

# *OSPI School Meal Programs Reference Sheet*

## **Flexibility in Determining Effective Date of Eligibility**

Children are eligible for free or reduced-price meal benefits on the date their eligibility is determined. However, Local Education Agencies (LEAs) may request flexibility from the State Agency to move the effective date of eligibility to an earlier date under certain circumstances. This applies to both traditional household applications and direct certification. LEAs using this flexibility must do so consistently for all children in all schools.

## **Requirements**

- LEAs adopting a flexibility in determining effective date of eligibility must refund any money paid on behalf of the child for reimbursable meals or milk during the period from the effective date through the date the certification was implemented at the school.
  - Accrued debt for meals or milk adjusted to free or reduced-price due to the change in effective date must be forgiven.
- Flexibility in Determining Effective Date of Eligibility may be used for the eligibility determinations outlined below:
  - **Child Nutrition Eligibility & Education Benefit (CNEEB) Applications:** First day eligible for free/reduced-price meals may be the date the application was dated as received or submitted to the food service department instead of the date the application was approved by the application approving official.
  - **Direct Certification (Basic Food, TANF, Foster, Medicaid):** First day eligible for free meals may be the date that appears in the date eligible column on the direct certification list instead of the date the list was uploaded into the point-of-service meal counting system.
    - The flexibility applies to extended eligibility, so all children in the household must be given refunds for meals or milk served to these children to be claimed at the free rate.
  - **Migrant, Homeless, Foster, ECEAP, and Head Start:** First day eligible for free meals may be the date the list was received from respective program administrators instead of the date the list was processed into the point-of-service meal counting system.



## Approval Process

Local Education Agencies (LEAs) must annually request written approval from OSPI to implement a Flexibility for Determining Effective Date of Eligibility procedure. Please submit a written procedure with the following information to your School Meals Program Specialist:

- ✓ Identify the eligibility date that will be used for each type of meal eligibility determination (Free/Reduced-Price Meal Applications, Direct Certification, Migrant, Homeless, ECEAP and Head Start).
- ✓ The process to document the date meal applications were received. We strongly encourage use of a date stamping system.
- ✓ The process to track the date lists were received from the homeless liaison, migrant coordinator, ECEAP, and Head Start Program Administrators as well as the direct certification list from the Education Data System (EDS).
- ✓ The process to retain the source document; direct certification list printed from the EDS, homeless list, migrant list, ECEAP and Head Start lists as well as meal applications.
- ✓ The process for tracking and paying refunds for money paid by the household for reimbursable meals prior to the eligibility determination. Adequate records must be kept.
- ✓ A statement that any accrued debts will be forgiven.

## Resources

- [Eligibility Manual for School Meals](#)
- [SP 11-2014: Effective Date of Free or Reduced-Price Meal Eligibility Determinations](#)
- [SP 51-2014: Eligibility Effect Date for Directly Certified Students](#)

## Acronym Reference

- CNEEB – Child Nutrition Eligibility & Education Benefit Application
- CNS – Child Nutrition Services
- ECEAP – Early Childhood Education and Assistance Program
- EDS – Education Data System
- LEA – Local Education Agency
- NSLP – National School Lunch Program
- OSPI – Office of Superintendent of Public Instruction
- SBP – School Breakfast Program
- TANF – Temporary Assistance for Needy Families
- USDA – United States Department of Agriculture