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## ENROLLING ALL CHILDREN IN A HOUSEHOLD FOR FREE SCHOOL MEALS

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### Overview

A new federal policy will make it easier for school districts to enroll certain low-income children for free school meals.

Under the revised policy, *all* children in a household are eligible for free school meals if *anyone* in the household is receiving assistance under the Supplemental Nutrition Assistance Program (SNAP, formerly the Food Stamp Program), the Temporary Assistance for Needy Families (TANF) cash assistance program, or the Food Distribution Program on Indian Reservations (FDPIR).<sup>3</sup>

### Key Findings

- Under revised USDA policy, if anyone in a household is a recipient of benefits under the Supplemental Nutrition Assistance Program (SNAP, formerly the Food Stamp Program), the Temporary Assistance for Needy Families (TANF) cash assistance program, or the Food Distribution Program on Indian Reservations (FDPIR), all children in the household are categorically eligible for free school meals.
- This policy change is important because an estimated 2.5 million children who receive SNAP benefits and should be automatically enrolled for free meals have been missed in the direct certification process. The new policy will make it easier for school districts to automatically enroll these children.
- By directly certifying all children in the household, districts can also generate resources to support their meals program; they will have fewer paper applications to process, fewer applications to verify, and more federal reimbursements.
- Implementation will be a crucial factor in whether the new policy connects more eligible children to free school meals. School districts can take several steps to reach all children who could benefit as a result of this new policy.

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<sup>2</sup> Tina Fritz Namian is a Program Analyst with the Food and Nutrition Service (FNS), USDA, previously on a special assignment with the Center on Budget and Policy Priorities. The views expressed are those of the authors and not necessarily those of FNS or USDA.

<sup>3</sup> See Food and Nutrition Service Memorandum, *Extending Categorical Eligibility to Additional Children in a Household*, USDA, August 27, 2009, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf) and Food and Nutrition Service Memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACFP\\_11\\_SFSP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf). This policy applies to the Child and Adult Care Food Program and the Summer Food Service Program, but this paper discusses only its application to the school meals programs.

Under previous policy, each child in a household had to provide the case number assigned to him or her by one of those programs, or be individually matched, in order to be approved for free meals. Last year an estimated 2.5 million children who receive SNAP benefits and could have been automatically enrolled for free meals were missed; some of these children missed out on free meals all together, while others were enrolled but completed a duplicative and unnecessary application.<sup>4</sup> This policy change will facilitate states' and school districts' efforts to automatically enroll eligible low-income children for free school meals, which reduces paperwork for school districts and families. This paper explains the new policy and provides suggestions on how to ensure school districts fully leverage this new opportunity to enroll children for free school meals.

## Household Eligibility Will Help Connect Low-Income Children to Free School Meals

Certain low-income children are automatically eligible for free school meals offered through the National School Lunch Program (NSLP) or the School Breakfast Program.<sup>5</sup> Their parents or guardians are not required to submit income information to establish their eligibility for free school meals; instead the children are eligible based on their participation in another federal program. This is referred to as "categorical eligibility."

Categorical eligibility applies primarily to children from households receiving benefits under SNAP, TANF cash assistance, or FDIPIR.<sup>6</sup> These programs have income limits that are similar to the NSLP and have more rigorous application processes. Children from households receiving these benefits may be enrolled for free school meals by completing an application that lists a

### Key Terms

- **Categorical Eligibility:** Children in households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP, formerly the Food Stamp Program), the Temporary Assistance for Needy Families (TANF) cash assistance program, or the Food Distribution Program on Indian Reservations (FDPIR) are automatically *eligible* for free school meals. Categorically eligible children can be *enrolled* for free school meals based on a school meals application that includes a SNAP, TANF, or FDIPIR case number or through direct certification.
- **Direct Certification:** Direct certification is automatic enrollment of children for free school meals based on confirmation from the relevant administering agency of a household's SNAP, TANF cash assistance, or FDIPIR participation without the need for a household application.
- **Letter Method of Direct Certification:** SNAP, TANF, and FDIPIR agencies send letters to participant households notifying them of their eligibility to receive free school meals. Parents or guardians must provide these letters to their children's schools as proof of their categorical eligibility for free school meals. Children are enrolled for free school meals based on the letter rather than a standard application.
- **Data Matching Method of Direct Certification:** SNAP, TANF, or FDIPIR records are matched against student enrollment records. Parents or guardians of children identified through the matching process are notified of their children's enrollment for free school meals and given an opportunity to decline benefits. No action is required by the parents or guardians for their children to receive free meals.

