United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive
Alexandria, VA 22302-1500

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SUBJECT: Verification and Reporting of Foster Children

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum is to provide guidance on the verification process and reporting for 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.

SFAs 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. These foster children are directly certified and not subject to verification if they are certified through this documentation.

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 **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.
- 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.

Reporting on the FNS-742, Verification Summary Report:

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

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

- 4-2A: # students approved as categorically eligible based on SNAP/TANF/FDPIR
- 4-2B # applications approved as categorically eligible based on SNAP/TANF/FDPIR.

Application includes only directly certified foster child(ren):

If an application is submitted for a foster child who **is** directly certified and reported in 4-1A (# approved as free eligible not subject to verification), the application is not reported and can be disregarded.

If an application is submitted for a foster child and attached documentation verifies foster care status (such as a signed letter from a court or State or local foster agency), the foster child is considered directly certified. The application does not go into the verification pool and is reported in 4-1A. Again, the application can be disregarded.

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

The foster child must be reported in:

- Box 4-2A: # students approved as categorically eligible based on SNAP/TANF/FDPIR
- The application **<u>must not be</u>** reported in box 4-2B (# applications approved as categorically eligible based on SNAP/TANF/FDPIR)

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

- Students:
  - Free: #4-3A - # students approved as FREE ELIGIBLE based on income/household size information submitted on an application
  - Reduced price: #5A – # students Total REDUCED PRICE ELIGIBLE reported

- Applications:
  - Free: #4-3B - # applications approved as FREE ELIGIBLE based on income/household size information submitted on an application
  - Reduced price: #5B - # 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 boxes:

- 4-2A: # students approved as categorically eligible based on SNAP/TANF/FDPIR
- 4-2B: # applications approved as categorically eligible based on SNAP/TANF/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:

- Box 4-1A (# approved as free eligible not subject to verification). Be sure to count the foster child only once in Box 4-1A. 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 box:

- Students:
  - Free: #4-3A - # students approved as FREE ELIGIBLE based on income/household size information submitted on an application
  - Reduced price: #5A – # students Total REDUCED PRICE ELIGIBLE reported

- Applications:
  - Free: #4-3B - # applications approved as FREE ELIGIBLE based on income/household size information submitted on an application
  - Reduced price: #5B - # 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 Box 4-1A (# 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 SNAP/TANF/FDPIR case number (categorically eligible):

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

- Box 4-1A: # approved as free eligible not subject to verification.

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

- 4-2A: # students approved as categorically eligible based on SNAP/TANF/FDPIR
- 4-2B # applications approved as categorically eligible based on SNAP/TANF/FDPIR

Application includes both a foster child(ren) <u>not directly certified</u> and students that provide SNAP/TANF/FDPIR case number (categorically eligible):

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

- 4-2A: # students approved as categorically eligible based on SNAP/TANF/FDPIR
- 4-2B # applications approved as categorically eligible based on SNAP/TANF/FDPIR

State agencies should direct questions concerning this guidance to the appropriate FNS Regional Office.

Original Signed

Cynthia Long
Director
Child Nutrition Division