Household Size-Income Statements and Determining Eligibility (FDCH Sponsors)

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This GM details the CACFP requirements pertaining to Household Size-Income Statements (HSIS) and determining their eligibilities for providers to receive Tier 1, Tier 2, and Tier Mixed meal rates.

PROVIDER / HOUSEHOLD LETTERS AND HOUSEHOLD SIZE-INCOME STATEMENTS (HSIS)

The FDCH component has three eligibility scenarios requiring slightly different Household Letters and HSIS forms. They are part of this GM as Attachments 1, 2 and 3; see below for descriptions of each and their applicable scenarios. Sponsors must use these attachments unless otherwise approved by DPI.

The Provider/Household Letters explains the HSIS. They include:

- Instructions for how to complete the HSIS;
- Current annual income eligibility guidelines for a household to determine whether they may be eligible for Tier 1 meal rates; and
- A statement that households are not required to complete and return the form.

Completion of Household Letter Prior to Distribution

Sponsors must sign the bottom of the *Provider/Household Letter* within each of the 3 Attachments prior to distribution.

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Household Size-Income Statements and Determining Eligibility (FDCH Sponsors)

The Household Size-Income Statements (HSIS) are the DPI-required forms which the sponsor must use to collect information from households to determine their eligibilities for Tier 1 and Tier 2 meal reimbursement rates.

- Sponsors must distribute the current HSIS form (with the accompanying Provider/Household Letter) to
 providers or families of enrolled children depending on one of three eligibility scenarios described
 below.
- New HSIS must be submitted annually. Forms are revised by DPI each year in July. At that time, sponsors must discontinue using copies of the past year's Household Letter and HSIS and use the new versions.
- One HSIS can be completed per household for all members; a separate HSIS does not have to be completed for each member.
- Providers/families must submit their completed HSIS (with support documentation if applicable) to the sponsor for making eligibility determinations and approval.
- Completing the HSIS is voluntary. If the provider or household does not return a completed HSIS, the
 provider will receive Tier 2 meal reimbursement rates for the meals they served and submitted on their
 claim.
- Confidentiality: Sponsors must have safeguards in place to protect the confidentiality of all information provided on the HSIS.

Attachment 1: Provider Letter / HSIS for Provider's Own/Residential Foster Children

A provider completes <u>Attachment 1: Provider Letter / HSIS for Provider's Own/Residential Foster Children</u> when they have been determined as Tier I based on area-eligibility and would like to claim reimbursement for meals served to their own enrolled children, residential foster children, and/or other children residing in their home; these children are referred to as "Provider's Own Children".

Refer to GM J - Tiering Requirements for information on area-eligibility determinations.

Provider's Own Children

Provider's Own (PO) children are those who reside in a household and are part of the same economic unit, including (but not limited to) their own children by birth or adoption, foster children, and grandchildren and housemates' children. The provider may only claim their PO children when meeting the following criteria:

1. Eligible based on Provider's HSIS:

Provider's Own (PO) children are potentially eligible for meal reimbursement when the provider is Tier 1 eligible by household size and income or receives program benefits as determined by their submitted HSIS (Attachment 2 for a provider establishing Tier 1 status by their own household eligibility or Attachment 1 for a provider who is Tier 1 based on area-eligibility).

If the provider is not eligible based on a completed HSIS (Attachment 1 or Attachment 2), then the PO children are not eligible for meal reimbursement, except if the PO children are in one of the categories explained in the section Children Qualifying for Automatic Tier 1 Eligibility of this GM.

2. Presence of Non-residential children

If the PO children are Tier 1 eligible based on a completed HSIS, then at least one non-residential child must be present and participating in the meal when served to the provider's own.

Further information on claiming meals served to PO children are in <u>GM B - Criteria for Meal</u> Reimbursement.

Attachment 2: Provider Letter / HSIS for Establishing Provider's Tier 1 Status

A provider completes <u>Attachment 2: Provider Letter / HSIS for Establishing Provider's Tier 1 Status</u> when they do not qualify for area-eligibility (*based on school or census data – see GM J*) and would like to establish eligibility as a Tier I home using their household size and income level or receipt of benefits.

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Submission of Verification Documents

Providers submitting a completed HSIS to establish eligibility as a Tier 1 provider must also submit verification documents to substantiate all of the eligibility information reported on their completed HSIS:

- Receipt of benefits (FoodShare WI, Wisconsin Works (W-2) Programs, or FDPIR) for these programs' automatic Tier 1 eligibility;
 OR
- If qualifying by household size and income, documentation to substantiate each household member's reported income by source.

