Policy Statement for Free and Reduced-price Meals, Afterschool Snack Programs, and Free Milk

The **Suffield Public Schools** local educational agency (LEA) has entered into an agreement to participate in the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP), and/or the Afterschool Snack Program (ASP), or to provide free milk under the Special Milk Program (SMP), and accepts responsibility for providing free and reduced-price meals and/or free milk to eligible children in the schools under its jurisdiction each school day.

The LEA assures the Connecticut State Department of Education (CSDE) that the following policy with respect to determining the eligibility of children for free and reduced-price meals will be uniformly implemented in all NSLP and SBP schools under its jurisdiction, as well as free milk in the SMP.

I. LEA Responsibilities

In fulfilling its responsibilities, the LEA agrees to each of the conditions below.

A. The LEA will indicate on the online agreement, the name of the determining official or officials designated by the LEA to make eligibility determinations on its behalf for free and reduced-price meals or for free milk.

B. The LEA will assure that for children who are not categorically eligible for free or reduced-price meal benefits, the LEA will determine eligibility for free or reduced-price meals or free milk in accordance with the current school year's Income Eligibility Guidelines (IEG).

C. The LEA will indicate the specific procedures the LEA will use in accepting applications from families for free and reduced-price meals, or for free milk. Additionally, the LEA must include the specific procedures for obtaining documentation for determining children's eligibility through direct certification, in lieu of an application. LEAs shall also provide households that are directly certified with a notice of eligibility, as specified in the Code of Federal Regulations (CFR) 7 CFR 245.6(c)(2), and shall include this notice in their policy statement.

D. The LEA will provide a description of the method or methods to be used to collect payments from those children paying the full price for meals or milk, or the reduced-price of a meal, which will prevent the overt identification of the children receiving free or reduced-price meals or free milk.

E. The LEA will provide an assurance that the school will abide by the hearing procedure set forth in 7 CFR 245.7 and the nondiscrimination practices set forth in 7 CFR 245.8.

F. The LEA will serve meals free to:
- children from families or households whose income is at or below the free income level in the current IEGs;
- children from households that provide a confirmed case number on the application; and
- children who are categorically free as indicated in 7 CFR 245.6 and the IEGs.

G. The LEA will serve meals at a reduced-price to children from families whose income is at or within the income level in the current IEG for reduced-price meals. The price for meals cannot be more than $.40 for lunch, more than $.30 for breakfast, or more than $.15 for afterschool snack.

H. The LEA will put procedures in place when selling competitive foods during meal service that prevent overt identification of the children receiving free or reduced-price meals or free milk.

I. The LEA will prevent disclosure of confidential free and reduced-price eligibility information as required under 7 CFR 245.6 (f-k).

II. LEA Operation of the School Food Service Program

The LEA agrees to operate its school food service programs in compliance with the requirements below.

A. Nondiscrimination

LEAs participating in the NSLP, SBP, or SMP shall not discriminate on the basis of race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by the United States Department of Agriculture (USDA). The LEA shall ensure that there are no barriers for participation in the Child Nutrition Programs (CNP) for Limited English Proficient (LEP) families, and that the LEA will communicate with parents and guardians in a language they can understand through the certification and verification processes.

The LEA shall take all necessary actions to ensure compliance with the nondiscrimination practices for children eligible to receive free and reduced-price meals or free milk, as outlined below.

1. The names of the children shall not be published, posted, or announced in any manner.
2. There shall be no overt identification of any of the children by the use of special tokens or tickets or by any other means.
3. The children shall not be required to work for their meals or milk.
4. The children shall not be required to use a separate dining area, go through a separate serving line, enter the dining area through a separate entrance, or consume their meals or milk at a different time.
5. When more than one lunch or breakfast or type of milk is offered that meets the requirements prescribed in 7 CFR 210.10, 7 CFR 220.8 or the definition of "milk" in 7 CFR 215.2, the children shall have the same choice of meals or milk that is available to those children who pay the full price for their meal or milk.
6. LEAs shall use the application form and letter template to prepare the notice or cover letter sent to parents/households as provided by the CSDE. In addition, LEAs shall also use the CSDE-provided templates for notification of benefits letters and verification communications. Use of any other documents requires prior approval by the CSDE.

