

# Direct Certification Improves Low-Income Student Access to School Meals: An Updated Guide to Direct Certification



The School Breakfast and National School Lunch Programs are vital for reducing childhood hunger, improving child health, and supporting academic achievement. Direct certification, an electronic data-matching process, is an important tool for ensuring that low-income children receive free breakfast and lunch without barriers. School districts benefit from the reduction in the number of school meal applications that they must process as more students are determined eligible for free school meals through direct certification. This results in greater administrative savings for the district, which allows them to put those resources into improving meal quality and service.

Additionally, community eligibility — a beneficial federal option for high-poverty school districts to offer school meals at no-cost to all students — is built on direct certification. Efficient and reliable direct certification systems more accurately reflect the poverty in the school, allowing more high-poverty schools to qualify for community eligibility. The number of directly certified students is used to determine the federal school meal reimbursement that a community eligibility school receives, thus impacting the financial viability of implementing the option. Direct certification first was introduced in 1986 to remove barriers to participate in school meals by allowing categorically eligible children to receive free meals without submitting a school meal application. Further, a study published in 2015 by the U.S. Department of Agriculture (USDA) found that the use of direct certification and community eligibility substantially reduced certification errors.<sup>1</sup> Direct certification increases access to school meals for low-income students, substantially reduces school meal certification errors, and is fiscally responsible at the school district, state, and federal levels.<sup>2</sup>

Since the introduction of direct certification, Congress and USDA have taken a number of legislative and policy steps to strengthen direct certification.

Currently, all school districts that participate in the

## History of Direct Certification

**1986:** Direct certification is introduced to remove barriers to participate in school meals.

**2004:** The Child Nutrition and WIC Reauthorization Act of 2004 requires all school districts operating school breakfast or lunch to establish a system to directly certify students receiving SNAP by the 2008–2009 school year.

**2010:** The Healthy, Hunger-Free Kids Act sets benchmarks for SNAP direct certification — 95 percent of all students receiving SNAP within a state must be directly certified for school year 2013–2014 (and beyond). It also establishes pilots for Medicaid direct certification for free school meals.

**2012:** Medicaid direct certification (certifying for free meals only) is piloted in Florida, Illinois, Kentucky, New York (New York City only), Pennsylvania, and certain school districts in California.

**2013:** Medicaid direct certification (certifying for free meals only) pilot begins in Massachusetts.

**2016:** The Medicaid direct certification demonstration (certifying for both free and reduced-price meals) begins in California, Florida, Massachusetts, Nebraska, Utah, Virginia, and West Virginia.

**2017:** Additional states are added to the Medicaid direct certification demonstration (certifying for both free and reduced-price meals) beginning in Connecticut, Indiana, Iowa, Michigan, Nevada, Texas, Washington, and Wisconsin.

School Nutrition Programs are required to conduct direct certification for students living in households that participate in the Supplemental Nutrition Assistance Program (SNAP). States are required to directly certify 95 percent of those students. Those that do not must present a plan to improve direct certification procedures, and fully meet the benchmarks set forth in Section 9(b)(4)(F) of the Richard

<sup>1</sup> <https://fns-prod.azureedge.net/sites/default/files/ops/APECII-Summary.pdf>

<sup>2</sup> <https://fns-prod.azureedge.net/sites/default/files/ops/APECII-Summary.pdf>

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B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1760(l)) in subsequent school years. Districts also can directly certify other students who are categorically eligible for free school meals, which includes children who live in households participating in Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR) or Medicaid (only available in some states<sup>3</sup>), and children who are homeless, migrant or in foster care or Head Start.

USDA's most recent report on direct certification rates found that in the 2016–2017 school year, 28 states achieved the benchmark of directly certifying 95 percent of children living in SNAP households, and no state had a SNAP direct certification rate below 74 percent.<sup>4</sup> While these results are promising and a number of states have made progress over recent years, states can take steps to further improve their direct certification systems. This will help ensure their most vulnerable children are being directly certified for free school meals.

