



# Chapter 5:

## Enrollment and Eligibility

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# Chapter 5: Enrollment and Eligibility

## 5.1 CACFP Annual Enrollment

The CACFP Annual Enrollment Form (ISBE form 67-98) must be completed every year for every child enrolled in:

- Child Care Centers
- Pre-kindergarten Programs
- Head Start or Even Start Programs
- Outside School Hours Programs.

➡ Exempt from this requirement are:

- At-Risk Afterschool Meals Programs
- DCFS license-exempt Outside School Hours Programs
- Emergency Shelters

### **Processing Annual Enrollment Forms**

Procedures should be established to complete new CACFP Annual Enrollment Forms every year. It is recommended to establish an annual renewal period for the CACFP Annual Enrollment Form, and coordinate it with the distribution of the Household Eligibility Applications so that the facility is collecting both forms at the same time from parents/guardians.

- *All enrollment forms are good for 12 months.* Ensure no more than 12 months lapse between the completions of enrollment forms.
- For those programs that require it, *a current enrollment form*, with parent/guardian signature and date, must be on file for every child before you can *claim their meals for reimbursement*, regardless of whether they are in the paid, reduced-price, or free category.

## 5.2 Income Eligibility Guidelines

The USDA bases CACFP reimbursement for centers on three categories: free, reduced price and paid. When using a family's income level and household size to determine eligibility for the free or reduced price categories, Income Eligibility Guidelines are used. The Income Eligibility Guidelines are adjusted annually by USDA and are effective July 1 through June 30. The guidelines are located online at <https://www.isbe.net/Documents/IEG-20.pdf>.

- To determine whether a child qualifies for free meals, the total household income must be equal to or less than the free income guidelines.
- To determine the reduced-price category, the household income must be equal to or less than the reduced-priced income guideline but greater than the free guidelines.
- An application falls into the denied (paid) category when the household income is more than the reduced-price household income.

**EXAMPLE:** If a household with five people has a total earning of \$40,000 per year, using the Sample *Income Eligibility Guidelines* below, you would:

- First, find the row for a household of five
- Following that row, notice the \$40,000 annual income is more than the free amount of \$36,972, but less than the reduced-price amount of \$52,614.
- Because the \$40,000 falls between the two amounts, the application would be approved as reduced-price for the children listed on the application.

<b>EXAMPLE: Income Eligibility Guidelines</b>										
<b>Sample Levels: Free Meals</b>						<b>Sample Levels: Reduced-Priced Meals</b>				
<b>Household Size</b>	Annual	Monthly	2x per month	Every Two Weeks	Weekly	Annual	Monthly	2x per month	Every Two Weeks	Weekly
<b>1</b>	15,444	1,287	644	594	297	21,978	1,832	916	846	423
<b>2</b>	20,826	1,736	868	801	401	29,637	2,470	1,235	1,140	570
<b>3</b>	26,208	2,184	1,092	1,008	504	37,296	3,108	1,554	1,435	718
<b>4</b>	31,590	2,633	1,317	1,215	608	44,955	3,747	1,874	1,730	865
<b>5</b>	★36,972	3,081	1,541	1,422	711	★52,614	4,385	2,193	2,024	1,012
<b>6</b>	42,354	3,530	1,765	1,629	815	60,273	5,023	2,512	2,319	1,160
<b>7</b>	47,749	3,980	1,990	1,837	919	67,951	5,663	2,832	2,614	1,307
<b>8</b>	53,157	4,430	2,215	2,045	1,023	75,647	6,304	3,152	2,910	1,455
<b>For Each Additional Family Member Add:</b>										
	5,408	451	226	208	104	7,696	642	321	296	148

### 5.3 Electronic Direct Certification

Your institution must be approved to participate in CACFP before you are given access to this system, and instructions may be found via IWAS.

#### ***What is Direct Certification?***

Direct Certification is a simplified way to determine which children are eligible for free meal benefits based on the Supplemental Nutrition Assistance Program (SNAP) and/or the Temporary Assistance to Needy Families (TANF). Currently, if a family completes a Household Eligibility Application with a valid SNAP or TANF number, the application is approved in the free category. With Direct Certification, you can check to see if a child is receiving those benefits with information provided directly by the agency administering those programs.

The Illinois State Board of Education, in cooperation with the Illinois Department of Human Services (the agency administering SNAP and TANF), has developed an internet system which allows you to check children enrolled at your institution directly to the SNAP and TANF data base. The Direct Certification process can only be conducted via this electronic system on the internet.

CACFP uses the same Direct Certification information used for school programs. CACFP center programs may use Income Eligible Medicaid using direct certification in any CACFP program.

When a child is identified on the Direct Certification Report, a Household Eligibility Application is not needed. The printed report is your documentation to claim that child for free meal and snack benefits. You are still required to have a CACFP Annual Enrollment

Form on file to claim meals for any child, regardless of eligibility category.

### **Using Direct Certification Results**

Children approved through Direct Certification must be updated annually and may not be more than 12 months old. Forms are considered current and valid until the last day of the month in which the form was dated one year earlier.

### **Extended Categorical Eligibility**

The Extended Categorical Eligibility policy states a valid SNAP or TANF case number allows all children in the same family to be automatically eligible for free meals. The USDA definition for *family* means *a group of related or nonrelated individuals, who are not residents of an institution or boarding house, but who are living as one economic unit*. The SNAP or TANF case number can belong to any member of the family, a child or an adult; however, the Electronic Direct Certification System currently only matches to children 18 years and younger.

When a child is listed on the Direct Certification Report, all children in that family attending your child care facility can be claimed for free meals and snacks. For example, if there are three children at your center from the same family and only one is identified through the *Electronic Direct Certification System*, the other two children can be approved for free meal benefits through the Extended Categorical Eligibility.

To document that Extended Categorical Eligibility is going to be given to the other children in the family, write their names *clearly* on the Direct Certification Report by the name of the child identified on the report. Then record all children's names and information on the *Master List of Enrolled Children* (ISBE 67-95). The Master List includes columns for effective dates of both Household Eligibility Applications and Direct Certification. The Master List also includes a box to mark when a child is approved using Extended Categorical Eligibility. The CACFP Annual Enrollment form will validate the children are within the same family unit. The Extended Categorical Eligibility is good for 12 months.

### **5.4 Household Eligibility Application**

To determine eligibility for each child claimed in the free or reduced-price category, Child Care Centers, Pre-kindergarten Programs, and Outside School Hours Programs will need to evaluate income levels and household size. This information must be collected on the Household Eligibility Application (HEA, ISBE form 69-88).

All institutions must ensure HEAs are approved correctly and that completed applications are on file for each child claimed in the free or reduced-price category.

HEAs are effective for 12 months and must be renewed annually. They should be retained

#### **➤ The Household Eligibility Application is not required for:**

- At-Risk Afterschool Meals Programs
- Emergency Shelters
- Head Start Programs — however, the form Head Start Master List of Enrolled Children should be used
- Even Start Programs — however, every year the Even Start official must re-establish categorical eligibility for free meals for all Even Start children. Once a child enters kindergarten, the child's family must be given an HEA to complete.

on file for at least three years, plus the current year, and should be kept confidential and in a secure location.

### ***Institution Responsibilities***

Parents or guardians should be provided with:

- *Parent Letter*—Copy the parent letter and distribute to parents or guardians with a copy of the household eligibility application. A Spanish version is available on our website.
- *Household Eligibility Application*—Copy the application with instructions and distribute to parents or guardians of children upon enrollment and annually thereafter. A Spanish version is available on our website.

To encourage parents and guardians to complete a HEA for their child(ren), explain to them the CACFP is a way for your center to generate other revenue to purchase food so you can offer more nutritious meals to the children. If parents refuse to complete the application, information is missing on the application, they don't return the application, or the income is over the income guidelines, the child must be claimed in the paid category. Income verification is not required for HEA approval.

### ***Processing Household Eligibility Applications***



*The information entered on each HEA identifies how you will claim each child's meals in the free, reduced-price, or paid category. You must claim children's meals in the categories for which they were approved. Remember that all applications must be updated annually and may not be more than 12 months old, and to keep all eligibility information confidential.*

#### **Section 1 – All Household Members**

Provide the names of all household members, including the adults and child(ren) for whom the application is submitted and the children's ages. Please note:

- All foster children in the same household may be listed on one application. A foster child application does not require all household members to be listed.
- The SNAP/TANF application does not need all household members to be listed.

#### **Section 2 – Foster Child**

If the child is under the legal responsibility of DCFS or the court, a check should be placed in the box next to that child's name to indicate they are a foster child.

A foster child may be included on the same HEA as the other children in household. If the foster child has any personal income, that must be included. Even though all the children are on one application, the foster child is still eligible for free meals but this free eligibility does not extend to the other children.

Or, a foster child that is under the legal responsibility of DCFS or the court can be approved for free meals and snacks when the foster parent provides a copy of the legal document from DCFS, a local placement agency, or the court showing the child is a foster child.

