

The Hilltop Institute



analysis to advance the health of vulnerable populations

House Bill 1391: Maryland's Kids First Act *Potential Medicaid/MCHP Eligibility Determination Process Enhancements*

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Table of Contents

Executive Summary i

Background 1

Express Lane Eligibility – Relying on Existing Public Programs..... 3

 Federal Express Lane Eligibility Initiatives..... 4

 A View from the States..... 5

Medicaid and SCHIP Eligibility Link to Income Tax Return Information..... 8

Options and Implementation Considerations for Maryland 9

 Options 9

 Implementation Considerations 9

Summary..... 14

Appendices

A. Express Lane Eligibility Activity in Select States 16

B. USDA School Lunch Prototype Application with Information Sharing Authorization Form
Free and Reduced Price School Meals Application and Verification Forms..... 17



House Bill 1391: Maryland’s Kids First Act
Potential Medicaid/MCHP Eligibility Determination Process Enhancements

Executive Summary

House Bill 1391, The Kids First Act (the Act), added §10-211.1 of the Tax-General Article (the statute) to the Annotated Code of Maryland effective July 1, 2008. The Act requires the Maryland Department of Health and Mental Hygiene (the Department) to “study and make recommendations for improving the processes for determining eligibility for the Maryland Medical Assistance Program and the Maryland Children’s Health Program, including the feasibility of facilitating outreach or auto-enrollment through linkages with other electronic data sources.”

The study explores options available to the state of Maryland with regard to identifying children that may be eligible for Medicaid (Medical Assistance) or MCHP by relying on existing electronic data sources. In accordance with these requirements, The Hilltop Institute, in collaboration with the Center for the Study of Democracy at St. Mary’s College of Maryland, conducted a study of potential processes for improving eligibility and enrollment procedures through linkages with other sources. These data sources include, but are not limited to, enrollment in other public service programs such as Supplemental Nutrition Assistance Program (SNAP)¹, the National School Lunch Program (NSLP), and Temporary Assistance for Needy Families (TANF).

States typically use two approaches to maximize linking program eligibility processes and data between Medicaid and SCHIP and other existing public programs:

- Using a unified application procedure to determine eligibility for multiple programs
- Accessing existing data from other public programs to identify potentially uninsured children participating in other public programs

Both approaches offer challenges to states attempting to streamline eligibility procedures. In addition to considering these two options for further enhancing the state’s eligibility processes, Maryland may also benefit from enhanced electronic data sharing between the Department and the Comptroller’s Office, such that state income tax data could be linked with Medicaid and MCHP. Experiences from other states that have implemented or attempted such linkages are highlighted throughout the study and may offer guidance to Maryland.

¹ As of October 1, 2008, Supplemental Nutrition Assistance Program (SNAP) is the new name for the federal Food Stamp Program.



Background

In the 2008 legislative session, the Maryland General Assembly passed House Bill 1391, the Kids First Act,² signed by Governor Martin O’Malley. The bill requires the Department to “study and make recommendations for improving the processes for determining eligibility for the Maryland Medical Assistance Program and the Maryland Children’s Health Program, including the feasibility of facilitating outreach or auto-enrollment through linkages with other electronic data sources.” The Hilltop Institute conducted this study on behalf of the Department.

According to data from the Maryland Health Care Commission, approximately 140,000 Maryland children were uninsured in 2006-2007, and approximately 70 percent of those uninsured children live in families with incomes that make them eligible for either Medicaid or the Maryland Children’s Health Program (MCHP). As indicated in Table 1, 100,000 children in Maryland are uninsured and in families with incomes at or below 300 percent of the family poverty level as calculated by the Maryland Health Care Commission. Nationally, it is estimated that as many as seven million children are uninsured even though they are eligible for either Medicaid or the State Children’s Health Insurance Program (SCHIP).³

Table 1: Characteristics of Uninsured Children by Family Poverty Level, 2006-2007

	Children (in thousands)*	Children Percent	Uninsured (in thousands)*	Uninsured Percent	Uninsured Rate
Family Poverty Level	170	11	40	24	22
Poor (<=100%)					
Near Poor (101% to 200%)	200	13	40	29	23
Low Moderate (201% to 300%)	240	16	20	16	11
Mid Moderate (301% to 400%)	230	16	20	14	9
High Moderate (401% to 600%)	330	23	10	9	4
High (601%+)	300	20	10	7	3

Note: Family income is reported as a percentage of the poverty level of income for each family (or individual) to standardize income for differences in family size. The family poverty level income percentages (FPLs) are based on the poverty level of income assigned to each family by the Census Bureau, as opposed to the poverty guidelines created by Health and Human Services (HHS) for programs such as Medicaid. The poverty level of income varies by family size, and the Census Bureau version also varies slightly by the age-mix of the family (unlike the HHS poverty levels). The Census Bureau poverty levels tend to be slightly above those established by HHS. The 2007 Census Bureau poverty level for a family of three ranges from \$16,218 – \$16,705, with \$16,689 being the most common value in Maryland’s under-age-65 population. Similarly, the most common poverty levels for other family sizes are as follows: 1 person = \$10,787; 2 persons = \$13,884; 4 persons = \$21,027; and 5 persons = \$24,744. Income ranges for the FPLs listed in the tables and figures are multiples of the poverty level.

These national estimates also indicate that over four million uninsured children from families with low income are participating in public programs with similar income eligibility rules to

² HB 1391 was enacted during the 2008 Regular Legislative Session and signed by the governor, to become Chapter 692 of the Laws of Maryland of 2008.

³ NIHCM Foundation. (2008, April). *Understanding the uninsured: Tailoring policy solutions for different subpopulations*. NIHCM Foundation Issue Brief. Retrieved December 1, 2008, from www.nihcm.org/pdf/NIHCM-Uninsured-Final.pdf



Medicaid and SCHIP. These public programs include the National School Lunch Program (NSLP); the Supplemental Nutrition Program for Women, Infants, and Children (WIC); Supplemental Nutrition Assistance Program (SNAP); child care programs; and Temporary Assistance for Needy Families (TANF). A study conducted by the Urban Institute estimated that three-quarters of all uninsured children in families with low-income live in families that participate in NSLP, WIC, SNAP, or Unemployment Compensation programs.⁴

To enroll in these public programs, families complete an application and submit necessary supporting documentation, providing much of the same information that is required for Medicaid and SCHIP enrollment. The natural overlap in the eligibility for these public programs and state public health insurance programs suggests that identification of uninsured children eligible for Medicaid and SCHIP could capitalize on data already collected from families enrolled in other programs. Such strategies would require the linking of electronic data sources from other public programs and incorporation of these data into the eligibility determination process for Medicaid/SCHIP. Maryland currently employs a unified application for SNAP, TANF, and Medicaid/MCHP. Applicants must indicate the public programs for consideration, but eligibility workers provide assistance to applicants to ensure they are knowledgeable on all three programs. Opportunities still exist, however, to improve outreach to Medicaid- and MCHP-eligible families.

This study explores options available to the state with regard to identifying children that may be eligible for Medicaid or MCHP by relying on existing sources. These data sources include, but are not limited to, enrollment in other public service programs such as SNAP, NSLP, WIC, and TANF.