## How Direct Certification Works

Any child belonging to a household that participates in SNAP, TANF, FDPIR, or Medicaid (only available in some states<sup>5</sup>), or children who are migrant, homeless or in foster care or Head Start are categorically eligible to receive free meals at school. Children who are categorically eligible for free school meals can be directly certified to receive free meals at school without submitting a school meal application to determine their income eligibility.

Before direct certification, children were determined eligible for free or reduced-price school meals through submitting a school meals application form to the school. Direct certification replaces this process for many children by identifying those who are categorically eligible to receive free school meals. Qualifying assistance programs have already checked household income, thus eliminating the

need for households to submit income information on school meals applications and for schools to process the applications.

Direct certification is an electronic data-matching process. States can use one of two direct certification approaches: state-level (central) matching or district-level (local) matching. With state-level matching, the state matching agency (most commonly the child nutrition agency) pairs SNAP, TANF, FDPIR, the foster care program, and Medicaid (only available in some states) participation data with school enrollment records and communicates these results to the school district. With district-level matching, the state child nutrition agency distributes program participation data to school districts, and the districts compare the data against their own enrollment lists. States choose the approach that best fits the characteristics of their state, such as how SNAP and the other federal nutrition programs are operated, as well as the size of the school districts in the state.

The majority of states have moved towards a central-matching process as this method has advantages over using a local-matching process.<sup>6</sup> Central-matching systems are more efficient because they do not require that all school districts develop individual systems to perform direct certification. Instead, the state has one system, which allows for easier updates to the system and promotes more uniform data that meets the specific needs of the system. Additionally, central-matching systems ease the process of exchanging program data between agencies because there is only one recipient (the state-level matching entity) of data rather than each individual school district. Lastly, the National Survey of Direct Certification Practices<sup>7</sup> found that central-matching systems are more likely to perform matches more often and to use more sophisticated matching algorithms, two best practices for improving direct certification (see the “Improving Direct Certification” section for more information).

Even if a state is using a central-matching process, school districts have the authority to enhance direct certification

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<sup>3</sup>The following states use Medicaid data, along with an income test, to determine categorical eligibility for free school meals: Illinois, Kentucky, New York, and Pennsylvania. The following states use Medicaid data to determine categorical eligibility for both free and reduced-price school meals: California, Connecticut, Florida, Indiana, Iowa, Massachusetts, Michigan, Nebraska, Nevada, Texas, Utah, Virginia, Washington, West Virginia, and Wisconsin.

<sup>4</sup><https://www.fns.usda.gov/direct-certification-national-school-lunch-program-report-congress-state-implementation-progress-1>

<sup>5</sup>The following states use Medicaid data to determine categorical eligibility for free school meals: Illinois, Kentucky, New York, and Pennsylvania. The following states use Medicaid data to determine categorical eligibility for both free and reduced-price school meals: California, Connecticut, Florida, Indiana, Iowa, Massachusetts, Michigan, Nebraska, Nevada, Texas, Utah, Virginia, Washington, West Virginia, and Wisconsin.

<sup>6</sup><https://fns-prod.azureedge.net/sites/default/files/ops/NSLPDirectCertificationStatePractices.pdf>

<sup>7</sup><https://fns-prod.azureedge.net/sites/default/files/ops/NSLPDirectCertificationStatePractices.pdf>

practices at the district level. For example, school districts can use additional data collected at a school to investigate unmatched records.

States are required to directly certify at least 95 percent of children who participate in SNAP, and states and school districts are required to complete the direct certification process at least three times a year (but can do it more frequently). States and school districts also can directly certify students who participate in TANF, FDPIR, Medicaid (only available in some states), and foster care through data matching. Other categorically eligible students, such as children who are homeless, migrant, or enrolled in Head Start, are typically certified based on a list provided to the school nutrition department via appropriate administrators such as a state's or school district's homeless liaison.

## Medicaid Direct Certification

The Healthy, Hunger-Free Kids Act of 2010 first authorized demonstrations to examine the potential to use of Medicaid data for direct certification. The statute requires that students be enrolled in Medicaid and belong to a family whose income, as defined by Medicaid, is below 133 percent of the Federal Poverty Level<sup>8</sup> to be eligible for free school meals using Medicaid data to be directly certified for free meals. According to a USDA simulation of the six states (Florida, Illinois, Kentucky, Massachusetts, New York, Pennsylvania, and certain school districts in California) that participated in the first year of the Medicaid Direct Certification pilots, 11.6 percent more children were directly certified for free meals. According to the evaluation, about half of the additional children would have been certified for free meals with an application in the absence of direct certification with Medicaid.<sup>9</sup> This demonstrates a promising increase in direct certification rates, as well as a significant reduction in the overall number of applications that school districts need to process and verify.

In 2016, USDA issued a request for proposals for states to be included in a demonstration project that allows direct certification for both free and reduced-price school meals using Medicaid income data. During the 2016–2017 school

## Direct Certification and Community Eligibility

**Community eligibility** is an exciting option for high-poverty schools to offer free school breakfast and lunch to all students while eliminating school meal applications. It is built on direct certification. Community eligibility bases school breakfast and lunch reimbursements on the percentage of enrolled students who are certified for free school meals without an application — those who are directly certified based on being in a household that participates in SNAP, TANF, FDPIR, Medicaid (in certain states) or those who are certified because they are homeless, migrant, in foster care, or in Head Start. High-poverty schools in states with lower direct certification rates often have a more difficult time qualifying for community eligibility (at least 40 percent of the students in a school, group of schools, or school district must be directly certified) or choosing community eligibility because the school breakfast and lunch reimbursements do not accurately reflect the poverty level in the school, which makes it difficult to operate a financially viable school nutrition program. Therefore, improving direct certification is an important strategy to ensure that high-poverty schools are able to implement community eligibility.

year, Florida and Massachusetts expanded their Medicaid direct certification to include reduced-price meals; and California (in 14 school food authorities<sup>10</sup>), Nebraska, Utah, Virginia, and West Virginia began using Medicaid income data to directly certify students for free and reduced-price school meals. In the 2017–2018 school-year, California implemented Medicaid direct certification statewide in addition to Connecticut, Indiana, Iowa, Michigan, Nevada, Texas, Washington, and Wisconsin.

It is worth noting that if a child can be directly certified for free school meals through SNAP, TANF, FDPIR, foster care, Head Start, or through being migrant or homeless, that

<sup>8</sup>As defined in section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)).

<sup>9</sup><https://www.mathematica-mpr.com/our-publications-and-findings/publications/summary-access-evaluation-report-evaluation-of-demonstrations-of-national-school-lunch-program>

<sup>10</sup>School Food Authorities (SFA) are the administering unit for providing school meals. They are often the same as a school district, but there are instances that SFAs serve schools across more than one school district.

certification always will take precedence over Medicaid direct certification.

## Improving Direct Certification

**Refining the direct certification process** in each state improves performance rates and increases the number of students directly certified for free school meals. Regularly assessing the success of the direct certification process is necessary to ensure children are matched properly. States use many different processes for directly certifying children and some states identify categorically eligible children much better than others.

Some states require exact matches in certain data fields, such as the name. It is common for low-income families' addresses to change and names can be entered into the systems inconsistently. Requiring an exact match increases the chance that categorically eligible children will not be identified. Other states use more sophisticated matching algorithms, such as a tiered-matching process or probabilistic matching. In a tiered-matching process, if the initial data fields do not find a match, there is a secondary process in place to attempt to match other data fields. Probabilistic matching compares data from two or more different sources and uses statistical probability to determine if a match has occurred. States that use tiered and/or probabilistic matching have a greater opportunity to identify children eligible for direct certification.