Their provider's HSIS is incomplete until they have submitted all needed verification documents to support the information reported on the HSIS.

- Refer to the section *HSIS Verification Requirements* in the <u>Determining Income Statements and Verification: A Step-by-Step Guide</u> for further guidance on the following:
 - ✓ Required documents that must be submitted for verification;
 - Exceptions only permitted for new providers just starting their child care business when:
 - Their household does not participate in benefit programs and did not receive any income during the month prior to their first operating month; and
 - Their previous year's income or prior income earned does not accurately reflect their current and/or projected net income.

Attachment 3: Household Letter / HSIS for Establishing Tier 1 Status for Children Enrolled in Tier 2 Homes A Tier 2 provider requests the sponsor to distribute Attachment 3: Household Letter / HSIS for Establishing Tier 1 Status for Children Enrolled in Tier 2 Homes when they would like to receive Tier 1 rates for meals served to non-residential children in care based on their families' household size and income level or receipt of benefits.

Transmission of HSIS by Tier 2 Providers

Sponsors are not required to but may offer Tier 2 providers the option of assisting with the transmission of completed HSIS from families of enrolled children to the sponsor for eligibility determinations.

The provider's role in this process is strictly limited to this function.

Providers:

- Must not require families to complete a HSIS;
- Are not allowed to review the completed HSIS or in any way assist the family with completing the HSIS;
- If offering to collect the completed HSIS from the families and forward them to the sponsor on their behalf for eligibility determinations, the provider must inform the families they have the choice to either return the completed HSIS directly to the sponsor or back to them:
 - If choosing to return their completed form directly to the sponsor, they must send it to the address printed on the accompanying Household Letter.

(Screenshot below is an example of sponsor information listed on the bottom of the Household Letter)

Submitting Completed HSIS for Eligibility Determination: You must submit your completed HSIS for the sponsor to make an eligibility determination. Your provider may offer to collect the completed HSIS from the families of their enrolled children and then forward them to the sponsor for making eligibility determinations. If the provider offers to collect the completed HSIS, you may choose to submit your completed HSIS by either:

- Giving your completed HSIS to the provider with your consent (by initialing the household member consent statement in Part 3 of the HSIS) for them to forward your completed HSIS to the sponsor on your behalf; OR
- Submitting the completed HSIS directly to the Sponsor by email, regular mail, or fax to the sponsor at:

Name We Care Inc. Email WeCare@gmail.com Address 702 South Bennett St., Hudson WI 55667 Fax 608.210.4411

We Care Inc. is not allowed to share any of your children's eligibility information or their eligibility determination with your provider. If you have any questions or concerns, call <u>Jeremiah Samuelson</u> with We Care Inc. at 608.210.4410

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If choosing to return their completed form back to the provider who will then forward it to the sponsor on their behalf, they must give the provider written consent by initialing the household member consent statement in Part 3 at the bottom of the HSIS form. (Screenshot below shows the provider consent statement at the bottom of the HSIS)

PART 3: Signature

An adult household member must sign and date this form.

If Part 2 is complete with the adult signing the form must list the last four digits of their SS# OR check "None" if they do not have I CERTIFY that all it formation on this form is true. I understand that this information is given in connection with the receipt of Federal fund and that CACEP difficials may verify the information. I am aware that if I purposely give false information, the home provider caring for my children may as meal reimbursement, and I may be prosecuted under applicable State and Federal laws.

Signature of Adult Household Member

Signature Date Mo/Day/Yr. Last 4 digits of SS# (or check "None" if you do not have the second of the second o

Sponsors:

When receiving the families' completed HSIS from a provider, the sponsor must:

- Ensure that the household consent statement on the completed HSIS has been initialed by an adult family member of the enrolled children and that the HSIS is fully complete;
- Investigate suspicious HSIS appearing to have "questionable" information or completion patterns and resolve them prior to making the eligibility determination. Examples of such suspicion are the use of whiteout, completion in pencil or different color inks, obvious differences in handwriting/printing styles, or being a copy of rather than the originally completed HSIS.