By establishing linkages with existing public programs, the state may better identify children who are eligible for Medicaid and MCHP and establish an outreach program that results in higher enrollment among eligible children. States have typically used two approaches to maximize their abilities to link Medicaid and SCHIP eligibility with other existing public programs: 1) using a unified application procedure to determine eligibility for multiple programs, and 2) accessing existing data from other public programs or other state agencies, such as the Maryland State Department of Education (MSDE), to identify potentially uninsured children participating in other public programs. However, separate program rules and information technology systems make streamlining applications and data sharing across programs challenging to implement. States are also beginning to explore opportunities for using existing data from state income tax records to maximize Medicaid and SCHIP outreach and enrollment efforts.

⁴ Kenney, G. M., Haley, J. M., & Ullman, F. C. (2000). *Most uninsured children are in families served by government programs*. Urban Institute. Retrieved December 1, 2008, from <http://www.urban.org/publications/309302.html>



Express Lane Eligibility – Relying on Existing Public Programs

Express Lane Eligibility refers to a process that aims to expedite enrollment into public health insurance programs, such as Medicaid and MCHP, for large numbers of uninsured children, through linking with enrollment data or the enrollment process in other public programs. Because they already receive most of the information about families necessary for enrollment in Medicaid or SCHIP through the application process for these other public programs, states have moved to streamline applications and to use electronic data from these programs to enhance their ability to reach and enroll Medicaid/SCHIP- eligible individuals.

States typically use two approaches to maximizing data from existing public programs. The first approach is to employ a unified application procedure to determine eligibility for multiple programs. The second approach is to access existing data from other public programs to identify potentially uninsured children participating in other public programs. A number of states authorize, in one form or another, the use of information provided to separate need-based public programs to streamline the Medicaid and/or SCHIP application or renewal process. See Appendix A for a brief description of some state Express Lane Eligibility initiatives. Additionally, several states have implemented Express Lane Eligibility electronic data sharing procedures. Experiences from these states may offer guidance to Maryland.

The ability to employ targeted outreach via an Express Lane Eligibility approach depends largely on the concordance of participation/eligibility requirements between a state's Medicaid or SCHIP program and other public programs. Certain public programs may be a better fit with the Express Lane approach. Supplemental Nutrition Assistance Program (SNAP) is generally considered to be the most compatible program to link with the Medicaid or SCHIP enrollment processes. However, SNAP may offer a somewhat limited opportunity to reach uninsured children because it is estimated that only about 6 percent of uninsured children participate in that program.⁵

States have also experimented with integrating aspects of Medicaid/SCHIP eligibility processes with those of the WIC program and NSLP. WIC provides nutrition education and supplemental foods, such as infant formula, milk, and eggs to low-income⁶ pregnant or nursing women, infants, and young children who are at “nutritional risk.” The NSLP is a federally funded program that provides free lunch for eligible children of families with incomes less than 130 percent of the federal poverty level and reduced price lunches for eligible children of families with incomes that are 130 to 185 percent of the federal poverty level. It is estimated that as much as 22 percent of low-income, uninsured children nationally are in families enrolled in WIC, and nearly 60 percent are in families enrolled in NSLP.⁷

⁵ Horner, D., Lazarus, W., & Morrow, B. (2003). Express lane eligibility. *The Future of Children*, 13(1), 224-229.

⁶ Low-income is defined as having a family income that is less than 185 percent of the federal poverty level.

⁷ Dorn, S., & Kenney, G.M. (2006, June 16). *Automatically enrolling eligible children and families into Medicaid and SCHIP: Opportunities, obstacles, and options for federal policymakers*. The Commonwealth Fund report. p 9. Retrieved December 1, 2008, from www.commonwealthfund.org/publications/publications_show.htm?doc_id=376814



In Maryland, 285,000 children participated in NSLP in 2007.⁸ Additionally, the Maryland Office of Planning and Budget reports that approximately 57,000 children participated in WIC during the same time frame. Applying the national uninsured estimates for these programs to Maryland, perhaps as many as 32,000 children in WIC and another 87,600 children in NSLP are uninsured. This suggests that slightly more than 119,000 uninsured children may be participating in those two programs.⁹ Maryland currently employs a unified application for SNAP, TANF, and Medicaid/MCHP.¹⁰ Applicants must indicate the public programs for consideration, but eligibility workers provide assistance to applicants to ensure they are knowledgeable on all three programs.

Other programs that may offer a logical bridge to Medicaid or SCHIP enrollment are Head Start, serving children in families with incomes up to 100 percent of the federal poverty level. The Maryland Department of Human Resources reports that 12,000 Maryland children participate in Head Start, and that 97 percent are insured.

Federal Express Lane Eligibility Initiatives

The Children's Express Lane to Improve Health Coverage and Program Integrity Act

In April 2007, Senators Richard Lugar (R-IN) and Jeff Bingaman (D-NM) introduced "The Children's Express Lane to Improve Health Coverage and Program Integrity Act." The legislation seeks to improve states' ability to identify and enroll uninsured children into Medicaid and SCHIP. Under the bill, states would have the option to expedite enrollment into Medicaid and SCHIP through other public means-tested programs.

According to the bill's sponsors, the legislation would aid the 70 percent of low-income, uninsured children currently in families already receiving benefits through food stamp programs, free or reduced price school lunches, and/or nutrition programs for women, infants, and children. Additionally, the bill would enable technological improvements so that state health insurance agencies could better link with other public benefit programs to eliminate administrative waste. The legislation would also authorize federal funding to support the information technology improvements necessary to make such a system work effectively.¹¹

While the legislation did not pass, it would have given state Medicaid and SCHIP programs the flexibility to:

⁸ Data are provided by the Maryland Department of Human Resources and reflect the number of children receiving Free or Reduced Price Meals through Local Education Agencies as of October 31, 2007.

⁹ Because WIC eligibility ends at age five, there is likely little overlap between child participants in WIC and NSLP.

¹⁰ Families can choose to fill out a separate MCHP application to expedite enrollment.

¹¹ Lugar, R. (2007, April 25). *Lugar introduces children's Express Lane to health coverage*. Press release. Retrieved December 1, 2008, from <http://lugar.senate.gov/press/record.cfm?id=273058>



- Grant income eligibility for Medicaid or SCHIP when another public program has already found that the family has an income low enough to qualify for health coverage—whether or not the other program uses a different income-finding methodology
- Access extra federal resources to develop the hardware and software needed to exchange data electronically with other programs and administer Express Lane most efficiently
- Access publicly held data to determine children’s eligibility rather than delaying or denying health coverage by making families complete duplicative paperwork

U.S. Department of Agriculture: State Medicaid and SCHIP Limited Disclosure of National School Lunch Plan Eligibility Information

The Agricultural Risk Protection Act of 2000, enacted on June 20, 2000, amended the National School Lunch Act to grant state Medicaid and SCHIP limited access to children's NSLP eligibility information. Schools and institutions may disclose eligibility information to identify and enroll eligible children in Medicaid or SCHIP. Although schools are not required to disclose this information, the U.S. Department of Agriculture (USDA) encourages them to share these data with state Medicaid and SCHIP agencies given that many children eligible for free and reduced price meals and free milk do not have health insurance.

Schools may provide names, eligibility status (whether they are eligible to receive free meals, free milk, or reduced price meals), and any other eligibility information obtained through NSLP eligibility process (including information either on the application or obtained through direct certification or verification) to persons directly connected with the administration of state Medicaid and/or SCHIP. See Appendix B for a copy of the USDA School Lunch Prototype Application with the Information Sharing Authorization Form.

