

2017-2018 Direct Certification and Verification Timelines

08/08/2017

Version 6.0.0

DIRECT CERTIFICATION AND VERIFICATION TIME LINES

Direct Certification and Verification processes determine children’s eligibility for meals benefits based on documentation obtained directly from the appropriate State or local agency or other authorized individual using a computer/electronic match between the Assistance Programs and/or the State or Local Education Agency (LEA). In most situations, direct certification of a child’s eligibility status should not involve the household. The State Agency provides a portion of the direct certification information to the LEA/school through the Child Nutrition Program (CNP) system. No application is necessary if eligibility for the National School Lunch Programs (NSLP) is determined through the direct certification process. The purpose of this document is to inform SFAs of the DC matching process; the programs used to qualify students for free and reduced priced meals, verification, and the time line for activities that must be completed by public and nonpublic schools throughout the school year.

Beginning in the 2016-17 SY, Direct Certification with Medicaid will direct certify students for both free and reduced priced meal eligibility.

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DIRECT CERTIFICATION OVERVIEW

Children identified on the direct certification list can participate in more than one program to receive meal benefits.

Use the table below to determine what program qualifies the student for free or reduced priced meals, matching level, electronic matching frequency, household eligibility extension, affect on Identified Student Percentage (ISP) for the Community Eligibility Provision (CEP), and additional information. The table denotes the reporting priorities for the Direct Certification programs. **SNAP supersedes all other programs.** For example, an LEA staff member would update a child’s record in the local Student Information System (SIS) as receiving free meals with SNAP if the child’s record in the direct certification list displays S T M-F. Another example, an LEA staff member would update a child’s record in the local Student Information System (SIS) as receiving free meals with Foster Child if child’s record in the direct certification list displays C M-F.

Program Description (The programs are listed in the order of reporting)	Denoted Value in CNP System	State (S) or LEA (L) Matching	Electronic Matching in CNP System (Frequency)	Eligibility extended to Household?	Applied to ISP for CEP?	Additional Information (see below)
Supplemental Nutrition Assistance Program (SNAP)	S	S	Y (nightly)	Y	Y	A
Temporary Assistance For Needy Families (TANF)	T	S	Y (nightly)	Y	Y	B
Food Distribution Program on Indian Reservations (FDPIR)		L	N	Y	Y	B
Foster Child	C	S	Y (nightly)	N	Y	C
Migrant		L	N	N	Y	D
Homeless/Runaway		L	N	N	Y	D
HeadStart/EvenStart		L	N	N	Y	D
Medicaid - Free	M-F	S	Y (nightly)	Y	Y	E
*Medicaid - Reduced	M-R	S	Y (nightly)	Y	N	E

* As part of the assurance for the demonstration project: If a student’s record is reported with **only the “M-R” value** on the directly certified list in the CNP system, then these households must receive a notification letter. If parent(s) or guardian(s) think the household may qualify for free meals based on household size and income, they may complete an application. (All households must be notified of eligibility for both free and reduced meal benefit.)

- A child is considered directly certified if the student appears on the direct certification list or is associated with a household of a student on the direct certification list. Students are not reported in 3-2 section of the Verification report if an LEA accepts a SNAP notification letter from a household or an application with the appropriate case number. LEA staff conducts the household match.
- A child is considered directly certified if the student appears on the direct certification list, is associated with household of a student on the direct certification list, or provides a notification letter. LEA staff conducts the household match.
- A child who is formally placed by a court or a State child welfare agency meets the Other Source Categorically Eligible designation. This definition does not apply to informal arrangements or permanent guardianship placements that may exist outside of State or court-based systems.
- Categorical eligibility must be confirmed through documentation prior to certifying the child’s eligibility for free meals. Direct certification for these programs may also be conducted using lists of

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eligible participants provided to the State or LEA from appropriate officials from the Direct Certification from Other Source Categorically Eligible Programs. Letters provided by such programs to eligible participants may also be used for direct certification.

E. Review the “**MEDICAID KEY DEMONSTRATION POLICIES**” section, on page 4, of this document.

DIRECT CERTIFICATION WITH MEDICAID DEMONSTRATION PROJECT

The Demonstration Project has the potential to improve student access to school meals, reduce administrative burden for schools and LEAs, and improve certification accuracy in the NSLP and School Breakfast Program (SBP). The USDA Food and Nutrition Service (FNS) is conducting an administrative pilot with states to directly certify students for both free and reduced price meal eligibility under the authority of Section 18(c) of the Richard B. Russell National School Lunch Act (NSLA), beginning in school year (SY) 2016-2017. In addition, FNS will assess the impact of recent changes in the Medicaid eligibility determination process, as implemented in January 2014, on the ability of State agencies to identify and directly certify children eligible for free and reduced price meals.