CHILDREN QUALIFYING FOR AUTOMATIC TIER 1 ELIGIBILITY

Foster children, Kinship care, children enrolled in Head Start, and migrant, runaway and homeless children

If the sponsor receives the specified documentation described below for these children, they may be determined as Tier 1 eligible **irrespective to the Tier status of the provider or households of enrolled children**. This applies to the following children:

- Enrolled residential children who are not eligible for Tier 1 rates based on the provider's completed HSIS:
- Non-residential children enrolled with Tier 2 providers, whose households do not qualify for Tier 1 rates based on their completed HSIS (Attachment 3).

The automatic Tier 1 eligibility of these children does not extend to other household members, including providers, as does when household members receive benefits from FoodShare WI, Wisconsin Works (W-2) Programs, and FDPIR. (For more information on extending Tier 1 eligibility, refer to the section *Extended Benefit Program Eligibility* in the <u>Determining Income Statements and Verification: A Step-by-Step Guide</u>).

➤ To be clear, providers are not Tier 1 eligible based on their residential children being enrolled in Head Start or being foster, migrant, runaway or homeless children.

Foster Children

Foster children are defined as children whose care and placement are the responsibility of the State or local welfare agency or who are placed with a caretaker household by the court. This may include foster children placed with relatives, provided the placement is made by the State or local foster care system or courts. The State must retain legal custody of the child(ren) for them to be considered foster children.

Foster children are automatically eligible for Tier 1 meal rates when one of the two documents below is obtained by the program:

- 1. **A Completed HSIS** indicating the child is a foster child. Refer to the <u>Determining Income Statements and Verification: A Step-by-Step Guide</u> for details on how to determine the HSIS for foster children.
- 2. **Documentation from State or Local Welfare Agency** confirming the child's status as a foster child and/or that the foster child has been placed in the foster care system.

Children are not considered foster when living/residing under informal caretaker arrangements or permanent guardianship placements. Once a child has been permanently placed in a home, the child is no longer considered a foster child and must be considered as a member of that household.

Kinship Care

Kinship care refers to the care of children by relatives or close family friends. These children are not considered foster children except in the rare cases when the State or local welfare agency retains legal custody. When relatives/family caring for a child has been issued legal guardianship by the court system, this child is not automatically eligible for Tier 1 rates; Tier 1 eligibility of the child requires a completed HSIS that includes the child as a member of the legal guardian's household. Furthermore, if basing the HSIS eligibility determination on household size and income, it must list all household members and their income, including income received for kinship care.

Children Enrolled in Head Start (including Early Head Start)

All children enrolled in Federal and Wisconsin-funded Head Start programs, including Early Head Start, are automatically Tier 1 eligible with certification from the Head Start agency.

• A completed HSIS with a notation of the child being enrolled in Head Start is not sufficient documentation for them to be Tier 1 eligible based on their Head Start enrollment.

The sponsor can determine children enrolled with their providers who are in Head Start as Tier 1 eligible if receiving one of the two documents listed below from the agency administering the Head Start program:

- 1. A copy of the approved Head Start application; or
- 2. A document that includes:
 - Certification that the children are currently enrolled in Head Start;
 - Name or signature of Head Start personnel providing the certification;
 - Date of certification
- These documents must be obtained annually for children remaining enrolled in Head Start for their Tier 1 eligibility status to not expire. If either of the two documents above cannot be obtained annually, the child's Tier 1 eligibility status must be based on a current, completed and correctly approved HSIS.

Migrant, Runaway, and Homeless Children

Written certification of the child's status from an official of the appropriate Runaway and Homeless Youth Program and Migrant Education Program or school official is required for these children to automatically qualify them for Tier 1 meal rates. Refer to the 'Other Source Categorically Eligible Programs' section of the <u>USDA's Eligibility Manual for School Meals</u> for the required documentation.

 Certification must be obtained annually for the children's Tier 1 eligibility status to not expire. If certification cannot be obtained annually, the child's Tier 1 eligibility status must be based on a current, completed and correctly approved HSIS.

INFORMATION TO REPORT ON THE HSIS

Households must complete the HSIS with all of the required information.

• For information on what must be included in Parts 1, 2 and 3 of the HSIS, see the <u>Determining Income</u> <u>Statements and Verification: A Step-by-Step Guide.</u>

Below is information on household members and income that must be listed in Part 2 of the HSIS when the eligibility determination is based on household size and income (and not receipt of benefits from FoodShare WI, WI Works (W-2) Programs, or FDPIR for which case numbers must be listed in Part 1 of the form).