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<sup>4</sup> See *Direct Certification in the National School Lunch Program: State Implementation Progress, Report to Congress*, U.S. Department of Agriculture, Food and Nutrition Service, October 2009, Table 2, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/NSLPDirectCertification2009.pdf>.

<sup>5</sup> The same application determines eligibility for lunches and breakfasts, though not all schools that operate lunch programs offer breakfast programs.

<sup>6</sup> See 42 U.S.C. § 1758(b)(4) and (5). See Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, January 2008, p. 16, <http://www.fns.usda.gov/cnd/governance/notices/iegs/EligibilityManual.pdf>. Children also may be categorically eligible for free school meals if they are determined to be migrant, homeless, or runaway children, or if they are enrolled in the federal Head Start or Even Start programs. For these children, individual eligibility must still be established. To confer categorical eligibility, TANF cash assistance programs must use standards that are comparable to or more restrictive than those in effect on June 1, 1995. See 42 U.S.C. § 1758(b)(5)(A).

case number or they may be automatically enrolled.<sup>7</sup>

To automatically enroll children for free school meals, typically the state agency responsible for administering the public benefit programs provides a list of school-aged children enrolled in one or more of the programs to the state agency administering the school meals programs or to the school district, which uses this list to establish the children's eligibility.<sup>8</sup> This automatic enrollment process is referred to as "direct certification."<sup>9</sup> By directly certifying children from these programs for free school meals, states can avoid having multiple programs collect the same income information from families while ensuring that school meal programs reach the neediest children.<sup>10</sup>

Until 2006, direct certification was optional for states. Congress recognized the benefits offered by direct certification, however, and made direct certification based on receipt of SNAP benefits mandatory. After a three-year phase in period, school districts now are required to conduct direct certification with SNAP records.<sup>11</sup>

Under previous policies regarding the matching process for direct certification, the state or school district had to match each child individually to a public benefits case record in order to directly certify the child. A particular challenge in conducting direct certification has been successfully matching all children in a household.<sup>12</sup> A child in a household receiving SNAP benefits might not be successfully matched against a student database for a variety of reasons. For example, there might be spelling variations in a child's name, use of nicknames, or variations in the use of hyphenated names.<sup>13</sup> These matching problems led to instances in which at least one child in a family was matched and others were not. This situation was frustrating to parents and school officials.

The new USDA policy addresses this specific problem by ensuring that if one student in the household is identified as participating in a public benefit program, then the school district must, to the extent possible, extend eligibility for free school meals to all children in the household even if there is not an exact record match for each child. Because 69 percent of school-age children have

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<sup>7</sup> This paper uses the term "enroll" to describe the approval of a child to receive free meals. The school meals programs use the term "certify" instead of enroll.

<sup>8</sup> This paper uses the term "school district" to refer to the "local educational agency," which has the statutory responsibility for determining eligibility for free or reduced price meals.

<sup>9</sup> Under federal regulations, families must be notified that their children have been directly certified and must be given the option to decline free school meals. See 7 C.F.R. § 245.6(c)(6)(ii).

<sup>10</sup> The benefits of direct certification, as well as the operational details of how direct certification works, are discussed in detail in Zoë Neuberger, *Implementing Direct Certification – States and School Districts Can Help Low-Income Children Get the Free School Meals for Which They Are Eligible*, Center on Budget and Policy Priorities, August 2006, <http://www.cbpp.org/cms/?fa=view&cid=591>.

<sup>11</sup> See 42 U.S.C. § 1758(b)(4). Revisions to this section, enacted as part of the Child Nutrition and WIC Reauthorization Act of 2004, required all states to implement direct certification with SNAP phased in over a three-year period beginning with school year 2006-2007. Direct certification with TANF and FDPIR remains optional.

<sup>12</sup> For purposes of the school meals programs, a household (also referred to as a family) is defined as "a group of related or nonrelated individuals, who are not residents of an institution or boarding house, but who are living as one economic unit." 7 C.F.R. § 245.2.

<sup>13</sup> See Zoë Neuberger, *Implementing Direct Certification – States and School Districts Can Help Low-Income Children Get the Free School Meals for Which They Are Eligible*, Center on Budget and Policy Priorities, August 2006, <http://www.cbpp.org/cms/?fa=view&cid=591>.

school-age siblings at home, this policy has the potential for reaching many children who otherwise may have been missed.<sup>14</sup>

Previously, when one child in a household was directly certified but others were not, the family was required to submit a paper application for the child or children who were missed, thus undermining the paperwork savings of direct certification. The new policy will largely eliminate the need for these families to submit a paper application, thus enabling families and school districts to realize the full paperwork reduction benefit of direct certification, while at the same time reaching more eligible children.

### Implementing the New Policy

Because the 2009-2010 school year had already begun in many areas when this new policy was announced in August 2009, some school districts may not have had the opportunity to fully implement the change. In planning for the 2010-2011 school year, however, there are steps states and school districts can take to implement the new policy so that more eligible children are directly certified.

- 1. Convey Key Messages:** School districts now have a responsibility to certify all children in the household for free meals if they have knowledge that at least one household member is a recipient of SNAP, TANF cash assistance, or FDPIR benefits. By conveying not only the guidance, but the importance of this responsibility, states can encourage school districts to take the steps needed to identify all children who may now be directly certified. According to the guidance:

Beginning in School Year 2009-2010, for direct certification with SNAP, FDPIR or TANF and applications with case numbers for these programs, all children in the family, as defined in 7 CFR 245.2, are categorically eligible for free meals. To the extent possible, the local educational agency (LEA) *must extend eligibility for free meals* to all children in what would be considered a family for the purposes of applying for free or reduced price meals or free milk.<sup>15</sup> [emphasis added]

### State Policy Implementation Checklist

- Inform school districts of their responsibility to certify all children in a household when anyone in the household receives SNAP, FDPIR, or TANF cash assistance benefits.
- Revise the direct certification matching system to ensure that, once a single child is matched, all children in the household are identified, either through the student database or through the SNAP database, and directly certified.
- Encourage school districts to use any data available to them to identify and directly certify additional children in the households of individually matched children.
- As required by USDA, revise notice to parents informing them that a child has been directly certified to include directions for making other children in the household known to the school district.
- Consistent with USDA's guidance, issue policies explaining to school districts the kind of documentation that can be used to directly certify additional children in a household when reported by a parent or school official.
- Revise application materials to request a SNAP, FDPIR, or TANF case number for any member of the household (not only children) and indicate that only one case number must be provided in order to qualify all of the children in the household for free school meals.

<sup>14</sup> Center on Budget and Policy Priorities analysis of March 2009 Census data.

<sup>15</sup> See Food and Nutrition Service Memorandum, *Extending Categorical Eligibility to Additional Children in a Household*, USDA, August 27, 2009, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf).

**2. Improve the Direct Certification Matching Process:** The matching process can be revised to ensure that, once a single child is matched, all children in the household are directly certified. There are two main methods that can be used to identify additional children in the household.

- Use the *student database* to identify additional children in the household. First, the student database would be matched against the SNAP database to identify individually matched children. Then the student database would be searched to identify additional children in the households of individually matched children. Some student databases have a specific household indicator. For student databases that do not have such an indicator, the child's address could be used to identify additional children in the household. This method could be used in states that do state-level matching or district-level matching, so long as there is a way of identifying additional household members using student records.
- Use the *SNAP database* to identify additional children in the household. After individual children are matched, any additional children in the households of matched children who are known to the SNAP agency would be added to the direct certification list.<sup>16,17,18</sup> But additional children in the household who attend schools in a different district might be missed under this approach because the SNAP database may not indicate which school district a child attends or such information may not be current. Such states would need to determine which school districts should be given the names of additional children in the household. One approach would be to give those names to the district of the child with an individual match. In many instances, all children in a household attend schools in the same district. Alternatively, the names of additional children in the household could be made available to all districts (or a subset of districts, based on geographic area) so that they could look up individual children to see whether direct certification may be extended to them.<sup>19</sup>

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<sup>16</sup> In some states, making this change to the data matching process might require making a change to the agreement, required under section 9(b)(4) of the Richard B. Russell National School Lunch Act (see 42 U.S.C. 1758(b)(4)), between the agency that administers the child nutrition program and the SNAP agency.

<sup>17</sup> A minor disadvantage of using the SNAP database to identify additional children in the household is that children who are not known to the SNAP program would be missed. Such children would largely be limited to those who have recently joined the household, such as those returning from living with the other parent or a relative. It would typically be to a household's advantage to report new children in the household because with a larger household size, the family might qualify for more SNAP benefits. But it is not typically a requirement for the household to report the new member until the household's benefits are renewed (usually every six months), unless the new individual has income that could change the household's eligibility status.

<sup>18</sup> USDA has indicated that if a child has been certified for free meals based on a household member's receipt of SNAP, FDPIR, or TANF cash assistance benefits, that child cannot confer eligibility for free meals to members of another household, if, for example, the child moves to another household during the school year or spends time with the household of another parent (when parents have shared custody arrangements). (See Food and Nutrition Service Memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, questions 15 and 16, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACEP\\_11\\_SESP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACEP_11_SESP_10-2010_os.pdf).) If the child is directly certified for free meals using the SNAP database rather than the student database, it may be possible to identify the child as a recipient of SNAP benefits, in which case the child's presence in another household would extend eligibility for free meals to the other children in the additional household.

<sup>19</sup> A look-up system could actually be used for any children known to the SNAP agency who are not matched initially, regardless of whether they live with a matched child. USDA has found that states with effective direct certification systems allow school districts to look up individual students often through web-based systems. See Food and Nutrition Service, *Direct Certification in the National School Lunch Program: State Implementation Progress, Report to Congress*, USDA, October 2009, p. 26, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/NSLPDirectCertification2009.pdf>.



### **Rochester, New York Used its Point-of-Sale Software to Identify Thousands of Additional Children in Categorically Eligible Households**

The Rochester School District serves approximately 32,000 students, of which approximately 28,000 (about 87 percent) are certified for free or reduced price meals. Approximately 13,000 students were certified through the district's initial direct certification data matching process at the start of the 2009-2010 school year. When district staff found out about USDA's new policy on extending eligibility to additional children in the household, they decided to use their point-of-sale software, which automatically receives data from the district's student database to see if they could identify children who were missed in their initial data match.

In December, district staff used the software to generate a "potential household match" list. For each child who had been directly certified or approved based on a categorically eligible application (one with a case number), the software generated a list of all children with that address. School food administrators printed the list, which amounted to 800 pages, and then used the student database to check the address of each additional child to make sure that it exactly matched the address of the certified child. This process took two staff members one week to complete. In some instances, such as when the street address was the same but the apartment number was different, the additional child could not be certified. But in many cases the additional child could be certified.

In total more than 6,800 additional children were identified as eligible for free meals; 98% of these children had not been enrolled for free or reduced price meals based on a paper application and were newly certified for free meals. School district staff went through this process again in February and in April, identifying more than 350 additional children who could be certified for free meals. The district plans to utilize this process for the 2010-2011 school year, but will check for additional children before the start of the school year so that children won't miss out on free meals.

Source: Telephone interview with Sharon Colantoni, Cook Manager, Rochester City School District Meal Application Office, April 27, 2010. For more information, please contact Sharon Colantoni at [Sharon.Colantoni@RCSDK12.org](mailto:Sharon.Colantoni@RCSDK12.org).

- 3. Use Any Records Available to the District:** If a data matching system identifies at least one child in the household, school districts have an obligation to connect low-income children with free meals by using their own data to identify and directly certify additional children in the household. In lieu of records, the school district may use information provided by school officials.<sup>20</sup>

As noted above, schools district may maintain information in a student database that can be used for this purpose. But districts may have other records or information available to them. For example, districts may collect information on enrollment forms that is not included in the student database. Alternatively, point-of-sale software that is typically used for counting and claiming meals or collecting fees could be used to identify additional children in the households of individually matched children. (Rochester, New York's use of its point-of-sale system is described in the text box above.) This will be helpful if the state has difficulty improving its data matching system as described above or as a further step in ensuring that all eligible children have been identified. States should alert districts to the new policy and provide technical assistance in implementing it. The policy says:

If the LEA [local educational agency or school district] does not have an application as a reference, it may be able to use school district enrollment records to determine additional children who are part of the family who were not identified through direct certification.<sup>21</sup>

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<sup>20</sup> See Food and Nutrition Service Memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, question 10, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACFP\\_11\\_SFSP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf).

<sup>21</sup> See Food and Nutrition Service Memorandum, *Extending Categorical Eligibility to Additional Children in a Household*, USDA, August 27, 2009, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf).