A View from the States

Alabama Food Stamp/Medicaid Verification System

The Alabama Medicaid Agency enjoys access to the state’s Department of Human Resources’ database for food stamps and child support enforcement. The Medicaid Agency uses the information provided to the food stamps and child support enforcement programs to verify income without contacting the applicant at both the initial enrollment and at renewal, when possible. The state plans to use a similar process for information provided by TANF recipients. The state intends to implement an automatic eligibility process that would allow children enrolled in the food stamps program to be automatically found eligible for Medicaid; however, such a change would require approval from the Centers for Medicare & Medicaid Services (CMS).

The state is in the early planning stages for this process, but the future of the project depends on finding adequate funding and resolving issues pertaining to federal law. Alabama foresees the creation of a web-based application process that will be linked to existing state databases and pull applicant information for use in an initial screening and eligibility determination in Alabama



SCHIP and Medicaid. A Robert Wood Johnson Foundation Supporting Families program grant which ended in 2004, assisted Alabama with highlighting the role that adequate funding plays in state efforts to streamline eligibility determinations and better integrate disparate state databases.¹²

California School Lunch/ Medi-Cal Express Enrollment Program

California implemented an Express Enrollment program that allows eligible children to apply for California's Medicaid program, Medi-Cal, through the NSLP application. Eligible children receive temporary Medi-Cal coverage while their parents/guardians submit additional information needed for a complete eligibility review. The program requires school districts and county Medi-Cal departments to work together. School districts must change their school lunch application to include an optional section where a parent or guardian can provide signed consent for the school district to share information on the application with Medi-Cal. The school districts also provide families with a special school lunch letter with an informational insert explaining Medi-Cal and the Express Enrollment process.¹³

Upon implementation of the pilot program, it was found that roughly one-third to two-thirds of the children eligible for free lunch were already enrolled in Medi-Cal. The state also found that a relatively high percentage of families that submitted the initial application and received temporary Medi-Cal coverage never completed the follow-up process. The program was initially pilot tested in about one percent of California's school districts.

Over the course of the three-year pilot program, Medi-Cal received just over 12,000 applications. The state determined that slightly more than 40 percent of the applications were from children already enrolled in Medicaid. Of the remaining 6,700 applications, over 1,900, or 28 percent, were ultimately enrolled in Medi-Cal. The state attributes the relatively low enrollment level to the fact that many families did not complete the follow-up process. The state estimates that full implementation in all school districts would have reached 200,000 to 500,000 uninsured children.¹⁴

Vermont Joint WIC/Medicaid and SCHIP Application

Vermont implemented a joint WIC and Medicaid/SCHIP application that potential enrollees may submit either to the Vermont Health Department—the state agency that administers the WIC program—or to the Vermont Department of Social Welfare, which administers the state's Medicaid and SCHIP programs. Both agencies use all information and documentation provided to the initial contact agency and rely on the initial agency's income determination, unless

¹² Robert Wood Johnson Foundation. (2007, February). *Supporting families after welfare reform: Access to Medicaid, SCHIP and Food Stamps*. Retrieved December 1, 2008, from www.rwjf.org/reports/npreports/sfw.htm

¹³ Cousineau, M. R., Wada, E. O., & Hogan, L. (2007). Enrolling in Medicaid through the National School Lunch Program: Outcome of a pilot project in California schools. *Public Health Reports*, 122(4), 452-460.

¹⁴ Horner, D. & Wasongar, D. (2006, July). *California's Express Enrollment Program: Lessons from the Medi-Cal/School Lunch Pilot Program—and suggested next steps in making enrollment gateways efficient and effective*. The Children's Partnership Issue Brief. Retrieved December 1, 2008, from <https://www.policyarchive.org/bitstream/handle/10207/6858/califexprog.pdf?sequence=1>



problems are seen. Vermont officials estimate that this process has resulted in 97 percent of WIC children having insurance at the time of their most recent WIC visit.¹⁵ Nationally, approximately 85 percent of WIC children are insured.¹⁶

Implementation of the joint application was not without difficulty and required some program eligibility changes to reconcile differences between the programs. Vermont obtained federal approval to change its state Medicaid plan to compensate for the following program differences:

- Medicaid counted in-kind income in determining eligibility, while WIC did not
- Medicaid counted parents' income when a pregnant or parenting minor paid room and board, while WIC did not
- WIC allowed depreciation as a business expense, while Medicaid did not

Vermont makes use of relevant state databases to better facilitate and coordinate enrollment of applicants. The Health Department and the Department of Social Welfare work cooperatively to cross check new Medicaid/SCHIP enrollees against new WIC participants. This cooperation is made easier by the fact that both departments are part of the Vermont Agency of Human Services.¹⁷

¹⁵ Horner, D., Lazarus, W., & Morrow, B.

¹⁶ Ibid.

¹⁷ The Children's Partnership. (2000, July). *WIC: A door to health care for California's children*. Retrieved December 1, 2008, from www.policyarchive.org/bitstream/handle/10207/6639/CP_WIC_for_web.pdf?sequence=1



Medicaid and SCHIP Eligibility Link to Income Tax Return Information

Efforts to link income data from tax returns with outreach and enrollment efforts for Medicaid and SCHIP are not without difficulty. The greatest challenge may be the issue of sharing data across tax agencies and Medicaid/SCHIP agencies. Pioneer states are just beginning to use tax returns as a way of identifying uninsured citizens and are exploring efforts to share data. As these initiatives are implemented, more streamlined and effective ways of sharing information across tax and Medicaid/SCHIP agencies should become evident.

New Jersey's Children's Mandate and Tax Return Outreach Program

Similar to Maryland's Kids First Act, New Jersey's Governor Jon Corzine recently signed Senate Bill 1557, which effectively mandates health insurance for children and expands coverage availability for parents. The legislation has an effective date of July 2009.¹⁸ To better facilitate coverage, New Jersey families will be asked to indicate on their state income tax returns whether their dependents have health insurance coverage. The state will then send applications and conduct outreach to families identified as having uninsured children who may be eligible for Medicaid or NJ FamilyCare, the state's SCHIP. Several task forces have been formed to develop strategies to enhance outreach and enrollment activities, including access to state taxation records and cross checking tax records with state Medicaid and NJ FamilyCare enrollment records.¹⁹

The legislation also authorizes the state health commissioner to verify income reported on Medicaid and NJ FamilyCare applications by comparing reported income with records of the Department of the Treasury or the Department of Labor and Workforce Development, such as tax returns or unemployment applications. A program applicant would be asked to provide written authorization for the Division of Taxation in the Department of the Treasury to release applicable tax information to the commissioner for the purposes of establishing income eligibility for the Medicaid or NJ FamilyCare. The authorization option would be included on the Medicaid or NJ FamilyCare application form. The specific authorization is to be developed by the health commissioner in consultation with the state treasurer.²⁰

¹⁸Senate Bill 1557. Retrieved December 1, 2008, from www.njleg.state.nj.us/2008/Bills/S2000/1557_R3.PDF

¹⁹The Commonwealth Fund. (2008, November 7). New Jersey's children's mandate and coverage expansion for parents. *States in Action*. Retrieved December 1, 2008, from

http://www.commonwealthfund.org/innovations/innovations_show.htm?doc_id=725904

²⁰ Senate Bill 1557.



