

Using Free and Reduced-Priced meal status for Individual Students

Even though the USDA has published an Eligibility Manual which includes a Disclosure Chart, more specific questions are frequently raised to Iowa Department of Education. These additional questions and answers are summarized below. Meal eligibility status is determined for the purpose of providing meal service to students. Access to this information is limited and as data of the USDA Child Nutrition program, is subject to disclosure restrictions imposed by section 9(b)(6) of the National School Lunch Act, not other federal programs including FERPA. If a person has legitimate access for a particular reason, that access cannot be used to provide the information for a different purpose. In cases where individual information can be shared, only the status may be shared, not how the student qualified for the status. For complete information also refer to the latest Eligibility Manual, Chapter 5 Confidentiality and Disclosure:

https://fns-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf

Question or Scenario	Individual Student Free or Reduced status available?	Comments
Do District employees have access solely based on their job title such as Guidance Counselor, Principal, Secretary, School Nurse, Food Service employee, etc.?	Requires specific parental prior notice and written consent annually.*	Access and use is not permitted solely according to job title. Allowable access or use of individual student meal status information is on a need to know basis for administration, enforcement, or reporting for a State or Federal Program.
Food service employees	Varies based on job duties in this federal program.	A Cashier may need to know a student's meal status to remind students to bring payments. A Cook does not need this information to prepare foods.
Assistance activities such as back pack program, adopt a family, Shop with a Cop, etc.	Requires specific parental prior notice and written consent annually.*	These are local programs and do not qualify to receive or use individual student status information without parental consent. A general sign up flyer can be sent to all households. There are situations that the meal eligibility process does not take into consideration such as medical expenses. Allow families to sign up if they are interested.
Title 1 Services	Varies	For the person assigning the additional services and completing state reporting progress of individuals, meal status may be provided for use. For the staff person providing the services, knowledge of the meal status is not necessary to be able to do their duties (do they teach differently to a low SES student reading at below grade level vs a high SES student reading at below grade level?)
To develop school boundaries, separate students into classrooms, or organize students into groups.	Requires specific parental prior notice and written consent annually.*	These are local programs and do not qualify to access or use individual student meal status information. Suggest utilization of census block maps, property values, etc.
Local district goals relating to academic performance of various groups including low SES students	Requires specific parental prior notice and written consent annually.*	This is a local program and does not qualify for individual student meal status information to be accessed or used.
For waiver of collection of school fees	Requires specific parental prior notice and written consent annually.*	This is a local program and does not qualify for individual student meal status information to be accessed or used.
Medicaid; <i>hawk-i</i>	Allowed and for <i>hawk-i</i> sharing by public schools is required.	The household must have the opportunity and be allowed to decline having its information shared.

*specific prior notice (fee waiver application) identifies specific NSLA-protected information to be shared and clearly identifies the purpose of each use of information or release of information (e.g. band instruments, sports equipment, back pack program, etc.). This consent must be obtained each school year and cannot be extended from one school year to another.

Questions may be directed to your National School Lunch Program Consultant in the Bureau of Nutrition & Health Services or Patti.Harding@iowa.gov.