




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Sponsors of the National School Lunch and School Breakfast Programs

**FROM:** John Frassinelli, Chief   
Bureau of Health/Nutrition, Family Services and Adult Education

**DATE:** September 9, 2016

**SUBJECT: Operational Memorandum No. 15-16**  
Early Implementation of Eligibility **Carryover Period** for Students Transitioning from Provision Schools: State Agency Extension Option

The purpose of this memorandum is to support the U.S. Department of Agriculture's (USDA) recommendation for encouraging early implementation of new regulatory provisions which allow local educational agencies (LEAs) to provide "carryover" eligibility for free school meals for the first 30 operating days of school year (SY) 2016-17. This carryover would be directed to those students transitioning to non-Provision schools from schools participating in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) under special provisions, including the Community Eligibility Provision (CEP) [42 USC 1759a]. Allowing LEAs to provide carryover eligibility for students transitioning from Provision schools limits disruptions in providing meal benefits to low-income students and minimizes the burden on the affected LEAs. Meals served to students during the carryover period are claimed at the "free" rate.

NSLP and SBP regulations at 7 CFR 245.6(c)(2) provide that students determined eligible for free or reduced-price school meals may have their eligibility status carried over for up to 30 operating days into the subsequent school year or until a new eligibility determination is made, whichever comes first. Carryover of eligibility provides LEAs adequate time to:

- collect and process household applications;
- determine student eligibility through participation in certain Federal Assistance Programs or through Other Source Categorical Eligibility; and
- determine student eligibility through direct certification data matching at the beginning of the new school year.

Students at schools operating the CEP, however, receive free school meals based on eligibility determinations made at the school, group, or district level. Previously, students transitioning from CEP and other Provision schools to non-Provision schools were required to complete applications or be determined eligible through direct certification in order to receive free or reduced price meal benefits at their new school.

The recently published final regulation, *National School Lunch Program and School Breakfast Program: Eliminating Applications through Community Eligibility as Required by the Healthy, Hunger Free Kids Act of 2010* (7 CFR 245.6(c)(2) and 245.9(1)); 81 FR 50194, July 29, 2016), provides state agencies the discretion to allow LEAs to provide eligibility carryover for up to 30

operating days (or until a new eligibility determination is made, whichever comes first) to students who transfer from Provision to non-Provision schools, within or between LEAs, both during and between school years.

There are many benefits to implementing this option:

- *Creating Consistent Carryover Policy:* Providing up to 30 operating days of meals at no cost to students moving from a Provision school to a non-Provision school creates consistency between carryover policies, enhancing operational ease for local program operators and preventing confusion for families.
- *Preventing Unpaid Meal Charges:* Providing up to 30 operating days of meals at no cost to students from a Provision school will ensure they do not accrue unpaid meal charges before an individual eligibility determination is made. Students who are eligible but not certified for free meals may be unable to afford meals at the paid rate, which can lead to unpaid meal charges and an unnecessary loss of funds for the nonprofit school food service account.
- *Supporting Transitioning Students:* By taking advantage of this opportunity, state agencies will support low-income students and their families during a potentially challenging period, and ensure a transitioning student enters their new classroom well-nourished and ready to learn.

*Therefore, effective immediately, the Connecticut State Department of Education will allow LEAs to provide eligibility carryover for up to 30 operating days (or until a new eligibility determination is made, whichever comes first) to students who transfer from Provision to non-Provision schools, within or between LEAs, both during and between school years.*

Questions may be directed to your school nutrition consultant.

<b>Consultants for School Nutrition Programs</b>	
<b>County</b>	<b>Consultant</b>
<ul style="list-style-type: none"> <li>• Fairfield County (Includes Region 9)</li> <li>• Litchfield County (Includes Regions 1, 6, 7, 12 and 14)</li> <li>• New London County (Lebanon, Ledyard, Lisbon, Montville, New London and North Stonington)</li> </ul>	<p>Fionnuala Brown  <a href="mailto:fionnuala.brown@ct.gov">fionnuala.brown@ct.gov</a>            860-807-2129</p>
<ul style="list-style-type: none"> <li>• Hartford County (Includes Region 10)</li> <li>• New London County (Bozrah, Colchester, East Lyme, Franklin, Griswold and Groton)</li> </ul>	<p>Teri Dandeneau  <a href="mailto:teri.dandeneau@ct.gov">teri.dandeneau@ct.gov</a>            860-807-2079</p>
<ul style="list-style-type: none"> <li>• Middlesex County (Includes Regions 4, 13 and 17)</li> <li>• New London County (Preston, Salem, Sprague, Stonington, Voluntown, Waterford and Waterford Country School)</li> <li>• Tolland County (Includes Regions 8 and 19)</li> <li>• Windham County (Includes Region 11)</li> </ul>	<p>Susan Alston  <a href="mailto:susan.alston@ct.gov">susan.alston@ct.gov</a>            860-807-2081</p>
<ul style="list-style-type: none"> <li>• New Haven County (Includes Regions 5, 15 and 16)</li> <li>• New London County (Norwich, Norwich Free Academy, Integrated Day Charter School, LEARN, Region 18 and Sacred Heart School)</li> </ul>	<p>Jackie Schipke  <a href="mailto:jackie.schipke@ct.gov">jackie.schipke@ct.gov</a>            860-807-2123</p>

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Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain in a binder for future reference. All CSDE operational memoranda are posted on the CSDE's [Operational Memoranda for School Nutrition Programs](#) Web page.