DATE: February 27, 2015
TO: Child and Adult Care Food Program (CACFP) Center Organizations
FROM: Robin Holz, Lead CACFP Consultant - Centers
       Bureau of Nutrition and Health Services
SUBJECT: Duration of Income Eligibility Determinations

The following memo includes current and updated guidance related to the income eligibility effective date. This memo replaces 2014-3 Dating Income Applications issued May 2, 2014.

Current Guidance:

- Income eligibility forms should be considered current and valid until the last day of the month in which the form was dated one year earlier. (For example, if a form is signed and dated by the parent on January 12, 2015, it is considered valid from January 1, 2015 through January 31, 2016.)
- The application effective date may be either the date the parent or guardian signed the income eligibility form or the month the organization official signs the form to approve the participant’s eligibility. This flexibility applies only to eligibility determinations made based on complete applications containing all required information.
- CACFP organizations must decide which date they will use as the effective date and apply it consistently for all income eligibility forms.
- Organizations implementing this flexibility must notify their State agency consultant at the time of a review or as requested.
- Households are not required to report changes, such as an increase in income, a decrease in household size, or when the household is no longer certified eligible for benefits through Food Assistance or the Family Investment Program (FIP). Once a household is approved for free or reduced-price meals, the household remains eligible for the benefit period, regardless of any change in household income or size. Year-long eligibility includes households that report zero income.

New Guidance:

- If the date of parent signature is not within the approval month or the immediately preceding month, the effective date must be the approval month. (For example, if the form was signed in February, but certified in April, meaning there was a delay in either submitting or approving the form during the month of March, the form is...
approved effective April 1 and expires at the end of April, one year later. Because the date of parent signature is not within the month of approval or the immediately preceding month, the effective date must be the month of approval.

- The CACFP organization is not required to record the date the parent or guardian submitted the application on the income eligibility form.
- Schools participating in CACFP may use either the date the income eligibility form was submitted or the date the school official signed the form as the effective date (the submission date must be date-stamped on the form if the date of submission is used). Schools may not use date of parent or guardian signature since that flexibility is not available in the National School Lunch Program.

If you have questions, please contact robin.holz@iowa.gov, (515)281-3484.