Food and Nutrition Service

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# DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM STATE IMPLEMENTATION PROGRESS, SCHOOL YEAR 2013-2014 REPORT TO CONGRESS - SUMMARY

## **Background**

This report responds to the requirement of Public Law 110-246 to assess the effectiveness of State and local efforts to directly certify children for free school meals. Direct certification is a process conducted by the States and by local educational agencies (LEAs) to certify eligible children for free meals without the need for household applications. The 2004 Child Nutrition and WIC\* Reauthorization Act required LEAs to establish systems to directly certify children from households that receive Supplemental Nutrition Assistance (SNAP) Program benefits by school year (SY) 2008-2009.

## **Eligibility for Program Benefits**

Children from households with incomes at or below 130 percent of the Federal poverty level are eligible for free school meals. Children from households with incomes between 130 and 185 percent of the poverty level are eligible for reduced-price meals.

Certain homeless, runaway, and migrant children and children from households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) Program, or the Food Distribution Program on Indian Reservations (FDPIR) are deemed "categorically eligible" for free school meals.

### **Direct Certification**

Student eligibility for free meals is determined by application or by direct certification. Although direct certification systems vary by State and LEA, all such systems are designed to eliminate the need for paper applications. LEAs are required to conduct direct certification three times per year: once at or around the start of the school year, and again 3 and 6 months after that initial effort.

All direct certification systems match student enrollment lists against SNAP agency records and the records of other assistance agencies whose participants

are categorically eligible for free meals. The matching process, whether automated or manual, requires no action by the children's parents or guardians. Effective with SY 2012–2013, States may no longer rely on the letter method of direct certification to the exclusion of data matching. However, letters from SNAP agencies to participant households continue to serve as documentation of categorical eligibility for free school meals, and households may forward them to their LEAs in lieu of traditional applications.

The Child Nutrition and WIC Reauthorization Act of 2004 required all LEAs to directly certify SNAP participant children by SY 2008-2009. Just 56 percent of LEAs directly certified some SNAP participants in SY 2004-2005, 1 year prior to the phased implementation of the 2004 Act's direct certification mandate. By SY 2013-2014, that number had grown to 93 percent.

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) instituted several additional reforms to strengthen and expand direct certification. These include:

- Establishing a multi-State demonstration project to begin directly certifying income-eligible children in SY 2012-2013 with data from State Medicaid systems;
- Providing performance awards for States with successful or improved direct certification systems;
- Requiring States to adopt improvement plans if their SNAP direct certification rates fall below 80 percent in SY 2011-2012, 90 percent in SY 2012-2013, or 95 percent in subsequent years; and
- Ending the letter method as a means of direct certification.

## **State Performance Measures**

This report presents information on the outcomes of direct certification for SY 2013-2014. The report estimates the number of school-age SNAP participants and the number of children directly certified with SNAP for free school meals in each State. The ratio of these figures is a measure of the success of State and

local systems to directly certify participating SNAP children. The report also estimates the number of all SNAP, TANF, and FDPIR participants certified for free school meals, either by direct certification or by application. This provides a more comprehensive measure of State success in certifying categorically eligible children for free school meals.

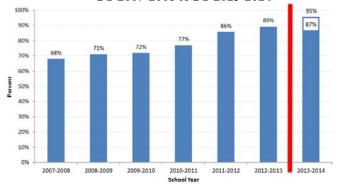
The methodology for calculating the performance measure this year was refined for this report to make use of new data elements from the revised Verification Collection Report (FNS-742) and the new Direct Certification Rate Data Element Report (FNS-834). The refined formula provides an improved measure of the success of State and local systems to directly certify SNAP-participant children. This revised methodology produces results that are not precisely comparable to prior year reports.

## **Key Findings**

States and LEAs directly certified 12.4 million children -- 11.2 million children based on participation in SNAP and 1.2 million children based on participation in other programs. This total represents an increase of 1 percent from the previous year.

In SY 2013-14, an estimated 87 percent of school-age SNAP participants were directly certified for free meals. The old methodology would have generated a 95-percent national rate, a 6-percentage-point increase from the previous year, confirming that States continue to improve their direct certification performance.

National Average Direct Certification Rate SY 2007-2008 to SY 2013-2014



The overall certification rate of categorically eligible children, by direct certification or by application, increased to almost 100 percent in SY 2013-2014, up from 95 percent in SY 2012-2013. Note: The components of this measure are subject to reporting and estimation error, and so do not necessarily reflect certification of every categorically eligible child.

The number of LEAs directly certifying SNAP-participant children continued to increase. The use of direct certification is nearly universal for larger LEAs; 99 percent of LEAs with enrollments of 5,000 or more students and 98 percent of those with enrollments of 1,000 to 4,999 directly certified some SNAP participants in SY 2013–2014.

Direct certification is less prevalent among smaller LEAs. About 96 percent of LEAs with 500 to 999 students, and 89 percent of LEAs with fewer than 500 students, directly certified some SNAP participants in SY 2013-2014.

Twelve States and the District of Columbia achieved direct certification rates at or above HHFKA's 95-percent performance target. The remaining States and Guam must develop and implement continuous improvement plans.

#### **State Best Practices**

Six States with successful or improved direct certification systems were interviewed for this report. Four of these States have revised their direct certification matching systems with the help of grant money made available by USDA. Recent direct certification changes that States link to performance improvements include improving data system capability—such as increasing use of automated processes—and increasing match frequency. Many of these changes were made to meet the performance benchmarks set forth in HHFKA.

States cited the inability of direct certification improvement measures to account for children who receive SNAP benefits but who are not enrolled in schools and thus are not eligible for direct certification. These students include home-schooled children, school dropouts, and some homeless and migrant children.

\* WIC is the Special Supplemental Nutrition Program for Women, Infants, and Children

U.S. Department of Agriculture, Food and Nutrition Service, "Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2013-2014, Report to Congress" by Quinn Moore, Kevin Conway, Brandon Kyler, and Andrew Gothro. Project Officer Dennis Ranalli. Report CN-14-DC. Alexandria, VA: May 2015.

Download full report:

http://www.fns.usda.gov/ops/child-nutrition-programs