

# INCOME ELIGIBILITY FORMS

Income Eligibility Forms (IEF) are used in Institutions for the purpose of determining eligibility for free and reduced-priced meals. Institutions (other than Emergency Shelters, Head Starts and At-risk Afterschool Centers) shall distribute IEFs to the families of participants enrolled in the Institution. If any At-risk Afterschool Centers or Schools, Head Starts, or Emergency Shelters also operate a child care program, the center will need to distribute and collect IEF's for the participants enrolled in the child care program.

Sponsoring organizations of day care homes shall distribute the IEF to day care home providers who wish to enroll their own eligible children in the CACFP. At the request of a provider in a tier II day care home, sponsoring organizations shall also distribute the IEF to the households of all children enrolled in the home, except for the enrolled children that the sponsoring organization already directly certified at the free status.

Institutions must maintain completed IEFs, or other "free" eligible documentation, on file for all participants counted in the free or reduced-priced categories on the Monthly Enrollment Eligibility Roster for centers.

This section provides guidance on:

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If Institutions use the IEF as their enrollment record to meet the annual requirements for enrollment, please see the Claim System and Required Records section of this manual for guidance on enrollment record requirements.

## Categorically Eligible free

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The following participants may be classified in the free category without income reported on an IEF:

1. Children who are determined income eligible for Head Start, by Head Start income guidelines;
2. Children in Even Start programs;
3. Participants in households that qualify for SNAP (food stamps) benefits;
4. Participants in households with Food Distribution Program on Indian Reservations (FDPIR);
5. Children in households with Temporary Assistance to Families in Idaho (TAFI);
6. Adult participants receiving SSI or Medicaid assistance;
7. Children that are homeless, migrant, or a runaway; and
8. Children that are in foster care

## Methods to Determine Participant's Eligibility

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Annually, Institutions must submit current center or tier II day care home enrolled participant's eligibility information in the site or provider application(s) in MyIdahoCNP. Below are the methods Institutions shall use to annually determine a participant's eligibility status in CACFP. The methods are in the order that Institutions are recommended to follow to reduce the amount of paperwork for both the Institution and participant household and to potentially increase the meal reimbursement rates for the center or tier II day care home.

Eligibility documentation below must be maintained for three years plus the current program year.

### STEP 1: DIRECT CERTIFICATION

This is the first method Institutions shall use to determine a participant's eligibility. All participants matched in SDE's Direct Certification system are categorically eligible free, since this system matches participants that receive the following benefits or services: SNAP, TAFI, and foster care. The system is located at <https://apps.sde.idaho.gov/CnpDirectCert>.



To determine enrolled participants eligibility status annually, the best practice is to run a group match of all enrolled participants in the center or tier II day care home on the first day of the month the center or tier II day care home annually updates the participant's eligibility information. Example: If a center distributes IEFs in August, then August 1st the center shall run a group match in the Direct Certification system. The Institution must maintain a dated copy of the group match report for supporting documentation of the participant's free eligibility status. For enrolled participants that the Institution directly certified, the Institution will not need to distribute the IEFs to these households. As new participants enroll during the year, the Institution shall run a single match in the system. Please refer to the Direct Certification Manual for procedures on how to complete group and individual matches in SDE's Direct Certification system.

If a child is not matched in the system either via a group or single match:

1. Institutions shall distribute the IEFs (skip to step 3);
2. Tier II day care homes shall collect documentation of Idaho Child Care Program (ICCP) participation (continue on to step 2).

## **STEP 2 (THIS METHOD IS ONLY FOR TIER II DAY CARE HOME PARTICIPANTS – INSTITUTIONS SKIP TO STEP 3): ICCP CERTIFICATION**

If a child or a child's parent is participating in or subsidized under an Idaho supported child care benefit program (ICCP) with an income eligibility limit that does not exceed the eligibility standard for free or reduced-priced meals, meals served to the child are automatically eligible for tier I reimbursement.

A sponsoring organization of day care Homes (SODCH) may identify enrolled children eligible for free and reduced-priced meals (i.e., tier I rates) without distributing the IEF by documenting the child's or household's participation in ICCP. Documentation shall consist of a current (dated within the previous month) document from ICCP reporting the household's participation in the program. This document must be made available to the tier II day care home or sponsoring organization (SO). The SO must maintain this document to support the child(ren)'s free eligibility. If the Tier II day care child participant is not an ICCP participant then the day care home may distribute the IEF to the household.

## **STEP 3: INCOME ELIGIBILITY FORM**

All children participants not matched in the Direct Certification system may still be eligible for free or reduced-priced status if they receive FDPIR benefits, are homeless, a runaway, in a migrant household, or qualify by income. Adults not matched in the Direct Certification

system, may still be eligible for free or reduced-priced status if they receive SSI or Medicaid benefits or qualify by income. The IEF is used to determine eligibility when participants are not matched in the Direct Certification system.

Sponsoring organizations of day care homes shall distribute IEFs to day care home providers who wish to enroll their own eligible children in CACFP. At the request of a provider in a tier II day care home, sponsoring organizations of day care homes shall distribute IEFs to the households of all children enrolled in the home.

## Distribution of Income Eligibility Forms

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Annually, FNS sets the Federal Income Guidelines (standards) for determining the following eligibility categories: free, reduced-priced, and paid. Prior to July 1<sup>st</sup> each year, Idaho SDE emails a copy of the new income guidelines and the updated Income Eligibility Form (IEF) to all Institutions for determining the eligibility of participants for free and reduced-priced meals under CACFP. In addition, the income guidelines and current IEFs will be posted in MyIdahoCNP under download forms.

The income guidelines are based on the household income and household size. Low income households meeting Federal guidelines are categorized as eligible for “free.” Households with slightly higher income are categorized as eligible for “reduced-priced.” Households with incomes above the reduced-priced guidelines are categorized as eligible for “paid.”

Beginning July 1<sup>st</sup> of each year, Institutions must begin distributing the current IEF and Letter to Households to all enrolled participant’s households. Institutions collect the IEFs annually for all current enrolled children, and they must distribute and collect IEFs for all new enrolled participants when they enroll in the program year (October 1 – September 30). The households are not required to complete and return the IEF; therefore, if the IEF is not completed and returned by the household, the Institution must categorize the participant as paid.

The Income Eligibility Form, Letter to Households, and other materials shall contain only the family size income levels for reduced-priced meal eligibility with an explanation that households with incomes less than or equal to these levels are eligible for free or reduced-priced meals. The IEF and Letter to Household may not contain the income standards for free meals.

If a child is a Head Start Participant, the Income Eligibility Form, Letter to Households, and materials distributed by child care Institutions shall state that the child is automatically eligible to receive free CACFP meal benefits, subject to submission by a Head Start official and Head Start statement of income eligibility documentation. Head Start programs will not need to distribute the IEFs to their participant’s households.

