

Determining Eligibility in the School Nutrition Programs and Summer Food Service Program

**Module 3:
Direct Certification**

Connecticut State Department of Education
Bureau of Child Nutrition Programs
September 2023

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Training Modules

- Module 1 Introduction to Application Certification and Verification
- Module 2 Processing Applications
- Module 3 Direct Certification
- Module 4 Test Your Knowledge About Processing Applications
- Module 5 Confidentiality and Disclosure
- Module 6 Verification
- Module 7 Completing the FNS 742 Verification Summary Report

<https://portal.ct.gov/SDE/Nutrition/Eligibility-for-Free-and-Reduced-price-Meals-and-Free-Milk-in-School-Nutrition-Programs/Related-Resources>

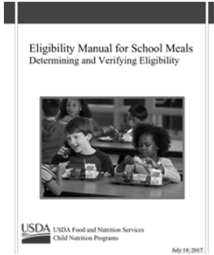
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USDA Resource

USDA's Eligibility Manual for School Meals

Last revision:
July 18, 2017



https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/FreeRed/USDA_eligibility_manual.pdf

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Module Topics

- Common acronyms and abbreviations
- Introduction to Direct Certification (DC)
- Types of DC
- Hierarchy of eligibility
- CSDE's DC Web Application
- Important considerations
- Foster children
- Quiz: DC or Not DC
- Records retention

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Common Acronyms and Abbreviations



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Common Acronyms and Abbreviations

- CEP = Community Eligibility Provision
- DO = determining official
- DSS = Connecticut Department of Social Services
- HH = household
- LEA = local educational agency
- PSIS = Public School Information System
- SNAP = Supplemental Nutrition Assistance Program
- SY = school year
- TFA = Temporary Family Assistance

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Common Acronyms and Abbreviations for Determining Eligibility in the School Nutrition Programs and Summer Food Service Program

Common Acronyms and Abbreviations in School Nutrition Programs			
0101	Administrative Services Division	0101	ADAP
0102	Department of Children and Families	0102	Administrative Services Division
0103	Department of Education	0103	Department of Health Services
0104	Department of Economic Development	0104	Department of Public Safety
0105	Department of Environmental Protection	0105	Department of Transportation
0106	Department of Health Services	0106	Department of Veterans Affairs
0107	Department of Labor	0107	Department of Workforce Development
0108	Department of Social Services	0108	Department of Youth Services
0109	Department of Transportation	0109	Department of Youth Services
0110	Department of Veterans Affairs	0110	Department of Youth Services
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https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Acronyms_Abbreviations_Determining_Eligibility_SNP_SFSP.pdf

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Introduction to Direct Certification

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Direct Certification

The process of determining children eligible for free or reduced-price meals or free milk based on documentation obtained directly from appropriate state or local agencies or other authorized individuals

Should not involve HH



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Directly Certified Children

- Not required to submit application
- Not selected for verification
- Eligible for free or reduced-price benefits for entire SY




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Categorical Eligibility

A child is automatically eligible for free or reduced-price meals or free milk

Terms to Know



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Two Situations Confer Categorical Eligibility

1. Child or another HH member receives assistance program benefits

- SNAP
- TFA

Free benefits extend to all children in HH


2. Child determined individually eligible through Other Source Categorical Eligible designation

- Application process
- DC

Free benefits do not extend to other children in HH

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Other Source Categorical Eligibility

1. Children enrolled in federal Head Start Program or state-funded pre-kindergarten with identical or more stringent eligibility criteria than Head Start
2. Homeless or runaway children
3. Foster children

Terms to Know

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Other Source Categorical Eligibility

- Homeless, runaway, or Head Start children are other source categorically eligible
 - Considered directly certified if officials of these programs provide lists of eligible participants
 - Free eligibility does not extend to other children in HH

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Other Source Categorical Eligibility

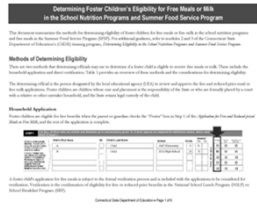
Child's status	DO must confirm child's status
Homeless	Yes
Runaway	Yes
Head Start	Yes
Foster	No

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Determining Foster Children's Eligibility for Free Meals or Milk in the School Nutrition Programs and Summer Food Service Program



https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/FreeRed/Foster_Children_Eligibility_SNP_SFSP.pdf