The LEA shall have written procedures for receiving and processing Civil Rights complaints that identify the outside agency to which complaints are forwarded (i.e. the CSDE, Northeast Regional Office in Boston, the Food and Nutrition Service, Office of Civil Rights, or the USDA Office of Civil Rights). Procedures must:

- include whether an allegation is made verbally or in person;
- have the person receiving the allegation record the complaint; and
- ensure that the procedures for receiving a complaint do not prevent a complaint from being accepted.

Additionally, the LEA's procedures cannot indicate that they attempt to resolve the complaint themselves, nor can the LEA's complaint process be a prerequisite for accepting a complaint.

The LEA must include the following nondiscrimination statement on all applicable CNP materials and at the point where reimbursable meals or milk are served:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
(2) fax: (202) 690-7442; or
(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

B. Anonymity and Accountability

LEAs shall establish procedures to collect money from children who pay for their meals and to account for the number of free, reduced-price, and full-price meals served at the point of sale (POS), or the number of cartons of free and full-price milk served. The LEA will ensure that overt identification of a child's eligibility status does not take place at the POS.

III. LEA Administration of the Eligibility Process

The LEA agrees to administer the eligibility process in compliance with the requirements below.

A. Notice to Parents

At the beginning of each school year, and whenever there is a change in eligibility criteria, each LEA must send to the parent/guardian in each household a letter provided by the CSDE, including the application form for free and reduced-price meals. The letter shall indicate how the household may apply for benefits. Any modifications to the CSDE letter template must be reviewed and approved by the CSDE.

B. Public Release

The LEA must distribute the Public Media Release annually, describing how families may apply for benefits and providing the current IEGs. New LEAs are required to distribute a Public Media Release announcing their sponsorship of the program.

The local unemployment office and area employers contemplating large layoffs will be told of the eligibility criteria for free and reduced-price meals and free milk, and other information supplied in the letter to parents/guardians.

C. Applications

Parents/guardians in households will be asked to submit one application per household to the approving officials. Applications may be submitted at any time during the year. Parents/guardians enrolling a new student in the school during the school year for the first time must be given an application.

A student's eligibility will transfer from one school to another. The school must collect the documentation from the previous school.

Parents/guardians must be given notification of the eligibility determination within 10 operating days of receipt of the application. The LEA must use the notification template provided by the CSDE, or receive approval from the CSDE to use an alternate form. The service of free or reduced-price meals or free milk will begin immediately upon determining eligibility.

Parents/guardians in households must be informed in writing of the reasons for denial of their application. They must be advised of the Hearing Official and the Hearing Process.

D. Direct Certification

LEAs must access the Direct Certification database weekly and must monitor the case management module weekly. At the beginning of each school year, the LEA must provide households with notification that their children are eligible for free or reduced-price meals through Direct Certification, and that no application for benefits is required. LEAs must extend free benefits to all children in the household.

E. Categorical Eligibility

Households must also be advised that a foster child is categorically eligible for free meals and may be included as a member of the foster family if the foster family chooses to apply for benefits for other children. The LEA must explain that including children in foster care as household members can help other children in the household qualify for free or reduced-price meals. If the foster family is not eligible for free or reduced-price meal benefits, this does not prevent a foster child from receiving free meal benefits.

Households with children who are categorically eligible under "Other Source Categorically Eligible Programs," including Head Start and homeless children, should contact the school for assistance in receiving benefits, and mark the application in the appropriate box.

F. Special Provisions

Special provision options are available to LEAs with prior CSDE approval, and allow household applications to be collected less frequently. These two options are described below.

- Provision 2: This provision reduces application and meal counting burdens. Schools cannot charge students for meals at any time. During the Base Year (year 1), the free and reduced-price process must be followed, including verification of applications. In the base year, schools must count meals by category (free, reduced-price and paid). In subsequent years, the verification process is not required. In the subsequent three years, reimbursement is based on claiming percentages established in the base year.

