



Promising Practices for Ensuring Access to School Meals for Limited English Proficient Families

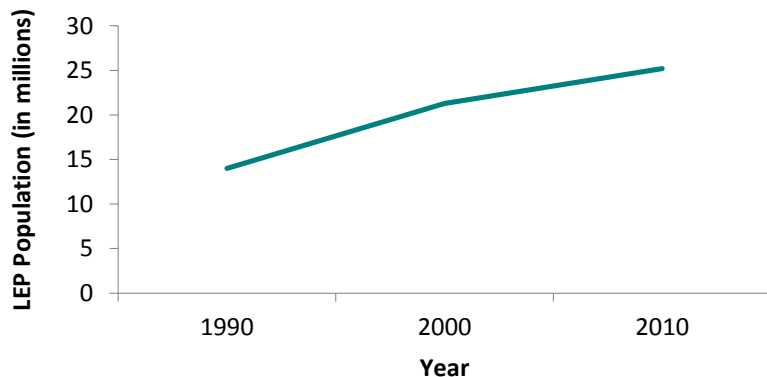
A report prepared by:
Center on Budget and Policy Priorities
Food Research and Action Center
Migrant Legal Action Program

I. Language Should Not be a Barrier to Accessing School Meals

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) make it possible for all school children in the United States to receive a nutritious breakfast and lunch every school day. These meals can play a critical role in supporting the healthy development of children. Enrolling for free or reduced price meals is the gateway to these benefits for lower-income children. The enrollment process should not be more difficult for families with limited English skills. Program rules require each school district to ensure that no participation barrier exists for Limited English Proficient (LEP) households.

This guide highlights promising practices for addressing the language needs of LEP households when school districts are enrolling children for school meals. These practices include effective strategies for identifying LEP families and then providing these families with meaningful access to information and communications regarding school meals.

LEP Population Growth, 1990 to 2010



The overall LEP population in the United States has increased substantially in the last 20 years, consistent with the growth of the U.S. immigrant population.¹ The LEP population has grown from roughly 14 million in 1990 to 25.2 million in 2010, an 80 percent increase.² The geographical distribution of LEP growth seen in the last two decades has been quite different from that in earlier periods. There has been significant growth in the number of LEP individuals residing in areas of the Southeast, Midwest, Pacific Northwest, and Mountain West that have not traditionally had substantial LEP populations.³

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) provide cash reimbursements to schools for each meal served to a child. NSLP and SBP are entitlement programs, which means that all children attending participating schools may receive meals for which the federal government pays all or part of the costs.

Household income (by family size) determines if a child is eligible to receive free or reduced price meals, or must pay most of the cost of the meals. To receive free meals, household income must be at or below 130 percent of the federal poverty level; for reduced price meals, income must be between 130 and 185 percent of the poverty level. Some children (e.g. children in households receiving TANF or SNAP benefits, migrant, homeless, runaway, and foster children) are automatically eligible for free meals upon certification of their status.

Children who eat school meals more often consume fruits and vegetables and have greater intakes of important nutrients such as fiber, iron, and calcium than children not participating in the school meals programs.^{4,5} Research shows that when a child's nutritional needs are met, the child is more attentive in class, and has better attendance and fewer disciplinary issues.^{6,7}

The dispersal of LEP individuals to new regions of the U.S. has resulted in an increasing number of local education agencies (LEAs) faced with the need to communicate with LEP households.⁸ Consequently, there is an increased need for language assistance when communicating with families about school based-programs like the National School Lunch and School Breakfast Programs. Limited English proficiency may be a barrier to participation in the school meals programs if a family does not have access to translation assistance or forms and information in their primary language.

In response to the increasing number of LEP households and the growing need to provide language assistance to these households during the school meals application process, in December 2011, the United States Department of Agriculture's Food and Nutrition Service (FNS) issued the guidance entitled, *Applications and Other Household Materials for Limited English Proficient Households*: <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>. The guidance clarifies the obligation of LEAs to ensure no barriers exist for participation in the school meals programs for LEP families. It outlines practices LEAs can adopt to fulfill their obligation to provide LEP services throughout the school meals application process. In addition to the guidance, FNS has made prototype school meals applications and related household materials available in 33 languages on its web site for school districts to use. These materials include notices for parents and instructions on how to complete an application.⁹

In the spring of 2012, the Food Research and Action Center and the Migrant Legal Action Program conducted a survey of school districts to assess local compliance with the guidelines set forth in the guidance and to identify districts that have adopted promising practices.¹⁰ The survey revealed that many school districts are struggling to meet their obligation to provide language assistance to LEP families during the school meals application process. However, a handful of districts use promising practices that are a model for other districts. This guide is intended to be a resource for developing strategies to ensure that LEP families have the same access as non-LEP families to the school meals programs.

II. Identifying LEP Households

As stated in the USDA guidance, *"Under Title VI, LEAs have a responsibility to be aware of the language needs of LEP households and ensure these households have access to the same information other parents have in a manner they can easily understand. LEAs should have a process for determining whether they have LEP parents in their schools and the language needs of these parents."*¹¹

There are two crucial times to identify LEP households for school meals communications:

- 1) when school meals applications are distributed; and
- 2) when there are additional communications related to eligibility (e.g. verification¹²).

When LEAs fail to identify LEP households at one or both of these times, some LEP families may not understand important program information resulting in a loss or delay of benefits for their children.

For educational purposes, schools must identify LEP families and most schools have a process for identifying LEP families when they enroll their children in school. Although the FNS LEP guidance explains that school enrollment is an opportune time to identify LEP households for purposes of school meals communications, 74% of the school districts surveyed do not rely on enrollment information to identify the primary language of households for the school meals application process. By sharing

household language data collected at enrollment with the school district's school food administrators, schools can eliminate duplicative efforts by school food staff, reduce paperwork and administrative costs, and improve school meals communications with LEP households.

An easy and effective way to share language information throughout a school district is the use of online records that indicate families' language needs. An online database is particularly helpful because it allows food and nutrition services personnel to access household language information at any point in the year. This practice helps ensure that any time a school district communicates with a family regarding school meals, it does so in a language the household will understand. Two school districts surveyed provide good examples of this practice.

Van Buren (MI) Public School District, a mid-sized¹³ school district that has experienced a huge increase in its LEP student population in the last 10 years,¹⁴ identifies LEP families at enrollment and enters their language needs into a district-wide database. The school nutrition services department can readily access information about a family's language needs through these online records and use this information to determine in which language a family should receive a school meals application. Once a family's application is processed, household materials are automatically printed in the primary language of the family as indicated in the district-wide database.

Northfield (MN) Public Schools, a mid-sized¹⁵ school district in which the LEP student population grew 20 times larger over 10 years,¹⁶ has a similar promising practice for identifying LEP families. The district collects household language information on its school enrollment form during the school registration process at each school site. The information is entered into an electronic database. The online records are used to determine in which language a family should receive both the school meals application and written materials regarding approval/denial or selection for verification.

III. Providing Meaningful Access to School Meals Information

As stated in the USDA Guidance, *"Once an LEA becomes aware of parents' communication needs, the LEA must communicate with them in a manner that provides the parents with meaningful access to information that is provided to non-LEP parents."*¹⁷

The school district must ensure that all LEP households applying receive language services; simply offering the most common alternative language is not sufficient. Nor is it sufficient to provide only a translated application; LEAs must ensure that LEP households can understand *all* household materials, including those related to verifying eligibility. In addition, it is important for LEAs to ensure that individuals with limited literacy can understand household materials. LEAs should also be sure that all materials include the required non-discrimination clause.¹⁸

In sum, it is imperative that school districts provide all materials to parents in their primary language to ensure that all families have access to information in a manner they can easily understand. There are three primary ways in which a school district can provide meaningful access to information regarding the school meals program:

1) Written Translations

Most school districts use written materials as the primary means of communicating with families regarding school meals. School districts are required to provide translations of both the school meals applications **and** any materials used to communicate with households for eligibility determination purposes (such as notices of approval/ denial or selection for verification). If state or local translations are not available in a particular language, an LEA must use the FNS translation from the prototype materials to assist LEP households.¹⁹ The FNS prototypes are available in 33 languages and can be accessed from the FNS website: <http://www.fns.usda.gov/cnd/frp/frp.process.htm/>

2) Oral Language Assistance²⁰

Oral language assistance should be provided for families that speak a language for which no written translated application is available or that have limited literacy and need assistance completing school meals applications. Oral language assistance is to be provided by school district staff or a third party translator/interpreter. School districts are obligated to provide quality and accurate translations and interpretations; no household should be expected to rely on family members or friends to provide translation or interpretation.

Once an LEP family has submitted an application, it is imperative that the family continues to receive the oral language assistance it needs to understand written communications regarding approval/denial and selection for verification, in order to prevent a loss or delay of benefits. The USDA guidance states that, *“State agencies and LEAs are expected to ...follow up with households that do not respond to the initial verification request, and provide oral assistance if the parent or guardian has difficulty understanding the written request.”*²¹

Two school districts surveyed demonstrate promising practices for providing both written translations and oral language assistance services to LEP parents.

South Washington County School District (MN) is a large²² LEA located in the suburbs of Minneapolis/St. Paul. The district’s LEP population grew 25 fold from 2000 to 2010²³ and the district has adapted its school meals enrollment procedures to respond to the needs of this growing LEP population. The district utilizes the FNS translated materials and distributes printed copies of the translated school meals application and household materials to families in their primary language. The district also provides either in-person oral translation by district staff or phone interpretation via a commercial language line for those families needing assistance completing the school meals application or understanding an approval/denial letter or verification notice.

Hawaii Department of Education,²⁴ the only statewide school district in the country, has more LEP students than all but 20 school districts in the United States.²⁵ The district has developed and provides printed copies of the school meals application in 14 languages. When families need additional assistance in a language for which the district does not have translations, the district uses third party translators to provide individual oral translation assistance during the school meals application process. In addition, Hawaii contracted with a third party to translate the school meals application and household materials into five Pacific Islander languages for which USDA does not provide translated prototypes.

3) Online Access

In addition to providing LEP families and non-LEP families equal access to printed copies of school meals applications, school districts must provide equal access to online materials. As stated in the guidance, “At a minimum, State agencies **must** make FNS’ translations of prototype materials available to their LEAs through a link on the web site where household materials are posted.”²⁶ (Emphasis supplied.) Districts should post direct links to local or state-translated materials in the languages of their district’s LEP families and post links to the USDA translations for all other languages. These links are most useful when they are clearly labeled and appear on the school meals homepage or the page where free and reduced price applications are posted.

Some school districts allow families to submit school meals applications electronically.²⁷ When electronic applications are offered, school districts should provide the online application in languages other than English.

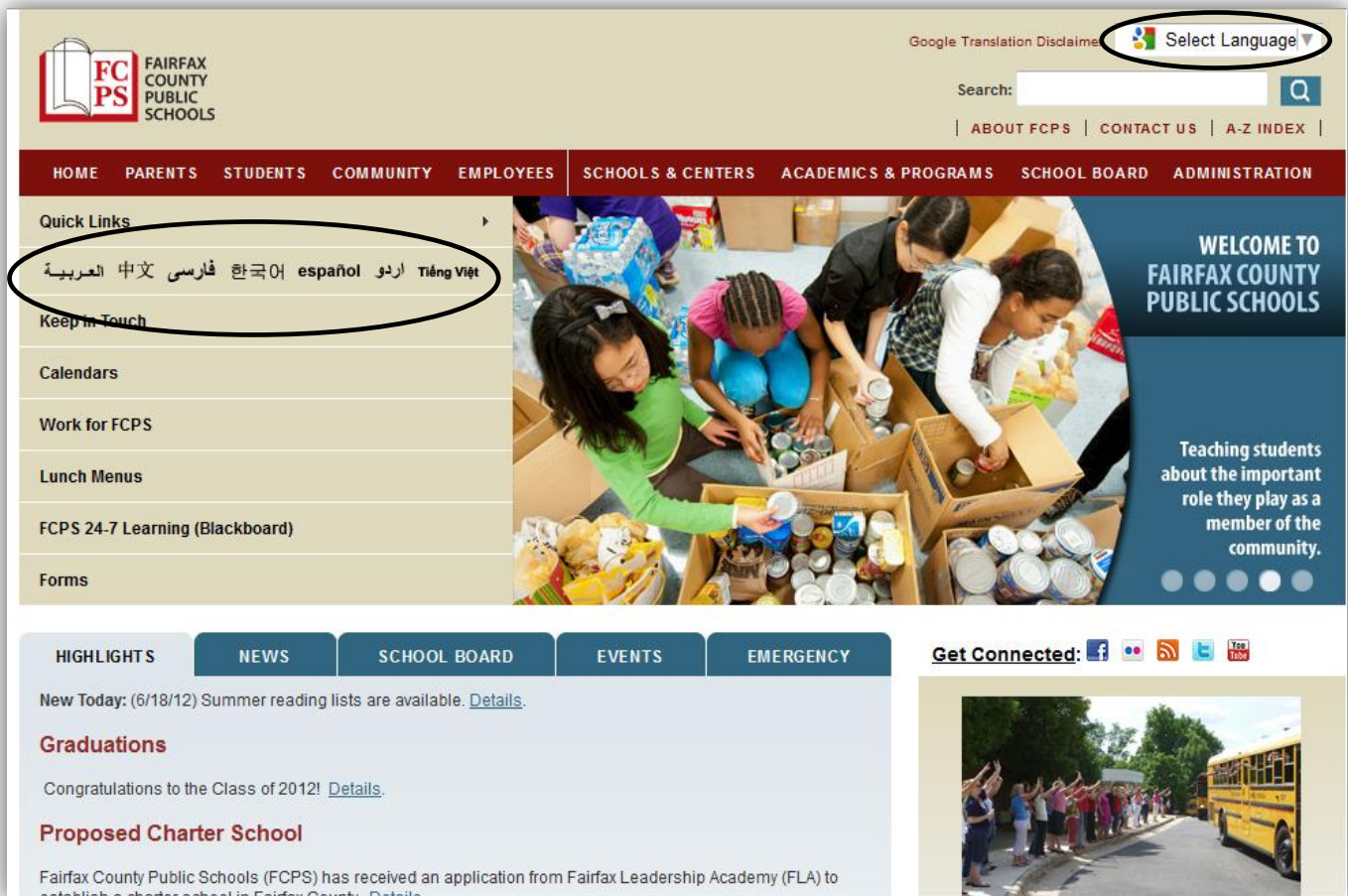
Two districts surveyed demonstrate model practices for providing online access to school meals applications for LEP families.

