



United States
Department of
Agriculture

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Food and
Nutrition
Service

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SUBJECT: National School Lunch Program and Direct Certification with SNAP

TO: Program Directors
All Regions

This memo is to inform you of changes and clarifications related to direct certification for the National School Lunch Program (NSLP) with the Supplemental Nutrition Assistance Program (SNAP). Please share this information with State agencies administering SNAP and encourage them to work with their NSLP counterparts to improve the direct certification of children in SNAP households.

With the recent passage of the *Healthy, Hunger-Free Kids Act of 2010* (HHFKA), a number of amendments have been made to the *Richard B. Russell National School Lunch Act* to connect more children to benefits. In addition, FNS has issued an interim rule implementing changes in direct certification (*Direct Certification and Certification of Homeless, Migrant and Runaway Children for Free School Meals*). Further, FNS has issued clarifications to existing statutes and regulations that pertain to direct certification. Many of these changes and clarifications have to do with increasing access to and improving the nutritional content of school meals. Other requirements pertain to tracking, reporting, and measuring program improvements. Some of these changes may overlap with SNAP. The law seeks to increase access to school meals through direct certification of children living in households receiving SNAP benefits through a variety of strategies.

1. Performance awards and benchmarks for NSLP-SNAP direct certification.

Section 101 of the HHFKA provides for performance awards for States making the greatest strides in directly certifying SNAP children. In addition, Section 101 establishes benchmarks for State direct certification rates for SNAP children. If a State NSLP agency fails to meet the established benchmarks, the agency must develop and implement a continuous improvement plan (CIP) to improve rates for the following school year. It is important that State SNAP agencies work closely with their NSLP counterparts to improve the direct certification rate within the State. State SNAP agencies should refer to the following guidance memos for more information on direct certification performance awards and rate benchmarks:

- *SP 33-2011, Child Nutrition Reauthorization 2010: Direct Certification Performance Awards and Use of Funds*; and
- *SP 32-2011, Child Nutrition Reauthorization 2010: Direct Certification Benchmarks and Continuous Improvement Plans*.

2. Elimination of the “letter method” as a means of directly certifying children for free meals and implementation of alternative methods of direct certification to replace the letter method for NSLP-SNAP.

State SNAP agencies must ensure they have a method in place to exchange eligibility information for the purpose of direct certification with their NSLP counterpart as soon as possible. The “letter method” may continue to be used as a secondary method of certifying eligible children—and it should be used when necessary to ensure that eligible children are properly certified for free meals—but NSLP State agencies can no longer claim such certifications as “direct certifications.”

For additional information, please refer to:

- *SP 13-2011, Child Nutrition Reauthorization 2010: Letter Method for Direct Certification;* and
- *SP 32-2011, Child Nutrition Reauthorization 2010: Direct Certification Benchmarks and Continuous Improvement Plans.*

3. An increase in the number of times direct certifications must be conducted during the school year.

State SNAP agencies should also be aware of the interim rule *Direct Certification and Certification of Homeless, Migrant and Runaway Children for Free School Meals* published April 25, 2011. This rule changes the minimum mandatory number of direct certification matches that must be conducted, from one to three times per school year, beginning with School Year 2011-2012. State NSLP agencies are now required to conduct direct certification efforts at or around the beginning of the school year, 3 months after the beginning of the school year, and 6 months after the beginning of the school year. More frequent direct certification efforts are permissible and encouraged.

For additional information, please refer to:

- *SP 31-2011, Frequency of Direct Certification Matching Activities Beginning in School Year 2011-2012.*

State SNAP agencies should cooperate fully with their NSLP counterparts to ensure the State can meet the minimum mandatory number of direct certification matches for children in SNAP households. Additionally, State SNAP agencies should be aware that potential joint NSLP-SNAP regulatory guidance mandating certain information exchange is likely, so establishing processes now for data collection and sharing is prudent. Specifically, NSLP personnel will need an unduplicated count of school-aged children (aged 5 to 17 years) in households receiving SNAP benefits at any time during the

months of July, August, and September. If State SNAP personnel are unclear as to how to contact NSLP agency staff, a list of contact information can be found here: <http://www.fns.usda.gov/cnd/contacts/statedirectory.htm>.

4. Clarification that children living in zero benefit SNAP households are not categorically eligible for free school meals (and thus, not eligible to be directly certified) since the household does not receive SNAP benefits.

Finally, FNS has received questions about direct certification of children in SNAP households certified as eligible for zero benefits. We wish to clarify that a child who is a member of a SNAP household certified as eligible for zero benefits is not categorically eligible for free meals through the NSLP. Questions have also arisen with regard to SNAP Employment and Training (E&T) services or reimbursements received by households that are certified as eligible for zero benefits. E&T services and reimbursements do not count as SNAP benefits and therefore children in these households do not qualify for free school meals through the NSLP. Benefits are allotments issued on electronic benefit transfer (EBT) cards, or other means approved by the Secretary, that can be used to purchase food at authorized retail food stores. State NSLP agencies have been told to be in compliance by July 1, 2012. State SNAP agencies should work together with their NSLP counterparts to ensure children from zero benefit households are excluded from being directly certified as soon as possible.

Direct certification supports the Administration's priority of ending childhood hunger by 2015 and ensuring that our children have access to nutritious food and nutrition education. It offers an effective, efficient way to certify eligible children for free school meals. Please advise your State SNAP agencies of the changes and clarifications in this memo and encourage them to cooperate fully with their NSLP counterparts. You may contact Michael Ribar of my staff at (703) 305-2449 if you have questions about this matter. Thank you for your cooperation.



Lizbeth Silberman
Director
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