

STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch, Breakfast and Special Milk Programs

FROM: John Frassinelli, Chief

Bureau of Health/Nutrition, Family Services and Adult Education

DATE: March 24, 2017

SUBJECT: Operational Memorandum No. 7-17

Reporting Annual Income on Applications for School Meals

The purpose of this memorandum is to share recent guidance from the Food and Nutrition Service (FNS) on the permissibility of including annual income on free and reduced-price applications for school meals.

Reporting Annual Income

When completing a free and reduced-price meal application, households must report all current income. Income is considered to be any money received, such as earnings, pensions, cash bonuses, and child or spousal support, unless the income source is specifically excluded by law for the Child Nutrition Programs.

Households may have income from a variety of sources that is received at different frequencies. For example, a household may receive paychecks on a weekly basis, and child support on a monthly basis. In other cases, such as households that rely primarily on seasonal work, agricultural work, or self-employment, annual income reporting might make it easier for households to capture their income because these households may receive payments at irregular intervals or only at certain times of the year.

The FNS does not set specific requirements regarding the income frequency options (e.g., weekly, bi-weekly, and monthly) that must be included on free and reduced-price applications for school meals. The 2016 *Eligibility Manual for School Meals* provides directions on how to process applications that include incomes at different frequencies. The FNS does not prohibit annual income reporting on free and reduced-price applications for school meals.

Although annual income reporting is not currently included on the FNS paper and web-based prototype applications, the FNS encourages state agencies and local officials to adapt the prototypes to best fit the needs of their applicants. For example, state and local agencies have the discretion to include annual income in the "Earnings from Work" category of Step 3 on the prototype. Note that the application template found the Connecticut State Department of Education's website currently does not include the option of annual income. It will be updated for the next school year.

Confirming Annual Income

As indicated above, the FNS has clarified that state agencies and local educational agencies (LEAs) have discretion to include annual income frequency reporting on their school meal program applications. Reporting some income sources as annual amounts on the free and reduced meal application may provide the LEA with the most accurate measure of a household's current income and may reduce improper program payments tied to applicant error.

If a household provides only annual income, the *LEA* is not required to secure additional income information from the household prior to making an eligibility determination. Therefore, sources reported in annual amounts are not subject to additional pre-certification review as described in past versions of the *Eligibility Manual for School Meals*. The FNS will correct this information in the next version of the manual.

Questions may be directed to your school nutrition consultant.

Consultants for School Nutrition Programs	
County	Consultant
 Fairfield County (Includes Region 9) Litchfield County (Includes Regions 1, 6, 7, 12 and 14) 	Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129
Hartford County (Includes Region 10)	Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079
 Middlesex County (Includes Regions 4, 13 and 17) Tolland County (Includes Regions 8 and 19) Windham County (Includes Region 11) 	Susan Alston susan.alston@ct.gov 860-807-2081
New Haven County (Includes Regions 5, 15 and 16)	Jackie Schipke jackie.schipke@ct.gov 860-807-2123
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JF:tdd

Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain in a binder for future reference. All CSDE operational memoranda are posted on the CSDE's Operational Memoranda for School Nutrition Programs webpage.