**Including programs in addition to SNAP** in the direct certification process will increase the number of children directly certified. All states are required to perform direct certification for children living in households receiving SNAP benefits, but there are many other programs that can be directly certified. Children who live in households receiving TANF,<sup>11</sup> FDPIR, are enrolled in foster care or Head Start, or who are homeless or migrant, are all categorically eligible to receive free school meals. According to a USDA direct certification improvement study, incorporating TANF and foster care participation data is associated with significantly higher direct certification performance.<sup>12</sup> In many states, the entity that administers SNAP benefits also administers

TANF benefits. In these cases, incorporating TANF data into the system does not require engaging additional agencies, easing the process. Including foster care data is slightly more complicated due to additional security measures required by agencies overseeing children in foster care, but overcoming those barriers offers an important opportunity to increase the number of students directly certified for free school meals. The process for identifying children who are homeless or migrant or in Head Start is often determined at the school district level through a school social worker, homeless liaison, or other point-person designated by the school district to communicate this information to the school nutrition department. Once a school nutrition department receives notice that a child belongs to a household that participates in Head Start, or is homeless or migrant, the child must immediately be directly certified and begin receiving free school meals.

**Extending categorical eligibility to additional children in the household** allows children in the same household with the same household income to be determined as eligible for free school meals without a school meal application. Children who live in households that are participating in SNAP, TANF, FDPIR, and Medicaid (only available in some states) are eligible for free school meals through "extended categorical eligibility" if another child in the household has been directly certified. Extended eligibility often takes place at the school district level rather than at the state level, although Oregon has made technology improvements to its state matching to extend eligibility to children living in the same household as another child who has been directly certified (see page 6 for more information on extending eligibility in Oregon). School districts generally are responsible for taking the necessary steps to ensure that all children living in a household receiving SNAP, TANF, FDPIR, and Medicaid (if available) are directly certified. School districts often will use parent/guardian name, address, or both to extend eligibility to children living in the same household as another child who has been directly certified. The process for extending eligibility is often manual, and many states require detailed documentation from school districts when extending categorical eligibility to children.

<sup>11</sup> The vast majority of states include TANF in their centralized direct certification data match. Check with your state agency to find out what programs are included in your state direct certification match.

<sup>12</sup> Gothro, A., Moore, Q., Conway, K., & Kyler, B., (2014). National School Lunch Program Direct Certification Improvement Study: Practices and Performance Report. Prepared by Mathematica Policy Research, Under Contract No. AG-3198-D-10-0074. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Joseph F. Robare. Available at: [www.fns.usda.gov/research-and-analysis](http://www.fns.usda.gov/research-and-analysis). Accessed on November 16, 2018.

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## Ensuring that all schools participating in the National School Lunch Program (NSLP) are conducting

direct certification is another important way to ensure all children in households receiving SNAP, TANF, FDPIR, and Medicaid, if available, are directly certified.<sup>13</sup> Even though all schools, including private and charter schools, participating in NSLP are required to directly certify students living in SNAP households, participation among non-public schools varies from state to state and the quality of the direct certification process also varies. Private and charter schools may have special challenges in performing direct certification, such as limited administrative capacity and undefined enrollment areas (for example, some charter schools are part of public school districts, while others are in their own school district). Federal requirements direct states with central-matching systems to incorporate private and charter schools into their direct certification programs, and, when possible, provide the same data and system access to private and charter schools that are available to public schools. State agencies should provide technical assistance and support to ensure all schools in their state are compliant and can promote the broader use of direct certification through outreach to private and charter schools.

**Performing direct certification matches as often as possible** is an important strategy to ensure children are certified to receive free school meals as soon as they become categorically eligible. States and school districts are required to conduct matches with SNAP data at least three times per year, but performing direct certification matches more frequently increases the number of students directly certified throughout the school year and decreases the time between becoming categorically eligible and receiving free school meals, ensuring that children have the meals they need and that families are not unnecessarily accruing school meal debt. States with central-matching systems tend to have an easier time increasing the frequency of matches because these changes occur at the state level and do not require changes to each school districts' individual systems. Some states perform direct certification matches monthly, weekly, or daily.