All IEF’s must include the following statements;

1. “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 the participant for free or reduced-priced meals. You must include the last

four digits of the Social Security Number of the adult household member who signs the application. The last four digits of the Social Security Number are 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 for the participant or other (FDPIR) identifier 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 the participant is eligible for free or reduced-priced meals, and for administration and enforcement of the Program.”; and

2. When either the SDE or the child care Institution plans to use or disclose children's eligibility information for non-program purposes.

## Letter to Households

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Institutions shall distribute a Letter to Households or guardians of enrolled participants to inform them of the procedures regarding eligibility for free and reduced-priced meals. The letter shall accompany the IEF and shall contain:

1. The income standards for reduced-priced meals, with an explanation that households with incomes less than or equal to the income standards listed would be eligible for free or reduced-priced meals. For non-pricing programs, including sponsoring organizations of day care homes, an explanation that the Institution receives more reimbursement for the nutritious meals served to the household's children without an additional charge to the household. (Income standards for free meals shall not be included in notices or Letters to Households);
2. How a participant's household may complete an Income Eligibility Form for free or reduced-priced meals;
3. An explanation that an IEF for free or reduced-priced benefits cannot be certified unless it contains complete "documentation";
4. The USDA Civil Rights Nondiscrimination Statement;
5. A statement that participants whose family members become unemployed are eligible for free or reduced-priced meals during the period of unemployment, provided that the loss of income causes the family income during the period of unemployment to be within the eligibility standards for those meals;
6. Except in the case of adult participants, a statement that foster children are eligible for free meals regardless of the income of such households with whom they reside.

### CHILD CARE INSTITUTIONS

The Letter to Households distributed by child care Institutions, other than sponsoring organizations of day care homes shall state that, if a child is a member of a SNAP or FDPIR household or is a TAFI recipient, the child is automatically eligible to receive free CACFP meal benefits, subject to Direct Certification or the completion of the Income Eligibility Form.

### SPONSORING ORGANIZATION OF DAY CARE HOMES

Sponsoring organizations of day care homes Letter to Households and other materials distributed shall state that, if a child or a child's parent is participating in or subsidized under an Idaho supported child care benefit program (ICCP) with an income eligibility limit that does not exceed the eligibility standard for free or reduced-priced meals, meals served to the child are automatically eligible for tier I reimbursement, subject to the sponsoring organization's receipt of a current (dated within the previous month) document from ICCP reporting the household's participation in the program.

Sponsoring organizations of day care homes shall not make free and reduced-priced eligibility information concerning individual households available to day care homes unless the adult household member indicates on the Letter to Households that the provider may collect the IEF. The adult household member may provide the completed IEF to either the provider or sponsoring organization. The organization shall also limit the use of free and reduced price eligibility information by household to persons directly connected with the administration and enforcement of the CACFP.

Sponsoring organizations of day care homes may inform tier II day care homes of the number of identified income eligible enrolled children. SDE permits sponsoring organizations to distribute IEFs to the households of children enrolled in tier II day care homes, and the IEF shall include a confidentiality statement.

### **ADULT DAY CARE CENTERS**

Letter to Households and other materials distributed by adult day care centers shall state that, if an adult participant is a member of a SNAP or FDPIR household or is an SSI or Medicaid participant, the adult participant is automatically eligible to receive free CACFP meal benefits, subject to Direct Certification or the completion of the IEF.

### **PRICING PROGRAMS**

Letter to Households for pricing Institutions must include an explanation that indicates that:

1. The information in the application may be verified at any time during the year; and
2. How a family may appeal a decision of the Institution to deny, reduce, or terminate benefits as described under the hearing procedure.

# Income Eligibility Form for Children

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The Income Eligibility Form (IEF) for households applying for income eligibility must include the following information:

1. The first and last names of all enrolled children, age, and date of birth;
2. The names of all other household members;
3. The last four digits of the social security number of the adult household member who signs the form, or an indication that he/she does not possess a social security number;
4. The income and frequency received by each household member identified by source of income (such as earnings, wages, welfare, pensions, support payments, unemployment compensation, social security, and other cash income received or withdrawn from any other source, including savings, investments, trust accounts, and other resources);
5. The signature of an adult member of the household which appears immediately below a statement that the person signing the form certifies that all information furnished is true and correct; that the form is being made in connection with the receipt of Federal funds; that CACFP officials may verify the information on the form; and that the deliberate misrepresentation of any of the information on the application may subject the applicant to prosecution;
6. The date the adult member of the household signed the form. The household adult must record the date.

If the Institution did not already Directly Certify households that are categorically eligible free, the household applying and submitting an IEF on behalf of children who are members of SNAP or FDPIR or TAFI households, or children who are in foster care, homeless, migrant or runaway, shall be required to provide on their Income Eligibility Form the following information.

1. The first and last names of all enrolled children in the household, age and date of birth;
2. SNAP case number (6-8 digits), FDPIR case number (9 digits), or TAFI case number (7 digits), or mark the foster child, homeless, migrant or runaway box. In accordance with the verification process, if a case number or foster child, homeless, migrant or runaway indication is provided, it may be used to verify the current certification for the child(ren) for whom free meal benefits are claimed;
3. The signature of an adult member of the household or State caseworker; and
4. The date the adult member of the household or State caseworker signed the form. The household adult or State caseworker must record the date.



Note: SDE has a separate letter for day care home providers applying for Tier I benefits.

**OPTIONAL**

**Children's Racial and Ethnic Identities**

We are required to ask for information about your children's race and ethnicity. This information is important and helps to make sure we are fully serving our community.

- Ethnicity (check one):  Hispanic or Latino  Not Hispanic or Latino
- Race (check one or more):  American Indian or Alaskan Native  Black or African American  Asian  Native Hawaiian or Other Pacific Islander  White

Dear Parent or Guardian:

Our facility offers healthy meals to all enrolled children as part of the Child and Adult Care Food Program (CACFP). The CACFP provides support to serve healthy meals and snacks. Please help us find out if your household qualifies for free or reduced priced meals and complete the Meal Benefit Income Eligibility and Enrollment Form. Please fill out the form completely, sign, and return this form today or as soon as possible. This information will be kept strictly confidential.

You have the option of returning it directly to your Provider or to the Provider's Sponsor. If you would like to provide your form directly to the sponsor, return the completed form to:

Sponsor Name: \_\_\_\_\_

Sponsor Address: \_\_\_\_\_

Sponsor Phone Number: \_\_\_\_\_

Initial here if you consent to allowing your provider to collect your form and submit it to the Sponsor. Your provider will not review your form.

When completing your form, be sure to read the instructions below carefully and fill out all required information.

**Step 1**

List ALL household members who are infants and children enrolled for care. (If more spaces are required for additional names, attach another sheet of paper). Foster children that are under the legal responsibility of a foster care agency or court are eligible for free meals. Any foster child in the household is eligible for free meals regardless of the household income. Check the box if any children are foster children. Households with foster children are not required to include payments received for the foster care as income. Mark if any children are Migrant/Seasonal Homestead, or enrolled in Head Start.

