

ELIGIBILITY

Documenting Eligibility

ISDs should provide annual training to employees responsible for determining and verifying eligibility. Training for school years ending in June 2021 and 2022 only should include detailed information on how to enroll eligible program and control families in the MSU Strong Beginnings research component. All staff must also have a clear understanding of effective practices to protect personally identifying information.

Child age, and income for each family must be verified before determining that a child is eligible to participate in the program. Programs must complete a verification form signed by the staff member determining eligibility and the parent/guardian providing documentation. This form should indicate the type of documentation viewed for verifying age and income eligibility, as well as specific details including the child's date of birth, the Federal Poverty Level (FPL) percentage for the family, and the calculation figures used to determine FPL. A sample Income Verification Sample Form can be found in the resources for this section. The completed verification form should be kept in the child file with copies of the documents used to determine eligibility.

Children who have been found income eligible for Strong Beginnings do not need to requalify based on their current income if enrolling in GSRP the following year. However, they need to have an income verification form in their GSRP file. They may have the one used for verification in Strong Beginnings. If that is not available, a new form is required although it is not used for admittance to the program.

Residency

All children who attend a state-funded Strong Beginnings program must live in Michigan. This includes migrant children during the times they are living in Michigan. Children, who live in bordering states, even if their parents/guardians work in Michigan, are not eligible for Strong Beginnings. If families move out of Michigan after attending Strong Beginnings, they are not eligible for automatic placement into GSRP.

Age

Strong Beginnings was designed to provide high-quality preschool to children at risk for low educational attainment two school years before they are regularly eligible for kindergarten. For Strong Beginnings, this means a child must turn three years of age on or before September 1. However, a provision exists for parents who wish to request early enrollment for children who will turn three after September 1, but on or before December 1.

Applications for children who will turn three years of age for Strong Beginnings between September 2 and December 1 MAY NOT be considered for enrollment until

September 1 or later. At that point, their applications are prioritized along with any other remaining applications as enrollment decisions are made. An application for early enrollment for a child who is eligible for Head Start must be referred to Head Start using the locally agreed upon process.

An assumption is made that parents opting to enroll their child in Strong Beginnings early, expect to also use the provision for early entry into GSRP the following fall. If there is a change to the plan to enroll in GSRP early, a second year of Strong Beginnings is permissible. This requires, however, that the parent re-apply and re-qualify for the second year of Strong Beginnings and, if still eligible, the child may be accepted based on the ISD's prioritization process and available space.

Documenting Age

The *MDE Pupil Accounting Manual* addresses the documentation of child age as required for local and intermediate school districts under Section 1135 of the Revised School Code (MCL 380.1135). It states:

- 1) Upon enrollment of a student for the first time in a local or intermediate school district, the district shall notify in writing the person enrolling the student that within 30 days he or she shall provide to the local or intermediate school district either of the following:
 - a) A certified copy of the student's birth certificate.
 - b) Other reliable proof, as determined by the school district, of the student's identity and age, and an affidavit explaining the inability to produce a copy of the birth certificate.

The Manual provides examples of "other reliable proof" that may be accepted: baptismal certificate indicating date and place of birth; court records; county, military, or immigration records; doctor or hospital records with sworn statements; certain family records; life insurance policy; or a sworn notarized statement from a parent or guardian. (A district must never deny enrollment or expel a pupil simply because the parent(s), or legal guardian, did not provide a birth certificate.)

A child whose age has been documented for Strong Beginnings does not need to provide age documentation to enroll in GSRP. The GSRP site must maintain a copy of the age verification form used for Strong Beginnings in the child's GSRP records. If the age verification form is unobtainable, the age of the child must be re-documented.

Income

Income means total cash receipts before taxes from all sources, with the exceptions noted below. Income includes money wages or salary before deductions; net income from self-employment; regular payments from Social Security or railroad retirement; payments from unemployment compensation, strike benefits from union funds, workers' compensation, veterans benefits (with the exception noted below), public assistance (including Temporary Assistance for Needy Families, Supplemental Security Income, Emergency Assistance money payments, and non-

Federally funded General Assistance or General Relief money payments); training stipends; alimony, child support, and military family allotments or other regular support from an absent family member or someone not living in the household; private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments; college or university scholarships, grants, fellowships, and assistantships; and dividends, interest, net rental income, net royalties, and periodic receipts from estates or trusts; and net gambling or lottery winnings. The *Income Eligibility Guidelines* can be found in the resources for this section.