Options and Implementation Considerations for Maryland

Options

The efforts of other states and federal initiatives provide insight into the options available to Maryland to better link information about uninsured children potentially eligible for, but not enrolled in, Medicaid/SCHIP. Implementation of such linkages provides the potential for targeting outreach to and streamlining enrollment for such children.

In order to improve the processes for determining eligibility for the Medicaid and MCHP programs, the state could enhance its use of Express Lane Eligibility or improve use of electronic data linkages with state income tax returns. Specifically, the Department's options include:

- Maximizing the linking of Medicaid and MCHP eligibility processes with that from other existing public programs such as NSLP and WIC through the use of a unified application procedure to determine eligibility for multiple programs
- Optimizing linkages with such public programs through the use of existing data from other public programs or with other state agencies, such as MSDE, to identify potentially uninsured children participating in other public programs
- Enhancing electronic data sharing between the Department and the Comptroller's Office with respect to employing state income tax data in determining families with children likely eligible for, but not enrolled in, Medicaid or MCHP

However, there are limitations inherent in any approach of streamlining eligibility and enrollment. These largely stem from disparate eligibility rules across programs, divergent program operations, and the use of distinct and separate information technology systems. Having outlined some of the options available to Maryland, it is now important to outline the implementation considerations that would accompany these efforts.

Implementation Considerations

An evaluation of the California School Lunch/Medi-Cal Express Enrollment program provides a good example of the benefits and the challenges faced by states hoping to streamline eligibility processes. Evaluators of California's Express Enrollment program ultimately found that "if the capacity of gateways to identify uninsured children can be joined with modernized enrollment procedures and policies, there is the potential to enroll large numbers of uninsured children far more efficiently and effectively."²¹ The challenge for states lies in the process of streamlining eligibility gateways and integrating them within the various requirements of enrollment procedures, eligibility policies, and technology across different public programs.

Many states have either undertaken or are considering a variety of initiatives to improve the processes for determining eligibility to facilitate the identification and enrollment of children into

²¹ Horner, D. & Wasongarz, D.



Medicaid and SCHIP. State experiences with eligibility streamlining efforts, including those in this report, highlight a number of considerations and challenges to the implementation of such efforts, including state technological capacity and variation in eligibility rules across public programs.

States, including California, have pursued streamlined or Express Lane enrollment strategies to determine eligibility for Medicaid or SCHIP based on the receipt of other means-tested non-health programs. To address the above challenges, states have not only adopted new technology to better track public program participant information, but also sought to reduce the differences in eligibility requirements, including the definition of family/household and manner in which income is determined across public programs.

Evaluations of Express Lane eligibility programs have found that such approaches require significant time and resources to screen out applicant children who are already enrolled in SCHIP or state Medicaid programs. The difficulty in screening out these children adds to the time and cost of outreach programs. Many states face prohibitive costs when attempting to better link existing state databases. Some states that have attempted to integrate applications, such as NSLP and Medicaid, have had to rely on a two-step process whereby those deemed to be potentially eligible for Medicaid after submitting the initial NSLP application are then required to submit a second, more detailed application in order to determine Medicaid eligibility. Lastly, any auto-enrollment initiative through data sharing relationships raises the question of whether or not people know they are covered and use services. There are no national studies that have evaluated the significance of this phenomenon, but Maryland should consider this as it designs potential auto-enrollment projects.

In Maryland, the Department has traditionally partnered with MSDE to focus outreach efforts through the school system as an important element in increasing applications for and enrollment in Medicaid and/or MCHP. School-based outreach has to-date included four major initiatives: (1) local health department outreach through the schools, (2) large-scale distribution of MCHP applications in Back-to-School packets, (3) information about how to obtain an MCHP application in the Free and Reduced Price Meals notices, and (4) Covering Kids & Families Back-to-School campaign, a national health access initiative reaching children in families with low incomes through a coordinated statewide advertising campaign, television and radio public service announcements, press conferences, and local outreach efforts.²²

Building upon this partnership, the Department may be able to enhance the processes for determining eligibility for Medicaid and MCHP by establishing an electronic process for matching Medicaid/MCHP data with MSDE's existing data on individuals enrolled in Free and Reduced Price Meals to identify children eligible for either program. Although the eligibility criteria are not identical (the Reduced Price Meals program has a lower income threshold: 185 percent of the FPL), the Department could create a database of MCHP/Medicaid-enrolled children with incomes less than 185 percent of the FPL and then match it to the Free and

²² Maryland Department of Health and Mental Hygiene. (2004, November). *Maryland Children's Health Program Outreach*. Report to the House Health and Government Operations Committee. p. 3.



Reduced Price Meals to identify children potentially eligible but not enrolled in each of the public programs.

This would essentially create a tool for both agencies to better target outreach to potentially eligible families.²³ The development of this matched database would be relatively easy and inexpensive. However, the options would add programming and administrative workloads at both agencies; necessitate the development of memoranda of understanding between MSDE and DHMH, clearly specifying approved data use; and require the agencies to clearly notify and receive consent from applicants that the data they provide may be used for other public program outreach purposes.

Technological Capacity

Approaches to a streamlined eligibility process that seek to link existing state databases generally require the adoption or development of new technology to bridge data across disparate information systems. Computer systems used to administer Medicaid/SCHIP programs have difficulty or cannot communicate directly with those of other public assistance programs. Therefore, states have found that they must obtain and share data manually to assure that children in food stamp programs or NSLP are determined eligible for Medicaid or SCHIP.²⁴

In California, the only way to determine if a School Lunch applicant is already enrolled in Medi-Cal is through a manual check of Medi-Cal enrollment records. The situation would be similar in Maryland: only a labor-intensive process of comparing applicant provided information with Medicaid or MCHP enrollment records would reveal whether an applicant for another program was already enrolled. This process requires significant time and resources and does not allow states to fully capture potential efficiencies of streamlined processes.

Additionally, variances in eligibility rules across programs often can prevent states from developing fully streamlined technological processes. Even if state electronic eligibility systems can communicate, the data shared within the systems may not be compatible with Medicaid/SCHIP program eligibility and enrollment requirements.

Maryland currently employs two web-based medical assistance application systems — Service Access & Information Link (SAIL) and Health-e-link. Although both SAIL and Health-e-link improve Maryland resident's access to health coverage applications, neither allows users to apply for WIC or NSLP at the same time as Medicaid/MCHP. Both WIC and NSLP utilize different application processes and software.

SAIL allows Maryland residents to apply for a variety of social service benefits through one electronic application. These benefits include medical assistance, SNAP, cash assistance, energy and electronic assistance, long term care, and child care subsidies. However, Health-e-link can only be used to apply for health coverage and assistance. It is a web-based application program

²³ Ibid., p. 9.

²⁴ Dorn, S., & Kenney, G.M.



being piloted in Howard and Anne Arundel County that allows county residents to apply for medical assistance as well as county-specific health coverage programs such as Healthy Howard.