**Step 2**

If applicable, list a current SNAP (food stamp), FDIPI, or TAFI case number for any member of the household (an EBT or Quest card number is not allowed). Skip step 3 and go to step 4.

**Step 3**

A) Report all current income received by all children. Refer to Source of Income for Children (see chart below).

B) Please include ALL members in your household who are living with you and share income and expenses, even if not related and even if they do not receive income of their own. DO NOT include infants and children already listed in Step 1. If your household income is less than or equal to the income Eligibility Guideline levels below, the facility receives more reimbursement for the nutritious meals served to your children without an additional charge to you.

Income: Report all income in gross income (before taxes and premium) only. Report all income in whole dollars. Do not include cents. Mark how often each type of income is received using the check boxes to the right of each field. If you are self-employed, report income from that work as a net amount. This is calculated by subtracting the total operating expenses of your business from the gross receipts or revenue. If you are Military, see "Sources of Income for Adults" below.

Report total household size: Enter the total number of household members in the field "Total Household Members (Children and Adults)". This number MUST be equal to the number of household members listed in Step 1 and Step 3.

Provide the last four digits of your social security number. The household's primary wage earner or another adult household member must enter the last four digits of their social security number in the space provided. If no adult household members have a social security number, leave this space blank and mark the box to the right labeled "Check for SSN".

**Step 4**

All forms must be signed and dated by an adult member of the household. By signing the form that household member is providing that all information has been truthful and completely reported.

**Income Eligibility Guidelines**  
Effective Dates July 1, 2021- June 30, 2022

Household size	FEDERAL INCOME CHART		
	Yearly	Monthly	Weekly
1	23,828	1,988	459
2	32,227	2,698	620
3	40,626	3,398	792
4	49,025	4,098	943
5	57,424	4,798	1,105
6	65,823	5,498	1,266
7	74,222	6,198	1,428
8	82,621	6,898	1,589
Each additional person:	8,399	700	162

Sources of Child Income	Example	Earnings from Work	Public Assistance / Alimony / Child Support	Pensions/Retirement / All Other Income
Earnings from work	A child with regular full or part-time job and earn salary or wages	Salary, wages, cash bonuses	Unemployment benefits	Social Security (including railroad retirement & black lung benefits)
Social Security	A child is blind or disabled and receives Social Security benefits	Net income from self-employment (farm or business)	Worker's compensation	Private pensions or disability benefits
> Disability Payments	A Parent is disabled, retired, or deceased, and their child receives Social Security benefits	If you are in the U.S. Military:	Supplemental Security Income (SSI)	Income from trusts or estates
> Survivor's Benefits	A friend or extended family member regularly gives a child spending money	> Basic pay and cash bonuses (do NOT include combat pay, DEER, FSSA, or privatized housing allowances)	Cash assistance from State or local government	Annuities
Income from person outside the household	A child receives regular income from a private pension fund, annuity, or trust	> Allowances for off-base housing, food and clothing	Alimony payments	Investment income
Income from any other source	A child receives regular income from a private pension fund, annuity, or trust		Child support payments	Earned interest
			Veteran's benefits	Rental income
			Strike benefits	Regular cash payments from outside household

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 the participant 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 last four digits of 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 FDIPIR identifier for the participant 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 the participant is eligible for free or reduced price meals, and for administration and enforcement of the program. We MAY share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, audits for program reviews, and law enforcement officials to help them look into violations of program rules.

This institution is an equal opportunity provider.

## Income Eligibility Form for Adults

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The Income Eligibility Form (IEF) for adults shall contain a request for the following information:

1. The first and last names of all adults for whom the application is made;
2. The first and last names of all other household members;
3. The last four digits of the social security number of the adult household member who signs the form, or an indication that he/she does not possess a social security number;
4. The income and frequency received by source of income (such as earnings, wages, welfare, pensions, support payments, unemployment compensation, social security, and other cash income received or withdrawn from any other source, including savings, investments, trust accounts, and other resources);
5. The signature of an adult member of the household which appears immediately below a statement that the person signing the form certifies that all information furnished is true and correct; that the form is being made in connection with the receipt of Federal funds; CACFP officials may verify the information on the form; and that the deliberate misrepresentation of any of the information on the form may subject the applicant to prosecution under State and Federal criminal statutes; and
6. The date the adult member of the household signed the form. The household adult must record the date.

Households applying on behalf of adults who are members of SNAP or FDPIR households or SSI or Medicaid participants shall be required to provide:

1. The first and last names of the adult participant;
2. SNAP, FDPIR case numbers, SSI, or Medicaid assistance identification numbers of the adults for whom automatic free meal eligibility is claimed;
3. The signature of an adult member of the household as provided. In accordance with the verification process, if a SNAP, FDPIR case number, SSI, or Medicaid assistance identification number is provided, it may be used to verify the current SNAP, FDPIR, SSI, or Medicaid certification for the adult(s) for whom free meal benefits are being claimed; and
4. The date the adult member of the household signed the form. The household adult must record the date.



**OPTIONAL Participants Racial and Ethnic Identities**

We are required to ask for information about participant's race and ethnicity. This information is important and helps to make sure we are fully serving our community.

Ethnicity (check one):  Hispanic or Latino  Not Hispanic or Latino  
 Race (check one or more):  American Indian or Alaskan Native  Black or African American  
 Asian  Native Hawaiian or Other Pacific Islander  White

Dear Participant:

Our facility offers healthy meals to all enrolled adults as part of our participation in the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP). The CACFP provides reimbursements for healthy meals and snacks served to adults enrolled in adult day care. Please help us comply with the requirements of the CACFP and keep your fees low by completing the attached Meal Benefit Income Eligibility and Enrollment Form. Please complete, sign, and return this form today or as soon as possible. **This information will be kept strictly confidential.** You have the option of returning it directly to your Provider or to the Provider's Sponsor. If you would like to provide your form directly to the sponsor, return the completed form to:

Sponsor Name: \_\_\_\_\_ Sponsor Address: \_\_\_\_\_ Sponsor Phone Number: \_\_\_\_\_

Initial here if you consent to allowing your provider to collect your form and submit it to the Sponsor. Your provider will not review your form.

When completing your form, be sure to read the instructions below carefully and fill out all required information.

**Step 1** List ALL household members who are adults enrolled for care (if more spaces are required for additional names, attach another sheet of paper). If the adult participants have no income, check the appropriate box.

**Step 2** If applicable, list a current SNAP (food stamp), FDIPIR, State SSI or Medicaid case number for any member of the household (an EBT or Quest card number is not allowed). Skip step 3 and go to step 4.

**Step 3 A)** Report all income earned by children household members. Children income is money received from outside your household that is paid directly to children; this includes but is not limited to earnings from work and social security (disability payments or survivor's benefits). Report the number of children in the household.

**B)** Please include ALL members in your household who are living with you and share income and expenses, even if not related and even if they do not receive income of their own. If your household income is less than or equal to the Income Eligibility Guideline levels below, the facility receives more reimbursement for the nutritious meals served to the adult participants without an additional charge to you.

**Income:** Report all amounts in gross income (before taxes and premiums) only. Report all income in whole dollars. Do not include cents. Mark how often each type of income is received using the check boxes to the right of each field. If you are self-employed, report income from that work as a net amount. This is calculated by subtracting the total operating expenses of your business from its gross receipts or revenue. If you are Military see source of income for adults below.

**Report total household size:** Enter the total number of household members in the field "Total Household Members (Children and Adults)". This number MUST be equal to the number of household members listed in Step 1 and Step 3.

**Provide the last four digits of your social security number.** The household's primary wage earner or another adult household member must enter the last four digits of their social security number in the space provided. If no adult household members have a social security number, leave this space blank and mark the box to the right labeled "Check if no SSN".

**Step 4** All forms must be signed and dated by an adult member of the household. By signing the form that household member is promising that all information has been truthfully and completely reported.

**Income Eligibility Guidelines**  
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Household size	FEDERAL INCOME CHART		
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6	65,823	5,486	1,266
7	74,222	6,186	1,428
8	82,621	6,886	1,589
Each additional person:	8,399	700	162

Sources of Income for Children		Sources of Income for Adults		
Sources of Child Income	Example	Earnings from Work	Public Assistance / Alimony / Child Support	Pensions/Retirement / All Other Income
Earnings from work	A child with regular full or part-time job and earn salary or wages	Salary, wages, cash bonuses Net income from self-employment (farm or business) If you are in the U.S. Military: ➢ Basic pay and cash bonuses (do NOT include contact pay, DECP, FSSA or privatized housing allowances) ➢ Allowances for off-base housing, food and lodging	Unemployment benefits Worker's compensation Supplemental Security Income (SSI) Cash assistance from State or local government Alimony payments Child support payments Veteran's benefits Strike benefits	Social Security (including railroad retirement & black lung benefits) Private pensions or disability benefits Regular income from trusts or estates Annuities Investment income Earned interest Rental income Regular cash payments from outside household
Social Security ➢ Disability Payments ➢ Survivor's Benefits	A child is blind or disabled and receives Social Security benefits A Parent is disabled, retired, or deceased, and their child receives Social Security benefits			
Income from person outside the household	A friend or extended family member regularly gives a child spending money			
Income from any other source	A child receives regular income from a private pension fund, annuity, or trust			

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 the participant 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 last four digits of the social security number is not required 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 the participant 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 the participant is eligible for free or reduced price meals, and for administration and enforcement of the program. We MAY share your eligibility information with 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.

This institution is an equal opportunity provider.

## Determination of Eligibility

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When the Institution receives a completed IEF, the Institution's determining official must review, certify, sign and date in the appropriate space on the form. It is the responsibility of each Institution to assign one or more employees the responsibility of approving or denying the Income Eligibility Form (IEF) that is submitted by each household. This individual(s) is (are) referred to as the determining official. The determining official cannot certify their own family's Income Eligibility Form.

Only complete Income Eligibility Forms containing all required information can be certified as free or reduced-priced eligible. If the adult household member or guardian chooses not to complete an IEF, will not include the required last four digits of their Social Security Number (SSN), or check the box indicating the signer has no SSN, the Institution must categorize the participant as paid.

Exception: the last four digits of a parent's social security number is not required on IEFs on behalf of a foster child, or for IEFs that qualify a participant with a valid SNAP case number (6-8 digits), FDPIR case number (9 digits), or TAFI case number (7 digits).

Institution officials may not complete an IEF income or benefit information for the adult household member or guardian unless the adult household member or guardian cannot read or write and requires the Institution's assistance to complete the IEF. When assisting households with completing the income section of the IEF, Institutions may refer to the most current Eligibility Manual located on the CACFP website under FNS Manuals. The Eligibility Manual is a supplemental resource available to Institutions when determining eligibility and whether funds received by the household must be reported and how. For example: income must be gross income and child support received is considered income that must be reported on the IEF.

The Institution shall take the income information provided by the household on the IEF and calculate the household's total current income. Applications with income that occurs at different frequencies must be annualized. When a completed IEF furnished by a family indicates that the family meets the eligibility criteria for free or reduced-priced meals, the participants from that family shall be determined eligible for free or reduced-priced meals. When a household submits an IEF with zero (0) income entered in the income section, or marks the No Income box and does not provide a current SNAP, TAFI, FDPIR case number, or marks the foster, migrant, homeless or runaway box, Institutions may certify the IEF in the free category.

When the information furnished by the family is not complete or does not meet the eligibility criteria for free or reduced-priced meals, Institution officials must consider the participants from that family as not eligible for free or reduced-priced meals, and must categorize the participants as paid.

In accordance with 7 CFR 226.23(f), free, reduced-priced and paid meal eligibility information must be reported by Institutions to SDE at least once each year in the center site application in MyIdahoCNP during the application packet annual updates. Such information may not be more than 12 months old.

Income Eligibility Forms should be considered current and valid until the last day of the month in which the form was dated one year earlier. All information on the IEF is confidential. Institutions must have internal controls to ensure that no one is allowed access to these documents other than authorized Institution employees. IEFs must be maintained in a safe and secure location, i.e. in a locked desk or filing cabinet.

## **INSTITUTION CERTIFICATION SECTION**

In the box labeled “For Official Use Only” Institution officials certify the IEF following these steps:

1. Indicate, by checking the appropriate box if the household is qualifying by SNAP, TAFI, FDPIR, or household income.
2. If qualifying by income, list the total income. If income is reported with different frequencies received, use the conversion factors on the IEF to annualize the income.
3. Record the total number of household members. Be sure all household members are listed on the form by name.
4. Indicate if the participant on the IEF is a foster child.
5. Determine the correct eligibility category using current household income and size of household compared to the current Federal income guidelines. The Institution should contact the household to obtain missing information or to clarify questions about information submitted on the IEF. The individual who adds information shall initial and date additional information; if the individual adding the information is not the parent or guardian, provide the method of retrieving the updated information.
6. Check the appropriate eligibility category determination: free, reduced-priced, or denied (paid).
7. For Tier II day care homes check the appropriate eligibility category determination: Tier I or Tier II
8. The certifying determining official must sign and date the IEF in the box labeled, “For

Official Use Only.”

9. The IEF is effective in the month the determining official makes the determination and signs and dates the form or when the adult household member signs and dates the form. Whichever date the Institution chooses in their procedure, the Institution must apply it consistently for all IEFs certified and provide the Institution’s procedures in the Institution’s Management Plan in MyIdahoCNP.