#### **Section 3 – SNAP or TANF Information**

An HEA with one valid SNAP or TANF case number allows all children in the household (listed on the application) to be approved for free meals. This process is called Extended Categorical Eligibility. The household member receiving the SNAP or TANF benefit can be either a child or an adult.

**Applications for children whose households receive SNAP or TANF must include:**

- The names of all children for whom the application is made.
- A SNAP or TANF number for at least one household member. If there is an accurate case number on the application, all children within the household will be eligible for benefits.
- Appropriate SNAP/TANF case numbers are 9 digits long.
  - Link card, Medicaid, or Kid Care numbers are not acceptable numbers. An individual may have these cards to receive other benefits but may not be receiving SNAP or TANF.
- If income is reported, but an appropriate case number is given, the income is ignored and the application must be approved free based upon the SNAP or TANF number reported.
- However, HEAs with invalid case numbers could be evaluated using household income to determine eligibility.
- Each application must contain the signature of an adult household member. A social security number is not required for a SNAP/TANF application.
- Some transitional numbers may not follow the number sequence listed above. The application may be approved if a letter is obtained from the public aid office and maintained with the signed application.

Section 4 – Homeless, Migrant, or Runaway

Homeless, runaway or migrant children are categorically eligible for free meal benefits. To identify children eligible under these categories, contact your local school, homeless liaison, or migrant coordinator of these programs.

The box showing if child is a homeless, migrant, or runaway child should be marked, and the signature of School Homeless Liaison or Migrant Coordinator and the date signed provided.

Section 5 – Total Household Gross Income

Households reporting income may qualify for free or reduced-price benefits. Applications are approved based on the current *Income Eligibility Guidelines* and household size established by the USDA. Ensure you are using the correct *Income Eligibility Guidelines*; check the dates on the top of the chart. Refer back to the *Income Eligibility Guidelines* section of this chapter for more information.

Indication of “No Income”:

Applicants without income are requested to write a “zero” in the applicable field or mark “no income.” The application must convey to the applicant that any income field left blank is a positive indication of no income and certifies that there is no income to report. Applications with blank income fields will be processed as complete.

## **Income Exclusions**

Income that is not to be reported or counted as income in the determination of a household's eligibility for free and reduced-price benefits includes:

- Any cash income or value of benefits a household receives from any Federal program that excludes such income by legislative prohibition, such as the value of assistance provided under SNAP
- Student financial assistance provided for the costs of attendance at an educational institution, such as grants and scholarships, awarded to meet educational expenses and not available to pay for meals
- Loans, such as bank loans, that are temporary and must be repaid.
- The value of in-kind compensation, such as housing for clergy or any other noncash benefit
- Occasional earnings received on an irregular basis; e.g., not recurring, such as payment for occasional baby-sitting or mowing lawns

### Section 6 – Signature and Social Security Number

An adult household member must sign the form. If Part 5 is completed, or zero income is listed, the adult signing the form must also list the last four digits of their Social Security Number OR place a check in the box: *I do not have a social security number.*

### Section 7 – Contact Information

Providing contact information is optional.

### Section 8 – Sharing Information with All Kids Insurance Program

In Illinois, it is a state law to require each organization in the Child Nutrition Programs to share children's eligibility status for purposes of enrolling children in the State Children's Health Insurance Program, also known as All Kids. Households are given the opportunity to decline the disclosure of the information they are providing. If you are asked to disclose information, you must follow the disclosure rules and use the prototype Disclosure Form available at [https://www.isbe.net/Documents/he\\_disclosure\\_confidentiality.pdf](https://www.isbe.net/Documents/he_disclosure_confidentiality.pdf).

For more information, see the section on Confidentiality – Disclosure of Information in this chapter.

### Child Care Representative Use ONLY, Sections, A, B, and C

The institution must complete Sections A, B, and C at the bottom of the application to determine whether the application can be approved for free or reduced-price meals.

*Section A* – Complete the following:

1. If approving the application based on household income listed in Section 5, see a. and b. below. If not, see #2 below.
  - a. Enter the total amount of income and the number of people listed in the

household. (If needed, convert income only if different frequencies of pay are reported. Do not round the annual income values resulting from each conversion. Total all converted annual income.)

- b. Use the Income Eligibility Guidelines for the appropriate pay period to determine eligibility.
2. If the child(ren) qualifies for Free or Reduced-price meals, mark an X in the appropriate box for "Free based on:" or "Reduced based on:", and place an X in the box for the reason why.
3. If the child (ren) does not qualify for free or reduced-price meals because household income is too high; or, you received an incomplete application or non-qualifying SNAP/TANF numbers, mark an X in the box for "Denied based on:", and place an X in both for the reason why denied.