**4. Notify Parents of New Policy:** Regardless of whether changes to the data matching process are made, the notice that is sent to parents alerting them that a child has been directly certified must be revised to explain how the household can report additional children. As stated by USDA, “the notice provided to families indicating that a child has been directly certified for free meals must explain how the household can report any additional children in the household who are not listed on the notice.”<sup>22</sup> This process will be most effective if the notice specifies a contact person who has the authority to directly certify additional children reported by parents.

**5. Establish a Policy for Directly Certifying Additional Children Reported by Parents:** Often school officials become aware that a child has been missed in the direct certification process because a parent alerts them that some but not all the children in the household were directly certified. Under the new policy, as noted above, parents should be encouraged to bring additional children in the household to the attention of the school or district. When this occurs, the district may directly certify the additional children without doing any additional data matching or collecting income information so long as the district documents that the children are in the same household. USDA has indicated that in these instances the forms of acceptable documentation include any of the following:<sup>23</sup>

- A statement signed by an adult member of the household that includes a list of all household members and the attestation statement from the free and reduced price meals application.<sup>24</sup>
- A free and reduced price school meals application that lists all household members and is signed by an adult household member. Such applications, used only to document extension of direct certification to additional children in the household, are not included in the verification pool and may not be selected for verification.<sup>25</sup>
- A notation in other records, such as a student database or roster, indicating that direct certification has been extended to the child.

USDA also indicates that direct certification or categorical eligibility may be extended based on “information from school officials such as principals or teachers” but USDA has not specified the kind of documentation needed in these instances.<sup>26</sup> Presumably a notation in of the individual providing the information in the school’s or district’s records would suffice.

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<sup>22</sup> Food and Nutrition Service Memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, question 2, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACFP\\_11\\_SFSP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf).

<sup>23</sup> *Ibid.*, question 17.

<sup>24</sup> On USDA’s model application, this attestation states, “I certify (promise) that all information on this application is true and that all income is reported. I understand that the school will get Federal funds based on the information I give. I understand that school officials may verify (check) the information. I understand that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted.” Food and Nutrition Service, *Free and Reduced Price School Meals Application and Verification Forms*, USDA, [http://www.fns.usda.gov/cnd/frp/2010\\_application.pdf](http://www.fns.usda.gov/cnd/frp/2010_application.pdf).

<sup>25</sup> Food and Nutrition Service Memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, question 24, [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACFP\\_11\\_SFSP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf).

<sup>26</sup> *Ibid.*, question 10.

## 6. Revise Application

**Materials:** Under the revised policy, if a household provides a SNAP, TANF cash assistance, or FDPIR case number for any household member on a school meals application, all children in the household must be certified for free school meals. As direct certification becomes more effective, there should be fewer paper applications with case numbers. Nonetheless, revising applications to reflect the new policy will ensure that families are aware of the change and are not asked for unnecessary information.

TANF cash assistance, or FDPIR case number for any household member on a school meals application, all children in the household must be certified for free school meals. As direct certification becomes more effective, there should be fewer paper applications with case numbers. Nonetheless, revising applications to reflect the new policy will ensure that families are aware of the change and are not asked for unnecessary information.

USDA has encouraged school districts to “revise school meal applications to indicate that providing a single case number for any member of the household will establish eligibility for all children in the family.”<sup>27</sup> USDA has also revised its model application in this manner.<sup>28</sup> Currently, most school meals applications ask only for case numbers for children. Therefore, applications should be modified to allow submission of a case number for any member of the household, not only for children. Revised applications should also note that if a parent lists a case number for any member of the household, no case numbers, income information, or Social Security numbers for any other household members need to be provided. To reflect this change, the request for the Social Security number of the adult completing the application or an indication that the adult does not have one, which often appears next to the signature line, could be moved to the section that requests income information.

States should revise model applications and instructions and alert school districts that they must follow the new USDA policy, which says:

### Acceptable Forms of Documentation for Extending Eligibility to Additional Children in the Household

- **SNAP, FDPIR, or TANF data:** States or school districts can reprogram their data matching process to identify all children in the household of a child who is matched so that eligibility may be extended to these children.
- **School district records:** School districts may use any records available to them as the basis for extending eligibility, including enrollment records or records in point-of-sale software.
- **School meals application:** An application with a case number for any household member is sufficient documentation to certify all children in the household as categorically eligible for free meals.
- **Information from school officials:** Information provided by a principal, teacher, or other school official is sufficient documentation to certify all children in the household.
- **Parent attestation:** A signed statement or meal application that lists all members of the household may be used as the basis for extending eligibility to all children in the household.
- **Other documents:** School districts may rely on legal documents that are available to them, such as custody agreements, as the basis for extending eligibility.