## COMMON ERRORS WITH INCOME ELIGIBILITY FORMS

During announced or unannounced reviews, SDE staff will review IEFs to verify each enrolled participant’s eligibility on the Monthly Enrollment Eligibility Roster or, for tier II day care homes, each enrolled child’s eligibility. If errors are found, fiscal action may occur, and the Institution shall be required to return the over claim to SDE.

SDE will categorize participants as paid when the following information is *missing* from the certified IEF on file:

1. Income information for households not receiving SNAP, TAFI, FDPIR benefits, or the foster, migrant, homeless, runaway boxes are not checked;
2. Last four digits of Social Security Number of the adult household member or guardian signing the IEF (or a checkmark that the signer has no SSN) for income eligibility IEFs;
3. A valid SNAP, TAFI, or FDPIR case number for categorical eligibility IEFs;
4. Enrolled participant’s name or birth date;
5. All household members not listed by name on income eligibility IEFs;
6. Signature of adult member of household or guardian;
7. Date adult member of household or guardian signed the form.

Other errors that may result in program review findings and fiscal action:

1. Total income added incorrectly;
2. Number of household members added incorrectly;
3. Using an outdated form (from a previous fiscal year);
4. Free, reduced-priced, or paid category not checked by Institution;
5. Participant placed in the wrong eligibility category;
6. IEF not certified, signed, and dated by Institution determining official;
7. IEF signed by determining official or adult household member or guardian more than 12 months prior;
8. Adult household member was not given a copy of the Letter to Households;
9. Lost or otherwise missing IEF not on file for participant categorized as free or reduced-priced eligible.

## Pricing Programs Written Notice of Eligibility

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Institutions that are pricing programs shall promptly provide written notice to each family informing them of the results of the eligibility determinations. When the information provided by the family is incomplete or does not meet the eligibility criteria for free or reduced-priced meals, Institution officials must consider the participants from that family as ineligible to receive free or reduced-priced meals, and must categorize the participants as eligible for “paid” meals. When information provided by the family of participants enrolled in a pricing program does not meet the eligibility criteria for free or reduced priced meals, pricing program officials shall provide written notice to each family denied free or reduced-priced benefits. At a minimum, this notice shall include:

1. The reason for the denial of benefits, e.g., income in excess of allowable limits or incomplete application;
2. Notification of the right to appeal;
3. Instructions on how to appeal; and
4. A statement reminding the household that they may reapply for free or reduced-priced benefits at any time during the year.

The reasons for ineligibility shall be properly documented and retained on file at the Institution.

## Appeals of Denied Benefits

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A family that wishes to appeal the denial of an IEF in a pricing program shall do so under the hearing procedures. However, prior to initiating the hearing procedures, the household may request a conference to provide all affected parties the opportunity to discuss the situation, present information and obtain an explanation of the data submitted on the application or the decision rendered. The request for a conference shall not in any way prejudice or diminish the right to a fair hearing. The Institution shall promptly schedule a fair hearing, if requested.

## How long is the Income Eligibility Form or Direct Certification Valid?

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CACFP Institutions have flexibility concerning the effective date of certification for Program benefits. The IEF is valid for 12 months either from the date signed by the determining official or from the date signed by the adult member of the household. CACFP Institutions must decide which date they will rely on as the effective date and apply this date to all Income Eligibility Forms submitted on behalf of all participants. The Direct Certification is valid for 12 months from the date the Institution prints the match report. Each match report, whether a group or single, must have a date printed on the report. This is the date SDE will verify during the Institution's program review.

### Examples:

1. The Institution chooses the certification dates of the determining official: If the determining official certifies the IEF and signs and dates it on August 25, 2014 the IEF is valid from August 1, 2014 – August 31, 2015.
2. The Institution chooses the determination dates when the adult member of the household signs the form: If the adult member of the household signs and dates the IEF on August 25, 2014, the determining official receives and certifies the IEF on September 15, 2014, the IEF is valid from August 1, 2014 – August 31, 2015. However, if the date the adult member of the household signed the IEF is not within the month of certification or the immediately preceding month, the effective date must be the date of certification by the determining official. Please note, the date of submission by the adult household member is not required to be recorded on the IEF.
3. Direct Certification date printed on the match report: If the Institution's determining official runs the group or single match and prints the report on August 25, 2014. The Direct Certification match is valid from August 1, 2014 – August 31, 2015.

## Verification of Eligibility

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SDE shall conduct verification of eligibility for free and reduced-priced meals on an annual basis, in accordance with the verification procedures. However, verification for individual Institutions shall occur not less frequently than once every three years. SDE may, with the written approval of WRO, use alternative approaches for conducting verification, provided that the results achieved meet the requirements below. This includes electronic desk reviews. If the verification process discloses deficiencies with the determination of eligibility and/or IEF procedures which exceed maximum levels established by FNS, SDE shall conduct follow-up reviews for the purpose of determining that corrective action has been taken by the Institution. These reviews shall be conducted within one year of the date the verification process was completed. The verification effort shall be applied without regard to race, color, national origin, sex, age, or disability. SDE shall maintain on file for review a description of the annual verification to be accomplished in order to demonstrate compliance with regulations.

### VERIFICATION PROCEDURES FOR NON-PRICING PROGRAMS

Except for sponsoring organizations of day care homes, SDE verification procedures for non-pricing programs shall consist of a review of all certified free and reduced-priced applications on file.

For sponsoring organizations of day care homes, SDE verification procedures shall consist of a review only of the certified free and reduced-priced IEFs on file for those day care homes that are required to be reviewed when the sponsoring organization is reviewed. However, SDE shall ensure that the day care homes selected for review are representative of the proportion of tier I, tier II, and tier II mixed day care homes with a mix of income eligible and non-income eligible children in the sponsorship, and shall ensure that at least 10 percent of all free and reduced-priced applications (or other documentation, if applicable) on file for the sponsorship are verified.

The review of IEFs shall ensure that:

1. The form has been correctly and completely executed by the household;
2. The Institution has correctly determined and classified the eligibility of enrolled participants for free or reduced-priced meals or, for day care homes, for tier I or tier II reimbursement, based on the information included on the form submitted by the household;
3. The Institution has accurately reported to SDE the number of enrolled participants meeting the criteria for free or reduced-priced meal eligibility or, for day care homes,

the number of participants meeting the criteria for tier I reimbursement, and the number of enrolled participants that do not meet the eligibility criteria for those meals in the monthly claim; and

4. SDE may conduct further verification of the information provided by the household on the certified form for CACFP meal eligibility. If this effort is undertaken, SDE shall conduct this further verification for non-pricing programs in accordance with the procedures described above.

