

# Eligibility and Verification 101 Fact Sheet

The [USDA Eligibility Manual for School Meals](#) provides more details than provided below and should be the go to source for eligibility and verification information for school meal programs.

## How Do Students Receive Free or Reduced Price Meals?

- All students in households receiving benefits from the Supplemental Nutrition Assistance Program (SNAP), the Family Investment Program (FIP), and certain Medicaid recipients are eligible for free or reduced price meals.
- Foster students that are under the legal responsibility of a foster care agency or court are eligible for free meals.
- Students participating in their school food authorities (SFAs) Head Start program are eligible for free meals.
- Students who meet the definition of homeless, runaway or migrant are eligible for free meals.
- Students may receive free or reduced price meals if their household's income is at or below the limits on the [Federal Income Eligibility Guidelines](#) (IEGs), which are revised yearly.

## What is a Benefit Issuance List?

- The benefit issuance list must contain the following information, at a minimum: student's first and last name, benefit status (free, reduced price or paid), method of determination (direct certification [DC], household extension DC, foster, income application, homeless, migrant or runaway), date of determination and date of any change in benefit status, school name and total number of eligible/enrolled students in SFA.
- A secure, comprehensive benefit approval process and an accurate, updated benefit issuance list are necessary to track the service of free, reduced price and paid meals. The compilation of the benefit issuance list occurs through the following methods: determination of free and reduced price meal/milk applications.
- Maintaining an accurate, updated benefit issuance list is required. The list(s) may be stored electronically or in hard copy depending on the Point of Service (POS) system used by the SFA. All benefit issuance documents must be retained on file for three years, plus the current fiscal year, or until all audits are resolved or completed.
- Student information on the benefit issuance list is on a "need to know" basis only. The information should not be made available to all school officials. Only those who are directly responsible for the ongoing operation of the nutrition program or responsible for monitoring program compliance should have access. SFAs must ensure, to the maximum extent practicable, students are not overtly identified as receiving free or reduced priced meal benefits to their peers and other school staff. The benefit issuance list should never be faxed or emailed due to the secure information being inadvertently exposed or shared with others.

## How Does My School Know that a Household is Receiving SNAP, FIP or Certain Medicaid Programs?

- Twice per school year, public school districts and some private school districts submit to the Department of Education (Department), in Student Reporting in Iowa (SRI), students enrolled in their district. The Iowa Department of Health and Human Services (Iowa HHS) submits a list of households who receive SNAP, FIP or certain Medicaid programs to the Department. The Department then matches students on SRI to the students on SNAP, FIP and certain Medicaid programs and produces a directly certified list of the students who were matched for each school district. If your school does not submit through SRI, the Department is unable to determine matches for your specific school.
  - For schools that do not have a direct certification list, the Department offers a tool called E-LookUp. This tool allows SFAs to search for individual students/residents. If found, they are a student/resident from a household that receives SNAP, FIP or certain Medicaid programs and will receive free or reduced price meal benefits.
- Due to extended eligibility, if any student or household member receives benefits from SNAP, FIP or Medicaid, Free/Reduced price eligibility for benefits extends to all students who are members of the household.
- A student's eligibility status has a year-long duration. Households are not required to report status changes.
- The date the DC list is downloaded by the SFA or the student is found using E-LookUp is the effective date of meal eligibility.

## When Should a Household Submit a Free and Reduced Price Application?

- If a household does not receive SNAP or FIP, they may qualify for free or reduced price meals based on their household size and income. These households may submit an Iowa application for free or reduced price meals/milk. On the meal application, households must record the members in their household; amount, source and frequency of their current income for each household member; the last four digits of the social security number for the household's primary wage earner or indicate that they do not have one.
- It is the responsibility of the determining official to compute the household's total current income and compare the total amount to the current year's IEGs.
- If a household's income is over the IEGs, then the family is denied benefits and must pay full price for meals.
- Meal applications must be processed within ten operating days after the received date. The meal eligibility benefits begin on the date the meal application is processed.

## How are Households Notified of their Free or Reduced Price Status?

- Households who are found on the DC list are sent a notification letter by the SFA informing them that their student(s) will receive free or reduced price meal benefits and that they do not need to complete an Iowa application for free and reduced price meals/milk. This letter should be sent as soon as possible after the direct certification list becomes available so that these households know that they do not need to complete an application.
- If a household is approved for free or reduced price meals, they must be notified either in writing or verbally of their eligibility status. On the [School Nutrition Resource Site](#), there is a prototype notification letter under finance-income eligibility. Using a modified version of this letter or using a letter generated from a POS system may require approval from the state agency (SA).
- Households with students who are denied benefits must be provided with written notification of the denial. The notification must advise the household of the reason for denial of benefits; right to appeal; instructions on how to appeal; and the ability to re-apply for benefits at any time during the school year.

## What is the 30-Day Carryover Period?

- Students who receive free or reduced price meal benefits during the previous school year are eligible for free and reduced price meals up to 30 operating days into the next school year. The carryover begins on the first operating day of school, or until a new eligibility determination is made.
- The 30-day carryover ends for enrolled students when: the SFA identifies the student or household in a DC match or through E-LookUp; or a family submits a new application during the 30-day carryover period.
- What happens after 30 operating days? If the household did not re-apply during the 30-day carryover, their benefits change to paid on the thirty-first operating day.
- The SFA cannot send a notice of denial or adverse action if a child's eligibility expires at the end of the 30-day carryover period. The household does not have a right to appeal a discontinuation of benefits due to the expiration of the carryover period because no eligibility determination was made during the current school year.

## Required Information for a Meal Application

Information on meal application	Required case number for application	Required for foster child, homeless/runaway, migrant application	Required for household size/income application
1. Names of children	X	X	X
Box checked for foster, homeless, migrant, or runaway		X	
2. Case number	X		
3. Name and income of adults			X
Income of children			X
Last four digits of social security number or indication of no SSN			X
Household size			X
4. Signature of adult household member	X	X	X
OPTIONAL: racial and ethnic data, low-cost health insurance for children-no share signature and fee/program waiver signature			

## What is Disclosure of Meal Eligibility Benefits?

- The information provided by families on the Iowa application for free and reduced price meals/milk will be used only for determining eligibility for meal or milk benefits. SFAs that plan to disclose a student's eligibility status for other purposes must inform households of this potential disclosure and receive permission from the household before disclosing eligibility information.
- Although a program or person may be authorized to receive eligibility information, there must be a legitimate "need to know" to provide a service or carry out an activity.
- Eligibility information is not available to all school staff. Teachers, guidance counselors, principals, etc. who are not providing such assistance under the appropriate statutory or regulatory requirements cannot have access.
- Each disclosure request must be individually listed for parents to opt in. Disclosure is not a requirement.

## Who are the Eligibility Officials?

- Determining official: determine enrolled students free and reduced price eligibility, including direct certification.
- Verifying official: complete verification duties and may be the same person as the determining official.
- Confirming official: reviews the applications selected for verification to determine accuracy of initial eligibility determination. Must be a different person than the determining official.
- Hearing official: holds a meeting for households who appeal the eligibility benefits made by the SFA and determining official. They must be different from the determining and verifying official, and must hold a position at a higher administrative level.

## What is Flexibility When Applying the Effective Date?

- Allows SFAs to apply eligibility benefits to students and extended eligibility students based on the date a meal application is received, or the match date on the direct certification (DC) list.
- Must implement the same process for all students enrolled in the SFA.
- Application approval process flexibility: SFA must date the meal application received and process the application within 10 operating days. Eligibility benefits would begin on the date the meal application was received. Must refund/forgive any debt accrued for reimbursable meals during 10-operating day processing period. Maintain documentation for refund/debt forgiveness.
- Direct certification (DC) approval process flexibility: SFAs will use original match date identified on DC list instead of the download date or date found using E-LookUp. Meal benefits begin on match date to all eligible enrolled students in the household as applicable, must refund/forgive any debt accrued for reimbursable meals from match date on and retain documentation that shows the original date of eligibility and refund/debt forgiveness.