**SNAP education and application assistance** is an important strategy to ensure families have the information they need to determine if they should apply for SNAP,

especially in states with low SNAP participation rate for families with children. Children whose households participate in SNAP are the largest group of students who are directly certified for free school meals. Unfortunately, some SNAP-eligible households with children do not participate. Families may be unaware that they are eligible to receive SNAP benefits or they may not know how to apply.

Many state agencies overseeing SNAP benefits have developed SNAP outreach plans and the Food and Nutrition Service (FNS) at USDA encourages them to coordinate and collaborate with community organizations. Anti-hunger advocates can partner formally with the state agencies to execute SNAP outreach plans. For more information, visit: <https://www.fns.usda.gov/snap/state-outreach-plan-guidance>.

For many communities, schools are ideal for information sharing. Providing SNAP education and application assistance at schools is a targeted strategy to increase the number of children directly certified for free school meals. Anti-hunger advocates can encourage school administrators to distribute SNAP information with back-to-school forms and report cards, by posting on the school district's food service webpage, and through email blasts, as well as by providing application assistance at parent nights, afterschool programs, and other school events.

### Conduct SNAP Education and Offer Application Assistance in Schools

- Many households that are eligible for SNAP do not participate because they are unaware that they are eligible or they do not know how to apply.
- The school social worker or counselor, as well as community partners, can help disseminate SNAP eligibility information to families, and assist with completing applications.
- Posting information on the school's nutrition website on how families can apply and find more information about SNAP can help reach more students and families.

<sup>13</sup> <https://fns-prod.azureedge.net/sites/default/files/ops/NSLPDirectCertificationStatePractices.pdf>

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**Building a relationship with the state agency overseeing direct certification** is an important step towards advocating for direct certification improvement. The state agency is responsible for meeting the benchmarks, and has a broad overview of the direct certification process. It can identify areas that need improvement. Building a relationship with the state agency provides an important channel to get questions answered faster, and an opportunity to partner together to provide direct certification support to school districts. For background materials regarding engaging with state agencies on direct certification, contact [FRAC](#).

**Engaging with school districts directly** is a great way to learn about the challenges they face and to identify

needs for training and support for local staff. Limited capacity and staff turnover at the local level means that continuous training is necessary to ensure local school administrators understand the direct certification process and the benefits of improving their matches. Local staff in states that are in the process of rolling out, or have recently rolled out, Medicaid direct certification might be unclear on how these changes will affect their direct certification process and may require additional training. Advocates can encourage school districts to share their challenges to the state agency, allowing the state to become aware of the issues school districts encounter and prompting them to address any systemic issues that arise or work one-on-one with the district to ensure they have the skills necessary to conduct accurate direct certification matches.

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## Resources to Improve Direct Certification

In addition to monitoring state direct certification performance and implementing continuous improvement plans when necessary, USDA provides states with resources and technical assistance to improve their direct certification. These include state-specific technical assistance when requested by the state agency; Match to Meal newsletters; policy guidance; and webinars.

### Case Studies

#### Extending Categorical Eligibility at the State Level: Oregon Department of Education

In 2015, the Oregon Department of Education (ODE) received a USDA direct certification implementation improvement grant that helped to improve the algorithms used at the state level to directly certify children for free school meals. These state level improvements included adding an algorithm capable of performing a household match, which extends eligibility to children who live in the same household as another child who has been directly certified.

Prior to the grant, ODE staff performed household matches by manually searching a list of household names and addresses of directly certified children against enrollment data to identify children who shared households with a child who already was directly certified. Now, this process is done entirely using algorithms.

ODE's 12-tiered matching algorithm makes both exact and probabilistic matches based on birthdate; first, middle, and last names; address; zip code; phone number; social security number (last four digits only); and guardian's name. The last algorithm in the tiered-matching process compares ODE student enrollment lists against the list of directly certified students. In order for categorical eligibility to be extended to a child not directly certified through the first 11 algorithms, they must have the exact same address, zip code, and guardian as another child who has been directly certified.

ODE performs weekly direct certification matches. A match performed on April 9, 2018, directly certified a total of 143,000 school-aged children; of those, 29,000 were directly certified through extended eligibility. School districts across Oregon have provided positive feedback regarding the increase in the number of matches made at the state level because of the technological advancements.

ODE's improvements to its direct certification process ensure more eligible low-income children have access to free school meals while also easing school districts' administrative burden. ODE is currently in the final stages of incorporating foster care data into its state direct certification match, with plans to implement this additional data set in the fall of 2018. It also is exploring including migrant children in the state match in the future.

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## Improving Direct Certification Technology: New York State Department of Education

New York has taken a number of steps to improve its direct certification matches since the Healthy, Hunger-Free Kids Act of 2010 was enacted. The first improvements began with the New York City (NYC) Department of Education's school food authority (SFA) providing school meals to New York City schools by implementing a sophisticated electronic direct certification-matching system during the 2011–2012 school year. The system uses advanced algorithms and probabilistic matching to identify children who are categorically eligible to receive free school meals against all available education records tied to the child.

In the 2012–2013 school year, the NYC Department of Education participated in the Medicaid direct certification demonstration project and added Medicaid income data into its electronic-matching system.<sup>13</sup> The direct certification technology improvements already implemented set the building blocks for the seamless integration of Medicaid income data. Through Medicaid direct certification, the NYC Department of Education increased the percentage of students directly certified to receive free school meals by 6.9 percentage points.<sup>14</sup>

During the 2016–2017 school year, the NYC Department of Education directly certified approximately 237,000 additional children — more than one-fifth of the students enrolled in the school district. So many more children were directly certified for free school meals that the SFA chose to implement community eligibility in all of the schools it serves at the start of the 2017–2018 school year.

The Medicaid direct certification demonstration was expanded to all school districts in New York state in the 2013–2014 school year — meaning all income-eligible children in New York receiving Medicaid can be directly certified to receive free school meals. While the addition of Medicaid data was an important step in identifying more children for free school meals, all school districts, except NYC Department of Education, were still directly certifying

children at the school district level, rather than through an electronic statewide match.

In the 2017–2018 school year, the New York State Department of Education implemented a statewide electronic direct certification-matching system that all public-school districts now use. This new sophisticated system is modeled after the NYC Department of Education's direct certification algorithms, which have increased the number of students identified as categorically eligible to receive free school meals.

The technological improvements and the integration of Medicaid data into the direct certification-matching process has resulted in an increase in community eligibility uptake throughout the state, which is expected to expand to even more schools in future years. New York's leadership in improving direct certification exemplifies the need to make long-term systematic advances to benefit fully from direct certification's capabilities to support the school nutrition programs, the school districts operating them, and the low-income children who rely on school meals for the nutrition they need to grow and learn.

## Conclusion

Low-income children across the country benefit from improved access to free school meals through direct certification. States and school districts can take steps to improve their direct certification systems, resulting in more children receiving the nutritious school meals they need to support their health and learning. School districts also benefit from the reduction in the administrative burdens of processing and verifying the applications of children who are categorically eligible to receive free school meals. Further, as direct certification rates improve, more schools are able to benefit from community eligibility, an important tool for providing meals at no cost to all students in high-poverty schools.

*This resource was written by Alison Maurice, child nutrition policy analyst at FRAC, and was based on an earlier guide developed jointly by FRAC and the Center on Budget and Policy Priorities. FRAC would like to thank Sandra Sheedy, with the New York State Department of Education, and Annie Marges, with the Oregon Department of Education, for their assistance in writing this resource.*

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<sup>13</sup> Under the DC-M demonstration, students are eligible if they are (1) enrolled in Medicaid and (2) in households with Medicaid gross income not exceeding 133 percent of the poverty level.

<sup>14</sup> <https://fns-prod.azureedge.net/sites/default/files/ops/DirectCertwithMedicaidYear2.pdf>