## **VERIFICATION PROCEDURES FOR PRICING PROGRAMS**

For pricing programs, in addition to the verification procedures SDE shall also conduct verification of the income information provided on the approved IEF for free and reduced priced meals and, at SDE discretion, verification may also include confirmation of other information required on the form. However,

1. If a SNAP, FDPIR or TANF case number is provided for a child, verification for such child shall include only confirmation that the child is included in a currently certified SNAP or FDPIR household or is a TANF recipient; or
2. If a SNAP or FDPIR case number or SSI or Medicaid assistance identification number is provided for an adult, verification for such adult shall include only confirmation that the adult is included in a currently certified SNAP or FDPIR household or is currently certified to receive SSI or Medicaid benefits.

SDE shall perform verification on a random sample of no less than 3 percent of the approved IEF's in an Institution which is a pricing program. Households shall be informed in writing that they have been selected for verification and they are required to submit the requested verification information to confirm their eligibility for free or reduced-priced benefits by such date as determined by SDE. Those households shall be informed of the type or types of information and/or documents acceptable to SDE and the name and phone number of an official who can answer questions and assist the household in the verification effort.

Households of enrolled children selected for verification shall also be informed that if they are currently certified to participate in SNAP, FDPIR or TANF they may submit proof of that certification in lieu of income information. In those cases, such proof shall consist of a current "Notice of Eligibility" for SNAP, FDPIR or TANF benefits or equivalent official documentation issued by a SNAP, Indian Tribal Organization, or welfare office which shows that the children are members of households currently certified to participate in SNAP, FDPIR or TANF. An identification card for any of these programs is not acceptable as verification unless it contains an expiration date. Households of enrolled adults selected

for verification shall also be informed that if they are currently certified to participate in SNAP or FDPIR or SSI or Medicaid Programs, they may submit proof of that certification in lieu of income information. In those cases, such proof shall consist of:

1. A current “Notice of Eligibility” for SNAP or FDPIR benefits or equivalent official documentation issued by a SNAP, Indian Tribal Organization, or welfare office which shows that the adult participant is a member of a household currently certified to participate in the SNAP Program or FDPIR. An identification card is not acceptable as verification unless it contains an expiration date; or
2. Official documentation issued by an appropriate SSI or Medicaid office which shows that the adult participant currently receives SSI or Medicaid assistance. An identification card is not acceptable as verification unless it contains an expiration date. All households selected for verification shall be advised that failure to cooperate with verification efforts will result in a termination of benefits.

Sources of information for verification may include written evidence, collateral contacts, and/or systems of records.

**Written evidence** shall be used as the primary source of information for verification. Written evidence includes written confirmation of a household’s circumstances, such as wage stubs, award letters, letters from employers, and, for enrolled children, current certification to participate in the Food Stamp, FDPIR or TANF Programs, or, for adult participants, current certification to participate in the Food Stamp, FDPIR, SSI or Medicaid Programs. Whenever written evidence is insufficient to confirm eligibility, SDE may use collateral contacts.

**Collateral contact** is a verbal confirmation of a household’s circumstances by a person outside of the household. The collateral contact may be made in person or by phone and shall be authorized by the household. The verifying official may select a collateral contact if the household fails to designate one or designates one which is unacceptable to the verifying official. If the verifying official designates a collateral contact, the contact shall not be made without providing written or oral notice to the household. At the time of this notice, the household shall be informed that it may consent to the contact or provide acceptable verification in another form. The household shall be informed that its eligibility for free or reduced priced meals shall be terminated if it refuses to choose one of these options. Collateral contacts could include employers, social service agencies, and migrant agencies.

**Systems of records** to which SDE may have routine access are not considered collateral contacts. Information concerning income, family size, or SNAP/FDPIR/TANF certification for enrolled children, or SNAP/FDPIR/SSI/Medicaid certification for enrolled adults, which is

maintained by other government agencies and to which SDE can legally gain access may be used to confirm a household's eligibility for Program meal benefits. One possible source could be wage and benefit information maintained by the State unemployment agency, if that information is available. The use of any information derived from other agencies must be used with applicable safeguards concerning disclosure.

Verification by SDE of receipt of SNAP, FDPIR, TANF, SSI or Medicaid benefits shall be limited to a review to determine that the period of eligibility is current. If the benefit period is found to have expired, or if the household's certification has been terminated, the household shall be required to document their income eligibility.

The SDE may work with the Institution to verify the documentation submitted by the household on the application; however, the responsibility to complete the verification process may not be delegated to the Institution.

If a household refuses to cooperate with efforts to verify, or the verification of income indicates that the household is ineligible to receive benefits or is eligible to receive reduced benefits, SDE shall require the pricing program Institution to terminate or adjust eligibility in accordance with the following procedures.

1. Institution officials shall immediately notify families of the denial of benefits.
2. Advance notification shall be provided to families which receive a reduction or termination of benefits 10 calendar days prior to the actual reduction or termination.
3. The 10-day period shall begin the day the notice is transmitted to the family.
4. The notice shall advise the household of:
  - a) The change;
  - b) The reasons for the change;
  - c) Notification of the right to appeal the action and the date by which the appeal must be requested in order to avoid a reduction or termination of benefits;
  - d) Instructions on how to appeal; and
  - e) The right to reapply at any time during the year.

The reasons for ineligibility shall be properly documented and retained on file at the Institution.

When a household disagrees with an adverse action which affects its benefits and requests a fair hearing, benefits shall be continued as follows while the household awaits the hearing:

1. Households which have been approved for benefits and which are subject to a reduction or termination of benefits later in the same year shall receive continued

benefits if they appeal the adverse action within the 10-day advance notice period;  
and

2. Households which are denied benefits upon application shall not receive benefits.

The SDE shall inform Institution officials of the results of the verification effort and the action which will be taken in response to the verification findings. This notification shall be made in accordance with the procedures outlined in 226.14(a).

If the verification results disclose that an Institution has inaccurately classified or reported the number of participants eligible for free, reduced-priced or paid meals, SDE shall adjust Institution rates of reimbursement retroactive to the month in which the incorrect eligibility figures were reported by the Institution to SDE.

If the verification results disclose that a household has not reported accurate documentation on the IEF which would support continued eligibility for free or reduced-priced meals, SDE shall immediately adjust the Institution rates of reimbursement. However, this rate adjustment shall not become effective until the affected households have been notified and any ensuing appeals have been heard.

#### **VERIFICATION PROCEDURES FOR SPONSORING ORGANIZATIONS OF DAY CARE HOMES**

Prior to certifying an IEF for a day care home that qualifies as tier I day care home on the basis of the provider's household income, sponsoring organizations of day care homes shall conduct verification of such income. Sponsoring organizations of day care homes may verify the information on IEFs submitted by households of children enrolled in day care homes.

## Eligibility Disclosure

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The SDE or Institution, as appropriate, may disclose aggregate information about children eligible for free and reduced-priced meals to any party without parental notification and consent when children cannot be identified through release of the aggregate data or by means of deduction. Aggregate information is the total number of free, reduced-priced and paid participants in an Institution or center. Additionally, the SDE or Institution may disclose information that identifies children eligible for free and reduced-priced meals to other CACFP Institutions and the individuals specified below without parental/guardian consent. The SDE or Institution that makes the free and reduced-priced meal eligibility determination is responsible for deciding whether to disclose program eligibility information.

