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Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

April 1, 2026

Action Required

Due date: Varies

Informational

BULLETIN NO. 011-26 CHILD NUTRITION SERVICES

TO: Educational Service District Superintendents
School District Superintendents
School District Business Managers
School District Food Service Supervisors
Administrators of Select Private Schools

FROM: Chris Reykdal, Superintendent of Public Instruction

RE: Meals for Washington Students and Provision 2

CONTACT: Liz Beechler, Director of School Meal Programs
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PURPOSE/BACKGROUND

The Washington State Legislature passed [House Bill \(HB\) 1238 \(2023\)](#): Providing Free School Meals for All during the 2023 legislative session amending the [Revised Code of Washington \(RCW\) 28A.235](#). This bulletin summarizes the requirements of RCW 28A.235.135, including impacts to operation of the United States Department of Agriculture's (USDA) National School Lunch Program (NSLP) and School Breakfast Program (SBP).

MEALS FOR WASHINGTON STUDENTS

RCW 28A.235.135 requires Local Education Agencies (LEAs) to provide breakfast and lunch at no cost to students enrolled at elementary schools where 30% or more of enrolled children are eligible for free or reduced-price meals, based on October 2025 [Area Eligibility Data](#) reported by LEAs. The Office of Superintendent of Public Instruction (OSPI) will notify LEAs of qualifying schools. The list of required elementary schools for school year 2026–27 is posted on the [OSPI Meals for Washington Students webpage](#).

“Elementary schools” are defined as schools that serve students in kindergarten, first grade, second grade, third grade and/or fourth grade. Regardless of other grade levels served in the

school, any school that serves students in any of the above grades qualifies as an “elementary school.” Qualifying schools must offer breakfast and lunch at no cost to all students. For example, in a qualifying school that serves students in grades K-8, all students, at all grade levels, must have access to meals at no cost. RCW 28A.235.135 requirements also apply to charter schools and state-tribal education compact schools.

Schools providing breakfast and lunch at no cost to students under this requirement must claim meals by eligibility category (free, reduced-price, or paid). Meals served to students in the reduced-price or paid category will receive supplemental funding to provide reimbursement equal to the USDA free rate. State supplemental reimbursement is contingent upon compliance with the USDA NSLP and SBP regulations and requirements.

RCW 28A.235.135 does *not* supersede [RCW 28A.235.300](#) which requires the operation of the Community Eligibility Provision (CEP) at schools with an Identified Student Percentage (ISP) of 40% or greater. Schools with an ISP of 40% or greater must continue to apply for CEP as required by legislation and may not end their CEP cycle early.

Second Chance for Qualification

Elementary schools that were previously eligible in school year 2025–26 or are nearly eligible with a free and reduced-price percentage between 25–30% in October 2025 may submit data to OSPI demonstrating that the school’s free and reduced-price percentage reaches 30% by April 1, 2026. Schools that meet the Meals for Washington Students eligibility criteria by April 1 can offer meals at no cost to all students in school year 2026–27 under RCW 28A.235.135.

- [Submit Enrollment Data Here by April 1](#)

LEAs are encouraged to promote the Child Nutrition Eligibility & Education Benefit (CNEEB) application and download Direct Certification diligently to qualify as many eligible students as possible. Promotional resources are available on the [OSPI Meal Application & Verification webpage](#).

PROVISION 2

Elementary schools that qualify for Meals for Washington Students are encouraged to begin a Provision 2 cycle. Provision 2 is a meal service option approved on a four-year cycle with the first year being a base year. **Schools that maintain at least a 30% free and reduced-price percentage during the base year will remain eligible to offer meals at no cost under RCW 28A.235.135 in years 2–4 of the Provision 2 cycle.**

During the base year, the LEA collects CNEEB Applications and claims according to approved eligibility status while still providing meals at no cost to all students. The average claiming percentages for free, reduced-price, and paid meals from the base year are then calculated and applied to years 2–4 of the cycle. LEAs must have strong internal controls for accurate meal

counts by approved eligibility category and a validation review must be conducted by OSPI during an LEA's Provision 2 Base Year to ensure the accuracy of the claiming percentages. Fiscal action may occur as a result of the validation review, as the claims are used to determine the claiming percentages for the following three school years.

Elementary schools operating under both Meals for Washington Students and Provision 2 will still receive the state supplemental reimbursement, so all meals are reimbursed at the federal free rate. Additional information on Provision 2 and state funding can be found on the [OSPI CEP & Provision 2 webpage](#).

