# SNP Memo #2021-2022-10

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**COMMONWEALTH of VIRGINIA   
Department of Education**

DATE: October 1, 2021

TO: School Nutrition Program Directors, Supervisors, and Contact Persons (Addressed)

FROM: Sandra C. Curwood, PhD, RDN, ***Sandy***

## SUBJECT: Free and Reduced-Price Eligibility, Carryover Status, and Verification in School Year 2021–2022

This memo provides information about the requirements for free and reduced-price meal eligibility, suspension of the expiration of carryover eligibility from prior school years, and verification during continued COVID-19 pandemic operation in school year (SY) 2021–2022. All school food authorities (SFAs) that are approved to operate the National School Lunch Program (NSLP) under normal circumstances must implement the requirements outlined in this memo, including SFAs approved to operate the Seamless Summer Option (SSO) to provide meals and claim reimbursement in SY 2021–2022.

### Free and Reduced-Price Eligibility

SFAs approved for the Community Eligibility Provision (CEP) divisionwide will continue to conduct direct certification (DC) only; CEP SFAs may not collect meal applications. SFAs approved to use traditional counting and claiming methods will continue to collect meal applications and conduct DC. SFAs with a mix of CEP and non-CEP schools will conduct DC for all schools and collect meal applications for non-CEP schools only.

SFAs providing meals using the SSO during the pandemic are not required to collect meal applications and will not use the free and reduced-price eligibility for meal counting and claiming. However, the DC and application eligibility will be used for other purposes, including pandemic EBT (P-EBT). All SFAs must use the most recent eligibility determination for a student. The most recent eligibility from a meal application may be from the current SY or continued carryover eligibility from SY 2019–2020 or SY 2020–2021. The most recent eligibility determination (including denial) supersedes prior eligibility.

### Direct Certification

As outlined by the U.S. Department of Agriculture (USDA), in policy memo [SP 16-2021](https://fns-prod.azureedge.net/sites/default/files/resource-files/SP16_CACFP14-2021os.pdf), regardless of operational status, all NSLP participating SFAs are expected to conduct DC as required by 7 CFR 245.6(b)(3). Virginia SFAs are required to conduct a DC match each month and may match more frequently. While the federal requirement for CEP SFAs is to conduct DC three times per year, CEP SFAs in Virginia are strongly encouraged to follow the same monthly DC frequency to maximize DC results.

### Pause of the 30-Day Carryover Eligibility Expiration

The USDA, as detailed in policy memo [SP 01-2020](https://fns-prod.azureedge.net/sites/default/files/resource-files/SP01_CACFP01_SFSP01-2021os.pdf), paused the expiration of the 30-day carryover of 2019–2020 eligibility into the 2020–2021 school year. The most recent verbal guidance from the USDA continues the pause of carryover expiration for **meal application** eligibility from SY 2019–2020 and SY 2020–2021 through SY 2021–2022. However, **DC determinations** from SY 2019–2020 and SY 2020–2021 will expire after the first 30 operating days in SY 2021–2022. New DC determinations have been made by SFAs throughout the pandemic using current source data and reflect current DC eligibility. Only DC determinations made in SY 2021–2022 will remain in effect through this school year and into the first 30 operating days of SY 2022–2023. Only new DC determinations are to be included in SY 2021–2022 reporting for verification and identified student percentage. The most recent eligibility determination, including denial, must supersede any prior eligibility.

### Verification

All SFAs are required to report certain data in the annual Verification Report (FNS-742) as specified by the USDA in policy memo [SP 21-2021](https://fns-prod.azureedge.net/sites/default/files/resource-files/SP16_CACFP14-2021os.pdf). SFAs that collected meal applications in SY 2021–2022 are also required to conduct verification of a sample of three percent of the approved applications for the current year. Verification and reporting requirements are outlined in a checklist in Attachment A to this memo. Refer also to the Virginia Department of Education, Office of School Nutrition Programs e-learning video on [RISE.com e-learning platform](https://vdoe-school-nutrition.rise.com/login), *Verification of School Meal Applications,* and the [USDA Eligibility Guidance Manual](https://fns-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf), Section 6: *Verification*, for instructions and guidance.

The verification sample must be based on the number of applications on file as of October 1. Certain data must be entered into SNPWeb no later than October 15, to confirm the required verification sample size. Verification must be completed by the annual required November 15 deadline. The completed SNPWeb verification report must be submitted in SNPWeb no later than December 15.

If you have questions, please contact your assigned SNP regional specialist or Lynne A. Fellin, Technical Advisor to the State Director, via email at [Lynne.Fellin@doe.virginia.gov](mailto:lynne.fellin@doe.virginia.gov).

### Attachments

#### School Food Authority Verification Report Checklist 2021

SCC/LAF/rd