Variation in Eligibility Rules

Public assistance programs have varying methodologies for determining eligibility due to federal requirements generally prohibiting Medicaid and SCHIP from relying on the income determinations of other means-tested programs.²⁵ States are permitted to use other program eligibility requirements to determine Medicaid eligibility, but only if the “rules for determining eligibility with respect to those requirements are the same or more restrictive than the rules in Medicaid.”²⁶ States have found it burdensome to develop and implement eligibility policies that meet this requirement while also remaining in accordance with the rules of other public programs. Therefore, parents of children with incomes low enough to qualify for Medicaid or SCHIP are generally required to complete a second application before their children can be determined eligible for and enroll in Medicaid or SCHIP.

The determination of what constitutes income also differs across programs and complicates the Medicaid/SCHIP’s ability to use data from other public assistance programs. For example, SNAP determines eligibility based on *household* income, while Medicaid and SCHIP rely on *family* income. Due to this difference in criteria for eligibility, the state would need to follow-up with food stamp applicants to determine which household members are also family members. Maryland has overcome this issue by gathering all relevant data in a single application, but this comes at the expense of simplicity and efficiency.

Another consideration for many states stems from the fact that public assistance programs such as WIC and NSLP do not impose an asset limit. Since Maryland does not impose an asset limit for families and children applying for Medicaid/MCHP, however, an asset test would not be a barrier to streamlining applications and/or database matches.

Differences in eligibility requirements related to citizenship and immigration status also pose a challenge. WIC, Food Stamps, and NSLP all have citizenship and immigration eligibility criteria and/or documentation requirements that vary from those of Medicaid. As of July 1, 2006, Medicaid enrollees must provide evidence of both citizenship and identity so that states have such documentary evidence prior to granting Medicaid eligibility to applicants.²⁷ Either United States citizenship or legal immigration status has always been a requirement for Medicaid eligibility. Prior to the Deficit Reduction Act of 2005 (DRA), states could accept a person’s declaration of

²⁵ Ibid.

²⁶ Centers for Medicare and Medicaid Services. (2001). *Continuing the progress: Enrolling and retaining low-income families and children in health care coverage*.

²⁷ Centers for Medicare & Medicaid Services. Fact Sheet. *HHS Issues Citizenship Guidelines for Medicaid Eligibility: Overview of New Guidance on Citizenship Documentation for Medicaid Benefits. June 2006. Retrieved 12/18/08 from:*
<http://www.cms.hhs.gov/apps/media/press/factsheet.asp?Counter=1878&intNumPerPage=10&checkDate=&checkKey=2&srchType=2&numDays=0&srchOpt=0&srchData=citizenship&keywordType=All&chkNewsType=6&intPage=&showAll=1&pYear=&year=0&desc=&cboOrder=date>



citizenship as sufficient for Medicaid.²⁸ SNAP requires each household member to declare—but not document—their citizenship status or to establish satisfactory immigration status.²⁹ Having United States citizenship and/or satisfactory immigration status is not an eligibility requirement for free and reduced price benefits in NSLP.³⁰ Additionally, the WIC program is available to eligible individuals regardless of citizenship or immigration status. Because of these variations, the Medicaid program generally cannot automatically enroll individuals in SNAP, NSLP, or WIC without further evidence of citizenship and/or satisfactory immigration status.

In an effort to overcome some of the variations in program eligibility and documentation requirements, states have created combined applications that ask all information for each program explicitly. However, some states have found this process cumbersome, potentially acting as a deterrent to applicants who may become overwhelmed by such a long application process. Additionally, a study by the Commonwealth Fund found that many states seeking Express Lane procedures use a “second step” application in which the Medicaid/SCHIP agency seeks an additional full application for children’s health coverage based on the completion of an application for another program, such as NSLP or WIC. However, in some instances, the second step is completed by families of less than one-third of the potentially eligible children.³¹ In California, the state determined that a significant number of potentially eligible children identified during its first step, or presumptive eligibility, are lost during the more complex second step of income determination.³²

Enhancement of Income Information Sharing

In Maryland, the Kids First Act requires outreach by the Comptroller and the Department to certain families whose tax returns indicate that a dependent child or children may be eligible for Medicaid or MCHP. Specifically, the Comptroller is identifying families reporting income that does not exceed the highest income eligibility standard for Medicaid/MCHP. For tax returns for the 2007 tax year, the statute requires the Comptroller to send such families a notice developed by the Department that indicates the child or children may be eligible for Medicaid/MCHP and includes information on how to enroll. Beginning with returns for tax year 2008, taxpayers will be required to report the presence or absence of health care coverage for each dependent child for whom an exemption is claimed. The Comptroller will send the taxpayer application and enrollment instructions for Medicaid/MCHP when 1) a taxpayer indicates that a dependent is uninsured and 2) the household's reported income does not exceed the highest level of income eligibility for Medicaid/MCHP.

²⁸ The new law does not apply to applicants and recipients who are legal immigrants. Such individuals continue to provide documentation of their immigration status as required prior to the DRA.

²⁹ United States Department of Agriculture. *Supplemental Nutrition Assistance Program: Policy guidance regarding inquiries into citizenship, immigration status and social security numbers in state applications for Medicaid, State Children's Health Insurance Program (SCHIP), Temporary Assistance for Needy Families (TANF), and Food Stamp benefits*. Retrieved December 17, 2008, from <http://www.fns.usda.gov/FSP/rules/Memo/00/QsAsonCitizenship.htm>

³⁰ Child Nutrition Programs, Food and Nutrition Service, United States Department of Agriculture. (2008, January). *Eligibility manual for school meals: Federal policy for determining and verifying eligibility*. p. 18. Retrieved December 17, 2008, from <http://www.fns.usda.gov/cnd/governance/notices/iegs/EligibilityManual.pdf>

³¹ Dorn, S., & Kenney, G.M.

³² The California Endowment.



In this collaborative effort, the Department and the Comptroller's Office have identified a key issue: the ability of the two agencies to share data on individuals identified to receive information about Medicaid and MCHP. The agencies are in the process of reviewing state and federal laws to determine the extent to which the Comptroller may share limited information reported on state tax returns directly with the Department in an effort to better identify uninsured individuals within the income limits of Medicaid and MCHP. However, from a preliminary analysis, it appears the Comptroller may be restricted from sharing income- and tax-related data with the Department. The state could achieve greater efficiencies via electronic information sharing across agencies. Electronic data matching across systems would allow the Comptroller to send information and applications to families with children not already enrolled in Medicaid/SCHIP. Additionally, the Department could use information about who received Medicaid/SCHIP applications from the Comptroller's Office to track responses and to follow up with families in order to provide additional information or assistance with the application.

Another possible limitation of the outreach initiative is that funding was not provided to include return postage in the mailed application package. The State may want to consider this to improve the rate of return.

Since Maryland is one of the first states to link tax information with outreach activities, researchers are extremely interested in evaluating the project. The Department recently was awarded a \$183,664 grant by the *Robert Wood Johnson Foundation State Health Access Reform Evaluation (SHARE) Project* to evaluate among other things whether or not the tax form is a reliable source to identify and enroll potential Medicaid/SCHIP eligible children. The evaluation will be conducted in partnership with Hilltop over the next two years.

Summary

In accordance with provisions of The Kids First Act, The Hilltop Institute, on behalf of the Department, studied ways in which Maryland could improve the processes for determining eligibility for Medicaid and MCHP. The study reviewed available methods for identifying children that may be eligible for Medicaid or MCHP by relying on existing data sources and eligibility processes for similar programs.

