



The Child and Adult Care Food Program

MEMORANDUM

TO: All Institutions Participating in the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP, or DC Free Summer Meals Program)

FROM: *Norma Birckhead*
Norma Birckhead, Manager, CACFP and SFSP

SUBJECT: Guidance on Income Eligibility Determinations and Duration and Q&As

DATE: November 5, 2014

STATE AGENCY MEMO: CACFP #01-2015 / SFSP #01-2015

This memorandum provides guidance and clarification regarding individual income eligibility determinations and durations in the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP). This memorandum incorporates recently clarified flexibility available for establishing the effective date of eligibility for children certified for free or reduced price meals in the CACFP and SFSP and therefore supersedes State Agency memorandum CACFP 06-2014/ SFSP 03-2014 issued April 25, 2014.

Eligibility Duration

In accordance with 7 CFR 226.23(f), CACFP institutions must collect and report to State agencies free, reduced-price, and paid meal eligibility information. Such information must be updated annually and may not be more than 12 months old. Income eligibility forms should be considered current and valid until the last day of the month in which the form was dated one year earlier.

Effective Date

Institutions now have flexibility concerning the effective date of certification for Program benefits. For the purposes of non-school institutions, the date to be used to make this determination may be either the date the parent or guardian signed the income eligibility form or the date on which the sponsor or independent center official signs the form to certify eligibility of the participant. However, if the date of parent signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification. These provisions also apply to the determination of eligibility for free meals under the SFSP when individual children's eligibility must be established by sponsors in accordance with 7 CFR 225.15(f).

Institutions must decide which date they will rely on as the effective date and apply this date to all income eligibility forms submitted on behalf of all participants in all centers and homes. For more information, refer to Food and Nutrition Service memorandum CACFP 01-2015 and SFSP 01-2015, *Duration of Income Eligibility Determinations: Guidance and Q&As*, October 31, 2014 available at:

https://www.partnerweb.usda.gov/communities/cndpolicy2/ProgramsLibrary2014/CACFP01_SFSP01-2015s.pdf

If you have questions regarding the information contained in this guidance, please contact your CACFP or DC Free Summer Meals Program Specialist. Or, contact me at (202) 442-4010 or norma.birckhead@dc.gov.



Questions and Answers

1. What methods may non-school CACFP institutions and SFSP sponsors use to establish the effective date of eligibility?

Non-school CACFP institutions and SFSP sponsors may use either the date of parent signature or the date of certification to establish the effective date of eligibility.

2. How should CACFP institutions and SFSP sponsors notify the State agency of which method they will use to establish the effective date of eligibility?

CACFP institutions and SFSP sponsors are encouraged to inform the State agency of this decision. During reviews, State agencies must ensure the same method has been applied to all individual income eligibility determinations. However, if the date of parent signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification.

3. For non-school CACFP institutions and SFSP sponsors, if a form is signed and dated by the parent on January 12, 2014, until what date is it considered valid?

It is considered valid from January 1, 2014, through January 31, 2015.

4. For non-school CACFP institutions and SFSP sponsors, if an individual income eligibility form is signed and dated by the parent on February 23, but is not received by the sponsor and certified until March 2, for which month does the income eligibility determination become effective? What if the form is received and certified April 2nd?

If the CACFP institution or SFSP sponsor is using the date of parent signature to determine eligibility, an individual income eligibility form signed and dated by a parent in February and certified in March would be valid effective February 1.

However, if the form was received and certified in April, meaning there was a delay in either submitting or certifying the form through the entire month of March, the form is valid effective April 1. Because the date of parent signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification.

5. When using the date of parent signature to establish the effective date of eligibility, what protocol must be taken if an incomplete or unsigned individual income eligibility form is submitted?

An incomplete individual income eligibility form must be returned to the household for completion. If the form is resubmitted without an updated signature and date and, if the date of parent signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification.