

## Effective Date of Eligibility

Often, unpaid meal charges are accrued by children who are later determined to be eligible for free or reduced price meals. FNS has issued policy memoranda clarifying the flexibility available to local educational agency (LEA) officials for establishing the effective date of eligibility for children certified for free or reduced price meals in the NSLP and SBP based on household applications or direct certification, respectively.<sup>12</sup>

In cases where a child is later determined eligible, use of this flexibility could be beneficial for LEAs and families alike. LEAs could benefit financially from adjusted claims, which may result in increased Federal reimbursement, while families could benefit from debt forgiveness or reduction. FNS recognizes the financial and administrative challenges of unpaid meal charges, and encourages LEAs to take advantage of this flexibility as a strategy to address them.

Use of this flexibility is at the LEA's discretion; however, an LEA implementing this flexibility must notify its State agency. These LEAs would submit their current month claims normally and follow State agency procedures for adjusting claims after initial submission. State agencies must work with LEAs to ensure the proper implementation of this flexibility and the accuracy of the LEA's adjusted claims. This flexibility is discussed in more detail below.

### Flexibility for Household Applications

LEAs may establish the date of an application's submission as the effective date of eligibility, rather than the date the official approves it. This flexibility applies only to complete applications containing all required information at the time of submission (see page 42 of the [2016 Eligibility Manual for School Meals](#)). LEAs may use this flexibility when processing household income applications and when waiting for documentation of other source categorical eligibility (e.g., for homeless or migrant children) indicated on a household application. LEAs exercising this flexibility must have a method to document the date the application was submitted, such as a date stamp. See [SP 11-2014](#); [CACFP 06-2014](#); [SFSP 11-2014](#); *Effective Date of Free or Reduced Price Meal Eligibility Determinations* for more details.

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<sup>12</sup> Because the regulations establish responsibility for eligibility determinations at the LEA level (see 7 CFR 245.6), this section references actions to be taken by the LEA rather than the SFA.