

# Eligibility Verification Procedure

## Purpose

This document explains the steps required to ensure that the children/expectant mothers most in need of services are enrolled first. Family Support staff or any trained site/center staff can follow this procedure.

## Guidance

This is designed to assist staff through the entire process to determine a child/expectant mother/family's eligibility. After determining eligibility staff will apply the category and risk factor selection points to the application and place the application on the center/sites' waitlist under the appropriate eligibility status (see *Category and Risk Factor Points and Procedure*). A child is eligible when they meet the age and family income requirement per the program performance standards. There are some exceptions to income guidelines that are based on ensuring that high risk children have access to the program. Expectant mothers must meet the income requirements. Staff must also consider other risk factors that will benefit the child/expectant mother such as services and support provided in education, child development, family support/engagement activities, health, nutrition, mental health, and special services

## Procedure

In this procedure, program staff will determine:

- Who is eligible and how to determine eligibility
- How to use categorical eligibility and other pertinent family/expectant mother/child information
- Identify what documents are needed to support the eligibility determination and
- When to document the eligibility status and determining other relevant forms needed. See *Eligibility Verification Form Tool*.

## Who Is Eligible For The PSES Early Learning Program?

This chart is a quick glance at the different models and age eligibility for the PSES Birth to 5 Early Learning Program. Additional details about eligibility are discussed throughout this document.

Name of Program Model	Model Requirements	
Early Head Start – Center Based	Newborn to 30+ months.* <i>(See Transitioning Early Head Start Three Year Olds to Preschool Programs or Community Options Procedure)</i>	
Early Head Start – Home Based	<ul style="list-style-type: none"> <li>• Expectant Mothers.</li> <li>• Newborn to 30+ months.* <i>(See Transitioning Early Head Start Three Year Olds to Preschool Programs or Community Options Procedure)</i></li> </ul>	
Family Childcare	Newborn to 5 years old (prior to August 31).	
Head Start - Full Day	<ul style="list-style-type: none"> <li>• 3 years old, but not yet 5 years old by August 31<sup>st</sup>.</li> </ul>	An EHS or community child already attending a full day center is age eligible on their 3 <sup>rd</sup> birthday.
Head Start - Part Day	3 years old, but not yet 5 years old by August 31 <sup>st</sup> .	
ECEAP - Extended Day	3 years old, but not yet 5 years old by August 31 <sup>st</sup> .	
ECEAP - Full Day	3 years old, but not yet 5 years old by August 31 <sup>st</sup> .	

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### Conducting Eligibility Interview

**Do I have to meet with the family in person?** Staff is requested to make every effort to conduct an in-person interview to verify and document eligibility prior to the child's enrollment. We know this may cause barriers for our families, therefore, staff is asked to ensure all income eligibility documents are confirmed and verified during the enrollment process.

### How to Determine Eligibility

The first step to determine a child's eligibility is to verify age and income before considering any other factors. Staff will consider categorical eligibility (for Head Start) after confirming the age and income. (Expectant mothers' age documentation is not required).

To verify a child's age, program staff must:

- Review when you can, however, keep in mind that the lack of documentation should not be a barrier to determine age eligibility
- Support school readiness goals as they create a plan with parents/legal guardians in obtaining this documentation
- Document in the *Family Partnership Record/Contact Log* or ELMS why documentation was unavailable
- If a child/family is homeless, staff has up to 90 days to collect this documentation.

The following are acceptable document to verify age:

- Birth Certificate.
- Adoption papers.
- Court documents.
- Foster care authorization letters.
- Child Profile.
- Government Document w/birth date.
- Individual Education Plan.
- Immunization Records.
- Medical card/record.
- Passport.
- School record.
- TANF award letter.
- Paternity affidavit.
- Other (Staff required to specifically enter/document the name of the "other" document used.)

To verify a child's/expectant mother's income, program staff must:

1. Know the income guidelines to determine eligibility:
  - Head Start: 100% (or below) of the Federal Poverty Level (FPL) guidelines or Categorically Eligible
  - ECEAP: 110% (or below) of the Federal Poverty Level (FPL) guidelines or Other identified risk factorsChildren whose family's income exceeds the Federal Poverty Level can apply and be considered after all income and categorically eligible children have been selected and enrolled.
2. Know how to determine income:
  - Count all annual (gross) income received by each family member in the household (related by blood, adoption or marriage to the child).
  - Use the *How to Count Family Size Chart* and the definition of family as follows:
    - Family is defined as all persons living in the same household who are supported by the income of the parent/ guardian(s) of the child enrolling **AND** the child is related to the parent or guardian(s) by blood, marriage or adoption.
    - Review a family size verification document, such as a benefit letter from TANF, SSI, foster care, or tax record. ELMS users are required to enter the specific document name into the system. All other staff who do not use ELMS must document this in the *Family Partnership Record/Contact Log*.



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### What Income Documents Are Acceptable to Determine Eligibility?