Medicaid Program

The program of medical assistance was established under Title XIX of the Social Security Act (SSA, 42 U.S.C 1396 et seq). This definition encompasses both regular and expanded Medicaid programs where States have used funding from Title XXI of the SSA to fund Medicaid expansions to reach children in families with higher incomes.

Eligible Child

For the purpose of these demonstrations, an eligible child is one who—

- receives, or lives in the household (as defined in 7 CFR 245.2) with a child who receives, medical assistance under the Medicaid program; and
- is a member of a family with an income, as measured by Medicaid, *before the application of any expense, block or disregard* (as defined in paragraph 3 below) that does not exceed the NSLP’s family income eligibility standards—
 - *Free school meal eligibility*, 130 percent of the Federal Poverty Level (FPL) for the family size used by Medicaid;
 - *Reduced price school meal eligibility*, 185 percent of the FPL for the family size used by Medicaid.

Family income as measured by Medicaid, before the application of any expense, block, or other disregard

Under the 2014 Medicaid changes, household policies and the methodology for measuring family income became consistent nationwide for most Medicaid categories. Household income for most categories covering children is defined as the sum of the Modified Adjusted Gross Income (MAGI) for every individual included in the child’s household, as determined for Medicaid eligibility purposes. However, a few Medicaid categories serving school age children still use the policies in place prior to 2014 for determining family income, such as categories for certain disabled children. Medicaid program will be referred to as the “MAGI” or “non-MAGI” categories.

- **MAGI categories:** For the Medicaid categories where the MAGI calculations for household income apply, all States follow the same disregard policy—a five percent of FPL disregard is applied for the applicable family size only if household income before the disregard is greater than the highest applicable income standard. States are not allowed to apply any other expense, block or disregard to the final calculated MAGI income amount. For the purpose of the direct certification

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demonstrations, “family income, as measured by Medicaid, before the application of any expense, block or disregard” is defined as the MAGI calculated amount for the family before application of the five percent of FPL disregard.

- **Non-MAGI categories:** For the non-MAGI categories, States still use the pre-2014 family income calculation rules where expenses, blocks and disregards still vary by State. For these categories that involve very few children, “family income as measured by Medicaid, before the application of any expense, block or disregard” is defined basically as the family’s gross income before the State applies any expense, block, or other disregard to reduce the family income.

MEDICAID KEY DEMONSTRATION POLICIES

For the school year beginning July 1, 2016, and each subsequent school year, LEAs participating in the demonstration projects will directly certify eligible children, as defined in *Section C - Definitions*, for free and reduced price lunches and breakfasts under section 9(a)(1)(A) of the NSLA and section 4(e)(1)(A) of the Child Nutrition Act of 1966. It is important for State agencies and LEAs to understand the following key policies and procedural requirements during the demonstrations.

1. Under the new demonstrations, participating States must conduct direct certification for **both free and reduced price meals** in every LEA participating in the project.
2. Households with eligible children directly certified for **free or reduced price meals** based on Medicaid data will not be required to submit applications for school meal benefits and will not be subject to the verification requirements at 7 CFR 245.6a.
3. Due to differences in household definition and income assessments between programs, some children **directly certified for reduced price meals** through Medicaid matches may have been eligible for free meals if the household had applied. Demonstration States must ensure that households with children directly certified for reduced price meals receive notice of the income level used. If parent(s) or guardian(s) think the household may qualify for free meals based on household size and income, they may complete an application.
4. Children meeting the “eligible child” definition for free school meal eligibility under the demonstrations with Medicaid are **not** considered categorically eligible for free school meals since they must meet an income standard as a factor of eligibility. Under the demonstrations, children may be directly certified **only** via an automated data matching process with Medicaid eligibility records. Children **must not** be certified based on the family providing a Medicaid case number or a letter from the Medicaid agency. Also, remember that categorical eligibility policies do not apply to certification for reduced priced meals under any circumstances.
5. Students already certified for **free or reduced price meals** based on direct certification or an application must not be negatively impacted by the match with Medicaid data. States that choose to apply for demonstrations to directly certify children for **free and reduced price meals** must build in safeguards at both the State and LEA/local levels to ensure that—
 - children **already certified for free meals** through the application process or directly certified for free meals through other means-tested programs or other conditions (foster care, migrants, runaways, homeless, etc.) are not changed from free to reduced price or full price meals based on the Medicaid match; and

