Summer Food Service Program (SFSP) Eligibility Issues

To: STATE AGENCY DIRECTORS (Special Nutrition Programs) - Colorado ED, Iowa, Kansas, Missouri DH, Montana DPI, Nebraska ED, North Dakota, South Dakota, Utah, and Wyoming DHSS

Prior to beginning the Fiscal Year 1993 SFSP, we wanted to clarify several policy issues relative to eligibility of sites. Also, please refer to SFSP-122 in which we provided additional guidance on site eligibility.

1. Use of Census Tract Data to Determine Eligibility

If 1980 census tract data was used to determine eligibility of a site in the 1992 Program, then 1990 census tract data will have to be provided to establish eligibility in 1993. The provision in the Regulations to allow submission of data every other year can not be allowed since the 1980 data is outdated.

The Child Nutrition Division has recently provided new guidance on how to determine whether a particular tract is eligible, using census tract data and the Income Eligibility Guidelines (IEGs) for reduced price meals. The most mathematically correct method is to take the difference between the IEGs for the family size above and below the average household size, multiply the difference by the household size fraction, and add that amount to the smallest IEG figure used.

Example:

Census tract information shows an average household size of 3.28 and median income of $21,000.

<table>
<thead>
<tr>
<th>IEG for family of four</th>
<th>$25,808</th>
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</thead>
<tbody>
<tr>
<td>IEG for family of three</td>
<td>$21,405</td>
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</table>

$4,403 x .28 = $1,233

$1,233 + $21,405 = $22,638

A tract with an average household size of 3.28 and a median income equal to or less than $22,638 would be eligible. Therefore, the tract in the example would be eligible since the median income was $21,000.
If the State Agency has already provided training to potential sponsors on the use of census tract data based on the guidance in the 1993 Sponsors Handbook, you do not have to use the method explained herein until the 1994 Program. However, this method could prove beneficial to some sites.

2. Use of School Data to Determine Eligibility

For sponsors using free and reduced price (F/RP) data, the data must be collected on a school basis, not school district wide, unless the school district is a one-school district or all schools in the district meet the 50 percent eligibility.

To determine eligibility of an "open" site, F/RP data from the school(s) in the area that the site is drawing from should be the first method used. If the school data is not a true reflection of the need of the area; e.g., magnet schools, bussing, pride of parents in not applying for F/RP meals and low participation in junior/senior high schools, then other types of data can be used.

If a site is drawing from an area that contains more than one school, then the data on enrollment and F/RP meals for each school in the area must be obtained to determine eligibility. If an area contains multiple schools; e.g., an elementary and a high school, and the elementary school more closely reflects the economic conditions of the area, then only data from the elementary school can be used. The reason for using the data from only one school should be documented.

School sites where summer school is conducted must open up the Program to all children in the area, not just the students attending summer school. This would require that all means of publicity should indicate the Program is available to all the children in the area. If only summer school students are allowed to participate, then the school should remain on the National School Lunch Program.

3. Use of Enrollment Data to Determine Eligibility

For a site that has to use enrollment data to establish eligibility, at least 50 percent of the children who enroll must be eligible for F/RP meals. A cut off date for accepting applications should be established so that eligibility can be determined prior to Program operations. As you are aware, sites must be approved by the State Agency (SA) prior to beginning operations. The SA would have to approve an enrolled site contingent upon it establishing that 50 percent of the enrollees are eligible, if that threshold could not be established prior to beginning operations. In this type of situation, a sponsor would be at risk if it began operations at a site and then could not claim reimbursement because eligibility could not be established.
If you have any questions regarding these issues, please contact a member of my staff at (303) 844-0359.

ANN C. HECTOR
Regional Director
Special Nutrition Programs