Household Members

Household members are the composition of individuals living together as a household; all household members must be reported on the HSIS.

The terms "family" and "household" are used interchangeably and are defined as a group of related or unrelated individuals living together as one economic unit.

• An Economic Unit share significant income and expenses. More than one economic unit may live in the same house. Separate economic units living in the same house are characterized by prorating expenses and economic independence from each other.

Various living arrangements may result in unique household compositions:

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Individuals to INCLUDE as Household Members:				
	Include adopted children in the household having legal responsibility for			
Adopted child	them. If the household receives assistance payments or a subsidy for the			
	adoption, include the payments as income.			
Child living with one parent,	Include a child as a member of the household with whom they reside. Children			
relative, or friend	of divorced or separated parents are part of the household with custody.			
	Both households complete a HSIS; the HSIS with the most beneficial			
Families with joint	eligibility determination should be recognized as the child's eligibility status.			
Families with joint custody	Example: If the HSIS for one parent is Tier 2 and the HSIS for the other			
	parent is Tier 1, the child may be determined as Tier 1 eligible regardless of			
	where the child is residing.			
Temporarily at school or	Include family members temporarily away at school (e.g., attending boarding			
living elsewhere school or college) or living elsewhere within the household.				
Foreign exchange student	Include as part of the host family's household.			
Deployed Military	Include members of the armed services or military activated or deployed for			
Personnel	any military combat operation within the household.			
	A child paying room and board in most situations contributes a token amount			
Child paying room and	and therefore is not a separate economic unit from the other household			
board	members. They must be included within the household where they reside			
	unless they are in the rare situation of paying for all of their own household			
	expenses, thus being a separate economic unit or separate household.			
Foster child	A foster child may be either included or excluded as a household member,			
	whichever composition qualifies the non-foster children as Tier 1 eligible.			
Individuals to EXCLUDE fr				
A person residing in an	A person residing in an institution or Residential Child Care Institute (RCCI)			
institution or RCCI	must not be counted as a household member.			
A person living elsewhere	,			
for an extended time	not considered members of the household.			
Emancipated child	An emancipated child must not be included within the household.			

Income to Report on HSIS

When completing Part 2 of the HSIS, each household member must report their current income from each income source received on a recurring basis.

Current income is considered to be income received for the current month (the month in which the HSIS is completed) or the month prior to when the HSIS was completed.

• If income received for the current or prior month does not accurately reflect the household member's annual income, the prior year's income may be reported if it accurately reflects their projected annual income.

The chart below identifies the income types and sources that must be reported on the HSIS:

Income Type	Description		
	Gross income from wages, salaries, tips, commissions, and cash bonuses Gross income is earning amounts before deductions (income taxes, Social Security taxes, insurance premiums, bonds, garnishment, bankruptcy, etc.)		
Earnings from work	• Net income from self-owned business, including farms and rental property Net income is the gross receipt of income less operating expenses. Negative net income must not be reported as a loss ; it must be reported as "zero" income.		
	Strike benefits, unemployment compensation, and worker's compensation		
	Military basic pay, cash bonuses, off-base housing, food, and clothing allowances (excluding combat pay and privatized housing allowances)		
	Unemployment benefits	Veteran's benefits	
Public	Worker's compensation	Pensions	
assistance,	• Supplemental Security Income (SSI)	 Retirement Social Security (including 	
alimony,	Regular cash assistance from State	railroad retirement and black lung benefits)	
pensions and	or local governments	Private pensions or disability benefits	
child support	Alimony payments	Adoption assistance payments	
	Child support payments	• Kinship	
Any other income regularly received	 Income from trusts or estates Annuities Investment income Dividends/interest on savings or bonds Dividends from IRA distributions Net rental income 	 Net royalties Cash withdrawn from savings Regular cash payments from persons not living in the household Any other money regularly available to pay for participant's meals 	

Income NOT to Report on HSIS:

- Value of in-kind benefits such as housing for clergy, military base housing, cars for salespersons, and employee medical or dental benefits, etc.
- Military combat pay
- Student financial assistance, including grants and scholarships
- Loans (i.e., bank loans)
- Occasional earnings, including payments received for odd jobs, like babysitting and lawn mowing
- Payments received from a foster care agency or court for the care of foster children
- Payments from any source directly received by an RCCI on a child's behalf
- Lump sum payments or large cash settlements provided as compensation for a loss, such as from an insurance company for fire damage to a house
 - Note: When lump sum payments are put into a savings account and the household regularly draws from that account for living expenses, the amount withdrawn must be reported as income
- The value of benefits received from certain federal programs. A few of these federal programs are:
 - USDA Child Nutrition Programs, WIC, and SNAP (FoodShare WI)
 - o FDPIR (Food Distribution Program for Indian Reservations)
 - Wisconsin Shares Child Care Subsidy (Title XX Child Care and Development Block Grants)

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➤ For a full list of types of income to not report, go to the <u>Federal List of Types of Income Excluded.</u> (This list is maintained by the Supplemental Security Income Program.)

Zero Income or No Income

When zero or no income is reported in Part 2 of the HSIS and all other required information is on the form, this can be accepted to determine the HSIS as Eligible (for Provider's Own children) or Tier 1 Eligible (for children enrolled in Tier 2 homes).

Providers applying for Tier 1 eligibility based on their own HSIS (Attachment 2), specific conditions must be met to approve them as Tier 1 when they have no income to report due to just starting their child care business.

➤ For information on these specific conditions, refer to the section Exception Only for New Providers Starting their Child Care Business with No Current Income in the Determining Income Statements and Verification: A Step-by-Step Guide.

Zero or no income may be reported as:

- Listing zero (\$0) income for household members;
- Checking "no income" for household members; or
- Leaving the income section in Part 2 blank

If the sponsor has knowledge suggesting a household has intentionally misreported zero or no income or its income is above the income guidelines and has left Part 2 blank, the sponsor must not determine the HSIS as Eligible or Tier 1 Eligible. Refer to the <u>Questionable HSIS</u> section below for more information.

ELECTRONIC SUBMISSION OF HSIS

Sponsors may accept electronically-submitted HSIS by the following methods:

- Emailed / faxed copy with the adult household member's handwritten signature and signature date;
- Through electronic signature applications, such as AdobeSign, DocuSign, etc., linking externally identifiable information of the signer or device used for transmission to the signature on the HSIS, including the date / time stamp and signer's name, email account used, or electronic device's IP address;
- Via Web-based Systems: Sponsors must obtain DPI approval prior to implementing web-based systems that collect required HSIS information for making eligibility determinations. Web-based software must have the capability to authenticate legally binding electronic signatures.

Unacceptable HSIS signatures are those having inserted text boxes where the signer has simply typed in their name or pasted screenshots from hard copies of the signer's handwritten signature.

Electronically-submitted HSIS must be legible and accessible for review by USDA and DPI officials, in accordance with the three-year record retention rule (*Refer to GM K-Recordkeeping Requirements*). Only staff authorized with access to confidential information should have access to HSIS (electronically submitted as well as those completed by hand).

Sponsors cannot require providers and families to submit their HSIS electronically. Hard copies of the Provider/Household Letter and HSIS form must be available for households to complete by hand and submit if they choose.

DETERMINING AND APPROVING HSIS

Sponsors must designate a staff person as the "Determining Official" or "DO" who is responsible for reviewing, determining, and approving all HSIS. The DO must keep all information collected on the HSIS as confidential.

The <u>Determining Income Statements and Verification: A Step-by-Step Guide</u> provides detailed steps on how to determine HSIS. The guide supplements this GM by going through each section of the HSIS, with examples, to help the DO decide if the HSIS is completed accurately and to ensure they are correctly determined.

Income Eligibility Calculator

The <u>Income Eligibility Calculator</u> may be used to calculate the total reported household income and determine the household's eligibility.

Note that the eligibility categories will display as Free, Reduced, Non-needy:

- o Free and Reduced means "Eligible" / "Tier 1 Eligible" for home providers' HSIS
- Non-needy means "Not Eligible" / "Tier 2 Eligible" for home providers' HSIS

Use the calculator's eligibility determination to complete the For Sponsoring Organization Use Only box on the HSIS.

Duration of HSIS Determinations

HSIS are valid starting the first of the month written in the *Effective Month of the Determination* box, through the last day of that month a year later. (*HSIS determinations are effective for 13 months*). Once the HSIS expires, it is no longer valid. The eligibility status of providers and their own children (including residential non-related children) must be changed to Not Eligible and Tier 1 eligible children enrolled in Tier 2 homes must be changed to Tier 2 Eligible until the *Effective Month of Determination* of a new HSIS.