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- children already certified for reduced price meals through the application process are not changed to full price meals based on the Medicaid match.
6. Increasing the number of direct certifications for free school meals via matching with Medicaid has a direct impact on a school's/district's identified student percentage (ISP) under the Community Eligibility Provision (CEP). However, direct certifications for reduced price meals will not impact the ISP, since the ISP is the percentage of students certified for free meals without an application.
 7. Most children receiving Medicaid and having family income at or below 130 percent of the FPL standard also receive Supplemental Nutrition Assistance Program (SNAP) and/or Temporary Assistance for Needy Families (TANF) benefits, as well as other program benefits that convey eligibility to be directly certified for free school meals. In collecting data for Federal reporting, direct certifications/matches should be identified as Medicaid only when the child is not already directly certified/matched based on receipt of benefits in another program. For example, if a child is already directly certified for free meals through SNAP data and then is identified as eligible to be directly certified based on Medicaid data, the SNAP direct certification takes precedence for reporting purposes and should not be re-categorized as a Medicaid match.

DIRECT CERTIFICATION LIST IN THE CNP SYSTEM

Participating public and nonpublic schools must submit a current "membership list" including grade levels for PK-12 students a minimum of three times a year (August 31 or start of the school year, October 31, and February 28). The list of enrolled students matched to individuals from the Nebraska Department of Health and Human Services (DHHS) is called the Direct Certification list. The DHHS's list of individuals includes SNAP, TANF, Foster Children, and Medicaid –Free and Reduced. LEAs/Districts may view the Direct Certification list by logging into the CNP system. Under the "Application" menu, the Direct Certification list is found in the "View Direct Certification" item under "Direct Certification".

DIRECT VERIFICATION

Direct Verification means using public records as a means to verify children's eligibility for free/reduced price meals. Direct verification may be conducted with SNAP, TANF, or FDPIR agencies or appropriate officials in programs represented in Other Source Categorically Eligible Programs to confirm eligibility for free meals. LEA may use the Direct Verification feature in the CNP system to determine if an individual on application qualifies for SNAP, TANF, Foster Children, and Medicaid/SCHIP by uploading a CSV file or entering individual information.

DIRECT CERTIFICATION AND VERIFICATION CALENDAR DEFINITIONS

DEADLINE DATES means the date when the activity is due.

ACTIVITY refers to Direct Certification or Verification tasks that need to be completed by the due date.

WHAT identifies the information or data required to complete the activity.

HOW identifies how the activity can be completed.

MATCHING SYSTEM is the tool used to generate the results to assist the district/systems to complete the activity by the deadline dates. The matching system uses data from the district/system for each activity during specified time frame.

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DIRECT CERTIFICATION AND VERIFICATION CALENDAR

(Gray shaded rows denote Verification activities for the Verification report)

Deadline Dates	Activity	What	How	Technology System
7/1/20XX	Direct Certification	Start of the new program year. DC list is available for new program year.	Review the direct certification list and possible match list. Staff may enter the information into the Single Student Interactive Screen for students not appearing on the list from last year. Send notification letters to households of students who qualify for free or reduced priced meals.	Uniq-ID and NSSRS (Direct Certification): July 1, 20XX to August 1, 20XX, the student data are students from the previous SY Colyar (Direct Certification): July 1, 20XX to August 30, 20XX, the student data are students from the current SY
30 operating days (beginning with the first day of school)	Direct Certification	Students eligibility for meal benefit extends from the previous School Year (SY)	Eligibility for meal benefits from the prior year carryovers for up to 30 operating days (beginning with the first operating day of school) into the current school year or until a new eligibility determination is made, either approved or denied. The new eligibility determination supersedes the carryover eligibility.	
8/15/20XX	Direct Certification	Submit NSLP CNP online Application renewal opens July 1, 20XX for the current SY.	LEA Staff must update the LEA's Program and Site application(s). Claims for reimbursement can not be paid without an approved application.	
8/31/20XX – 9/15/20XX	Direct Certification	Enter or upload a student roster of all students to NDE either for the current SY.	LEA Staff can enter students using one of four methods listed below: <ul style="list-style-type: none"> • Upload/enter student in e-Scholar® Uniq-ID (Nonpublic) • Upload student in NDE Nebraska Student and Staff Record System (NSSRS) (Public) • Enter Students into Single Student Interactive Screen (SSIS) (Nonpublic and Public) • Upload .csv file to the Colyar® Child Nutrition Program (CNP) (Nonpublic and Public) 	