The Hilltop Institute found that Maryland may be able to enhance eligibility processes by incorporating additional Express Lane Eligibility strategies into its Medicaid and MCHP processes and by creating streamlined electronic data sharing between state income tax data and Medicaid/MCHP eligibility data files. States using Express Lane Eligibility typically follow two approaches for maximizing linkages between Medicaid and SCHIP and other existing public programs: using a unified application procedure to determine eligibility for multiple programs; and accessing existing data from other public programs to identify potentially uninsured children participating in other public programs. Maryland currently employs a unified application for SNAP, TANF, and Medicaid/MCHP. Applicants must indicate the public programs for



consideration, but eligibility workers provide assistance to applicants to ensure they are knowledgeable on all three programs.

Both approaches to Express Lane Eligibility offer challenges to states attempting to streamline eligibility procedures. In addition to considering these two options for further enhancing the state's eligibility processes, Maryland may benefit from enhanced electronic data sharing not only between the Department and public assistance agencies such as MSDE, but also between the Department and the Comptroller's Office. Experiences from other states that have implemented or attempted such linkages may offer guidance to Maryland by demonstrating necessary implementation considerations. To address challenges in streamlining eligibility processes, states found the need for new technology or technology improvements to enhance connections across systems, as well as the need to address differences in eligibility requirements across programs. Disparate eligibility rules are not insignificant challenges to overcome and may require the Department to share data across programs as a first-step towards enrolling children across public programs, *e.g.*, WIC and NSLP. It is important to keep in mind that WIC is a federal program, and the federal government may decline or refuse to share data with state Medicaid programs.

As the Department continues to explore opportunities to identify uninsured children who might be eligible for Medicaid, resources also should be spent on the infrastructure to support eligibility determinations. Given the current economic environment and the recent health care expansion, enrollment has increased, which is straining the infrastructure supporting the Medicaid program. Outreach activities are most useful if individuals' applications can be processed in a timely manner. Opportunities exist to further automate the eligibility processing system but such automation requires an investment of resources by the State. Additionally, before beginning new outreach activities, the State should consider opportunities to enhance current outreach activities, *e.g.*, providing postage with the applications mailed by the Comptroller.



Appendix A. Express Lane Eligibility Activity in Select States³³

Express Lane Activity	State/City	Description of Activity
State law authorizes Express Lane Eligibility	Louisiana	Louisiana: In 2007, enacted legislation allowing Medicaid/SCHIP to use income findings from non-health programs when authorized by federal law.
Streamlined enrollment using information provided to a non-health program to initiate a health program application	California Maryland New Jersey Vermont Virginia	California: Provides accelerated, streamlined enrollment into Medicaid and SCHIP by allowing children to apply for health coverage using the school lunch application. In 2006, passed legislation to develop an electronic gateway from WIC into health coverage. Maryland: Provides accelerated enrollment to Medicaid/SCHIP applicants whose families already have active cases with the Department of Social Services (TANF, Food Stamps, SSI, or Medicaid). New Jersey: Piloted express enrollment into Medicaid through the school lunch application process. Ongoing use of simplified express application from any entry point. Vermont: Uses the WIC income determination for Medicaid unless issues arise indicating need to re-evaluate per Medicaid rules. Virginia: In 2002, passed legislation paving the way for expedited eligibility processing for Medicaid/SCHIP based on enrollment in WIC/school lunch.
Automatic renewal using information provided to a non-health program	Alabama Arkansas Idaho Illinois Louisiana Maryland South Dakota Washington Wisconsin	These states use information provided to other agencies to determine eligibility for renewal for Medicaid/SCHIP and automatically extend the eligibility period. Generally, the process interfaces with Food Stamps, but sometimes with child support enforcement, TANF, school lunch programs. Maryland: Maryland currently employs a unified application for SNAP, TANF, and Medicaid/MCHP. Applicants must indicate the public programs for consideration, but eligibility workers provide assistance to applicants to ensure they are knowledgeable on all three programs.
Administrative renewal using available data to verify ongoing eligibility	Hawaii Illinois Utah (SCHIP only)	These states send families a renewal form but ask that it be returned only if information has changed. When not returned, the state verifies continuing eligibility for children using administrative data and available databases.
Automatic/default enrollment based on enrollment in non-health program	New York City	New York City: In 2000, conducted a one-time process which enrolled all uninsured Food Stamp recipient children into Medicaid unless their parents opted out of the "roll over."
Automatic eligibility using another health eligibility finding	Wisconsin	Wisconsin: Automatically enrolls migrant laborers into Medicaid with proof of enrollment in another state Medicaid program, despite differences in program rules.

³³ Chart reprinted in its entirety from: Expresslaneinfo.org
<http://www.expresslaneinfo.org/Content>

Appendix B.

USDA School Lunch Prototype Application with Information Sharing Authorization Form Free and Reduced Price School Meals Application and Verification Forms



Free and Reduced Price school meals application and verification forms

school year _____ - _____

Instructions For School Districts

This packet contains:

Required information that *must* be provided to households:

- Letter to Households
- Free and Reduced Price School Meals Application

Verification of eligibility information materials:

- Notification of Selection for Verification of Eligibility
- Letter of Verification Results

Optional application-related materials that *may* be provided to households:

- Sharing Information With Medicaid/SCHIP
- Sharing Information With Other Programs

The pages are designed to be printed on 8½” by 11” paper. Some pages may be printed front and back. You will need to identify the benefits that are offered in your school, such as afterschool snacks. **[Bold bracketed fields]** indicate where you need to insert school district specific information. For example, you must include your district’s no-charge telephone number for verification assistance on the verification materials. If these materials have not been modified to include your State’s name for Temporary Assistance to Needy Families (TANF), State Children’s Health Insurance Program (SCHIP), or, if applicable, to add Food Distribution Program on Indian Reservations (FDPIR), you should insert this information as appropriate. If you make additional changes, you must submit your application package to your State agency for approval.

This prototype application package includes information regarding the exclusion of housing allowance for those in the Military Housing Privatization Initiative. If this is not pertinent to your school district, please modify as appropriate.

If you have questions, contact:

[State agency address]

[Insert School District Letterhead]

Dear Parent/Guardian:

Children need healthy meals to learn. **[Name of School]** offers healthy meals every school day. Breakfast costs **[\$]**; lunch costs **[\$]**. Your children may qualify for free meals or for reduced price meals. Reduced price is **[\$]** for breakfast and **[\$]** for lunch.

1. Do I need to fill out an application for each child? No. Complete the application to apply for free or reduced price meals. Use one Free and Reduced Price School Meals Application for all students in your household. We cannot approve an application that is not complete, so be sure to fill out all required information. **Return the completed application to: [name, address, phone number].**

2. Who can get free meals? Children in households getting Food Stamps or TANF and most foster children can get free meals regardless of your income. Also, your children can get free price meals if your household income is within the free limits on the Federal Income Guidelines.

3. Can homeless, runaway and migrant children get free meals? Please call **[school, homeless liaison or migrant coordinator]** to see if your child(ren) qualify, if you have not been informed that they will get free meals.

4. Who can get reduced price meals? Your children can get low cost meals if your household income is within the reduced price limits on the Federal Income Chart, shown on this application.

5. Should I fill out an application if I got a letter this school year saying my children are approved for free or reduced price meals? Please read the letter you got carefully and follow the instructions. Call the school at **[phone number]** if you have questions.