- Community Eligibility Provision (CEP): This process reduces application and meal counting burdens. Schools may participate if 40 percent or more of their students are certified as free eligible through direct certification. Schools may not charge students for meals. Identified student percentages (ISP) are determined by April 1 of the prior year. Reimbursement is determined by the ISP and the current USDA multiplier. This program operates for a four-year period.

G. Hearing Procedure

A family may appeal a decision made by the LEA with respect to an application the family has made for free or reduced-price meals or for free milk. The hearing shall be held with reasonable promptness, and the LEA shall provide convenient and adequate notice as to the time and place of the hearing. Based on 7 CFR 245.7, the hearing shall provide for both the family and the LEA:

- a simple, publicly announced method to make an oral or written request for a hearing;
- an opportunity to be assisted or represented by an attorney or other person;
- an opportunity to examine, prior to and during the hearing, any documents and records presented to support the decision under appeal;
- an opportunity to present oral or documentary evidence and arguments supporting a position without undue interference; and
- an opportunity to question or refute any testimony or other evidence and to confront and cross-examine any adverse witnesses.

Additionally, the LEA shall ensure that:

- the hearing shall be conducted and the decision made by a hearing official who did not participate in making the decision under appeal or in any previously held conference;
- the decision of the hearing official shall be based on the oral and documentary evidence presented at the hearing and made a part of the hearing record;
- the parties concerned and any designated representative shall be notified in writing of the decision of the hearing official;
- a written record shall be prepared with respect to each hearing, which shall include the challenge or the decision under appeal, any documentary evidence and a summary of any oral testimony presented at the hearing, the decision of the hearing official, including the reasons therefor, and a copy of the notification to the parties concerned of the decision of the hearing official; and
- the written record of each hearing shall be preserved for a period of three years, and shall be available for examination by the parties concerned or their representatives at any reasonable time and place during that period.

When a household disagrees with an adverse action that affects its benefits and requests a fair hearing, benefits shall be continued while the household awaits the hearing and decision.

- Households that have been approved for benefits and that are subject to a reduction or termination of benefits later in the same school year, shall receive continued benefits if they appeal the adverse action within the 10 calendar day advance notice period.
- Households that are denied benefits upon application shall not receive benefits.

H. Records

The LEA shall maintain a file of the following records for three years after the end of the fiscal year to which they pertain:

- all applications, verification records and documentation of action taken; and
- records of all appeals, and challenges, and their disposition.

I. Verification

Verification is required for participation in the NSLP and SBP. Each LEA shall designate a verification official to complete the activities for the entire LEA.

The LEA shall follow the program regulations and guidance provided by the CSDE for the verification of applications, will conduct verification in accordance with program regulations by November 15 each year, and will maintain all records documenting the verification process. The annual Verification Collection Report (FNS 742) shall be completed and submitted by **December 15**, using the CSDE's Online Application and Claiming System for Connecticut CNP.

J. Amendments to Policies

Unless there is a substantive change, the LEA does not need to update the policy statement and resubmit for CSDE approval. Routine changes, such as the inclusion of the new income eligibility guidelines, do not require resubmission.

K. The LEA must amend its policy statement for any substantive changes to its free and reduced-price policy, and include a description of the change. In all cases, the LEA must have an approved policy statement on file at the CSDE that accurately describes its current free and reduced-price policies. Amendments must be submitted for approval to the CSDE by **September 15**. The amendments must be approved by the CSDE prior to implementation. The amendments must reflect:

- changes made by the LEA, e.g., changes in money collection and POS systems, designation of a new hearing officials, changes in procedures for accepting applications, revisions in the letter to households or application for free and reduced-price meals/free milk;
- changes required by laws/regulations; and
- additional information specified by the CSDE.

Attachments

Prior to submitting the completed Policy Statement and related materials below, LEAs should refer to the CSDE's document, *Overview of Meal Counting and Claiming Process.* These forms are available on the CSDE's Forms website (see "Application Forms for Free and Reduced Meals," "Money Collection and Point-of-Service (POS) Meal Count Systems" and "Public Release"). The verification forms are available on the CSDE's Verification Procedures for School Nutrition Programs website.

The LEA must upload the twelve attachments below to the CSDE's Online Application and Claiming System for Connecticut CNP. All forms except for the Policy Statement are available as PDF and Word documents.

