



**United States
Department of
Agriculture**

Food and
Nutrition
Service

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Alexandria, VA
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MEMO CODE: SP 27-2008

DATE: July 7, 2008

SUBJECT: July 1, 2008, Mandatory Implementation of Direct Certification with the Food Stamp Program

TO: Special Nutrition Programs
All Regions

State Agencies
Child Nutrition Programs
All States

Implementation Date/Applicability of Mandate

Effective July 1, 2008, all local educational agencies (LEAs), regardless of enrollment, must conduct direct certification activities with the Food Stamp Program. The only exceptions to mandatory direct certification are:

- Schools in non-base years which operate under Provision 2 or Provision 3; direct certification must be conducted only in base years; and
- Certain residential child care institutions (RCCIs) or boarding schools. Because children who reside in an RCCI or a boarding school are not eligible to receive benefits under the Food Stamp Program, those RCCIs or boarding schools with only residential students do not have to conduct direct certification. However, RCCIs and boarding schools must conduct direct certification for any day students in attendance.

Resources for Direct Certification Implementation

We encourage small LEAs, such as private schools and RCCIs, as appropriate, to work with their local public LEAs as those LEAs are more likely to have experience with direct certification. Individual students' information may be shared between schools and institutions participating in the Child Nutrition Programs. We also encourage LEAs to work with their State agency to implement direct certification.

LEAs that have not conducted direct certification before should review Part 6 of the January 2008 edition of the Eligibility Manual for School Meals for additional guidance (http://www.fns.usda.gov/cnd/Guidance/eligibility_guidance.pdf). Other useful resources are the *Data Matching in the National School Lunch Program: 2005 - December 2006* and *Approaches to Direct Certification and Direct Verification: Guide for State and Local Agencies*. Here are the links to these materials: [Report Summary](#); [Volume 1: Final Report](#); [Volume 2: Select Case Studies](#); and

[Approaches to Direct Certification and Direct Verification: Guide for State and Local Agencies.](#)

In addition, any one attending the School Nutrition Association's annual conference in Philadelphia, Pennsylvania, may wish to attend the session entitled Certification and Verification Overview scheduled for Monday July 21, 2008 at 3:30 pm. at the convention center.

To assist State and local agencies in their efforts to improve their direct certification systems, there are still funds available for direct certification grants. These grants are designed to assist both the Child Nutrition and the Food Stamp Program State agencies with improving and expanding their direct certification systems. While the 2008 grants are closed, State agencies may apply for the next round of grants when they are announced later this year.

Direct Certification Methods

It has come to our attention that some children who are members of households receiving food stamps may not be identified through the matching process. This may occur when food stamp and school records differ and do not result in a clear match. However, the food stamp agency may be able to identify additional children receiving benefits who were not identified in the initial process. For example, John Smith may be initially identified, but his sister Susan may not be because the LEA submitted her name as Sue. Through a secondary process, the food stamp agency can show that his sister is a member of the household receiving food stamps. This secondary process is also considered direct certification. Keep in mind, however, that categorical eligibility must always be established for each child.

The methods used to conduct direct certification can always be improved and expanded and should not be considered static. The more children who are identified as eligible through the direct certification assists both families and LEAs by simplifying the certification process and by more accurately targeting free meal benefits. While direct matches are the ultimate goal, small LEAs may consider using the "letter method" initially. This method has the office administering the Food Stamp Program providing the family with a letter documenting their eligibility which the family can provide to the LEA. However, LEAs must be working toward use of direct matches as the ultimate goal of direct certification is to significantly reduce paperwork for both families and LEAs. Further, we encourage State agencies and LEAs to conduct direct certification more frequently to find children who may have become eligible after the initial effort or who are new to the LEA.

State agencies should contact their regional office if they have any questions.

Original Signed

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Director

Child Nutrition Division