### **PERSONS AUTHORIZED TO RECEIVE ELIGIBILITY INFORMATION**

Only persons directly connected with the administration or enforcement of a program or activity listed in this section may have access to children's free meal eligibility information, without parental consent. Persons considered directly connected with administration or enforcement of a program or activities listed in this section are Federal, State, or local program operators responsible for the ongoing operation of CACFP or activity or persons responsible for program compliance. CACFP operators may include persons responsible for carrying out CACFP requirements and monitoring, reviewing, auditing, or investigating CACFP. CACFP operators may include contractors to the extent those persons have a need to know the information for program administration or enforcement. Contractors may include evaluators, auditors, and others with whom Federal or SDE and CACFP operators contract with to assist in the administration or enforcement of their program in their behalf.

### **DISCLOSURE OF CHILDREN'S NAMES AND FREE OR REDUCED-PRICED MEAL ELIGIBILITY STATUS**

The SDE or Institution, as appropriate, may disclose, without parental consent, only children's names and eligibility status (whether they are eligible for free meals or reduced-priced meals) to persons directly connected with the administration or enforcement of:

1. A Federal education program;
2. A State health program or State education program administered by the State or local education agency;
3. A Federal, State, or local means tested nutrition program with eligibility standards comparable to the National School Lunch Program (i.e., food assistance programs for households with incomes at or below 185 percent of the Federal poverty level); or
4. A third party contractor assisting in verification of eligibility efforts by contacting households who fail to respond to requests for verification of their eligibility.

## **DISCLOSURE OF ALL ELIGIBILITY INFORMATION**

In addition to children's names and eligibility status, the SDE or Institution, as appropriate, may disclose without parental/guardian consent, all eligibility information obtained through the free and reduced-priced meal eligibility process (including all information on the IEF or obtained through Direct Certification) to:

1. Persons directly connected with the administration or enforcement of programs authorized under the Richard B. Russell National School Lunch Act or the Child Nutrition Act of 1966. This means that all eligibility information obtained for the Child and Adult Care Food Program may be disclosed to persons directly connected with administering or enforcing regulations under the National School Lunch Program, Special Milk Program, School Breakfast Program, Summer Food Service Program, and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) (Parts 210, 215, 220, 225 and 246, respectively);
2. The Comptroller General of the United States for purposes of audit and examination; and
3. Federal, State, and local law enforcement officials for the purpose of investigating any alleged violation of CACFPs requirements listed in this section.

## **USE OF FREE AND REDUCED-PRICED MEALS ELIGIBILITY INFORMATION BY PROGRAMS OTHER THAN MEDICAID OR IDAHO CHILDREN'S HEALTH INSURANCE PROGRAM (CHIP)**

The SDE and Institutions may use children's free meal eligibility information for administering or enforcing the Child and Adult Care Food Program. Additionally, any other Federal, State, or local agency charged with administering or enforcing the Child and Adult Care Food Program may use the information for that purpose. Individuals and programs to which children's free or reduced-priced meal eligibility information has been disclosed under this section may use the information only in the administration or enforcement of the receiving program. No further disclosure of the information may be made.

## **DISCLOSURE OF CHILDREN'S FREE OR REDUCED-PRICED MEAL ELIGIBILITY INFORMATION TO MEDICAID AND/OR CHIP, UNLESS PARENTS DECLINE**

Children's free or reduced-priced meal eligibility information may only be disclosed to Medicaid or CHIP when both SDE and the Institution so elect, the adult household member or guardian does not decline to have their eligibility information disclosed and the other provisions described in this section are met.

The SDE or Institution, as appropriate, may disclose children's names, eligibility status (whether they are eligible for free or reduced-priced meals), and any other eligibility

information obtained through the IEF or obtained through Direct Certification to persons directly connected with the administration of Medicaid or CHIP.

Persons directly connected to the administration of Medicaid and CHIP are State employees and persons authorized under Federal and State Medicaid and CHIP requirements to carry out initial processing of Medicaid or CHIP applications or to make eligibility determinations for Medicaid or CHIP.

SDE must ensure that:

1. The Institution and health insurance program officials have a written agreement that requires the health insurance program agency to use the eligibility information to seek to enroll children in Medicaid and CHIP; and
2. Parents/guardians are notified that their eligibility information may be disclosed to Medicaid or CHIP and given an opportunity to decline to have their children's eligibility information disclosed, prior to any disclosure.

#### **USE OF CHILDREN'S FREE AND REDUCED-PRICED MEAL ELIGIBILITY INFORMATION BY MEDICAID/CHIP**

Medicaid and CHIP agencies and health insurance program operators receiving children's free and reduced-priced meal eligibility information must use the information to seek to enroll children in Medicaid or CHIP. The Medicaid and CHIP enrollment process may include targeting and identifying children from low income households who are potentially eligible for Medicaid or CHIP for the purpose of seeking to enroll them in Medicaid or CHIP. No further disclosure of the information may be made. Medicaid and CHIP agencies and health insurance program operators also may verify children's eligibility in a program under the Child Nutrition Act of 1966 or the Richard B. Russell National School Lunch Act.

#### **NOTIFYING HOUSEHOLDS OF POTENTIAL USES AND DISCLOSURES OF CHILDREN'S FREE AND REDUCED-PRICED MEAL ELIGIBILITY INFORMATION**

Households must be informed that the information they provide on the IEF will be used to determine eligibility for free or reduced-priced meals and that their eligibility information may be disclosed to other programs.

For disclosures to programs, other than Medicaid or CHIP, that are permitted access to children's eligibility information, without adult household member or guardian consent, the SDE or Institution, as appropriate, must notify parent/guardians at the time of application that their children's free or reduced-priced meal eligibility information may be disclosed. The SDE or Institution, as appropriate, must add the following statement to the Privacy Act

notice/statement as required, “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.”

For children determined eligible for free meals through Direct Certification, the notice of potential disclosure is included in the document informing parents/guardians of their children’s eligibility in the qualifying program (TAFI, SNAP, or Foster Agency).