Questionable HSIS

The HSIS is a legal document. The household member who signs the HSIS certifies that all reported information is complete, true, and correct. Upon signature, this household member certifies they understand that the information provided on the HSIS is given in connection with the receipt of federal funds; that agency officials may verify the information on the form for accuracy; and that deliberate misrepresentation of information may subject them to prosecution under applicable state and federal laws.

> Sponsors have an obligation to verify all questionable HSIS (verification for cause). If there is concern about the authenticity or correctness of the information provided on a HSIS, the sponsor, DPI, and/or USDA may, on a case-by-case basis, verify the HSIS for "cause" by requesting the household submit verification documents supporting its listed information on the form.

Refer to the Verification for Cause section of the <u>USDA's Eligibility Manual for School Meals</u> for the required protocol in verifying a questionable HSIS for accuracy.

Incomplete HSIS

If a collected HSIS is incomplete because it is missing any of the required information, as specified in the <u>Determining Income Statements and Verification: A Step-by-Step Guide</u>, and in this GM, the DO must not complete Section 3 of the HSIS until the missing information is obtained and properly documented on the form. The provider/children must remain as "Not Eligible" or "Tier 2 eligible" until the month during which the DO approves the HSIS.

Obtaining Missing Information

The HSIS is a legal document and must be treated as such. Sponsors must make all attempts to have the household fully complete the HSIS with all of the required information. However, if households return incomplete forms, the sponsor must contact the household to obtain the information. With the exception of the household member's signature and signature date, the sponsor may obtain information by phone, email or text.

After obtaining missing information, the DO must note the following on the HSIS:

- The information obtained;
- From whom the information was received:
- The Date information was received; and
- The DO's initials

SHARING INCOME ELIGIBILITY INFORMATION BETWEEN CHILD NUTRITION PROGRAMS

Within this section, the program disclosing the children's eligibility will be referred to as the "disclosing agency" and the program receiving the disclosed information will be referred to as the "receiving agency".

The terms of "Free" and "Reduced" used for the eligibility statuses in the NSLP or Child Care Component (group child care) are equivalent to the terms "Eligible" and "Tier 1 Eligible" for FDCHs; "Non-needy" is equivalent to "Not Eligible" for FDCHs.

Eligibility information may be shared between programs participating in any of the following Child Nutrition Programs without giving prior notice to or receive consent from the household: CACFP, NSLP, SBP, SFSP, WIC, and SMP.

Eligibility Information Permitted for Disclosure

Upon request, programs participating in any of the Child Nutrition Programs may disclose children's names and their eligibility information, including their eligibility determinations (Free, Reduced, or Non-needy), to persons directly connected with the administration of other programs participating in a Child Nutrition Program. Disclosing agencies are responsible for deciding what information may be released to the receiving agency and to whom.

Disclosure Protection Requirements

Receiving agencies are subject to the same confidentiality and disclosure protection requirements as the disclosing agencies. This information must only be transmitted to or shared with "persons directly connected" or must legitimately "need to know" the eligibility information in order to carry out their responsibilities in administering the Child Nutrition Programs for their program.

The decision to disclose eligibility information to another program must be taken seriously. The disclosing agency must clearly communicate to the receiving agency that this information cannot be shared with any other program. The receiving agency must ensure that all safeguards are in place to prevent improper disclosure and that it is securely stored.

Disclosure Agreements

Sharing eligibility information between Child Nutrition Programs is an administrative option that is encouraged, but it is not required. The disclosing agency has the option and is encouraged to enter into a written agreement with the receiving agency. This written agreement should specify the information that will be shared, describe how the shared information will be protected, and prohibit the receiving agency from further disclosure of this information with other programs. The sharing agreement should include the disclosing agency's release of the following:

- The children's eligibility determinations; and
- The Effective Month of Determination of each child's eligibility

The receiving agency must report the enrolled children's eligibilities based on the validity period of the HSIS determined by the disclosing agency. Said another way, the receiving agency must report the children as "Eligible" or "Tier 1 Eligible" according to the disclosing agency's *Effective Month of Determination* for each HSIS.

The receiving agency must retain copies of the dated correspondence used by the disclosing agency for transmitting the eligibility information to the receiving agency.

A prototype disclosure agreement is available in the <u>USDA's Eligibility Manual for School Meals</u> Appendix C: Prototype Agreement—Disclosure of Free & Reduced Price Information.