

DATE: October 31, 2011
TO: Authorized Representative, School Food Services
FROM: Karen Wooton, Coordinator, School Food Services
SUBJECT: Verification Reporting of Foster Children

This memorandum provides guidance on the verification process and reporting of categorically eligible foster children. Historically, foster children applied for free meals as households of one based on their own income, if any. For the verification process and reporting, the application was treated as an income based application. Now foster children are categorically eligible and the verification process and reporting procedures must be modified to accommodate this change. In addition, since a foster child's free status is not extended to the other children in the household, the procedures for verification and reporting require clarification.

Local Education Agencies(LEAs) must use the following procedures to verify and report foster children.

Determining the verification application pool:

Foster Children who are Directly Certified

Foster children may be identified and certified eligible through documents obtained or provided by courts or State or local foster agencies. In Missouri, The Department of Social Services, Children's Division, provides the household with a letter indicating the child is a foster child or a list is provided to the LEA. Either form of documentation is acceptable for direct certification documentation. Foster children, with documentation, are considered directly certified and are not subject to verification. Please note this information differs from the initial guidance our office received from USDA regarding the reporting of foster children on the Verification Report under Free Eligible – Not Subject to Verification.

Foster Children Appearing on an Application(s)

Foster children may be identified and certified eligible through an application if they are not directly certified. It is the foster family's choice whether to submit separate applications for the foster child and for the non-foster children in their household or combine all the children on a single application. Both types of applications would be included in the verification pool.

- If a directly certified foster child is listed on an approved application with the non-foster children in the household, that application is considered an **income** application. The application is included in the verification pool, but no eligibility verification is done for the foster child since she/he was directly certified. If the foster child has any income it must be included on the application and is subject to verification.

- If the foster family submits **one application** listing the foster child(ren) and other children in the household, the foster child is certified as categorically eligible and the other children are certified on income or other sources of categorical eligibility. The application is counted in the verification pool.
 - If the non-foster children are ineligible and the foster child is not already directly certified, the foster child is certified eligible and the application is considered a categorically eligible application and may be selected for verification when applicable.
 - If the non-foster children are certified eligible for free or reduced priced meals on the basis of income, the application is considered an income application. In addition, if the foster child's status was not already directly certified, the LEA must verify his/her status as well as other eligibility information on the application if that application is selected for verification.
- If **separate applications** are submitted and approved for the foster and non-foster children, both applications are included in the verification pool.
 - If the foster child's status was not already directly certified, the foster child is certified eligible and the application is considered a categorically eligible application and may be selected for verification when applicable.
 - If a directly certified foster child is on a separate application, the direct certification supersedes the application and therefore the application is disregarded and would not be included in the verification pool.

Reporting on the Verification Report:

Application includes only foster child(ren) who are not directly certified:

The student AND application must be reported as categorically eligible. LEAs must report in the following fields:

9. Number of students approved as categorically eligible based on Food Stamps/Temporary Assistance/Food Distribution Program on Indian Reservations (FS/TA/FDPIR)
10. Number of applications approved as categorically eligible based on FS/TA/FDPIR.

Application includes only directly certified foster child(ren):

If an application is submitted for a foster child who **is** directly certified (is on list provided by Department of Social Services (DSS) - Children's Division provided to the LEA or household provides a letter from DSS indicating the child is a foster child) this is reported in Number 8 (Free Eligible - Not Subject to Verification). The application does not go into the verification pool and can be disregarded.

Application includes both a foster child(ren) who is not directly certified and income eligible students:

The foster child must be reported in:

9. Number of students approved as categorically eligible based on FS/TA/FDPIR
10. The application **must not be** reported in 10 (# applications approved as categorically eligible based on FS/TA/FDPIR). The application will follow the non-foster children.

The income eligible student(s) AND application must be reported in the appropriate free and reduced price income eligible field:

Students:

11. Number of students approved as FREE ELIGIBLE based on income/household size information submitted on an application
13. Number of students Total REDUCED PRICE ELIGIBLE reported

Applications:

12. Number of applications approved as FREE ELIGIBLE based on income/household size information submitted on an application
14. Number of applications Total REDUCED PRICE ELIGIBLE reported

If the other children on the application are determined to be ineligible due to not meeting the income requirements, then the foster child must be reported in the following fields:

9. Number of students approved as categorically eligible based on FS/TA/FDPIR
10. Number of applications approved as categorically eligible based on FS/TA/FDPIR

Since the other children on the application do not qualify for benefits, the application is tied to the foster child.

Application includes both a directly certified foster child(ren) and income eligible students:

The foster child must be reported in:

8. Be sure to count the foster child only once in Number 8. If already documented and accounted for as directly certified before receiving the application, do not count again. Report the other students and application in the appropriate free and reduced price categories.

The income eligible student(s) AND application must be reported in the appropriate free and reduced price income eligible field:

Students:

11. Number of students approved as FREE ELIGIBLE based on income/household size information submitted on an application
13. Number of students Total REDUCED PRICE ELIGIBLE reported

Applications:

12. Number of applications approved as FREE ELIGIBLE based on income/household size information submitted on an application
14. Number of applications Total REDUCED PRICE ELIGIBLE reported

If the other children on the application with the foster child are determined to be ineligible due to not meeting the income requirements, then the foster child must be accounted for in Number 8 (# approved as free eligible not subject to verification) if not already reported. The application is not reported and not subject to verification.

Application includes both a directly certified foster child(ren) and students that provide FS/TA/FDPIR case number (categorically eligible):

If not already accounted for, the directly certified foster child must be reported in:

8. Number of Students approved as free eligible not subject to verification.

The categorically eligible student(s) AND application must be reported in:

9. Number of students approved as categorically eligible based on FS/TA/FDPIR
10. Number of applications approved as categorically eligible based on FS/TA/FDPIR

Application includes both a foster child(ren) not directly certified and students that provide FS/TA/FDPIR case number (categorically eligible):

If a foster child is included on an application with categorically eligible non-foster child(ren) certified through a FS/TA/FDPIR case number, all students in the household are categorically eligible. SFAs must report in the following fields:

9. Number of students approved as categorically eligible based on FS/TA/FDPIR
10. Number of applications approved as categorically eligible based on FS/TA/FDPIR