

CONNECTICUT STATE DEPARTMENT OF EDUCATION
Bureau of Health and Nutrition Services, and Child/Family/School Partnerships
Child Nutrition Programs
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Middletown, Connecticut 06457-1543

OPERATIONAL MEMORANDUM

TO: Sponsors of the National School Lunch Program (NSLP), School Breakfast Program (SBP) and Special Milk Programs

FROM: Maureen Staggenborg, Director, Child Nutrition Programs

DATE: October 3, 2005

SUBJECT: Operational Memorandum # 22-05

I. Clarification of Migrant Status Application and Processing
II. Clarification of Direct Verification Provision

- I. **Clarification of Migrant Status Application and Processing** - On the 2005 sample Free and Reduced Price Meal Application form, question #2 asks the parent/guardian if the child they are applying for is homeless, migrant or a runaway. If the household checked off that the child is a migrant, then the child must be enrolled in a *Migrant Education Program (MEP)*. Please note that the following cities and towns in Connecticut are the only locations to have a Migrant Education Program: **Hartford, New Britain, Meriden and Windham**. (In Windham's Migrant Education Program, other towns are included and migrant children in these other towns are also eligible for free meals based on their migrant status.)

If you are not in one of the above mentioned towns listed or you are not part of the Windham consortium you may not approve the application based on migrant status. You must contact the household and request that they complete another application which may qualify the household based on other criteria.

- II. **Clarification of Direct Verification Provision** – The 2004 Child Nutrition and WIC Reauthorization Act permits local educational agencies (LEAs) the option to directly verify free or reduced-price meal applications selected for verification using income and program participation information from a public agency administering the Food Stamp Program, Food Distribution Program on Indian Reservations (FDPIR), and Temporary Family Assistance (TFA) and State Medicaid programs under title XIX of the Social Security Act, or similar income tested program or other source of information as determined by the Secretary.

The United States Department of Agriculture (USDA) has not completed development of the regulations to implement this provision. However, the following guidance is offered regarding direct verification:

- The decision to use direct verification is at the LEA level. The State agency must support and assist with any LEA’s decision to use direct verification.
- Receipt of food stamps, TFA cash assistance, or FDPIR benefits confirms a household’s free status and may be used to verify eligibility. Direct verification with State Medicaid agencies may be used to confirm a household’s free status if the Medicaid income limit is not more than 133 percent of the poverty guidelines and reduced price status if the limit is between 133 percent and 185 percent. In addition, States with Medicaid eligibility above 133 percent of poverty may be able to indicate if a free meal eligible household has income below 133 percent, or a reduced price eligible household has income between 133 – 185 percent.
- Direct verification information may only be used to support the original eligibility status, or the status as corrected by the confirmation review. Household eligibility status can not be changed based on the direct verification information. If there is a conflict, the household must be contacted for additional verification information.
- Direct verification information from public agencies must be the most recent information available. “Most recently available” is information reflecting program participation or income before the 180-day period ending on the date of application for free or reduced price meals.

Questions regarding any part of this memorandum may be directed to:

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