



STATE OF CONNECTICUT
STATE DEPARTMENT OF EDUCATION



TO: Child and Adult Care Food Program (CACFP) Sponsors – **Head Start Recipients**

FROM: Paul F. Flinter, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: June 13, 2008

SUBJECT: Operational Memorandum #09C-08
Automatic Eligibility for Free Meal Benefits Extended to All Children
Enrolled in Head Start

This memorandum provides guidance regarding amendments to the Richard B. Russell National School Lunch Act (NSLA) that extend automatic eligibility for free meal benefits, including free milk, to all children enrolled in Head Start and participating in child nutrition programs.

On December 12, 2007, the President signed *The Improving Head Start for School Readiness Act of 2007* (Public Law 110-134) which contains several significant revisions to the Head Start program, including amendments to the eligibility criteria in section 645 of the Head Start Act (42 U.S.C. 9840). Public Law 110-134 also amends sections 9(b)(12)(A)(iii) and 17(c)(5) of the NSLA to correspond with the new eligibility criteria.

Head Start serves primarily children from families with household incomes at or below the Federal poverty level. However, a small proportion of children in families with household incomes above the poverty level may be served. In the past, only those children who were income eligible for Head Start were considered automatically eligible for free meals in the child nutrition programs.

Public Law 110-134 makes *any* child enrolled in Head Start automatically eligible for free meals without further application or eligibility determination. Therefore, even a child who is not from a household with an income at or below the poverty level is automatically eligible for free meals if they are enrolled in Head Start.

Institutions may now establish eligibility of all Head Start enrollees through documentation provided by the Head Start program. The United States Department of Agriculture (USDA) will be updating the relevant eligibility guidance to reflect this change.

All reimbursable meals served to children enrolled in Head Start may be claimed at the free rate. Institutions may submit revised claims to claim all reimbursable meals served to Head Start enrollees that were not previously claimed at the free rate. All such reimbursable meals served on December 12, 2007, and beyond may be claimed.

The following steps outline the process for filing revised CACFP reimbursement claims due to changes in Head Start:

- 1. Photocopy the Master List for each affected month.** The only months that are eligible for revision under this change are December 2007 (beginning December 12, 2007) and January through May 2008.
- 2. Prepare a revised reimbursement claim (*Form ED-103 Schedule D*) for each affected month.** The only changes to the originally-filed reimbursement claims that will be accepted for processing are changes to reflect the re-categorization of eligibility counts for Head Start participants. There should be NO changes to non-Federal Head Start eligibility counts or meal counts. This is an exception to the normal claim revision process and it should not be associated with the claim filing deadlines previously outlined in Operational Memorandum #01C-08 dated October 24, 2007. ***Beginning with the June 2008 claim for reimbursement, all original claims must include the re-categorization of Head Start children as free for CACFP.***
- 3. Submit the revised claims and accompanying Master Lists to the Child Nutrition Unit no later than September 15, 2008.** Documentation should be addressed to the consultant who approved your institution's FY2007-08 CACFP application renewal package.

Sponsors that do not wish to file revised claims due to changes in Head Start should notify the Child Nutrition Unit in writing of this decision.

Effective immediately, all Head Start sponsors will now be required to:

- 1. maintain Master Lists that identify Federal Head Start children as *free* for CACFP eligibility;**
AND
- 2. collect completed *Head Start Child Enrollment Forms* annually for all Head Start participants in order to document CACFP enrollment (see attached).**

Sponsors that had previously implemented Head Start automatic eligibility will no longer be required to maintain a Master List that differentiates between Head Start automatically eligible children and those who are *free/reduced/over income* based on Income Eligibility Applications. Sponsors that had *not* previously implemented Head Start automatic eligibility will no longer be required to collect Income Eligibility Applications for Federally-funded Head Start children.

Sponsors are advised to evaluate the cost effectiveness of filing revised reimbursement claims and should contact Child Nutrition Unit staff if there are any questions regarding the financial impact of this decision. Questions regarding this memo may be addressed to Susan Boyle at 860-807-2074, Celia Cordero at (860) 807-2076 or Benedict Onye at 860-807-2080.

PFF:shb
Attachment

Important: This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for your future reference. Operational Memoranda are also posted on the Child Nutrition website at:
<http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=321576>