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Deadline Dates	Activity	What	How	Technology System
10/1/20XX	Verification	<p>Pull approved applications for the current SY</p> <p>Verification not required for</p> <ul style="list-style-type: none"> • Schools participating in CEP or schools participating in Provision 1, 2, 3 for both breakfast and lunch. • Students certified under the direct certification procedures. <p>Please review the Eligibility Manual for School Meals for Verification.</p>	<p>The verification sample pool as of Oct 1.</p> <ul style="list-style-type: none"> • Sample pool is based on the number of approved applications (paper or electronic) and is not based on the number of children eligible for free and reduced priced meals. • At least one approved application must be verified. • Determine the sample size: <ul style="list-style-type: none"> <input type="checkbox"/> Standard (Lesser of 3% or 3,000 error-prone) <input type="checkbox"/> Alternate one (Lesser of 3% or 3,000 selected randomly) <input type="checkbox"/> Alternate two (Lesser of 1% or 1,000 error prone applications PLUS lesser of one-half of one percent or 500 applications with SNAP/TANF/FDPIR case numbers) • When calculating the sample size, all fractions or decimals are rounded upward to the nearest whole number. • Determine verification method <ul style="list-style-type: none"> <input type="checkbox"/> Direct Verification – LEA contacts public agencies to verify income or program participation prior to contacting the household for documentation. <ul style="list-style-type: none"> ○ Enter Students into Single Student Verification screen ○ Upload .csv file in CNP system. Under the ‘Application’ menu, click on the ‘Direct Verification’ item. <input type="checkbox"/> Notification to Household - Written Evidence, such as, pay studs with dates from employers or award letters from welfare departments, collateral contacts, or support payment decrees from courts). 	<p>UniqID and NSSRS (Direct Certification): August 1, 20XX to November 15, 20XX, the student data are students from the current SY then students previous SY if a student is not found in current student roster.</p>

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Deadline Dates	Activity	What	How	Technology System
10/31/20XX	Direct Certification	Enter students who Transfer In	LEA Staff can enter students using one of four methods listed below: <ul style="list-style-type: none"> • Upload/enter students in e-Scholar® Uniq-ID (Nonpublic) • Upload students in NDE NSSRS (Public) • Enter Students into SSIS (Nonpublic and Public) • Upload .csv file to the Colyar® CNP (Nonpublic and Public) 	
11/15/20XX	Verification Reporting	Submit the results of the Sampling (3%) of approved applications and Direct Certification process	Complete the Annual Verification Report (FNS 742) Summary. <ul style="list-style-type: none"> <input type="checkbox"/> Collect data from Verification process based on Oct 1 sampling pool <ul style="list-style-type: none"> • Verification – Letter sent to Households • Direct Verification - Enter or submit data in the CNP system. Match occurs with Direct Certification, SNAP, TANF, Foster Children, Medicaid, and SCHIP. <input type="checkbox"/> Collect data from Direct Certification process and household matches based on Oct 31 list date. Please review the “SNP Verification Report” training video: https://www.education.ne.gov/ns/training/nslp_alltraining.html	Colyar (Direct Verification): October 1, 20XX to November 15, 20XX, the district/system submits applications.
2/28/20XX+1	Direct Certification	Enter students who Transfer In	LEA Staff can enter students using one of four methods listed below: <ul style="list-style-type: none"> • Upload/enter students in e-Scholar® Uniq-ID (Nonpublic) • Upload students in NDE NSSRS (Public) • Enter Students into SSIS (Nonpublic and Public) • Upload .csv file to the Colyar® CNP (Nonpublic and Public) State Agency uses data to complete and post the Community Eligibility Provision (CEP) Annual Notification report located at: https://www.education.ne.gov/ns/NSLP/CEP/CEP.html	UniqID and NSSRS (Direct Certification): November 16, 20XX to June 30, 20XX+1, the student roster are students from the current SY.

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RESOURCES

Eligibility Manual for School Meals

<https://www.education.ne.gov/ns/forms/nslpforms/Attachments/Elibility%20Manual.pdf>

Direct Certification Instructions

<https://www.education.ne.gov/ns/forms/nslpforms/DirectCert.html>

School Lunch Training, Bookkeeper PowerPoint Videos, Foodservice Training

http://www.education.ne.gov/ns/training/NSLP_Training/SchMealTrain/School%20Meals.html

Application – Income Eligibility Forms and Resource Center

<http://www.education.ne.gov/ns/forms/nslpforms/FreeReducedApp.html>

Colyar® Child Nutrition Program (CNP)

<https://nutrition.education.ne.gov/>

If you have other question about the NSLP, please contact (800) 731-2233 (Nebraska Only) or nde.nsweb@nebraska.gov. If you are in Lincoln, please call (402) 471-2488.

If you need access to the e-Scholar® Uniq-ID, please contact the NDE Help Desk at (888) 285-0556 or nde.helpdesk@nebraska.gov. If you are in Lincoln, please call (402) 471-3151.