



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

RICK SNYDER
GOVERNOR

MICHAEL P. FLANAGAN
STATE SUPERINTENDENT

**FISCAL YEAR 2014
CHILD AND ADULT CARE FOOD PROGRAM
FAMILY DAY CARE HOME SPONSOR MEMORANDUM #6**

TO: Family Day Care Home Sponsors

FROM: Kyle L. Guerrant, Director
Office of School Support Services

DATE: December 13, 2013

SUBJECT: **Effective Date of Free or Reduced Price Meal Eligibility Determinations**

Action: **Determine Effective date for Household Income Eligibility Statements (HIES)**

This memorandum clarifies the flexibility available to Family Day Care Home (FDCH) sponsors for establishing the effective date of eligibility for children certified for free or reduced price meals in the National School Lunch (NSLP), School Breakfast Programs (SBP), and free milk in the Special Milk Program (SMP) based on household applications. Please note, while this memorandum specifically discusses the NSLP, SBP and SMP, this flexibility extends to the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP), as applicable.

Children have generally been certified eligible for free or reduced price meal benefits on the date the HIES is approved. However, FDCH sponsors have flexibility concerning the effective date of certification for program benefits. Section 9(b)(9)(A) of the Richard B. Russell National School Lunch Act, 42 U.S.C. 1758(b)(9)(A), states that a child in a household meeting the income limits "at the time the application is submitted...shall be served a free lunch." [Section 9(b)(9)(B) provides the same authority for reduced price lunches.] The specific point in time for the effective date of eligibility is not addressed in program regulations. The *Eligibility Manual for School Meals* provides that the determination, notification, and implementation of free or reduced price meal status be made within ten operating days from the date the HIES is received by

STATE BOARD OF EDUCATION

JOHN C. AUSTIN – PRESIDENT • CASANDRA E. ULBRICH – VICE PRESIDENT
DANIEL VARNER – SECRETARY • RICHARD ZEILE – TREASURER
MICHELLE FECTEAU – NASBE DELEGATE • LUPE RAMOS-MONTIGNY
KATHLEEN N. STRAUS • EILEEN LAPPIN WEISER

608 WEST ALLEGAN STREET • P.O. BOX 30008 • LANSING, MICHIGAN 48909
www.michigan.gov/mde • (517) 373-3324

the FDCH sponsor. **Therefore, if the FDCH sponsor chooses, it may establish the date of submission of a HIES as the effective date of eligibility, rather than the date the FDCH sponsor official approves it.** This flexibility applies to eligibility determinations made through the HIES process only and only to complete HIES containing all required information at the time of submission (see part 3C of the *Eligibility Manual* that can be found at www.michigan.gov/cacfp under Resources). FDCH sponsors can use this flexibility when processing HIES.

FDCH sponsors exercising this flexibility must do so for all children at all family day care homes. In addition, FDCH sponsors must have a method to document the date HIES were submitted, such as a date stamp. Use of this flexibility is at the FDCH sponsor's discretion; however, an FDCH sponsor implementing this flexibility must notify the Michigan Department of Education (MDE) Child and Adult Care Food Program (CACFP).

This flexibility would assist low-income participants by allowing them to access free or reduced price meals during the eligibility determination period. However, CACFP expects this flexibility to have a limited application in CACFP programs as HIES are typically processed within the month they were submitted.

If you have any additional questions concerning this memorandum, contact CACFP at 517-373-7391 or go to <http://www.fns.usda.gov/cnd/Care/Regs-Policy/PolicyMemoranda.htm> to view the federal guidance.