## What is SNAP/FIP?

- Enrolled students may be found on the DC list or via E-LookUp, a letter turned in by the household from SNAP/FIP agency (free lunch letter), or a valid case number (SNAP or FIP) written on a meal application. Case numbers written on applications should be approved at face value and do not need to be verified via direct certification or E-LookUp. The case number is unique, 10 digits and may begin with a letter.
- If one enrolled student in the household qualifies for the benefits, all the other enrolled students in the household are extended the same benefit.

## What is Other Free or Reduced (Medicaid Free and Reduced)?

- Students receiving Medicaid benefits are not automatically eligible for free or reduced priced meals if they cannot be found on a DC Match Download or through E-LookUp. A household submitting a Medicaid number on an application or bringing in a letter showing they receive Medicaid does not qualify them for meal benefits.
- Other Free and Other Reduced students found on the DC list or through E-LookUp are the Medicaid students.
- If one enrolled student in the household qualifies the benefits, all the other enrolled students in the household are extended the same benefit.

## What is Foster Categorical Eligibility?

- Enrolled students may be eligible as foster care free eligibility status if they are found on the DC list or using E-LookUp, a letter from a foster agency or court confirming foster status, or foster box on a meal application.
- Foster status does not extend to other enrolled students in the household.
- The foster box checked on a meal application may be selected for verification but is approved as free foster care eligibility status.

Foster	Not Foster
Formally placed with caretaker household/kinship care	Informally placed with relatives or other caretaker arrangement without court or state intervention
Formally placed by judgment, decree or other order of any court of competent jurisdiction	Informally placed in kinship care or with families who assume guardianship responsibilities that exist outside of state/court systems
Formally placed by state child welfare agency or court	Household obtains legal guardianship of student
State retains legal custody of the student	Household adopts student

## What is Homeless/Runaway Categorical Eligibility?

- Eligibility determined by a local agency confirming homeless/runaway status, documentation provided by district homeless liaison or completed application with documentation of status confirmed by homeless liaison.
- The hosting household may include all homeless/runaway household members if they provide financial support to the homeless family.
- Eligibility is not extended to other enrolled students in the household.

## What is Migrant Categorical Eligibility?

- Migrant children are categorically eligible for free meal benefits.
- If the student has been identified as migrant on the DC download, no further documentation is needed.
- Categorical eligibility based on migrant status does not extend to other children in the household.

## What Happens if a Household Appeals?

- The household must be given 10 calendar days written advance notice of the change, with the first day being the day the notice is sent, to appeal either the level of meal benefits for which it has been approved.
- When a household appeals a reduction or termination of benefits within the 10 calendar days, the SFA must continue to provide the benefits for which the student was originally approved, until the final determination.
- A hearing official designated by the SFA is the individual who conducts the hearing and issues a decision. The hearing official must be an individual who is not connected with the approval or verification process.
- The parties concerned and any designated representative(s) must be notified in writing of the decision of the hearing official. If the hearing official rules that the benefits must be reduced, the actual reduction or termination of benefits must take place no later than 10 operating days after the hearing official's decision.

## What is Verification?

- Verification is confirmation of eligibility for free and reduced price school meals. Verification is only required when eligibility is determined through the application process, not through direct certification or if officials document a student as homeless, runaway or migrant.
- Households are selected for verification based on a sample pool of approved applications on file as of Oct. 1 each school year.
- When a household is selected for verification, the household must be sent a letter informing them of their selection and the types of information they submit to the SFA, such as pay stubs.
- The SFA must make at least one follow-up attempt when the household does not respond.
- If the household responds and provides all the needed evidence, verification is considered complete. If the household does not respond, verification is considered complete when a notice of adverse action is sent.
- The SFA must complete the verification activities no later than Nov. 15 of each school year.
- All SFAs must report the results of verification on the verification report on IowaCNP.

## What is Verification for Cause

- Defined as verifying applications on a case-by-case basis when the SFA is aware of income or household members missing from the meal application.
- Only after the determination of eligibility has been made can the school begin the verification for cause process.
- Verification for cause may be completed any time throughout the school year.
- Follow the same process for verification for cause as traditional verification.

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