

# Direct Certification: Understanding the Pieces to Complete the Puzzle

Joseph Templin, *Program Analyst*  
*Operational Support Branch – Child Nutrition Programs, USDA Food and Nutrition Service*



# History of Direct Certification with SNAP

<b>2004</b>	<p>All NSLP LEAs must perform direct certification <u>with SNAP</u> by SY 2008-09</p> <p>(May conduct direct certification with other programs, but are not required to do so)</p>	<p><b>P.L. 108-265</b> Child Nutrition and WIC Reauthorization Act of 2004</p>
<b>2008</b>	<p>Assess effectiveness of direct certification and publish results in Report to Congress</p> <p>(starting with SY 2007-2008)</p>	<p><b>P.L. 110-246</b> Food Conservation, and Energy Act of 2008 (2008 Farm Bill)</p>
<b>2010</b>	<p>Performance benchmarks are set at 95% for SY 2013-2014 and beyond</p> <p>(lower benchmarks for the two previous school years)</p> <p><b>SNAP Letter Method no longer DC</b></p> <p>(phased out by regulation by SY 2012-2013)</p>	<p><b>P.L. 111-296</b> Healthy, Hunger-Free Kids Act of 2010</p>
<b>2013</b>	<p><b>New formula and ways to collect/report data elements</b></p> <p>to compute State direct certification performance rates with SNAP</p>	<p><b>Final Rule</b> NSLP: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010</p>

# Benchmarks - Direct Certification with SNAP

**SY 2013-2014** and beyond – **95%**

**Second year** - SY 2012-2013 - **90%**

**First year** – SY 2011-2012 – **80%**

# How is Direct Certification with SNAP Conducted?

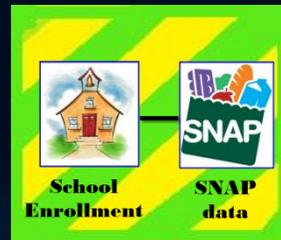
Source Data

School Enrollment Data

SNAP Participation Data



Use Match Results to directly certify at local level

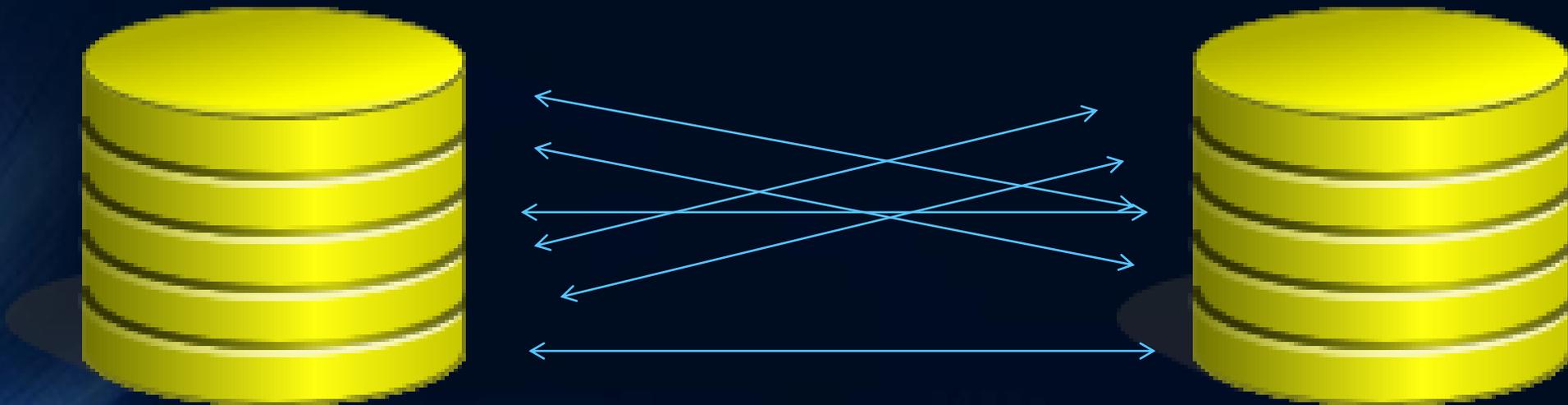


Match Results



Student Data

SNAP Data



- The DC process depends on matching data –attributes of a real-world child – provided in electric form.

**WILLIAMS**

**151 W. OAK ST.**

**ROBERT SIMPSON**

**ANGELA**

**02-04-2004**

**60604**

**LINCOLN ELEMENTARY**



# How we build the SNAP-DC Rate

## Formula

- Data Element #1
- Data Element #2
- Data Element #3

(2008 Farm Bill)



**NEW**

**Direct  
Certification  
Performance  
Rate**

**=**

$$\frac{\#1 + \#3}{\#2}$$



#1

# DATA ELEMENT #1

The # of children living in households receiving **SNAP** benefits who are **directly certified** for free school meals as of the last operating day in October





# DATA ELEMENT

# #1

Who collects it?