6. I get WIC. Can my child(ren) get free meals? Children in households participating in WIC may be eligible for free or reduced price meals. Please fill out an application.

7. Will the information I give be checked? Yes, we may ask you to send written proof.

8. If I don't qualify now, may I apply later? Yes. You may apply at any time during the school year if your household size goes up, income goes down, or if you start getting Food Stamps, TANF or other benefits. If you lose your job, your children may be able to get free or reduced price meals.

9. What if I disagree with the school's decision about my application? You should talk to school officials. You also may ask for a hearing by calling or writing to: **[name, address, phone number]**.

10. May I apply if someone in my household is not a U.S. citizen? Yes. You or your child(ren) do not have to be a U.S. citizen to qualify for free or reduced price meals.

11. Who should I include as members of my household? You must include all people living in your household, related or not (such as grandparents, other relatives, or friends). You must include yourself and all children who live with you.

12. What if my income is not always the same? List the amount that you normally get. For example, if you normally get \$1000 each month, but you missed some work last month and only got \$900, put down that you get \$1000 per month. If you normally get overtime, include it, but not if you get it only sometimes.

13. We are in the military, do we include our housing allowance as income? If your housing is part of the Military Housing Privatization Initiative, do not include your housing allowance as income. All other allowances must be included in your gross income.

If you have other questions or need help, call **[phone number]**.

Si necesita ayuda, por favor llame al teléfono: [phone number].

Si vous voudriez d'aide, contactez nous au numero: [phone number].

Sincerely,
[signature]

INSTRUCTIONS FOR APPLYING

If your household gets FOOD STAMPS OR TANF, follow these instructions:

Part 1: List child(ren)'s name, school, grade, and a Food Stamp or TANF case number.

Part 2: Check the appropriate box, if any.

Part 3: Skip this part.

Part 4: Skip this part.

Part 5: Sign the form. A Social Security Number is not necessary.

Part 6: Answer this question if you choose to.

Check the appropriate box and contact [your school, homeless liaison, migrant coordinator].

Fill out application by following instructions for ALL OTHER HOUSEHOLDS.

If you are applying for a FOSTER CHILD, follow these instructions:

Part 1: Use a separate application for each foster child. List the child's name, school, and grade.

Part 2: Skip this part.

Part 3: Check the box and list the child's personal use monthly income, if any.

Part 4: Skip this part.

Part 5: Sign the form. A Social Security Number is not necessary.

Part 6: Answer this question if you choose to.

ALL OTHER HOUSEHOLDS, including WIC households, follow these instructions:

Part 1: List each child's name, school, and grade.

Part 2: Check the appropriate box, if any.

Part 3: Skip this part.

Part 4: Follow these instructions to report total household income from last month.

Column 1–Name: List the first and last name of **each** person living in your household, related or not (such as grandparents, other relatives, or friends). You must include yourself and all children living with you. Attach another sheet of paper if you need to.

Column 2 –Gross income last month and how often it was received. Next to each person's name list each type of income received last month, and how often it was received. For example, *Earnings from work*: List the **gross income** each person earned from work. This is not the same as take-home pay. **Gross income is the amount earned before taxes and other deductions.** The amount should be listed on your pay stub, or your boss can tell you. Next to the amount, write how often the person got it (weekly, every other week, twice a month, or monthly). *All other income*: List the amount each person got last month from welfare, child support, alimony, (second column) pensions, retirement, Social Security (third column), and ALL OTHER INCOME SOURCES (fourth column). In the All Other column, include Worker's Compensation, unemployment, strike benefits, Supplemental Security Income (SSI), Veteran's benefits (VA benefits), disability benefits, regular contributions from people who do not live in your household, and ANY OTHER INCOME. Report net income for self-owned business, farm, or rental income. Next to the amount, write how often the person got it. If you are in the Military Housing Privatization Initiative do not include this housing allowance.

Column 3–Check if no income: If the person does not have any income, check the box.

Part 5: An adult household member must sign the form and list his or her Social Security Number, or mark the box if he or she doesn't have one.

Part 6: Answer this question if you choose to.

FREE AND REDUCED PRICE SCHOOL MEALS FAMILY APPLICATION

Part 1. Children in School (Use a separate application for each foster child)

Names of all children in school (First, Middle Initial, Last)	School Name	Grade	Food Stamp or TANF case # (if any). Skip to Part 5 if you list a Food Stamp or TANF case #

Part 2. If the child you are applying for is homeless, migrant, or a runaway check the appropriate box and call [your school, homeless liaison, migrant coordinator at phone #] Homeless Migrant Runaway

Part 3. Foster Child

If this application is for a child who is the legal responsibility of a welfare agency or court, check this box and then list the amount of the child's personal use monthly income: \$ _____. Skip to Part 5.

Part 4. Total Household Gross Income—You must tell us how much and how often

1. Name (List everyone in household) <i>(Example)</i> <i>Jane Smith</i>	2. Gross income and how often it was received <i>Example: \$100/monthly \$100/twice a month \$100/every other week \$100/weekly</i>				3. Check if NO income
	Earnings from work before deductions	Welfare, child support, alimony	Pensions, retirement, Social Security	All Other Income	
	\$200/weekly	\$150/weekly	\$100/monthly	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>
	\$ ____/____	\$ ____/____	\$ ____/____	\$ ____/____	<input type="checkbox"/>

Part 5. Signature and Social Security Number (Adult must sign)

An adult household member must sign the application. If Part 4 is completed, the adult signing the form must also list his or her Social Security Number or mark the "I do not have a Social Security Number" box. (See Privacy Act Statement on the back of this page.)

I certify (promise) that all information on this application is true and that all income is reported. I understand that the school will get Federal funds based on the information I give. I understand that school officials may verify (check) the information. I understand that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted.

Sign here: X _____ Print name: _____ Date: _____

Address: _____ Phone Number: _____

Social Security Number: ____ - ____ - _____ I do not have a Social Security Number

Part 6. Children's racial and ethnic identities (optional)

Mark one or more racial identities:

- Asian
- American Indian or Alaska Native
- White
- Native Hawaiian or Other Pacific Islander
- Black or African American
- Other

Mark one ethnic identity:

- Hispanic or Latino
- Not Hispanic or Latino

Don't fill out this part. This is for school use only.

Annual Income Conversion: Weekly x 52, Every 2 Weeks x 26, Twice A Month x 24 Monthly x 12

Total Income: _____ Per: Week, Every 2 Weeks, Twice A Month, Month, Year Household size: _____

Categorical Eligibility: _____ Date Withdrawn: _____ Eligibility: Free _____ Reduced _____ Denied _____ Reason: _____

Temporary: Free _____ Reduced _____ Time Period: _____ (expires after _____ days)

Determining Official's Signature: _____ Date: _____

Confirming Official's Signature: _____ Date: _____ Follow-up Official's Signature: _____ Date: _____

Your children may qualify for free or reduced price meals if your household income falls within the limits on this chart.

FEDERAL INCOME CHART			
For School Year			
Household size	Yearly	Monthly	Weekly
1			
2			
3			
4			
5			
6			
7			
8			
Each additional person:			

Privacy Act Statement: This explains how we will use the information you give us.

