

# ELIGIBILITY

## Documenting Eligibility

Grantees should provide annual training to employees responsible for determining and verifying eligibility. All staff must also have 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 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. An *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 being certain to black out any confidential information such as social security numbers, parents' birthdates or driver's license information, or other personal information not essential to determining child eligibility. See "Security of Information" in the [ISD Administration of GSRP](#) section for more information.

## Residency

All children who attend a state-funded Great Start Readiness Program (GSRP) 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 GSRP.

## Age

The Great Start Readiness Program (GSRP) was designed to provide high-quality preschool to children at risk for low educational attainment in the school year before they are regularly eligible for kindergarten. For GSRP, this means a child must turn 4 years of age on or before September 1. However, a provision exists for families who wish to request early enrollment for children who will turn 4 after September 1, but on or before December 1.

Applications for children who will turn 4 years of age 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. A Head Start eligible child turning 4 years of age between September 2 and December 1 MAY NOT be considered for enrollment in a GSRP/Head Start Blend classroom until September 1 or later in accordance with GSRP requirements.

An assumption is made that families opting to enroll their child in GSRP early, expect to also use the provision for early entry in kindergarten the following fall. If

there is a change to the plan to enroll in kindergarten early, a second year of GSRP is permissible. This requires that the parent/guardian apply for a second year of GSRP 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 (GSRP may also accept other religious ceremonial certificates such as a Bris certificate or naming certificate); court records; county, military, or immigration records; doctor or hospital records with sworn statements; certain family records; life insurance policy. These alternative proofs need to be accompanied by a signed statement from a parent/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.) Through the year, programs should support families to ensure they have the proper documents for enrollment in kindergarten.

## **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); 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); 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.

Grantees may consider the income:

- 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/guardian is recently unemployed) then the GSRP grantee 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 GSRP) 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 + GSRP 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, GSRP 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 (including Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP) funding, or Supplemental Security Income (SSI)), 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 GSRP and is considered to be in the lowest income bracket. In these cases, the family's income is considered to be in the lowest bracket, 0 – 50% FPL and should be reported as such in MSDS.

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 GSRP and the family's income must be considered to be in the lowest bracket, 0 – 50% FPL in terms of eligibility, but actual income is collected at the time of enrollment and reported in MSDS in the corresponding bracket. 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 bracket. 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.

When prioritizing a child with an IEP that does not include a recommendation for placement in an inclusive preschool setting, the family's actual FPL should be used. The child is then placed on a list of applicants from lowest to highest family poverty level. Children whose families are at the same poverty level should be ranked according to other collected program eligibility factors, including the existence of a diagnosed disability or developmental delay.

In either case, a child with an IEP from a family with income above 300% FPL, may not be charged GSRP 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. Grantees can gather information (i.e., living arrangements, assets, etc.) to make an informed judgment about the family's income status.

A child who attended a Head Start program as a 3-year-old may be enrolled in a GSRP Head Start/Blend program without reverifying the family's income following Head Start policy.

It is recommended that the ISD verify with its local Head Start partner(s) specific information about the factors considered to be automatic qualifiers for Head Start to ensure all children eligible for Head Start are properly referred.

In some cases, a child receiving Child Development and Care Subsidy funding to assist with child care expenses may be enrolled in a GSRP classroom at the same center with no further documentation of income required. This is allowable when the ISD prioritization policy allows a child currently enrolled in a tuition classroom at a center to be prioritized for GSRP at the same center. If classroom capacity for GSRP is limited, a determination of exact family FPL may be necessary and income documentation may be required.

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.

## 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 GSRP. Tiered income eligibility ensures that GSRP finds and provides services to its target population and focuses on those most at risk. However, all program eligibility factors must be collected and considered before enrolling a child in GSRP.

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 GSRP 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/guardian can sign and date a form indicating which program eligibility factors pertain. Alternatively, a note can be included in the file with the staff member's signature and date indicating WHAT the parent/guardian 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.*

*Julie Smith, Lead Teacher*

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. MDE collects program eligibility factor information on each enrolled child in the Michigan Student Data System (MSDS) Early Childhood Collection 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 families 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. Families 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.