# SNP Memo #2020-2021-36


**COMMONWEALTH of VIRGINIA
Department of Education**

DATE: December 15, 2020

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

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

## SUBJECT: Free and Reduced-Price Eligibility in School Year 2020-2021

This memo provides information about the requirements for free and reduced-price meal eligibility by application and direct certification (DC) during the COVID-19 pandemic in school year 2020-2021. All school food authorities (SFAs) that would normally operate the National School Lunch Program (NSLP) must implement the requirements outlined in this memo, even though they may be operating the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) to provide meals during the pandemic.

### Free and Reduced-Price Eligibility

SFAs approved to operate the Community Eligibility Provision (CEP) will continue to conduct DC only; CEP SFAs may not collect meal applications. SFAs approved to operate using traditional counting and claiming methods will continue to collect meal applications and conduct DC. SFAs that have CEP schools and schools not participating in CEP will conduct DC for all schools and collect meal applications for non-CEP schools only.

SFAs providing meals using the SFSP or SSO during the pandemic 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 during pandemic operation. The most recent eligibility may be a meal application or DC approved in 2020-2021 or carryover eligibility from the 2019-2020 school year that has not expired due to the pause in carryover expiration explained later in this memo. The most recent eligibility supersedes prior eligibility.

### Direct Certification

As outlined by the U.S. Department of Agriculture (USDA), in policy memo [SP 04-2021](https://fns-prod.azureedge.net/sites/default/files/resource-files/SP04_CACFP03_SFSP03-2021os.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.

A new Department of Social Services (DSS) source file will be available in SNPWeb each month, all year, by the fifteenth of the month. If the fifteenth is on a weekend or state holiday, the file will be available on the next business day. The only exception to these deadlines is the annual July file, which will be available in SNPWeb by the end of the third week of July. Mark your calendar annually with these dates to schedule your monthly DC matching process.

### 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), has paused the expiration of the 30-day carryover of 2019-2020 eligibility into the 2020-2021 school year. The 2019-2020 eligibility may continue to be used through the 2020-2021 school year. However, SFAs must use the most recent eligibility for any student. Students with a meal application or DC determination in the 2020-2021 school year would use that determination, as it is the most recent. If the household has not submitted a new application and the student has not been newly certified for DC, the 2019-2020 carryover eligibility remains in effect. It is important to remind households to submit meal applications now and when circumstances change throughout the school year.

SFAs should work with their software vendor to capture students eligible in 2019-2020 and update the expiration date of their eligibility through the end of the 2020-2021 school year if there is no new eligibility determination. The most recent eligibility determination, including denial, must supersede prior eligibility. USDA guidance indicates the 2019-2020 carryover period will resume if the SFA transitions back to NSLP operation in the 2020-2021 school year, minus any NSLP days used at the beginning of 2019-2020. The USDA will issue additional guidance for 2021-2022 prior to the new school year.

### Verification

SFAs that collected meal applications in 2020-2021 are required to conduct verification on a sample of three percent of the approved applications for the current year. The verification requirements are unchanged; however, the deadline to complete verification is extended to February 28, 2021. A separate verification memo with instructions specific to the 2020-2021 school year will be available.

If you have questions, please contact your assigned SNP regional specialist or Dr. Sandy Curwood, Office of School Nutrition Programs Director, by email at sandra.curwood@doe.virginia.gov.

SCC/LAF/cc