

PUBLIC SUBMISSION

As of: July 26, 2012
Received: July 17, 2012
Status: Pending_Post
Category: Govt.-State
Tracking No. 8109d4ab
Comments Due: August 07, 2012
Submission Type: Web

Docket: FNS-2012-0030

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Determining Eligibility for Free and Reduced Price Meals and Free Milk

Comment On: FNS-2012-0030-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals Determining Eligibility for Free and Reduced Price Meals and Free Milk

Document: FNS-2012-0030-DRAFT-0004

Comment on FR Doc # 2012-13943

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Organization: Michigan Department of Education, Office of School Support Services

Government Agency Type: State

Government Agency: Michigan Department of Education

General Comment

Michigan is one of the pilot states participating in the Community Eligibility Option (CEO). Assuming one of the purposes of the FNS 742 is to be able to report the number of students eligible for free meals, this report, specifically for CEO states, will not reflect an accurate total. The reasons for the inaccurate number are a reflection of the report format itself and the way CEO districts serve and count their students.

The report itself contains two fields that are not filled out by CEO schools – 4-2(a) and 4-3(a), the number of students categorically eligible and the number of free income eligible respectively. It is understandable why these two fields are not filled out by CEO schools – 4-2(a) because they will typically be included in 4-1(a) as identified students and 4-3(a) because there are not supposed to be any students approved for benefits based on an income application.

However, for a CEO state and the participating School Food Authorities (SFA), the number of free students actually being reached is greatly understated. The current and proposed form for CEO schools counts only the number of directly certified students as free eligible and not the total number of students actually eligible to receive free meals. One possible number to report for CEO schools would be the number of directly certified students times 1.6 (the current CEO factor). The resultant

number would reflect the potential number of free REIMBURSABLE meals at this school. However, in reality, ALL students in CEO schools are eligible to receive free meals which would be a much higher number. This number would more accurately reflect the total number of students eligible for free benefits in our CEO schools. Only when we can include all students in our CEO schools as eligible for free meal benefits will this report accurately reflect the number of students reached for this important benefit.