*Section B* – Complete the following:

The Determining Official (sponsor or independent center official) must sign and date the application.

*Section C*—

### **Household Eligibility Application (HEA) determinations and Effective Dates**

All CACFP institutions must select ONE method to determine and make effective all household eligibility applications.

#### **All CACFP participants may select:**

- The date the sponsor or independent center signs the application as the effective date certifying the child's (children's) eligibility. (Includes schools participating in the National School Lunch Program)
- For claiming purposes, the effective date may be made retroactive back to the first day the child participates in the CACFP as long as it occurs in the same month in which the child's eligibility is certified.

#### **Non-schools only may select:**

- The date the parent or guardian signs the application as the effective date certifying the child's (children's) eligibility. However, if the date of parent signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification by the sponsor or independent center.
- (Institutions not participating in National School Lunch program may select)

#### **Schools participating in the National School Lunch program only may select:**

- The date the household submitted the application as the effective date certifying the child's (children's) eligibility. The institution must have a method to document the date the application was submitted such as a date stamp.
- For claiming purposes, the effective date may be made retroactive back to the first day the child participates in the CACFP as long as it occurs in the same month in which the child's eligibility is certified.



When an application is incomplete, or correct information cannot be gathered, the application must be denied and the child’s meals will be claimed at the paid rate of reimbursement.

## 5.5 Determining Household Size and Income

To determine if a household meets income eligibility requirements for benefits, officials must compare the household size and total household income to the Income Eligibility Guidelines.

Households may ask for guidance on whom to include as a household member or what to include as income on the application for benefits; although, officials may have to use their own discretion in some instances. A household is defined as a group of related or nonrelated individuals, who are not residents of an institution or boarding house, but who are living as one economic unit.

Income reported on the HEAs should be based on the total income received during the month prior to application for free or reduced-price meals. If such income does not accurately reflect the household's annual income, income shall be based on the projected annual household income. If the prior year's income provides an accurate reflection of the household's current annual income, the prior year may be used as a base for the projected annual income.

## 5.6 Confidentiality – Disclosure of Information

If asked to disclose information, reference the following chart:

<b>ALL ELIGIBILITY INFORMATION</b>		
<b>Recipient of Information</b>	<b>Information That May be Disclosed</b>	<b>Required Notification and Consent</b>
<b>Child Nutrition Programs under the NSLP or Child Nutrition Act</b>	All eligibility information	Prior notice and consent not required
<b>Federal, State, or local law enforcement officials investigating alleged violations of any programs under the NSLA and CNA or investigating violations of the programs authorized to have access to names and eligibility status</b>	All eligibility information	Prior notice and consent not required
<b>Comptroller General of the United States for purposes of audit and examination</b>	All eligibility information	Prior notice and consent not required

<b>Medicaid or the State Children’s Health Insurance Programs (SCHIP), administered by a State or local agency authorized by a State or local agency authorized under titles XIX or XXI of the Social Security Act to identify and enroll eligible children</b>	All eligibility information, unless parents elect not to have information disclosed	Must give prior notice to parents and opportunity for parents to decline to have their information disclosed
<b>ELIGIBILITY STATUS ONLY</b>		
<b>Recipient of Information</b>	<b>Information That May be Disclosed</b>	<b>Required Notification and Consent</b>
<b>Federal/State or local means tested nutrition programs with eligibility standards comparable to the NSLP</b>	Eligibility status only	Prior notice and consent not required
<b>Federal education programs</b>	Eligibility status only	Prior notice and consent not required
<b>State education programs administered by a State agency or local education agency</b>	Eligibility status only	Prior notice and consent not required
<b>State health programs other than Medicaid/SCHIP, administered by a State agency or local education agency</b>	Eligibility status only	Prior consent not required
<b>NO ELIGIBILITY INFORMATION, UNLESS PARENTAL CONSENT IS OBTAINED</b>		
<b>Recipient of Information</b>	<b>Information That May be Disclosed</b>	<b>Required Notification and Consent</b>
<b>Local education programs</b>	NO eligibility information unless parental consent is obtained	Must obtain parental consent
<b>Federal health programs other than Medicaid/SCHIP</b>	NO eligibility information unless parental consent is obtained	Must obtain parental consent
<b>Local health program</b>	NO eligibility information unless parental consent is obtained	Must obtain parental consent

## Notes: