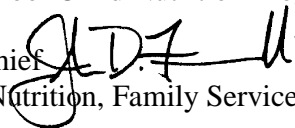




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the School Child Nutrition Programs – including Special Milk Programs

FROM: John Frassinelli, Chief 
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: October 12, 2016

SUBJECT: Operational Memorandum No. 1-17
Application and Other Household Materials for Limited English Proficient Households

This memorandum serves as a reminder to Local Educational Agencies (LEAs) of their responsibilities to Limited English Proficient (LEP) households. In August 2015, the Connecticut State Department of Education (CSDE) published a [Data Bulletin](#) which provides an overview of the English Learners (EL) in the state. (The CSDE defines the EL student as a student who lacks sufficient mastery of English to assure equal educational opportunity in the regular school program.) According to the data, Connecticut’s ELs were more than twice as likely as others to be eligible for free or reduced-price meals (76.8 percent compared with 35 percent). Also, during the last five years, the number of ELs eligible for free or reduced-price meals increased more than for others (10.1 percent versus 6.3 percent). Therefore, it is important that school nutrition programs be knowledgeable of these needs and address them appropriately to ensure that all families have access to the school nutrition programs.

The U.S. Department of Agriculture (USDA) recently issued [SP 37-2016](#) which provides guidance and Q and A on this topic. LEAs are responsible for ensuring that their applications and other household materials (letter, application, instructions, notices and verification materials) are available in a language the LEP household can understand.

In an effort to assist LEAs with determining the appropriate methods of communication with LEP households, the information below has been provided by the USDA’s Food and Nutrition Service (FNS). Additionally, the CSDE enforces the federal regulations that all schools have an obligation to communicate meaningfully with parents of ELs and to notify them adequately of information about any program, service, or activity called to the attention of parents of non-ELs. The U.S. Department of Education issued the [English Learner Tool Kit](#) which provides valuable information for districts and [Chapter Ten](#) specifically focuses on ensuring meaningful communication with LEP parents. For more information go to [Connecticut’s English Learners](#) website.

USDA Recommended Methods of Communication

- **Identify the primary language of households that may be free or reduced-price eligible and communicate in that language.** Most schools have a system in place to identify parents’ primary language for communications regarding the child’s education. LEAs can use information gained from using a Home Language Survey, which is conducted at enrollment to determine the dominant language in the home. As an alternative, LEAs could use FNS’ “[I speak](#)” list to identify the appropriate language for communications regarding school meals.

- **Ensure that all LEP households applying for benefits receive language services.** Offering the most common alternative language is not sufficient to the USDA.
- **Serve parents or guardians with limited literacy.** It is important for LEAs to ensure that individuals with limited literacy can understand the household materials. The USDA prototype materials are designed to be comprehensible to someone with low literacy. The Federal government's guidelines for plain writing are available at [Regional Directors State Directors Page](#). For parents or guardians who are unable to read, LEAs are expected to provide assistance so that parents can understand and complete the application, certification and verification process.
- **Provide written translations.** LEAs may choose to develop their own written translations of materials (including applications submitted online) in the most prevalent languages of households in their district. As a reminder, the FNS does provide [translations of prototype materials](#) to assist LEAs with this process. The FNS also expects LEAs to take appropriate measures to ensure that language and communication are not barriers to program participation. *If LEAs do not have their own translated application materials, they must at a minimum make FNS' prototype translations available.* Currently the FNS application package contains many materials the LEA may need to send out and the FNS understands this has deterred some LEAs from making these materials available directly to the households. The FNS is preparing an application in all currently available translations that contains only the information generally made available when a household applies and the FNS will notify the state agency office when this option is available to the LEAs.
- **Provide oral interpretation services.** For parents that speak less prevalent languages or who have limited literacy, the LEAs should identify oral interpretation services available within the school that can be used to communicate with households about school meal benefits. Parents should not need to rely on family members (especially children) or friends, as these people are not always able to provide quality and accurate interpretations. LEAs are encouraged to also partner with other local resources, such as migrant or refugee assistance agencies when available. LEAs are reminded that parents/guardians must be informed of their right to free interpretive services.
- **Assist with verification.** LEAs are expected to have a system in place to provide verification notices to each household in the primary language of the parents or guardians in the household, 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. The USDA translations of prototype verification materials are available on the FNS website with the translated application materials.
- **Include the required non-discrimination statement.** Parents need to understand that they will be treated fairly if they apply for free or reduced price school meals. The letter to households or the application itself **must** include the non-discrimination statement that appears on the USDA's prototype application.

Additionally, the federal government has established a website that is dedicated to providing state agencies and LEAs with important information addressing the topic of LEP. LEP.gov promotes a positive and cooperative understanding of the importance of language access to federally conducted and federally assisted programs. This site acts as a clearinghouse, providing and linking to information, tools, and technical assistance regarding limited English proficiency and language services for federal agencies, recipients of federal funds, users of federal programs and federally assisted programs, and other stakeholders. LEAs should review this website – especially the [LEP map](#) which outlines each state’s county and the concentration of languages spoken by LEP individuals in that particular community.

LEAs are reminded that the nonprofit food service account is a legitimate funding source to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

Questions may be directed to:

Consultants for School Nutrition Programs	
County	Consultant
<ul style="list-style-type: none"> Fairfield County (Includes Region 9) Litchfield County (Includes Regions 1, 6, 7, 12 and 14) New London County (Lebanon, Ledyard, Lisbon, Montville, New London and North Stonington) 	<p>Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129</p>
<ul style="list-style-type: none"> Hartford County (Includes Region 10) New London County (Bozrah, Colchester, East Lyme, Franklin, Griswold and Groton) 	<p>Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079</p>
<ul style="list-style-type: none"> Middlesex County (Includes Regions 4, 13 and 17) New London County (Preston, Salem, Sprague, Stonington, Voluntown, Waterford and Waterford Country School) Tolland County (Includes Regions 8 and 19) Windham County (Includes Region 11) 	<p>Susan Alston susan.alston@ct.gov 860-807-2081</p>
<ul style="list-style-type: none"> New Haven County (Includes Regions 5, 15 and 16) New London County (Norwich, Norwich Free Academy, Integrated Day Charter School, LEARN, Region 18 and Sacred Heart School) 	<p>Jackie Schipke jackie.schipke@ct.gov 860-807-2123</p>

JF:tdd

Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain for future reference. All CSDE operational memoranda are posted on the CSDE’s [Operational Memoranda for School Nutrition Programs](#) webpage.