- Individual Income Tax Form 1040:
  - If not self-employed, look for the gross income (before taxes and deductions.)
  - If self-employed, look for net income or adjusted gross income (after taxes and deductions.)
- W-2 Form, pay stubs, pay envelopes:
  - Please determine if income listed on these documents comes from WorkFirst.
- Written statement from employers.
- Current status of public assistance:
  - Temporary Assistance for Needy Families (TANF) and WorkFirst.
  - Social Security Income (for a disability) ECEAP Only: For parent and child only.

Staff must also remember that the lack of documentation from a parent/legal guardian must not be a barrier for staff to determine eligibility. Staff can interview the parent and document the conversation on the Eligibility Verification Form as a Staff Statement and obtain a written statement from the parent declaring income (see: *Statement Regarding Income or Statement of No Income*). If documentation is not available, see *Eligibility Verification Form Tool*. See *Definition of Income Guidance*.

### Using Categorical Income Eligibility

Categorical eligibility is a term adopted from the Head Start performance standard, however, ECEAP similarly recognizes the same population of children as the most in need of services. The current *PSESD Category and Risk Factor Points Procedure* will guide staff in ensuring the child with the most needs is offered an enrollment opportunity first.

### Using Temporary Assistance for Needy Families and WorkFirst Program Income to Determine Eligibility

WorkFirst is a public assistance program. However, in lieu of receiving TANF cash, the parent/legal guardian in the program will receive minimum wage for working a job. This program is often referred to as Community Jobs. The parent may submit a W-2 or 1040 Tax Return because they are eligible to file for taxes at the end of the year.

### Using Social Security Income Disability to Determine Eligibility

Not all families that receive income from the Social Security office are eligible under Categorical Eligibility and staff must ensure that the income is based on a disability for a child and/or parent/legal guardian and sometimes a sibling or other member in the family household (family count):

- **In Head Start**, any family counted as a household member receiving SSI (for a disability) is considered public assistance and the child/family is categorically eligible. Collect all income, but income is not relevant to the eligibility status.
- **In ECEAP**, the parent or child must be the recipient of the SSI (for a disability) before staff can determine the child/family as categorically eligible. Collect all income. However, if the recipient of the SSI is a disabled sibling, grandparent or other household member, collect all income and if the income is over the FPL, this child would be placed in an over-income status and the child may or may not be offered an enrollment opportunity.
- **What is Third Party Verification?**  
Staff can receive reliable third party verbal or written verification when documents are not available.
  - Obtain the family's written consent prior to contacting a 3<sup>rd</sup> party.
  - Verify and document the 3<sup>rd</sup> party has first-hand knowledge about the family's eligibility status and can verify eligibility information such as family size, income, homelessness, etc.
  - Document on the *Eligibility Verification Form* the 3rd party's agency name, name of 3<sup>rd</sup> party and the phone number.
  - Adhere to the PSESD program safety, privacy policies and procedures.

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- See What are the Exceptions below

### How do I count the child/family's income for eligibility?

Staff must collect 12 months of income from the parent or legal guardian to determine income eligibility. Staff will request either the calendar year or previous 12 months prior to application. Staff can also obtain a verbal or written statement from the parent or legal guardian or contact a 3<sup>rd</sup> party to verify income.

- **What is Calendar Year?** It is receiving income that reflects the calendar year prior to application. For example, January to December Tax Return, W-2 or last pay stub for the year.
- **What is Previous 12 Months?** It is receiving income that reflects the 12 months prior to the application. For example, if the family applied in May 2015, staff would review the income received from May 2014 of the previous year to April 2015.
- **What are the Exceptions?** Exceptions are made for a homeless or unaccompanied child (a child not in the physical custody of a parent/legal guardian, foster child, , a foster child waiting for placement, informal relative care, or formal relative care, also known as kinship care.
  - For a child in foster care, count only the foster care grant amount (multiply by 12).
  - For a child receiving a child-only TANF grant, count only the grant amount (multiply by 12).
  - For a child living with an adult who is not their parent or legal guardian, count only the child's income; usually zero (Use Zero when entering ELMS and \$1 when entering in Child Plus). Staff should document as \$1.00 on the *Eligibility Verification Form*.
  - For a child whose parent or legal guardian is temporarily housed with relatives or others, count only the income of the child's parents or legal guardians.
- **What are Current Month Circumstances?** At time of application a child's family may present information about a change in the household income or circumstance which may qualify the child as income or categorically eligible despite the income documents showing conflicting information (i.e. over-income). The documentation will be accepted but the family states it does not reflect the current situation. Staff should interview the family and obtain additional documents to support the reported change to use the current month circumstances for eligibility. Staff must:
  - Review income from the last calendar year AND the previous calendar year income prior to using current circumstances.
  - Document on the *Eligibility Verification Form Guidance* the justification for using this eligibility status.
  - See *Eligibility Verification Form Procedure* for additional information in using this status.
- **What is extenuating circumstance?** It is when a child's family had a significant decreased in income due to a catastrophic (extenuating) circumstance such as the death of a wage earner, separation, divorce, domestic violence, unexpected job loss or similar circumstances. Staff must:
  - Review income from the last calendar year AND the previous calendar year income prior to using extenuating circumstances.
  - Remember extenuating circumstances eligibility is based on income change, not situational changes.
  - Contact your Family Support Senior Regional Coordinator (RSC) when a family with extenuating circumstances has been identified. Your RSC will guide you through ensuring that all steps were followed before placing this child's application on the waitlist.

### What is Over-income?

It is when staff reviews a child or family 12 month calendar year or the previous 12 months income and determines that the income is above the FPL.

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### Do I Still Determine Eligibility for an Over-Income Child?

Yes. PSESD Early Learning Program allows a certain percentage of children whose family's income exceed the Federal Poverty Level (FPL) to enroll if all eligible children and families have been offered the opportunity first. See *Enrollment Procedure* for specifics of enrolling an over-income child.

### What If a Child/Family is Determined Over-Income but Are Also Categorically Eligible?

Homeless, TANF, Child-Only TANF, Foster care, relative care/kinship, SSI disability and for EHS and HS only a child care subsidy for extended and full day are eligible regardless of income (See *Eligibility Verification Form Tool*).

#### Exceptions:

- **For ECEAP:** SSI disability income must be for the child or the parent/legal guardian. Documents must show the disability payment is for the child or the parent/legal guardian to qualify for ECEAP services.
- **For ECEAP:** A child must be on a current Individual Education Plan (IEP) with documented proof to qualify for ECEAP services and not be considered over-income.
- **For Head Start:** Income that exceeds the 100% FPL must also be impacted by specific developmental or environment risk factors linked to research to school success.
- **For ECEAP:** Income that exceeds the 110% FPL must also be impacted by specific developmental or environmental risk factors linked to research to school success.

The following are the identified risk factors identified by the Department of Early Learning. These risk factors are linked to school success. See *Category and Risk Factors Points Procedure and Category and Risk Factor Points Chart* to assign the correct point to a child's application.

RESEARCH-BASED RISK FACTORS
Child was expelled from an early learning program/child care due to behavior.
Child lives with someone other than a parent, step-parent or foster parent (kinship or other guardianship).
Child lives with a single parent.
One or both parents were under age 18 when this child was born.
Child is not currently homeless, but was within the past 12 months.
One parent/current guardian completed 6th grade or less.
One parent/current guardian completed 7th to 12th grade, no diploma or GED.
Family was under CPS supervision in the past (documented abuse or neglect).
Child on a school district IEP, <b>not</b> speech/language only, no other public preschool option available.
Child on a school district IEP, <b>not</b> speech/language only, public preschool option is available.
Child is on a school district IEP, speech/language only.
Child has suspected developmental delay or disability, no IEP (per parent or staff).
Child has limited English language.
Parent requires an interpreter to communicate with English speakers.
Transferring from an ECEAP or Head Start operated by a different ECEAP contractor or Head Start grantee.
Child was in Early Head Start, Part C ESIT early intervention or a birth to three home visiting programs last school year.
Parent is currently deployed to a combat zone, or was within past year.

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Child has a parent who is incarcerated.
Household domestic violence.
Household substance abuse.
Household mental illness, child or adult, including maternal depression.
Child has a chronic health condition (diabetes, asthma, seizures, etc.)
Child has no medical coverage.
Child has no medical home.
Child has no dental coverage.
Child has no dental home.
Child is not fully immunized and not exempt.
Child had low birth weight (<5.5 pounds).
Parent is a migrant worker.
Parent is disabled.
Family is isolated, without a support system.
ECEAP received a professional referral for this family.

### Are There Other Factors To Consider For Eligibility?

#### Authorization to Enroll

In order to ensure all children are safe, the PSESD Early Learning Program has adopted the requirement of verifying legal authorization to enroll a child in the program. Staff must:

- Obtain and retain documents that prove this authority in the family file
- Request documents during the eligibility process (highly recommend, but must be before enrollment)
- Every effort should be made to use the types of legal documents below (For ECEAP - the list of documents are in ELMS):
  - Adoption records.
  - Birth Certificate.
  - Legal Will.
  - Court order.
  - Foster Care.
  - Tax Return Record (listing child).
  - Insurance documents (state relationship).
  - Social Worker.
  - School/Personnel Records.
  - Lawyer.
  - Religious leader.
  - Mental health professional.
  - Records from hospital, clinic, other public health or social service agency.
  - Records from DSHS listing guardian.
  - Court or legal document.
  - Other: List name of document.

**Exception:** If a family is homeless, staff has up to 90 days to collect documentation if information is not immediately available.

Please ensure this guidance is used in conjunction with the current *Eligibility Verification Form Procedure* and other ERSEA documents.

#### Related Documents/Systems:

*Family Partnership Record/Contact Log*  
*Category and Risk Factor Points Chart*

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*Category and Risk Factor Points Procedure*

*Eligibility Verification Form*

*Eligibility Verification Form Tool*

*Enrollment Procedure*

*How to Count Family Size Chart*

*Current year Income Eligibility Guidelines*

*Transitioning Early Head Start Three Year Olds to Preschool Programs or Community Options Procedure*

*Definition of Income Guidelines*