The following income may be considered:

- Of the last 12 months,
- Of the preceding calendar year, or
- At the time of enrollment.

For example, if neither the last 12 months or the preceding calendar year accurately represents the family's situation at the time of enrollment (e.g., because the parent is recently unemployed) then the Strong Beginnings program providers contractor should use its judgment in deciding if it seems likely that the current situation more accurately reflects a family's likely economic status during the period of the child's enrollment.

A family includes all persons related by blood, marriage, or adoption, living within a household who are supported by the income of the parent or guardian of the child enrolling or participating in the program. A parent who is not living in the prospective child's home and is not likely to return to that home at any time in the near future (i.e., during the child's participation in Strong Beginnings) should not, however, be included when determining family size (with the exception of a deployed parent). Programs must make individual judgments about whether the absent parent is truly part of the child's family or not and to document, in the child's file, the decision and the reasons for that decision.

For parents who have joint custody, the total number of family members for both families are summed and then divided in half, rounding up when necessary. For example, if both custodial parents have remarried and each has a child from this marriage, the family size is 2 custodial parents + 2 spouses + 2 children + Strong Beginnings child = 7; divided by 2 = 3.5, or rounding up, 4. If one parent is paying any child support to the other parent, the income of the parent receiving the child support should be used for determining income eligibility. If neither parent is providing any child support to the other, the program should count half of each parent's income and the sum of these two should be used by the program in determining income.

If a child is being raised by another family member (e.g., grandparent, aunt, sibling), who does not have guardianship, Strong Beginnings aligns with federal guidance to Head Start grantees. As in every situation, staff begin by gathering as much information as possible about the family situation. Staff should determine if

they believe the current arrangement will be temporary or long-term and if a conversation with the child's parents would be both possible and beneficial. If staff determines that the child is, for all intents and purposes, being raised by that family member the program should consider the income of the family member when determining income eligibility.

A child from a family that is receiving public assistance, a child in foster care, or a child who is experiencing homelessness is eligible for Head Start. If a child in any of these situations has been referred to Head Start, is eligible but is not enrolled, the family may apply for Strong Beginnings and is considered to be in the lowest quintile. In these cases, the family's income is considered to be in the lowest quintile, 0 – 50% FPL and should be reported as such to the MSU research team.

A child with an individualized education program (IEP) recommending placement in an inclusive preschool setting who is income eligible for Head Start must be referred to the local Head Start agency. However, if the child is not eligible for and/or enrolled in Head Start, the family may apply for Strong Beginnings and the family's income must be considered to be in the lowest quintile, 0 – 50% FPL in terms of eligibility, but actual income is collected at the time of enrollment and reported to the MSU research team in the corresponding quintile. This along with additional program eligibility factors must be considered when prioritizing children for enrollment. The ISD or program should have a policy regarding how the child will be prioritized within that quintile. For instance, the policy could state that the family's actual FPL will be used unless it is over 50%; in that case, the child will be considered to be at 50% FPL.

A child with an IEP recommending placement in an inclusive preschool setting or a need for early childhood special education service from a family with income above 250% FPL, may not be charged Strong Beginnings sliding fee scale tuition.

If a family claims it has no income, the family is also eligible for Head Start and must be referred to the local Head Start agency. If the family is unable to provide income documentation, the program must determine the accuracy of the verbal report of income. Information (i.e., living arrangements, assets, etc.) gathered from other sources may be used to make an informed judgment about the family's income status.

Student loans are excluded as income. This is true whether student loans are federally insured or commercially issued. Student grants for tuition/books are exempt from income calculations. However, grants for room/board/living expenses should be used to calculate income. Scholarships, fellowships and grant funds received in cash and not used for qualified educational expenses are also considered income.

Adoption subsidy payments, whether federal, state, or employer sponsored, are excluded as income.

A housing allowance provided to a member of the clergy is not considered income.

