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## Maintaining Child Eligibility Files for GSRP

Eligibility for GSRP requires verification of a child's age and family income, as well as documentation of Program Eligibility Factors. Documentation of eligibility must be on file for every child enrolled in GSRP. This documentation must be maintained for seven (7) years.

MDE requires that ISD monitoring of subrecipients includes annual review of child files to verify child eligibility was accurately and properly determined. Child files are also subject to periodic MDE review.

### Documenting Eligibility

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 detail 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 template can be found in the resources for the *Eligibility Section* of the *GSRP Implementation Manual*:

[https://www.michigan.gov/documents/mde/Income\\_Verification\\_Sample\\_411614\\_7.pdf](https://www.michigan.gov/documents/mde/Income_Verification_Sample_411614_7.pdf). The completed verification form should be kept in the child file with copies of the documents used to determine eligibility.

### Security of Sensitive Information

Maintaining copies of child birth certificates or other child and family personal information, as well as financial documents viewed to verify income in child files must be considered with great care. Maintenance procedures for sensitive documents must include security measures to ensure the files and the data contained therein is protected. This includes redacting personally identifiable data on forms including social security numbers, date of birth (for all but the child enrolled), maiden names, etc. Files should be kept in a secure location under lock and key, only accessible to authorized program staff.

### Electronic Files

Files may be electronic with scanned or photo images of eligibility documentation but must include proper security protocols to ensure safety of the data and limit files access only to authorized program staff.

### Educational Records vs. Eligibility Records

The educational record for each child - including home visit and parent teacher conference forms, observation data, developmental screener data, other child growth/progress documentation, and samples of child's work, etc. - is distinctly different than eligibility documentation and should be maintained in a separate file. In cases of single, separated, or divorced families, both parents must be granted access to the child's educational information (unless court documents specify otherwise), *however*, access to personal data provided to determine eligibility (e.g. tax forms, pay stubs, etc.) should be restricted to only the parent that provided that data.