For disclosure to Medicaid or CHIP, the SDE or Institution, as appropriate, must notify parents/guardians that their children’s free or reduced-priced meal eligibility information will be disclosed to Medicaid and/or CHIP unless the parent/ guardian elects not to have their information disclosed and notifies the SDE or Institution, as appropriate, by a date specified by the SDE or Institution, as appropriate. Only the parent or guardian who is a member of the household or family for purposes of the IEF may decline the disclosure of eligibility information to Medicaid or CHIP. The notification must inform parents/guardians that they are not required to consent to the disclosure, that the information, if disclosed, will be used to identify eligible children and seek to enroll them in Medicaid or CHIP, and that their decision will not affect their children’s eligibility for free or reduced-priced meals. The notification may be included in the Letter to Households that accompanies the IEF, on the IEF itself or in a separate notice provided to parents/guardians. The notice must give parents/guardians adequate time to respond if they do not want their information disclosed. The SDE or Institution, as appropriate, must add the following statement to the Privacy Act notice/statement, “we may share your information with Medicaid or Idaho Children’s Health Insurance Program (CHIP), unless you tell us not to. The information, if disclosed, will be used to identify eligible children and seek to enroll them in Medicaid or CHIP.” For children determined eligible for free meals through Direct Certification, the notice of potential disclosure and opportunity to decline the disclosure may be included in the document informing parent/guardians of their children’s eligibility for free meals through the Direct Certification process.

## **OTHER DISCLOSURES**

The SDE and Institutions that plan to use or disclose information about children eligible for free and reduced-priced meals in ways not specified in this section must obtain written consent from children’s parents or guardians prior to the use or disclosure.

1. The consent must identify the information that will be shared and how the information will be used.
2. There must be a statement informing adult household members or guardians that

failing to sign the consent will not affect the child's eligibility for free or reduced-priced meals, and that the individuals or programs receiving the information will not share the information with any other entity or program.

3. Parents/guardians must be permitted to limit the consent only to those programs with which they wish to share information.
4. The consent statement must be signed and dated by the child's adult household member or guardian who is a member of the household for purposes of the IEF.

### **AGREEMENTS WITH PROGRAMS/INDIVIDUALS RECEIVING CHILDREN'S FREE OR REDUCED-PRICED MEAL ELIGIBILITY INFORMATION**

Agreements or Memorandum of Understanding (MOU) are recommended or required as follows:

1. The SDE or Institution, as appropriate, should have a written agreement or MOU with programs or individuals receiving eligibility information prior to disclosing children's free and reduced-priced meal eligibility information. The agreement or MOU should include information similar to that required for disclosures to Medicaid and CHIP.
2. For disclosures to Medicaid or CHIP, the SDE or Institution, as appropriate, must have a written agreement with the State or local agency or agencies administering Medicaid or CHIP prior to disclosing children's free or reduced-priced meal eligibility information to those agencies. At a minimum, the agreement must:
  - a) Identify the health insurance program or health agency receiving the children's eligibility information;
  - b) Describe the information that will be disclosed;
  - c) Require that the Medicaid or CHIP agency use the information obtained and specify that the information must be used to seek to enroll children in Medicaid or CHIP;
  - d) Require that the Medicaid or CHIP agency describe how they will use the information obtained;
  - e) Describe how the information will be protected from unauthorized uses and disclosures;
  - f) Describe the penalties for unauthorized disclosure; and
  - g) Be signed by both the Medicaid or CHIP program or agency and the SDE or Institution, as appropriate.

### **PENALTIES FOR UNAUTHORIZED DISCLOSURE OR MISUSE OF CHILDREN'S FREE AND REDUCED-PRICED MEAL ELIGIBILITY INFORMATION**

In accordance with section 9(b)(6)(C) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1758(b)(6)(C)), any individual who publishes, divulges, discloses or makes known

in any manner, or to any extent not authorized by statute or this section, any information obtained under this section will be fined not more than \$1,000 or imprisoned for up to 1 year, or both.

For more information please refer to the Eligibility Manual for School Meals located on the CNP website at <https://www.sde.idaho.gov/cnp/cacfp/> under Food and Nutrition Service (FNS) Manual. This manual is for the Child and Adult Care Food Program and provides additional guidance for determining and verifying eligibility.

# Questions and Answers

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## **WHAT METHODS MAY NON-SCHOOL CACFP INSTITUTIONS USE TO ESTABLISH THE EFFECTIVE DATE OF ELIGIBILITY?**

Non-school CACFP Institutions may use either the date of the adult member of the household's signature or the date of certification by the determining official to establish the effective date of eligibility.

## **HOW SHOULD NON-SCHOOL CACFP INSTITUTIONS NOTIFY SDE OF WHICH METHOD THEY WILL USE TO ESTABLISH THE EFFECTIVE DATE OF ELIGIBILITY?**

CACFP Institutions are encouraged to inform the SDE of this decision by providing it in the Institutions IEF procedures in their Management Plan in MyIdahoCNP. During reviews, SDE must ensure the same method has been applied to all individual income eligibility determinations. However, if the date of the adult member of the household's signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification by the determining official.

## **FOR NON-SCHOOL CACFP INSTITUTIONS, IF AN IEF IS SIGNED AND DATED BY THE ADULT HOUSEHOLD MEMBER ON JANUARY 12, 2021, UNTIL WHAT DATE IS IT CONSIDERED VALID?**

It is considered valid from January 1, 2021, through January 31, 2022.

## **FOR NON-SCHOOL CACFP INSTITUTIONS, IF AN INDIVIDUAL INCOME ELIGIBILITY FORM IS SIGNED AND DATED BY THE ADULT HOUSEHOLD MEMBER ON FEBRUARY 23<sup>RD</sup>, BUT IS NOT RECEIVED BY THE INSTITUTION AND CERTIFIED UNTIL MARCH 2<sup>ND</sup>, FOR WHICH MONTH DOES THE INCOME ELIGIBILITY DETERMINATION BECOME EFFECTIVE? WHAT IF THE IEF IS RECEIVED AND CERTIFIED APRIL 2<sup>ND</sup>?**

If the CACFP Institution is using the date of the adult member of the household's signature to determine eligibility, an individual Income Eligibility Form signed and dated by an adult household member in February and certified in March would be valid effective February 1st.

However, if the IEF was received and certified in April, meaning there was a delay in either submitting or certifying the form through the entire month of March, the form is valid effective April 1st. Because the date of the adult member of the household's signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification by the determining official.

**WHEN USING THE DATE OF THE ADULT MEMBER OF THE HOUSEHOLD'S SIGNATURE TO ESTABLISH THE EFFECTIVE DATE OF ELIGIBILITY, WHAT PROTOCOL MUST BE TAKEN IF AN INCOMPLETE OR UNSIGNED INDIVIDUAL INCOME ELIGIBILITY FORM IS SUBMITTED?**

An incomplete individual Income Eligibility Form must be returned to the household for completion. If the form is resubmitted without an updated signature and date and, if the date of the adult member of the household's signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification by the determining official.

**ARE CENTERS AND PROVIDERS REQUIRED TO DATE STAMP INCOME ELIGIBILITY FORMS WHEN THEY ARE SUBMITTED BY THE ADULT HOUSEHOLD MEMBER?**

Date stamps upon submission are not required for non-school CACFP Institutions. The effective date of eligibility is either the date of the adult member of the household's signature or the date of certification by the determining official. Date of submission is not an optional effective date; therefore, no date stamp indicating date of submission is required.