

April 4, 2000

SUBJECT: Categorical Eligibility of Pre-Kindergarten Even Start Participants for Free Meal Benefits

TO: Regional Directors  
Special Nutrition Programs  
All Regions

Public Law 105-336, enacted October 31, 1998, reinstated categorical eligibility for pre-kindergarten Even Start participants participating in the Child and Adult Care Food Program (CACFP), beginning October 1, 1998. This memorandum supersedes our June 1995 guidance and sets forth operational guidance consistent with statutory changes. Furthermore, this memorandum extends this categorical eligibility provision to the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Special Milk Program for Children (SMP), and closed enrolled sites in the Summer Food Service Program (SFSP).

### **What is categorical eligibility?**

To apply for free meal benefits under the Child Nutrition Programs, most households must submit a completed application indicating the household size and income. The official designated to approve applications compares the information submitted by the household to the Income Eligibility Guidelines that we issue annually to determine their eligibility for free and reduced price benefits. However, certain participating children are eligible for free meals based on their participation in other Federal programs (i.e. categorical or automatic eligibility), such as the Even Start Family Literacy Program.

### **What are the criteria for Even Start categorical eligibility?**

For a child to be categorically eligible for free meals based on their participation in Even Start, three criteria must be met. First, the school or institution that is providing the child with Even Start services must be participating in CACFP, NSLP, SBP, SMP or SFSP. Second, the child must be enrolled as a participant in a Federally-funded Even Start Family Literacy Program. Third, the child must be at the pre-kindergarten level. Once a child has entered kindergarten, that child loses his or her categorical eligibility for free meals based upon Even Start. Additionally, categorical eligibility does not apply to other family members.

### **What documentation is required for categorical eligibility?**

- Required documentation – To establish categorical eligibility for free meals in the CACFP, NSLP, SBP and SFSP or for free milk in the SMP, documentation of a child's participation in a Federally-funded Even Start program and documentation that the child is at the pre-kindergarten level must be provided by an Even Start official.

Documentation of a child's Even Start participation could include:

- an approved Even Start application for the Child's family; or
- a statement of enrollment in Even Start; or
- a list of children participating in Even Start.

Conformation that the child has not yet entered kindergarten must be included in the documentation from the Even Start official.

- Re-Certification of Categorical Eligibility – At the beginning of each year, the official responsible for determining eligibility for free and reduced price meals in the CACFP, NSLP, SBP and SFSP for free milk in the SMP must re-establish categorical eligibility for each Even Start child.
- Record Retention – The documentation of a child's Even Start participation, including confirmation that the child has not yet entered kindergarten, must be maintained on file in accordance with the regulations governing the Child Nutrition Programs. These records must be readily available for review by the Department of Agriculture, the State agency, and other appropriate agencies.

### **What happens when categorical eligibility ends?**

When a child is no longer categorically eligible for free meals under the criteria set forth in this memorandum, the child's family must be provided an opportunity to apply for free and reduced price meals under standard free and reduced price application procedures or to obtain free meal benefits through direct certification. The school or institution is responsible for providing the family with instructions on how to apply for these benefits.

Please share this information with your State agencies as soon as possible. If you have any questions, please contact Mary Jane Whitney at (703) 305-2620.

**Original Signed**

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Director  
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