How to Apply for Provision 2

1. Indicate LEA's intent to start a Provision 2 base year in the NSLP/SBP Renewal Application due September 1, 2026.
2. Submit meal counting and claiming procedures for the Provision 2 base year to your OSPI School Meal Programs Specialist.
3. OSPI will conduct a validation review of CNEEB applications, verification, and the claim for reimbursement. The validation review is usually conducted off-site or completed in conjunction with an LEA's Administrative Review.

NATIONAL SCHOOL LUNCH PROGRAM AND SCHOOL BREAKFAST PROGRAM REQUIREMENTS

LEAs providing breakfast and lunch at no cost under RCW 28A.235.135 must continue to collect Child Nutrition Eligibility & Education Benefit (CNEEB) applications, download Direct Certification lists monthly, claim meals according to a student's approved eligibility status, and follow all NSLP and SBP requirements, including the following:

Child Nutrition Eligibility & Education Benefit Applications

LEAs must distribute and collect the [Child Nutrition Eligibility & Education Benefit Application](#). The CNEEB Application may qualify households for: meal benefits, Summer-EBT benefits, reduced fees for other programs and activities, and help secure additional funding for the LEA.

LEAs must also distribute *Letters to Households* to families each school year after July 1. These materials inform families of the meal programs available to students.

Direct Certification

Direct Certification is the process LEAs use to certify categorically eligible children for free or reduced-price meals without further application. Students may be directly certified for free or reduced-price meals based on participation in assistance programs, including but not limited to Basic Food and Temporary Assistance for Needy Families (TANF). LEAs are required to perform direct certification at least monthly per [RCW 28A.235.280](#).

Notification of Eligibility Determination

LEAs must provide written notification to households of their eligibility status. Households with children who are approved or denied for free or reduced-price benefits must be notified through mail or email.

Verification

Verification of applications remains an annual requirement under Meals for Washington Students, unless a school is in a Provision 2 non-base year. Verification is the confirmation of eligibility for free and reduced-price meals and is only required for eligibility approved through the application process (not directly certified students).

Information about CNEEB Application materials, including Letter to Household, Notice of Eligibility, and Verification resources can be found on the [OSPI Meals for Washington Students webpage](#).

Meal Counting & Claiming

LEAs must continue to implement a point-of-service meal counting system that claims reimbursable meals according to a student's approved eligibility status (free, reduced-price, paid), unless operating Provision 2 in a non-base year. Meal counting systems must meet all requirements outlined in 7 CFR 210.7 and 7 CFR 210.8. Reference the [Point-of-Service Meal Counting Reference Sheet](#) for details on program requirements.

Paid Lunch Prices

Schools operating under Meals for Washington Students do not need to establish student lunch prices and should not include meal counts from these schools in the [Paid Lunch Equity Tool](#) calculation. Prices for adult meals must continue to be set in accordance with requirements outlined in the [Adult Meal Prices Reference Sheet](#).

IMPACTS TO OTHER PROGRAMS

Learning Assistance Program (LAP): Temporary Stability Factor

HB 1238 included a temporary hold harmless provision for School Year (SY) 2023–24 through SY 2025–26 to ensure LEAs and schools did not lose important state funding by providing meals at no cost. **This hold harmless provision expired in 2025–26 and does not apply to LAP allocations for 2026–27 and beyond unless there is a legislative change.** For the 2026–27 school year, OSPI will use the standard method for both LAP base and LAP high poverty allocations for LEAs.

National Board-Certified Teaching Bonus: Temporary Stability Factor

A temporary stability factor was also in place to ensure schools qualifying as 'High Poverty Schools' in school year 2022–23 maintained their status for school year 2024–25 and 2025–26 National Board-Certified Teacher bonuses when providing meals at no cost. **This stability factor has expired and does not apply to National Board-Certified Teacher bonuses for 2026–27 and beyond.**

To ensure Free and Reduced-Price Lunch (FRPL) percentages are as accurate as possible, LEAs and schools must conduct direct certification monthly and distribute, collect, and process the [CNEEB Application](#) in accordance with USDA and OSPI requirements. Diligent review and download from the Direct Certification system and robust collection of the CNEEB ensures LEAs accurately capture income data. LEAs and schools can find more information about the CNEEB, including guidance, templates, and best practices on the [OSPI Meals for Washington Students webpage](#).

INFORMATION AND ASSISTANCE

For questions regarding this bulletin, please contact schoolmeals@k12.wa.us or call 360-725-6200. The OSPI [Telecommunication Relay Services](#) number is 711 or 1-800-833-6384.

This bulletin is also available on the [Bulletins](#) page of the OSPI website.

Tennille Jeffries-Simmons
Chief of Staff

Leanne Eko
Chief Nutrition Officer
Child Nutrition Services

CR:ln

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by:

1. **Mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **Fax:** 833-256-1665 or 202-690-7442; or
3. **Email:** program.intake@usda.gov

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