application; and
- Different application types and formats.

Application Overview

LEAs must provide household applications to families applying for free or reduced price meals or free milk benefits, unless the household has been directly certified. The application and all supporting materials must be clear, simple in design, and understandable and uniform in format. The application materials must also conform to the requirements described in this section.

Application Content

This section lists the information required in the application. Except for the information in the attesting statement, the required information on the application form may be separate from the signature block and organized at the LEA's discretion. For example, the Use of Information Statement may be referred to in the signature block but may be on the reverse side of the application or included with the instructions on how to complete the form.

Requirement 1: Use of Information Statement

As only the last four digits of a Social Security Number are required to be provided, the Privacy Act statement is no longer required. The Use of Information Statement must be provided on the application instead, exactly as follows:

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 submit all needed information, 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 primary wage earner or other adult household member who signs the application. The social security number is not required when you apply on behalf of a foster child or 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.

Requirement 2: Attesting Statement

A statement must be included directly above the signature block for the signing adult to certify that:

- The person signing is furnishing true information;
- The application is being made in connection with the receipt of Federal funds;
- School officials may verify the information on the application; and
- Deliberate misrepresentation of the information may subject the applicant to prosecution under State and Federal statutes.

Requirement 3: Children’s Racial and Ethnic Identities

Although survey questions on children’s ethnicity and race are optional for households to complete, they must be included on the application. The categories and format must be identical to those listed on the USDA *Prototype Application for Free and Reduced Price School Meals*, at <http://www.fns.usda.gov/revised-prototype-free-and-reduced-price-application-materials-sy-2016-17>. See *FNS Instruction 113-1: Civil Rights Compliance and Enforcement – Nutrition Programs and Activities*, at <http://www.fns.usda.gov/sites/default/files/113-1.pdf>.

Requirement 4: Categorical Eligibility Based on Assistance Programs

The application must provide space to identify the case number of any household member who receives benefits from Assistance Programs and their case numbers. When a case number for one of the three Assistance Programs (SNAP, TANF, and FDPIR) for any household member is listed on the application, all children in the household are eligible for free meals.

Requirement 5: Other Source Categorical Eligibility and Income Eligibility

In the case of children designated as Other Source Categorically Eligible (with the exception of Head Start where LEAs should have access to complete participation records for children) the application must provide space for indicating status in the Other Source Categorical Eligibility Programs. This is necessary because of the possibility of “mixed households” in which some children may be designated as Other Source Categorically Eligible and some may not. **For more information about mixed households, see *Special Situations When Determining Eligibility*.**

Other Requirements:

When distributing the household applications, LEAs must:

- Provide households with instructional materials similar to those included with the FNS prototype application. **(See *Application Types*.)**
- Provide one household application for all children who attend schools in the same LEA.

When distributing household applications, LEAs may:

- Pre-fill the application with data other than income data from the prior year or from another school source.

When distributing the household application, LEAs may not:

- Require separate/multiple applications for each child in a mixed household that includes children who are Other Source Categorically Eligible and children who apply based on household income.
- Require a household to submit an application.

Citizenship and Legal Status

United States citizenship or immigration Status is not a condition of eligibility for free and reduced price benefits. LEAs must apply the same eligibility criteria for citizens and non-citizens.

USDA has determined that the Child Nutrition Programs are not subject to title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, which restricts certain welfare and public benefits for undocumented individuals.

LEAs are prohibited from requesting citizenship or immigration Status on the application because citizenship or immigration Status is not a requirement for participation in the school meal programs, and may pose a barrier to participation and deter otherwise eligible households from applying.

Application Types

Prototype Application

LEAs are encouraged to use the FNS *Prototype Application for Free and Reduced Price School Meals* to support access to school meals for eligible children. The prototype application complies with Federal requirements and meets all criteria examined during administrative reviews. **These materials have been updated for use in SY 2016-2017, and may be adapted either for direct use by State and local agencies, or as a reference for designing an effective application packet. They may be viewed and downloaded at: <http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.**

The *Prototype Application for Free and Reduced Price School Meals* is accompanied by the following materials:

- **Prototype letter to households, titled *Frequently Asked Questions About Free and Reduced Price School Meals***
- **Prototype application instructions, titled *How to Apply for Free and Reduced Price School Meals***
- **Prototype information sharing authorizations:**
 - *Sharing Information with Medicaid/CHIP*
 - *Sharing Information with Other Programs*
- **Prototype verification materials:**
 - *We Must Check Your Application*
 - *We Have Checked Your Application*

- Prototype household benefit issuance notifications:
 - *Notice to Households of Approval/Denial of Benefits*
 - *Notice of Direct Certification*

The SY 2016-2017 FNS prototype application includes several design modifications intended to simplify the application for households and improve application processing by local officials. Inclusion of these elements on the application is ***optional***:

- The income reporting fields in the FNS prototype ask for income sums in whole dollars only. Standard rounding rules apply. To round amounts to the nearest whole dollar, round down amounts from 1 to 50 cents and round up amounts from 50 to 99 cents. For example, a weekly income of \$305.47 would be rounded down to \$305.
- In recognition that children do not receive income on a regular basis, the FNS prototype separates household member reporting sections for infants, children, and students up to grade 12, apart from those for adult household members. This is intended to reduce the risk of duplicate entries and more accurately reflect a list of all household members. Income for children is then totaled into a single reporting field.
- The FNS prototype includes a “grade” field in the children and students reporting section. The additional identifying information will assist in matching of student names to existing enrollment figures.
- The FNS prototype includes a “For School or District Use Only” section to assist in the review process for determining officials. This feature was included on prior application designs and has been returned to the application based on feedback from State and local officials.
- The FNS prototype has moved the “Source of Income” Chart from the instructions document to the top of the prototype application, reverse side.

Foreign Language Translations

Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency (LEP). Under title 6 of the Civil Rights Act of 1964, LEAs are required to:

- Assist LEP persons;
- Be aware of household language needs; and
- Ensure that households comprised of LEP persons have access to the same information other families have in a manner they can easily understand.

State agencies and LEAs are responsible for ensuring that applications and other household materials used in the application process are available in a language the LEP persons can understand. LEAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages. ***Simply offering the most common non-English***

language is not sufficient. Additionally, liaisons proficient in foreign languages may assist households with completing the application process.

To assist LEAs in meeting these requirements, FNS provides translated versions of its prototype school meal application materials. These translated application packets are available in 49 languages and include all documents and resources that are part of the English language version. They are made available to facilitate LEA-level efforts to ensure that LEP households have access to free and reduced price application materials in a language they can understand. These materials may be viewed and downloaded at: <http://www.fns.usda.gov/school-meals/translated-applications>.

To summarize, State agencies and LEAs must assist LEP persons throughout the application process:

- **Determine Language Needs:**
 - LEAs should become familiar with language needs in their community and determine where information or translation services in those languages may be obtained. When possible, LEAs should partner with State and local resources, such as migrant or refugee assistance agencies.
 - Many schools identify an LEP individual's primary language during the school enrollment process and store this information in an online database to ensure that communications sent to families throughout the school year are sent in the appropriate language.
 - LEAs may use the Home Language Survey, USDA's "I Speak" survey, or other language surveys to help identify LEP persons and their language needs. (See *I Speak Statements*, <http://www.fns.usda.gov/sites/default/files/cnd/Ispeak.pdf>.)
- **Provide Translated Applications:**
 - Once a school becomes aware of an LEP individual's needs, the school is responsible for ensuring that their application and other household materials (letter, instructions, notices, and verification materials) are available in a language the LEP individual can understand.
 - LEAs may use the translated application materials available through FNS. (See *Translated Applications*, <http://www.fns.usda.gov/school-meals/translated-applications>.)
 - State agencies must ensure that FNS prototype applications are available to their LEAs, and that LEAs that do not have their own translations make the FNS applications available to the families who need them.
 - The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

- **Provide Language Services:**
 - After identifying LEP persons, LEAs should provide language services to assist with meal benefit applications. When necessary, LEAs should provide oral interpretation services to parents or guardians with limited literacy.
 - Household members (especially children) are not expected to provide interpretive services. In many circumstances, household members are not competent to provide accurate interpretations, and the use of household members to provide interpretations may create a conflict of interest.
 - LEAs should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. For example, LEAs may consider sharing language assistance materials and services among and between recipients, advocacy groups, and Federal grant agencies.
- **Follow Up as Needed:**
 - State agencies and LEAs are expected to have a system in place to provide verification notices to each household in the parent or guardian’s primary language, follow up with households that do not respond to the initial verification request, and provide oral assistance if the parent or guardian has difficulty understanding the written request.
 - USDA translations of prototype verification materials are available on the FNS website.