<sup>27</sup> *Ibid.*, question 6.

<sup>28</sup> Food and Nutrition Service, *Free and Reduced Price School Meals Application and Verification Forms*, USDA, [http://www.fns.usda.gov/cnd/frp/2010\\_application.pdf](http://www.fns.usda.gov/cnd/frp/2010_application.pdf).



For households submitting applications with case numbers for some, but not all, of their children, the LEA must certify all children as categorically eligible for free meals or milk. Any income information on the application is disregarded. Further, for purposes of carry-over into the new school year, categorical eligibility must, to the extent feasible, be extended to newly enrolled siblings.<sup>29</sup>

## **Household Eligibility Can Make Direct Certification More Successful**

While the number of school districts directly certifying children based on SNAP receipt has grown significantly over the past several years, USDA data indicate a wide variance among states in the percentage of children in households receiving SNAP benefits who were directly certified for free school meals. States with the highest rates certified nearly all such children, while the least successful states certified less than 50 percent of those children.<sup>30</sup> (See Appendix A.) Although many children who are missed in the direct certification process are ultimately enrolled based on a paper application, USDA has found that eligible children are more likely to receive free school meals if the direct certification system in their state performed well.<sup>31</sup>

This new policy provides all states the opportunity to directly certify children who otherwise may have missed out on free meals and can prevent eligible families from accumulating school meal charges. For example, in its 2009 report to Congress on direct certification, USDA noted that Iowa has been effective in increasing the number of children in households receiving SNAP benefits directly certified for free school meals (prior to the policy change discussed in this paper). In Iowa, the SNAP agency provided the names of siblings who were matched in the direct certification process to each district receiving the name of a matched child in the household. Districts were encouraged to search for these children in the student databases and directly certify them.<sup>32</sup> In this case, the state educational and SNAP agencies are working together to ensure that school districts are aware of children who are eligible for direct certification.

States that have had trouble matching all children in a household will likely see significant benefits from this policy change. In addition, areas with large immigrant communities are likely to benefit from this policy change. Legal immigrants face numerous eligibility restrictions in the SNAP and TANF cash assistance programs even if their household income is low enough to qualify for these programs. As a result, some members of a mixed immigration status household may be enrolled for public benefits while others are not. This policy change will make it easier for school districts to simply and automatically connect all eligible children in immigrant households to free school meals.

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<sup>29</sup> Food and Nutrition Service Memorandum, *Extending Categorical Eligibility to Additional Children in a Household*, USDA, August 27, 2009, [http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP\\_38-2009\\_os.pdf](http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf)

<sup>30</sup> See *Direct Certification in the National School Lunch Program: State Implementation Progress, Report to Congress*, U.S. Department of Agriculture, Food and Nutrition Service, October 2009, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/NSLPDirectCertification2009.pdf>.

<sup>31</sup> *Ibid.*

<sup>32</sup> *Ibid.*, p. 26. These strategies also could be applied by the agencies administering TANF cash assistance and FDPIR.

## Conclusion

The new federal policy discussed here offers an important opportunity for states and school districts to automatically enroll more eligible children for free school meals. An estimated 2.5 million children who could have been automatically enrolled were missed last year.<sup>33</sup> Some of these children were ultimately enrolled based on a duplicative paper application, but others missed out on free school meals all together. Many of the children who were missed lived in households with other children who were automatically enrolled.