The **School Food Authority** tracks, records, and reports the number of SNAP Direct Certifications that occur by the last operating day in October

#1

# The count on Line 3-2 of the FNS-742 is Data Element #1



<b>Section 3</b>	<b>**ALL SFAs must report Section 3 or check box 3-1 if applicable**</b>	<b>B. Number of FREE Students</b>
	3-1: <input type="checkbox"/> Check the box only if every school/RCCI in the SFA was not required to perform direct certification with SNAP (i.e. NON-BASE year Provision 2/3 for all schools)	
	3-2: <b>Students directly certified through Supplemental Nutrition Assistance Program (SNAP):</b> Do NOT include SNAP letter method certifications in this SNAP count, report these in 3-4B below.	
	3-3: <b>Students directly certified through other programs:</b> Include those directly certified through Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), or Medicaid (if applicable); those documented as homeless, migrant, runaway, foster, Head Start, Pre-K Even Start, or non-applicant but approved by local officials. <b>DO NOT include SNAP students already reported in 3-2.</b>	
	3-4: <b>Students certified Categorically FREE eligible through SNAP letter method:</b> Include students certified for free meals through the family's providing a letter from the SNAP agency	



**SNAP DC**

# Data Element #2

## The "School-aged SNAP UNIVERSE"

The # of school-aged children in SNAP households during the months of July, August, and September



USDA uses ages 5-17 years old for “school aged”  
in the count for Data Element #2

But, even though

USDA uses ages **5-17** years old for “school aged”  
in the count for Data Element #2

States are to use as broad an age range for the match  
as will include **ALL** students in their NSLP schools

# SNAP State Agency Responsibilities for Data Element #2

#2



- Look at the SNAP rolls for the months of:

## July, August, and September

July							August							September						
Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa
	1	2	3	4	5	6					1	2	3	1	2	3	4	5	6	7
7	8	9	10	11	12	13	4	5	6	7	8	9	10	8	9	10	11	12	13	14
14	15	16	17	18	19	20	11	12	13	14	15	16	17	15	16	17	18	19	20	21
21	22	23	24	25	26	27	18	19	20	21	22	23	24	22	23	24	25	26	27	28
28	29	30	31				25	26	27	28	29	30	31	29	30					
8:●	15:○	22:○	29:○				6:●	14:○	20:○	28:○				5:●	12:○	19:○	26:○			

On SNAP at any time during these three months?

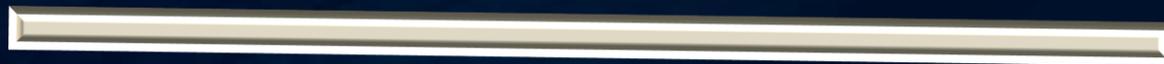
beginning with July-August-September of 2013



#1

SNAP  
DC

+ #3



#2



“THE UNIVERSE”

# Data Element #3

## The "SPECIAL PROVISION" Adjustment

The # of children in SNAP households attending special provision schools operating in a **non-base year**



ON LINE 3-2

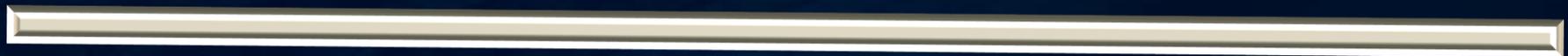
#1



SNAP  
DC



#3



#2



“THE UNIVERSE”

# DATA ELEMENT #3

## NSLP State Agency Responsibilities

#3



The NSLP State agency ensures that a **“Special Provision Match” with SNAP** is run with special provision schools **not** operating in a **base year**, **totals** the number of matches, and **reports** the total on the FNS-834.

# DATA ELEMENT #3



With which schools must the match be run?

- **Provision 2/3 schools** when operating in non-base year.
- **Community Eligibility** schools, each year they operate under community eligibility.
- **Other schools** operating in a non-base year under the special provisions of 7 CFR 245.9—that is, those schools that would not be reporting SNAP-DCs on line 3-2 of the FNS-742.

# DATA ELEMENT #3

Must the State itself run the match?



**Regardless** of the method of matching (central or local or combo) for the regular SNAP matched:

- The **NSLP State agency** may run the “Special Provision Match” with SNAP; or
- The **SFAs** may run the “Special Provision Match” with SNAP and report the counts to the NSLP State agency; or
- States may decide to use a **combination** of approaches.