1. Policy Statement ***(must be signed by an Authorized Representative – not the food service director)***
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/policystatement.pdf

2. Meal Application and Data Management Process
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/mealcount/mealappdata.pdf
   - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/mealcount/mealappdata.doc

3. Site Information on Money Collection and Point-of-Service (POS) Meal Count Systems
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/mealcount/sfadata.pdf
   - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/mealcount/sfadata.doc

4. Public Media Release
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/publicrelease.pdf
   - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/publicrelease.doc

5. Application for Free and Reduced-price School Meals or Free Milk
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/familyapp.pdf
   - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/familyapp.doc

6. Parent/Guardian Letter: Frequently Asked Questions (FAQs) About Free and Reduced-price School Meals, **and/or** Parent/Guardian Letter: Frequently Asked Questions (FAQs) About Free School Milk
   - School Meals PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/parentmeals.pdf
   - School Meals Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/parentmeals.doc
   - Milk PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/parentmilk.pdf
   - Milk Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/parentmilk.doc

7. Parent/Guardian Notification Letter *(approving or denying meals or milk benefits)*
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/parentnotif.pdf
   - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/parentnotif.doc

8. Parent/Guardian Notification Letter for Direct Certification based on SNAP, TFA or Medicaid Benefits (Version 1)
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/dcparentnotif1.pdf
   - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/dcparentnotif1.doc

9. Parent/Guardian Notification letter for Direct Certification based on Foster Child, Homeless, Runaway or Head Start (Version 2)
   - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/dcparentnotif2.pdf
   - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/dcparentnotif2.doc

10. Parent/Guardian Notification letter for Direct Certification based on Medicaid Benefits – Reduced-Price Meals (Version 3)
    - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/forms/dcparentnotif3.pdf
    - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/forms/dcparentnotif3.doc

11. Letter to Household of Notification of Selection for Verification of Eligibility
    - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/notifiselect.pdf
    - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/verification/notifiselect.doc

12. Letter of Verification Results and Adverse Action for Income Households
    - PDF: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/letteraainc.pdf
    - Word: www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/verification/letteraainc.doc

The attachments are adopted with and considered part of this policy.

An Authorized Representative (not the food service director) must sign and scan the Policy Statement and return to the CSDE using the CNP Online Application and Claiming System.

Signature: _____

Name: **William Hoff**

Title: **Business Manager**

Date: **7/28/2017**

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
(2) fax: (202) 690-7442; or
(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

This document is available on the CSDE's Forms webpage at www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320680.

MOTION TO ADOPT POLICY STATEMENT FOR FREE AND REDUCED PRICE MEALS:

THE SUFFIELD BOARD OF EDUCATION HAS AGREED TO PARTICIPATE IN THE NATIONAL SCHOOL LUNCH PROGRAM, AND THE SCHOOL BREAKFAST PROGRAMS AT SUFFIELD HIGH SCHOOL, SUFFIELD MIDDLE SCHOOL, MCALISTER INTERMEDIATE SCHOOL AND A. WARD SPAULDING SCHOOL AND ACCEPTS RESPONSIBILITY FOR PROVIDING FREE AND REDUCED PRICE MEALS.

THE SCHOOL FOOD AUTHORITY ASSURES THE CONNECTICUT STATE DEPARTMENT OF EDUCATION THAT THE SCHOOL FOOD AUTHORITY WILL UNIFORMLY IMPLEMENT THE POLICY TO DETERMINE CHILDREN'S ELIGIBILITY FOR FREE AND REDUCED PRICE MEALS IN ALL SCHOOLS THAT PARTICIPATE IN THE NATIONAL SCHOOL LUNCH PROGRAM AND SCHOOL BREAKFAST PROGRAM. IN FULFILLING ITS RESPONSIBILITIES, THE SCHOOL FOOD AUTHORITY AGREES TO ALL CONDITIONS OUTLINED IN THIS "POLICY" (AS ATTACHED HERETO).

MOTION BY:_____

SECONDED BY:_____

VOTE: YEA: _____ NAY:_____

DATE OF MEETING: _____