Broward County (FL) School District, the 6th largest school district in the country, provides a promising model for providing online access to school meals-related communication for LEP families. The district has the 11th largest number of LEP students in the country.²⁸ The district has responded to the diverse language needs of its families and has not only posted printable versions of the school meals application in English, Spanish, Creole, and Portuguese, but also offers electronic submission of applications in these four languages. Broward County is the only school district surveyed that offers electronic submission in languages other than English and Spanish.²⁹

Online access is another area in which the **South Washington County (MN) School District** uses good practices. The district provides links to printable versions of FNS’ translations in Arabic, Hmong, Khmer-Cambodian, Laotian, Russian, Spanish, and Vietnamese on the side bar of the LEA’s food and nutrition service’s homepage. While electronic submission is available only in English and Spanish, South Washington County School District takes an additional step towards increasing online access to school meals applications for families that speak other languages. When a user is on the online application interface and the user selects “other languages,” the user is redirected to the printable version of the USDA translations in the languages listed above. This feature helps to ensure that families accessing the online application have access to a printable application in a language they understand as an alternative to the electronic application if English or Spanish is not the family’s primary language.

It is important to recognize that even when translated materials are posted on a district’s website, LEP families may struggle to find these translations if they must navigate the website in English.

Fairfax County (VA) Public Schools, a large school district with the 7th largest number of LEP students in the country³⁰ provides a model website design for making online school meals-related communication accessible for LEP families. The district’s website, as shown below, has links on its homepage translated into Arabic, Chinese, Farsi, Korean, Spanish, Urdu and Vietnamese that redirect families to a page with a language line number and a link to a section of the website dedicated specifically to the language selected. On the language-specific pages, families can find free and reduced price meals outreach materials (video and print) in their language. As an alternative, families can also select a language from a drop-down menu of 64 languages at the top of the district’s homepage, and the entire website text will be translated using Google translate.³¹ Once the website is translated, a family is able to access translations of the school meals applications in the seven languages listed above. Providing translated materials online and translated website text reduce the barriers an English-only website presents to LEP families when they are attempting to access translated school meals applications online.



IV. Conclusion

This guide explains a school district's obligation to provide language assistance to families to make sure they receive the free or reduced price school meals for which they qualify and provides examples of school districts across the country that are successfully serving children regardless of the language their family speaks at home. These promising practices show that providing LEP households with meaningful access to school meals communications is achievable. We hope that other school districts will use these models to improve their procedures for providing language assistance. Food service personnel, school administrators, teachers, and advocates all can agree that guaranteeing access to school meals for LEP families is not only the law, but an important step towards ensuring that all of our school children are healthy and productive learners.

¹Pandya, C, Batalova, J and McHugh, M. (2011). Limited English Proficient Individuals in the United States: Number, Share, Growth, and Linguistic Diversity. Washington, DC: Migration Policy Institute.

² *Ibid.*

³ *Ibid.*

⁴Condon, EM, Crepinsek, MK, and Fox, MK. (2009). School meals: types of foods offered to and consumed by children at lunch and breakfast. *Journal of the American Dietetic Association*, 109(2 Supplement 1), S67-S78.

⁵ Gleason, PM and Suito, CW. (2003). Eating at School: How the National School Lunch Program Affects Children's Diets. *American Journal of Agricultural Economic*, 85(4): 1047-1061.