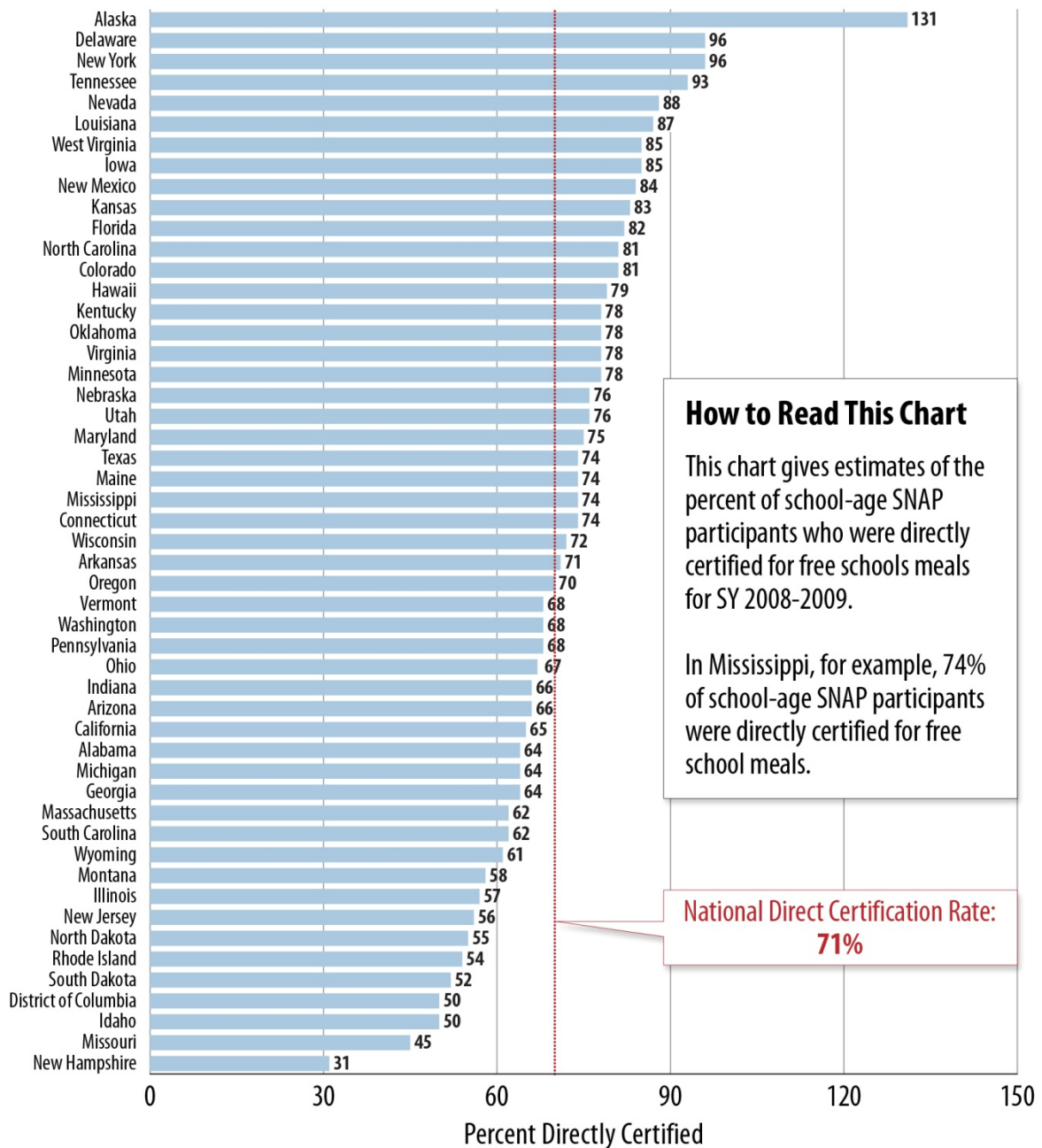
USDA's new policy will make it significantly easier for states and school districts to automatically enroll *all* children in the household. Information about other children in the household may be obtained in a number of ways. In planning for the 2010-2011 school year, it is important that states and school districts develop processes to identify and certify these children in order to increase access to school meals for low-income children and to streamline administrative procedures for families and school districts.

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<sup>33</sup> *Ibid.*, Table 2.

## Appendix A:

### Percentage of Children Eligible for Direct Certification Based on Receipt of SNAP Benefits Who Are Directly Certified for Free School Meals (2008-2009 School Year)



Note: It is possible for states to directly certify more than 100 percent of school-age children eligible for direct certification based on SNAP receipt because some children were directly certified based on receipt of TANF cash assistance or FDIPIR benefits. These children were counted in the numerator of this measure, but the denominator included only children eligible for direct certification based on receipt of SNAP benefits.

Source: *Direct Certification in the National School Lunch Program: State Implementation Progress, Report to Congress*, U.S. Department of Agriculture, Food and Nutrition Service, October 2009, Figure 4, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/NSLPDirectCertification2009.pdf>.