See SP 37-2016: *Meaningful Access for Persons with Limited English Proficiency in the School Meal Programs: Guidance and Q&As*, <http://www.fns.usda.gov/meaningful-access-persons-limited-english-proficiency-lep-school-meal-programs-guidance-and-qas>.

Application Formats

In SY 2015-2016, FNS amended the prototype application, which implemented various content and visual changes. The required format changes will be phased in during SY 2016-2017 and SY 2017-2018, as described below.

Requirements for All Applications – SY 2016-2017

LEAs are not required to use the prototype application. However, along with other required application elements, the *Indication of No Income* element from the prototype application must be part of all State or local application designs beginning in SY 2016-2017.

- **Indication of No Income:** Applicants without income are requested to write a “zero” in the applicable field or mark “no income.” The application must convey to the applicant in a clear and easy to understand instruction that *any income field left blank is a positive indication of no income* and certifies that there is no income to report. Applications with blank income fields are to be processed by the school district as complete, rather than incomplete as in prior practice. See SP 33-2015: *Revised Prototype Free and Reduced*

Price Application Materials: Policy Changes and Design Overview,

[http://www.fns.usda.gov/revised-prototype-free-and-reduced-price-application-materials-policy-changes-and-design-overview.](http://www.fns.usda.gov/revised-prototype-free-and-reduced-price-application-materials-policy-changes-and-design-overview)

Requirements for all Applications Effective SY 2017-2018

The application modifications below were optional for SY 2015-2016 and will continue to be optional for SY 2016-2017. However, for SY 2017-2018 applications, the following elements will be required:

- **Total Household Members Reporting Field:** The application must include a field for reporting the total number of members present in the household. This is an accountability safeguard and encourages the household to report all members who are present. Electronic applications may be exempt from explicitly following this requirement if they otherwise ensure that the household has been given a clear opportunity to report all household members.
- **Placement of Social Security Number Reporting Field:** State and local agencies must structure their applications to ensure that only those households applying on the basis of income are requested to provide the last four digits of an adult household member's Social Security Number (or indicate a lack thereof). Households applying based wholly on categorical eligibility status are not required to provide this information.

Paper Applications

If the LEA only uses paper applications, an application form and instructions must be included with the letter to households. A sample household letter and instructions are included with the Prototype Household Application developed by FNS. See *Applying for Free and Reduced Price School Meals*, <http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.

Electronic and Scanned Applications

The LEA may make available and accept applications electronically. The LEA may also scan paper applications. When using electronic and scanned applications:

- All disclosure restrictions must be met, and acceptance of the application and electronic signatures must conform with FNS policy. See SP 10-2007, SFSP 06-2007, CACFP 07-2007: *Update on Electronic Transactions in the Child Nutrition Programs*, <http://www.fns.usda.gov/update-electronic-transactions-child-nutrition-programs-1>.
- The system should include a statement explaining how to obtain a paper application if households decide they no longer want to complete an application electronically.
- The process for scanning applications must meet all requirements as well as perform functions as outlined in this guidance.

Electronic Applications

If the LEA uses an electronic system as one of their application processes, the letter to households must inform the household how to access the system in order to apply for benefits. It must also explain that the household still has the option to submit a paper application and must indicate how the household may obtain and submit a paper application from the school. When using electronic applications:

- The system must include a question or data field to indicate a child's Head Start, migrant, runaway, foster, or homeless status.
- The system may ask for a student identification number or a child's birth date. However, the household must be informed that these data fields are not required by NSLP, SBP, or SMP.
- For SY 2016-2017, the LEA is encouraged to amend the electronic application to reflect the FNS prototype application. However, if modifications are made, the system must be able to recognize and accept whole dollar amounts.

Note: USDA and FNS do not evaluate, recommend, approve, or endorse any software used for certification or verification purposes. There are no Federal specifications for software vendors. LEAs are responsible for assuring that any automated certification and verification processes meet all regulatory requirements and policies, including the calculation of income frequencies, and that the software used is performing correctly and meets all requirements.