



## **Free and Reduced-Priced Meals Policy**

*Adopted XX-XX-2021 (DRAFT UNTIL BOARD APPROVED)*

Lighthouse Community Public Schools ("LCPS" or "Charter Schools") Board of Directors (the "Board") recognizes that adequate nutrition is essential to the development, health, and learning of all students. The Chief Executive Officer or designee shall facilitate and encourage the participation of students from low-income families in the Charter Schools' food service program.

Each LCPS school site shall provide at least one nutritionally adequate meal (breakfast or lunch) each school day, free of charge or at a reduced price, for students whose families meet federal eligibility criteria.

### **Free and Reduced-Price Meals Application and Notification**

The Chief Executive Officer or designee shall ensure that the application form for free and reduced-price meals and related materials include the following statements:

1. Applications for free and reduced-price meals may be submitted at any time during a schoolday.
2. Children participating in the federal National School Lunch Program will not be overtly identified by the use of special tokens, special tickets, special serving lines, separate entrances, separate dining areas, or by any other means.

The application packet shall include the following notifications and information using simple and culturally appropriate language:

1. A notification that if a child qualifies for free school lunches, then the child may qualify for free or reduced-cost health coverage.
2. A request for the applicant's consent for the child to participate in the Medi-Cal program, if eligible for free school lunches, and to have the information on the school lunch application shared with the entity

designated by the State Department of Health Care Services to make an accelerated determination and the local agency that determines eligibility under the Medi-Cal program.

3. A notification that the Charter School will not forward the school lunch application to the entity designated by the State Department of Health Care Services to make an accelerated determination and the local agency that determines eligibility under the Medi-Cal program, without the consent of the child's parent or guardian.
4. A notification that the school lunch application is confidential and, with the exception of forwarding the information for use in health program enrollment upon the consent of the child's parent or guardian, the Charter School will not share the information with any other governmental agency, including the federal Department of Homeland Security and the Social Security Administration.
5. A notification that the school lunch application information will only be used by the entity designated by the State Department of Health Care Services to make an accelerated determination and the state and local agencies that administer the Medi-Cal program for purposes directly related to the administration of the Medi-Cal program and will not be shared with other governmental agencies, including the federal Department of Homeland Security and the Social Security Administration for any purpose other than the administration of the Medi-Cal program.
6. Information regarding the Medi-Cal program, including available services, program requirements, rights and responsibilities, and privacy and confidentiality requirements.

If LCPS elects to post its free and reduced-price meals application online, it will include the following:

1. Include a link to the Internet Web site on which translated applications are posted by the United States Department of Agriculture, with instructions in that language that inform the applicant how to submit the application.
2. Require completion of only those questions necessary for determining eligibility.
3. Include clear instructions for families that are homeless or migrant.
4. Comply with the privacy rights and disclosure protections established by Public Laws 113-79 and 105-277.

5. Include links to all of the following:
  - (i) The online application to CalFresh.
  - (ii) The online single state application for health care.
  - (iii) The Internet Web page maintained by the State Department of Public Health entitled "About WIC and How to Apply," or another Internet Web page identified by the State Department of Public Health that connects families to the Special Supplemental Nutrition Program for Women, Infants and Children.
  - (iv) The Internet Web site of a summer lunch program authorized to participate within the city or school district.

Eligibility and ongoing eligibility shall be determined for the free and reduced-price meal program based on the criteria made available by the California Department of Education.

### **Direct Certification**

Although every family should submit an application for free or reduced-price lunch, in certain circumstances, LCPS may be able to determine student eligibility without further application. LCPS shall directly certify as eligible the following students:

1. Any child who is a member of a household receiving assistance under the supplemental nutrition assistance program as eligible for free lunches and/or free breakfasts under the Child Nutrition Act of 1966.
2. Any child who is a member of a household that receives CalWORKs (also known as Temporary Assistance for Needy Families or "TANF") or CalFresh aid.
3. Any child who is a member of a household that receives the assistance of a Food Distribution program on Indian Reservations.
4. Any child identified as a foster, migrant, homeless or runaway youth, as defined by the California Education Code.

It is the policy of the Board that non-paying students shall not be shamed, treated differently, or served a meal that differs from the meal of a paying student. This Policy prohibits the Charter School from disciplining a student which would result in the denial or delay of a nutritionally adequate meal to that student.

## **Unpaid Meals**

LCPS shall notify a parent/guardian of the negative balance of a student's school meal account no later than ten (10) days after the account has reached a negative balance. Before sending this notification to the parent/guardian, LCPS will exhaust all options and methods to directly certify the student for free or reduced-price meals. LCPS shall ensure that a student who is eligible for a reimbursable meal whose parent or guardian has unpaid school meal fees is not denied a reimbursable meal of the student's choice because of the fact that the student's parent or guardian has unpaid meal fees.

In the event that LCPS determines that a student who has accrued a negative balance would have been eligible for free or reduced-price school meals, the Charter School shall credit such balance in accordance with this Policy. LCPS shall reimburse school meal fees paid by a student's parent/guardian in the event that the student is subsequently determined to have qualified for free or reduced-price meals. In the event that LCPS is not able to directly certify the student, LCPS shall provide the parent or guardian with a paper copy of, or an electronic link to, an application with the notification and contact the parent or guardian to encourage application submission.

LCPS will not overtly identify any student with unrecovered or delinquent debt. Should it become necessary that LCPS take action to recover unpaid meal charges, LCPS shall not take any action directed at a student to collect unpaid school meal fees and the cost to recover such debt will not exceed the amount of the debt owed. LCPS may attempt to collect unpaid school meal fees from a parent or guardian, but shall not use a debt collector, as defined in Section 803 of the federal Consumer Credit Protection Act (15 U.S.C. Sec. 1692a). LCPS shall comply with the cost principles set forth in 2 C.F.R. section 200.426 and applicable law. LCPS's collection policies for unpaid meal charges is consistent with LCPS's collection procedures and policies for all debt, and with state agency guidance.

## **Confidentiality/Release of Records**

All applications and records related to eligibility for the free and reduced-price meal program shall be confidential and may not be released except as provided by law and authorized by the Board or pursuant to a court order.

The Board authorizes designated employees to use individual records pertaining to student eligibility for the free and reduced-price meal program for the following purposes:

1. Disaggregation of academic achievement data
2. Identification of students eligible for alternative supports in any school

identified as a Title 1 program improvement school

If a student transfers from the Charter School to another charter school, district, county office of education program, or private school, the Chief Executive Officer or designee may share the student's meal eligibility information to the other educational agency to assist in the continuation of the student's meal benefits.

The Chief Executive Officer or designee may release the name and eligibility status of a student participating in the free or reduced-price meal program to another charter school, school district, or county office of education that is serving a student living in the same household as an enrolled student for purposes related to program eligibility and data used in local control funding formula calculations.

The Chief Executive Officer or designee may release the name and eligibility status of a student participating in the free or reduced-price meal program to the Superintendent of Public Instruction for purposes of determining funding allocations under the local control funding formula and for assessing accountability of that funding.

The Chief Executive Officer or designee may release information on the school lunch program application to the local agency that determines eligibility for participation in the Medi-Cal program if the student has been approved for free meals and if the applicant consents to the sharing of this information.

The Chief Executive Officer or designee may also release information on the school lunch application to the local agency that determines eligibility for CalFresh or to an agency that determines eligibility for nutrition assistance programs if the student has been approved for free or reduced-price meals and if the applicant consents to the sharing of this information.

This information released shall adhere to the following requirements:

1. Individual indicators of participation in a free or reduced-price meal program shall not be maintained in the permanent record of any student, unless otherwise authorized by law.
2. The public release of information regarding individual student participation in a free or reduced-price meal program is not permitted.
3. All other confidentiality requirements imposed by law or regulation are met.