

Access to Good Nutrition: Connecting Low-Income Children to Free School Meals with Direct Certification August 2009, Executive Summary



NYS can and should improve direct certification methods to ensure that needy children are eligible for free school meals.

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Under federal law, children living in households enrolled in the Food Stamp Program (FSP) and/or Temporary Assistance to Needy Families (TANF) are automatically eligible to eat free breakfast and lunch at school. These children are identified as 'categorically eligible' for free school meals. In general, children from low-income households are required to submit an application to the school district for free or reduced-price school meals. However, categorically eligible children are *not* required to submit further application for free school meals. Instead, these low-income children are eligible and qualify for free school meals through a 'direct certification' process.

June 2010

States may implement direct certification in various ways. NYS uses the letter method, in which households with categorically eligible children are mailed a 'direct certification letter' stating a child's eligibility for free school meals. The household *must submit* the letter to the school district in order to confirm eligibility and qualify for free school meals. **NYS should stop using the inefficient and laborious letter method. Instead, NYS should adopt a paperless, centralized, and state level data matching method for direct certification that does not rely on household response to confirm a child's eligibility for free school meals.**

NYS' letter method has tremendous limitations and disadvantages:

- Letters mailed to households with categorically eligible children are not always submitted to school districts (they are perceived as notification only).
- Letters are costly to produce/mail.
- Households with categorically eligible children are still completing unnecessary free and reduced-price meal applications. In NYS, 30% of all categorically eligible qualified for free school meals are completing a free and reduced-price meal application when they should have submitted their direct certification letter.*
- Of all direct certification methods, letters have the lowest efficacy rate. Of the six lowest performing states to directly certify children, four of them used the letter method.**

State level data matching is an effective and efficient method of directly certifying categorically eligible children for free school meals. State level data matching identifies a significantly higher number of categorically eligible children than the other methods of direct certification.

NYS can and should adopt a single, centralized, and state level direct certification method to: reduce burdens on school districts and households; implement cost saving measures; utilize paperless technology; and most of all, ensure that more low-income children have access to free nutrition at school on a consistent basis.



*USDA, 2009, **USDA, 2007

*"A lot of parents do not read the instructions and assume that we (food service staff) are receiving the same letter and do not turn them in."
- food service director*

*"It would be awesome if we were sent a list of those students that qualify from the state or local agencies involved with this process...with today's technology there has to be a better way."
- food service director*



Benefits of Eliminating the Letter Method and Adopting State Level Data Matching in NYS:

- **Saves school district staff resources:** State level data matching is a way to immediately identify children for free meals. It eliminates the time school districts have to wait for households to submit direct certification letters. It requires less staff time than processing unnecessary free and reduced-price meal applications submitted by categorically eligible children.
- **Costs administering agencies less money:** In states that upgraded from letters to state level data matching, direct certification-related costs were reduced to one-third or one-quarter annually. While there are initial costs attributed to adopting state level data matching, the USDA has issued grants to cover costs of establishing and/or improving data matching methods.
- **Reduces paperwork:** By upgrading to data matching, state administering agencies do not have to generate and mail large amounts of direct certification letters, school districts have significantly less letters and applications to process and store, and parents/adult caregivers do not need to undertake additional action of submitting their letter to the school district.
- **Allows school districts to draw down more meal reimbursements as soon as possible:** When school districts have access to electronic lists of categorically eligible children before the school year, they are able to immediately identify categorically eligible children. This means that the school district is able to start claiming meal reimbursements when serving meals to categorically eligible children at the beginning of the school year. School districts do not have to wait for submitted direct certification letters (if they are submitted at all).
- **Promotes program accuracy and integrity:** Data matching is highly accurate. When a child is directly certified through data matching, the child is rarely ineligible for free meals. For, these households have already completed a rigorous and extensive means-tested process to qualify for food stamps and/or TANF.
- **Builds upon individual school districts' data matching:** Some schools in NYS are already conducting data on their own. Adopting a standard, statewide process would ensure all needy children in districts throughout NYS are reached.

Recommendations for Direct Certification in NYS

Eliminate the Direct Certification Letter: NYS should end using the letter method for direct certification, as the paperwork is burdensome to both school districts and households. In addition, letters are costly to print and mail for state administering agencies.

Adopt State Level Electronic Data Matching: Relevant NYS administering agencies should use statewide databases to identify children from households enrolled in certain types of public assistance to automatically qualify these children for free school meals. State level data matching should occur at multiple times throughout the school year.

Support Data Matching Techniques that Identify More Eligible Children: Computer matching processes should successfully match children regardless of name misspellings in databases or typos in computer entries, and should capture siblings of matched children (since they are often also eligible for free school meals). To capture children who may have enrolled in the FSP/TANF/FDPIR mid-school year, school districts should be able to access a periodically updated list of categorically eligible children throughout the school year.

Provide Funds for Related Equipment and Training for Implementation: School districts should be financially supported for starting and implementing new methods of direct certification (with grants for software upgrades and/or technological equipment), if needed. In addition, school district employees such as food service directors and school business administrators should be trained on how to operate and access lists of directly certified students.

To access the full report online, please visit:
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