⁶ Murphy JM. "Breakfast and Learning: An Updated Review." *Journal of Current Nutrition and Food Science* 2007; 3(1): 3-36.

⁷ Murphy JM, Drake JE, and Weineke KM. (2005). Academics & Breakfast Connection Pilot: Final Report on New York's Classroom Breakfast Project. Nutrition Consortium of New York State. Albany, New York.

⁸ Pandya, C, Chhandasi, P, Batalova, J, and McHugh, M. (2011). Limited English Proficient Individuals in the United States: Number, Share, Growth, and Linguistic Diversity. Washington, DC: Migration Policy Institute.

⁹ The prototypes are forms and notices intended to be models for LEAs to adapt for their district. The prototype materials include the following documents: Letter to Households, Instructions for Applying, Free and Reduced Price School Meals Family Application, Notice to Households of Approval/Denial of Benefits, Notification of Selection for Verification of Eligibility, Letter of Verification Results, Notice of Direct Certification (optional), Sharing Information with Medicaid/SCHIP (optional), Sharing Information with Other Programs (optional),. The existing prototypes are designed to be used by school districts rather than parents. For example, they include notices that do not apply to all families. FNS is developing a version of the translations specifically designed for households.

¹⁰ Thirty-eight school districts responded to the telephone survey. They were selected because they had large numbers of LEP students or rapid growth in the number of LEP students over the last decade. The districts with rapid growth in their LEP student population were selected from three categories based on total student enrollment: less than 5,000 students, 5,000-9,999 students, and 10,000 or more students.

¹¹ United States Department of Agriculture. (2011). *Applications and Other Household Material for Limited English Proficient Households*. Retrieved from <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

¹² Verification is the process to confirm a child's eligibility for free or reduced price school meals. Each school year, LEAs must verify the eligibility of the children on a sample of the school meals applications approved for free or reduced price meals.

¹³ Van Buren Public School District's total student enrollment is 5,725. The mean school district size in the 2008-2009 school year was 3,478. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

¹⁴ Van Buren Public School District's LEP population grew from 0 to 117 from 2000 to 2010. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

¹⁵ Northfield Public School District serves 3,896 students. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

¹⁶ Northfield Public School District's LEP population grew from 11 to 220 in 10 years. U.S. Department of Education. Institute of Education Sciences, National Center for Education Statistics.

¹⁷ United States Department of Agriculture. (2011). *Applications and Other Household Material for Limited English Proficient Households*. Retrieved from <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

¹⁸ <http://www.fns.usda.gov/fns/non-discrimination.htm>.

¹⁹ *Ibid.*

²⁰ Oral language assistance refers to oral translation, which is the oral explanation of written text from English to the primary language of an LEP family, as well as oral interpretation, which is the oral explanation of spoken communication from English to the primary language of an LEP family.

²¹ United States Department of Agriculture. (2011). *Applications and Other Household Material for Limited English Proficient Households*. Retrieved from <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

²² South Washington County School District serves 17,194 total students. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

²³ South Washington County School District's LEP population grew from 26 to 654 in ten years. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

²⁴ The Hawaii Department of Education is the only statewide public education system in the United States. The school district is analogous to the school districts of cities and local communities elsewhere in the United States, but also operates like a state education agency.

²⁵ The Hawaii Department of Education has 18,097 LEP students. U.S. Department of Education. Institute of Education Sciences, National Center for Education Statistics.

²⁶ United States Department of Agriculture. (2011). *Applications and Other Household Material for Limited English Proficient Households*. Retrieved from <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

²⁷ Electronic submission allows a family to fill out a schools meals application on a web page that sends their household information directly to an online server for processing. It is an alternative to the distribution and collection of paper applications.

²⁸ Broward County Public Schools serve 24,400 LEP students. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

²⁹ Fairfax County School District serves 34,030 LEP students. U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

³⁰ The Center on Budget and Policy Priorities reviewed the school meals web sites of the 100 largest school districts during the 2011-2012 school year. Fifty offered electronic submission of an application, but only three (including Broward County) offered electronic submission in a language other than English or Spanish.

³¹ Fairfax County offers the following disclaimer for Google Translate: "The Fairfax County Public Schools web site is being translated through "machine translation" powered by Google. By selecting a language from the menu, you are asking for pages on this site to be converted into a language other than English. As with any machine translation, the conversion is **not context-sensitive and may not fully convert text into its intended meaning. Fairfax County Public Schools cannot guarantee the accuracy of the converted text nor are we liable for any resulting issues.** Graphics with text, PDF files and special applications on this site **cannot be translated.**" (Emphasis in original.)