The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the social security number of the adult household member who signs the application. The social security number is not required when you apply on behalf of a foster child or you list a Food Stamp Program, Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs. We MAY share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.

Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly. In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write to *USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington DC 20250-9410* or call (800) 795-3272 or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.

SHARING INFORMATION WITH MEDICAID/SCHIP

Dear Parent/Guardian:

If your children get free or reduced price school meals, they may also be able to get free or low-cost health insurance through Medicaid or the State Children's Health Insurance Program (SCHIP). Children with health insurance are more likely to get regular health care and are less likely to miss school because of sickness.

Because health insurance is so important to children's well-being, **the law allows us to tell Medicaid and SCHIP that your children are eligible for free or reduced price meals, unless you tell us not to.** Medicaid and SCHIP only use the information to identify children who may be eligible for their programs. Program officials may contact you to offer to enroll your children (Filling out the Free and Reduced Price School Meals Application does not automatically enroll your children in health insurance).

If you do not want us to share your information with Medicaid or SCHIP, fill out the form below and send in (Sending in this form will not change whether your children get free or reduced price meals).

No! I DO NOT want information from my Free and Reduced Price School Meals Application shared with Medicaid or the State Children's Health Insurance Program.

If you checked no, fill out the form below.

Child's Name: _____ School: _____

Signature of Parent/Guardian: _____ Date: _____

Printed Name: _____ Address: _____

For more information, you may call [name] at [phone].

Return this form to: [address] by [date].

SHARING INFORMATION WITH OTHER PROGRAMS

Dear Parent/Guardian:

To save you time and effort, the information you gave on your Free and Reduced Price School Meals Application may be shared with other programs for which your children may qualify. **For the following programs, we must have your permission to share your information. Sending in this form will not change whether your children get free or reduced price meals.**

No! I **DO NOT** want information from my Free and Reduced Price School Meals Application shared with any of these programs.

Yes! I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.

Yes! I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.

Yes! I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.

If you checked yes to any or all of the boxes above, fill out the form below. Your information will be shared only with the programs you checked.

Child's Name: _____ School: _____

Signature of Parent/Guardian: _____ Date: _____

Printed Name: _____

Address: _____

For more information, you may call **[name]** at **[phone]**.
Return this form to: [address] by [date].

WE MUST CHECK YOUR APPLICATION

You must send the information we need, or contact [name] by [date], or your children will stop getting free or reduced price meals.

School: _____ Date: _____

Dear _____:

We are checking your Free and Reduced Price School Meals Application. Federal rules require that we do this to make sure only eligible children get free or reduced price meals. You must send us information to prove that **[names of children]** are eligible.

If possible, send copies, not original papers. If you do send originals, they will be sent back to you only if you ask.

1. If you were getting Food Stamps or TANF when you applied for free or reduced price meals, or at any time since then, send us a copy of one of these:

- Food Stamp or TANF Certification Notice that shows dates of certification.
- Letter from Food Stamp or Welfare Office that says you have gotten Food Stamps or TANF.
- **Do not send your EBT card.**

2. If you get this letter for a homeless, migrant or runaway child, please contact [school, homeless liaison, or migrant coordinator] for help.

3. If the child is a Foster Child:

Send us official documentation from the agency sponsoring the child.

4. If you do not get Food Stamps or TANF for your children:

A. Write name and Social Security Number of each adult household member below.

Name	Social Security Number (See Privacy Act Statement, page 2)	No Social Security Number
_____	- - - - - - - - - -	<input type="checkbox"/>
_____	- - - - - - - - - -	<input type="checkbox"/>
_____	- - - - - - - - - -	<input type="checkbox"/>
_____	- - - - - - - - - -	<input type="checkbox"/>
_____	- - - - - - - - - -	<input type="checkbox"/>
_____	- - - - - - - - - -	<input type="checkbox"/>
_____	- - - - - - - - - -	<input type="checkbox"/>
_____	- - - - - - - - - -	<input type="checkbox"/>

B. Send this page along with papers that show the amount of money your household gets from each source of income.

The papers you send must show the **name** of the person who received the income, the **date** it was received, **how much** was received, and **how often** it was received. **Send information to: [address].**

Acceptable papers include:

Jobs: Paycheck stub or pay envelope that shows the amount and how often pay is received; letter from employer stating gross wages and how often they are paid; or business or farming papers, such as ledger or tax books.

Social Security, Pensions, or Retirement: Social Security retirement benefit letter, statement of benefits received, or pension award notice.

Unemployment, Disability, or Worker’s Comp: Notice of eligibility from State employment security office, check stub, or letter from Worker’s Compensation.

Welfare Payments: Benefit letter from welfare agency.

Child Support or Alimony: Court decree, agreement, or copies of checks received.

Other income (such as rental income): Information that shows the amount of income received, how often it is received, and the date received.

No income: A brief note explaining how you provide food, clothing and housing for your household, and when you expect an income.

Military Housing Privatization Initiative: Letter or rental contract showing that your housing is part of the Military Housing Privatization Initiative.

Timeframe of Acceptable Income Documentation: Please submit papers that show your income at the time that you applied for benefits. If you do not have this information, you may submit papers from time of application up to time of verification.

If you have questions or need help, please call [name] at [phone number]. The call is free. [Toll free or reverse charge explanation].

Sincerely,

[signature]

Privacy Act Statement: The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the social security number of all adult household members. The social security number is not required when you apply on behalf of a foster child or you list a Food Stamp Program, Temporary Assistance for Needy Families (TANF) Program or Food Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast programs.

Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly. In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write to *USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington DC 20250-9410* or call (800) 795-3272 or 202-720-6382 (TTY). USDA is an equal opportunity provider and employer.

WE HAVE CHECKED YOUR APPLICATION

School: _____ Date: _____

Dear _____:

We checked the information you sent us to prove that **[names of children]** are eligible for free or reduced price meals and have decided that:

- Your children's eligibility has not changed.
- Starting **[date]**, your children's eligibility for meals will be changed **from reduced price to free** because your income is within the free meal eligibility limits. Your children will receive meals at no cost.
- Starting **[date]**, your children's eligibility for meals will be changed **from free to reduced price** because your income is over the limit. Reduced price meals cost **[\$]** for lunch and **[\$]** for breakfast.
- Starting **[date]**, **your children are no longer eligible** for free or reduced price meals for the following reason(s):
 - ___ Records show that you did not receive Food Stamps, or TANF.
 - ___ Records show that the child(ren) is not homeless, runaway, or migrant.
 - ___ Your income is over the limit for free or reduced price meals.
 - ___ You did not provide: _____
 - ___ You did not respond to our request.

Meals cost **[\$]** for lunch and **[\$]** for breakfast. If your household income goes down or your household size goes up, you may apply again. If you did not provide proof of current eligibility, you will be asked to do so if you reapply.

If you disagree with this decision, you may discuss it with **[name]** at **[phone]**. You also have the right to a fair hearing. If you request a hearing by **[date]**, your children will continue to receive free or reduced price meals until the decision of the hearing official is made. You may request a hearing by calling or writing to: **[name]**, **[address]**, **[phone number]**.

Sincerely,

[signature]

Non-Discrimination Statement: This explains what to do if you believe you have been treated unfairly. In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write to *USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington DC 20250-9410* or call (800) 795-3272 or 202-720-6382 (TTY). USDA is an equal opportunity provider and employer.



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