Use of School Year Household Data to Document Child and Adult Care Food Program (CACFP) Free and Reduced Price Meal Eligibility

State Agency Directors - Colorado ED, Colorado DH, Iowa, Kansas, Missouri DH, Missouri ED, Montana OPI, Montana DHES, Nebraska ED, North Dakota, South Dakota, Utah, Wyoming DHSS, and Wyoming ED

The purpose of this memorandum is to address the use of free and reduced price applications and eligibility information collected by School Food Authorities (SFAs) which administer child care facilities participating in the Child and Adult Care Food Program (CACFP).

Use of Free and Reduced Price Information Collected by SFAs

SFAs may use free and reduced price meal applications and eligibility information collected by the school for their National School Lunch, School Breakfast or Special Milk Programs for CACFP meal eligibility documentation when the SFA which collected the data itself administers the child care facility. This includes both "regular" free and reduced price meal application information, and free meal eligibility information collected by schools via the "direct certification" method authorized by Public Law 101-147, the Child Nutrition and WIC Reauthorization Act of 1989.

Whenever the SFA uses its school programs information to document eligibility for CACFP benefits, it should take every precaution to ensure that this information is controlled by limiting access to those who are normally involved in the eligibility determination process. We also recommend that, when using direct certification information, SFAs and State Agencies inform the public assistance offices from which the direct certification information was obtained that they plan to use this information to document eligibility of children for CACFP benefits in centers administered by the SFA.

Direct Certification

As stated above, information obtained by SFAs through the direct certification method authorized by Public Law 101-147, may be used in child care centers administered by SFAs for CACFP purposes. However, the law did not authorize food service authorities other than SFAs to obtain information by direct certification. Therefore, CACFP centers and sponsors who are not SFAs are not authorized to obtain direct certification information.
CACFP centers and sponsors may use direct certification information, however, when a child's household itself has been given the direct certification information by the local Food Stamp or Aid to Families with Dependent Children office, or when the SFA has provided the household with a "notice of eligibility" based on direct certification procedures. In these instances, the household could submit the direct certification information to a center or sponsor just as it would otherwise submit a free and reduced price meal application. A center or sponsor other than a SFA could use this information since the household would be submitting the information voluntarily and no issue of confidentiality would arise. Such information can also be used by an adult day care center when an adult participant's household has been given participation information by Food Stamp, Supplemental Security Income, or Medicaid offices and has, in turn, submitted it to the center.

As with other free and reduced price eligibility information, direct certification information must always be dated in order for a determination to be made as to whether or not it is current.

If you have any questions, please contact my staff at (303) 844-0359.

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