If a parent is an active member of the U.S. Armed Forces, certain pay can be excluded from family gross cash income. Please be aware that an adjusted family income may make the family income-eligible for Head Start, and in that case, must be referred to Head Start. The following are NOT included as gross cash income for active duty U.S. Armed Forces personnel:

- Combat Pay - Compensation for active service while in a combat zone.
- Living Allowances – Basic Allowance for Housing (BAH) even if BAH is used to pay mortgage interest and taxes; Basic Allowance for Subsistence (BAS); housing and cost of living allowances abroad; Overseas Housing Allowance (OHA).
- Moving Allowances – moving household and personal items; storage; moving trailers or mobile homes; temporary lodging; dislocation; military base realignment, and closure benefit.
- Travel Allowances – annual roundtrip for dependent students; leave between consecutive overseas tours; reassignment in a dependent restricted status; transportation during ship overhaul and inactivation, per diem.
- Family Allowances – specified educational expenses for dependents; emergencies; evacuation to a place of safety; separation.
- Death Allowances - burial services; death gratuity payments to eligible survivors; travel of dependents to burial site.
- In-kind Benefits – dependent-care assistance; legal assistance; medical/dental care; commissary/exchange discounts; space-available travel on government carriers.
- Other payments – defense counsel services; certain disability pension payments (active members of the military cannot receive more than 60% disability pay) including payments received for injuries incurred as a direct result of a terrorist or military action; disability severance payments; group-term life insurance; professional education; ROTC educational and subsistence allowances; State bonus pay for service in a combat zone; uniform allowances; survivor and retirement protection plan premiums.

Documenting Income

The best documentation of income is a copy of the most recent tax return. Alternate forms of documentation are paycheck stubs (indicate pay period: bi-weekly, weekly, etc.), W-2 forms, written statements from employers, or documentation showing current status as recipients of public assistance. The program's documentation verifying the income calculation must be signed by the staff member and retained in the child's file.

Children who have been found income eligible for Strong Beginnings do not need to requalify based on their current income if enrolling in GSRP the following year. The GSRP must maintain a copy of the income verification form used for Strong Beginnings in the child's GSRP records. If the income verification form is unobtainable, income of the child must be re-documented, but the child does not need to requalify based on current income. All children attending Strong Beginnings

are eligible to attend GSRP even if their income is higher than that of children seeking to enroll in GSRP who have not attended Strong Beginnings.

Documenting Program Eligibility Factors

There are seven program eligibility factors. Based on the prevalence data, family income is the main factor in determining eligibility for Strong Beginnings. Tiered income eligibility ensures that Strong Beginnings finds and provides services to its target population and focuses on those most at risk. However, program eligibility factors must be collected and considered before enrolling a child in Strong Beginnings.

When deciding whether a situation or condition should be considered an eligibility factor, the most important question to ask is whether and how the situation puts the child at risk for low educational attainment and if/how this will have a negative impact on the child's development. If the situation or condition is not something that puts the child's educational future at risk, then it is not an eligibility factor for that child.

The seven program eligibility factors used to determine Strong Beginnings eligibility are:

- 1) Low family income
- 2) Diagnosed disability or identified developmental delay
- 3) Severe or challenging behavior
- 4) Primary home language other than English
- 5) Parent(s) with low educational attainment
- 6) Abuse/neglect of child or parent
- 7) Environmental risk

The same condition or concern should not be counted twice; e.g., a child with severe or challenging behavior should not also be considered as having a developmental delay in the social/emotional domain. Additionally, more than one situation under environmental risk may apply to a child and should be documented; however, environmental risk may be counted as only one eligibility factor.

It is recommended that programs record all program eligibility factors for each child at the time of enrollment; additional program eligibility factors that staff become aware of beyond the enrollment period are also recorded. The documentation is helpful in designing program services for children, making referrals for family members, and helping to create summaries of eligibility factor prevalence locally and state-wide. When "parent report" can be used as documentation, the interviewer and the parent can sign and date a form indicating which program eligibility factors pertain. Alternately, a note can be included in the file with the staff member's signature and date indicating WHAT the parent reported; e.g., to document parent report of low educational attainment, the following could be noted:

8/12/10 - At the intake interview, Ms. Brown reported that she has a GED and the child's father has not graduated from high school

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The chart, *Program Eligibility Factors*, found in the resources for this section, will help to further define each of the program eligibility factors and suggest possible ways to document them. The MSU research team collects program eligibility factor information on each enrolled child at the end of the program year and documentation is reviewed during monitoring.

Sensitive Interviewing

Many programs use a brief phone interview to initially screen children to determine whether they might be eligible. A family that seems to have an eligible child should be invited for a more in-depth interview. Giving parents a list of questions or factors to fill out on their own is not recommended; many topics are confidential and can be uncomfortable to address. Parents should be assured that confidentiality is strictly maintained and that the program carefully protects personal information. Sensitive interviewing techniques help to build the strong relational foundation for helpful and appropriate services for children and families. The Family Liaison's assistance may be utilized in Strong Beginnings programs to lead or support the interviewing process and add relevant information to children's files during the school year.