




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of School Child Nutrition Programs

FROM: John Frassinelli, Chief 
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: August 4, 2014

SUBJECT: Operational Memorandum #45-14
Eligibility Effective Date for Directly Certified Students

This memorandum addresses inquiries regarding flexibility in determining the effective date of eligibility for students who are directly certified to receive free meals or free milk in the National School Lunch Program (NSLP), the School Breakfast Program (SBP) and the Special Milk Program (SMP). The following clarifications are consistent with the flexibility provided for determining the effective date of eligibility for applications in policy memorandum [OM 8-14, *Effective Date of Free or Reduced Price Meal Eligibility Determinations.*](#)

As defined in the Code of Federal Regulation (CFR) under [7 CFR 245.2](#), direct certification means determining a child is eligible for free meals or free milk, as applicable, based on documentation obtained directly from the appropriate State or local agency or individuals authorized to certify that the child is:

- a member of a household receiving assistance under the Supplemental Nutrition Assistance Program (SNAP), the Food Distribution Program on Indian Reservations (FDPIR), or the Temporary Family Assistance (TFA) program; or
- a foster child, homeless child, migrant child, Head Start or Even Start child or runaway child.

Methods of direct certification include automated data matching, the letter method, and lists or other forms of documentation provided to the school or local educational agency (LEA) directly from the appropriate State or local agency administering the assistance program. The following information addresses the flexibility for determining the eligibility effective date under all methods used to directly certify students for free meal or milk benefits and applies only to the school meal programs.

Automated Data Matching Method

Automated data matching is the most common method used to directly certify students who are members of Assistance Program households (i.e., SNAP, TFA, or FDPIR) or in foster care. LEAs may consider the effective date of eligibility for free school meal or milk benefits to be the date of the automated data matching file (or benefit recipient file from another agency) which first identifies the student as eligible for direct certification, rather than the date the LEA accesses and processes the automated data matching file into their local point of service system. To be used for this purpose, the data file must have been generated and received by the LEA in the current school year. Please see the scenarios in the attached guidance for further explanation of the automated data matching methods. **NOTE:** Automated data matching is the **only** method of direct certification acceptable for SNAP.

Letter Method and Lists or Other Forms of Documentation

The letter method and lists or other forms of documentation may be used to directly certify students as members of TFA and FDPIR households, as well as Other Source Categorically Eligible Programs (i.e., foster child, homeless child, migrant child, Head Start or Even Start child and runaway child). LEAs may consider the effective date of eligibility for free school meal or milk benefits to be the date the household or appropriate State or local agency submitted the letter, list or other form of documentation to the LEA, rather than the date the school official approves the documentation. Although the letter method is not a form of direct certification for SNAP, a letter from the appropriate SNAP agency can be used in lieu of an application to establish a child's categorical eligibility. Therefore, the flexibility in determining the effective date of eligibility also applies to the letter method of documentation from SNAP. Please see the scenarios in the attached guidance for further explanation of the letter method and lists or other forms of documentation for direct certification.

IMPLEMENTATION

If the LEA elects to exercise the flexibility described in this memorandum, the LEA must:

- do so consistently for all the direct certification methods described herein (i.e., automated data matching, letter method, and lists or other forms of documentation);
- apply the direct certification eligibility effective date flexibility consistently to all students directly certified across all participating schools and school meal programs within the LEA;
- document the effective date used, such as a date stamp, to document the date lists or letters from other agencies were received, or the documented and traceable run date of automated match files or recipient benefit files from another appropriate agency;
- apply the extended eligibility provision in 7 CFR 245.6(b)(7) if categorical eligibility is based on SNAP, TFA or FDPIR;
- refund any money paid by or on behalf of the student for reimbursable meals or milk during the period from the free meal eligibility effective date (as established through the methods described in this memorandum) through the date the direct certification is actually implemented at the local school, including forgiving accrued debt, for any meals or milk adjusted to free due to the change in effective date. **The LEA can only claim those meals or milk at the free reimbursement rate if the student is given a refund or the debt is discharged;** and
- notify their State agency. State agencies must work with the LEAs to ensure the proper implementation of the flexibility and the accuracy of the LEA's adjusted claims, as applicable.

LEAs electing to use this flexibility must follow the State agency procedures and timelines for adjusting claims after initial submission. **The Food and Nutrition Service encourages LEAs that choose to use this flexibility to resolve and implement direct certification matches as**

early as possible upon receipt of appropriate documentation. This will help to ensure that eligible children receive free benefits as early as possible and that adjusted claims are submitted accurately during claim submission timeframes.

For further information, please reference the attached guidance and the [Eligibility Manual for School Meals](#) to be issued in 2014.

Questions may be directed to:

Consultants for School Nutrition Programs	
County	Consultant
• Fairfield County	Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129
• Hartford County (towns/cities beginning with A-R)	Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079
• Hartford County (towns/cities beginning with S-W) • Windham County	Susan Alston susan.alston@ct.gov 860-807-2081
• Litchfield County	Allison Calhoun-White allison.calhoun-white@ct.gov 860-807-2008
• Middlesex County • Tolland County	Andy Paul andrew.paul@ct.gov 860-807-2048
• New Haven County	Jackie Schipke jackie.schipke@ct.gov 860-807-2123
• New London County	Monica Pacheco monica.pacheco@ct.gov 860-807-2073

JF:tdd