**NOTE:** States with no special provision schools (or with only those operating in a base year) need not run a “Special Provision Match.” **Simply report “0” on the FNS-834.**

# Direct Certification Performance Rate



SNAP  
DC

SFA on LINE 3-2 of FNS-742



SPECIAL  
PROVISION  
ADJUSTMENT

NSLP State agency on FNS-834



“THE UNIVERSE”

SNAP State agency on FNS-834

# How's Missouri Done?

SCHOOL YEAR	MISSOURI	NATIONAL	BENCHMARK
2011-2012	72%	86%	80%
2012-2013	80%	89%	90%
2013-2014	86%	87%	95%



# History of Direct Certification with SNAP

**2010**

**Performance benchmarks are set at 95%**

**for SY 2013-2014 and beyond**

*(lower benchmarks for the two previous school years)*

**SNAP Letter Method no longer DC**

*(phased out by regulation by SY 2012-2013)*

**P.L. 111-296**

**Healthy, Hunger-Free Kids Act of  
2010**

What happens if a State does not meet the Benchmark.....

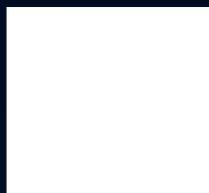
# Continuous Improvement Plans

- Per Section 101(b) of the HHFKA and Federal regulations at 7 CFR Section 245.13, each State that does not meet the benchmark for a particular school year is required to develop and implement a CIP to improve its direct certification procedures and fully meet the benchmarks set forth in the HHFKA in subsequent school years.
- Submitted Plans provide the specific measures the State will use to identify more children who are eligible for direct certification based on SNAP data, including improvements or modifications to technology, information systems, or databases; a multiyear timeline for the State to implement these measures; and goals for the State to improve direct certification results.

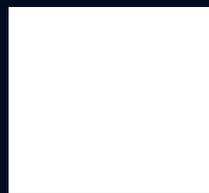
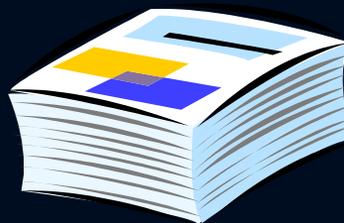
### Source Data



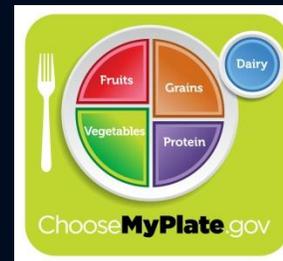
### Match Process



### Match Results



### Load into POS

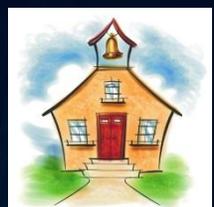


### Report Out

742



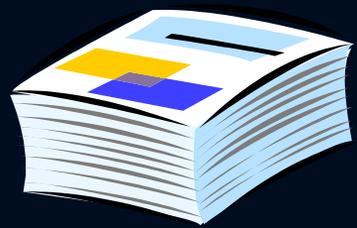
### Source Data



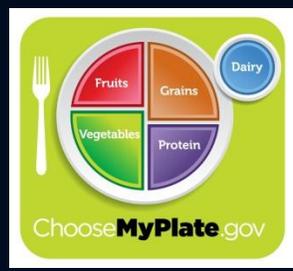
### Match Process



### Match Results



### Load into POS



### Report Out

742





# "Grow" DATA ELEMENT #1





# How to Grow DATA ELEMENT #1

Know what is considered to be a  
SNAP Direct Certification

## Certifications Based On:

- **Matching** SNAP database to Student-Enrollment Database
- **Adjudication** of the unmatched or partial SNAP match list
- **SNAP-combo** matches, SNAP trumps!
- **Extended** SNAP-DC Eligibility
- **Converting** to SNAP DC by the last operating day in October

# What can the SFAs do to increase the rate?

- **Know** what constitutes a SNAP Direct Certification
- **Make sure** the POS system properly records the type of certification and can select/sort/count by type
- **Keep** school enrollment data as current and up-to-date as possible
- **Check** new students as they enroll
- **Send** SNAP DC status to transferring student's school
- **Adjudicate** the non-matches—try to find every child
- **Go back and code** a student as a SNAP DC if the student shows up on the SNAP DC list, even if the student has already been certified in another way, so long as it is done before the last operating day in October
- **Get/arrange for** additional assistance during heavy certification times, if possible

## What can the SFAs do to increase the rate?

- **Get** proper training, ask questions if anything is not well understood, train back-ups for your role in the process
- **Look** to see where the automated systems could be revised to make things easier for you—if you are doing a series of steps over and over, they could probably easily be automated
- **Understand** the policies and rules governing direct certification
- **Properly complete** the FNS-742, Verification Collection Report
- **Check** your submission last year to see if it is close to this year's—if it is not close, is the difference warranted? If not, search for errors

# The End Result of Direct Certification



Improve access for low-income children



Reduce paperwork for households and program administrators



Improve integrity of the free and reduced-price meal certification process

*Direct Certification provides an excellent opportunity for State and local partners to best utilize available data and technologies to effectively and efficiently provide access to school meals, increase program integrity, and best utilize available resources.*

Joe Templin, USDA-FNS

Noted DC System Expert and Wrigleyville Resident

September 28, 2015

Questions?