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Mixed Households

Households that include children who are Other Source Categorical Eligible and children who are not


Same HH could have two different eligibility determinations

Terms to Know

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Types of Direct Certification



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Five Types of Direct Certification for Students

1. CSDE's DC list
2. List of LEA's foster children
3. List of LEA's homeless or runaway students
3. List of LEA's students enrolled in Head Start students (or state-funded program with more stringent income requirements)
3. Eligible for Medicaid on CSDE's DC List

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DC Method 1: CSDE's DC List

Code	Student's status	Extension of eligibility
FS	SNAP benefits	Free: all children in HH
AF	Temporary Family Assistance (TFA) benefits	Free: all children in HH
OT (Other)	Foster child *	None


* Does not include homeless, runaway, and Head Start

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DC Method 2: List of LEA's Homeless or Runaway Students

- Must be signed and dated by LEA's homeless liaison
- May receive list by secure email
- Set up communication process between homeless liaison and DO to identify homeless students

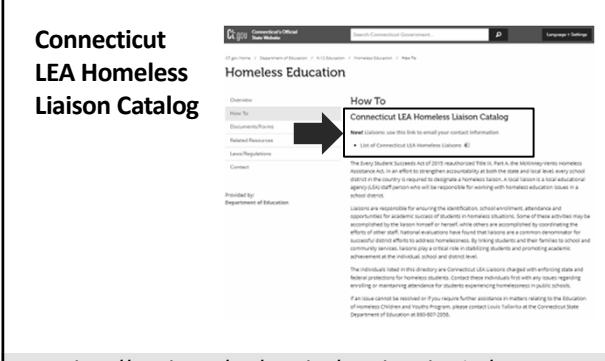


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Connecticut LEA Homeless Liaison Catalog



<https://portal.ct.gov/SDE/Homeless/Homeless-Education/How-To>

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DC Method 3: List of students enrolled in Head Start or state-funded program with more stringent income requirements

- Must be signed and dated by director of LEA's federally funded Head Start Program/ other state-funded program
- May send by secure email

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DC Method 4: LEA's List of Foster Children

- Must be signed and dated by LEA's foster care point of contact
- Not subject to verification
- Free benefits do not extend to other children in HH

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DC Method 5: Eligible for Medicaid on CSDE's DC List

- Directly certifies children for free or reduced-price meals and free milk

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Medicaid Eligible Students

Student's code on DC list	Benefits
FM – Free Medicaid	<ul style="list-style-type: none"> • Free eligibility • Extends to all children in HH
RM – Reduced Medicaid	<ul style="list-style-type: none"> • Reduced-price eligibility • Extends to all children in HH

Must track different codes for verification and audit purposes

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Reduced-price Eligibility through Medicaid

- Could also be eligible for free meals through HH application
- Reduced Medicaid status cannot negatively impact eligibility if determined free eligible
- Determination of free eligible supersedes reduced Medicaid

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Medicaid and Community Eligibility Provision (CEP)

Medicaid students	Count toward CEP identified student percentage (ISP)
Free	Yes
Reduced	No

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Considerations for Direct Certification with Medicaid

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/DirectCert/Considerations_Direct_Certification_Medicaid.pdf

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Hierarchy of Eligibility

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Hierarchy of Eligibility

- 1 Eligibility for SNAP benefits (FS) supersedes all other eligibility categories
- 2 Medicaid match should never overlay existing DC match with another allowable program category, e.g., SNAP, TFA, OT
- 3 LEAs must identify Medicaid match only when child does not match with SNAP, TFA, or OT

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Hierarchy of Eligibility: Example 1

Student categorized as RM (Reduced Medicaid) → Latest DC file categorizes student as AF

- Student's eligibility changes to AF
- Free benefits extend to all children in HH

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Hierarchy of Eligibility: Example 2

Student's name appears twice on DC list

- SNAP (FS)
- Reduced Medicaid (RM)

→ Give student highest benefit

- SNAP (FS)

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Summary of Hierarchy of Eligibility

Code	Benefits
1 FS = SNAP	<ul style="list-style-type: none"> • Free eligibility • Extends to all children in HH
2 AF = Temporary Family Assistance (TFA)	<ul style="list-style-type: none"> • Free eligibility • Extends to all children in HH
3 OT = Other (foster children)	<ul style="list-style-type: none"> • Free eligibility • Does not extend to all children in HH
4 FM = free Medicaid	<ul style="list-style-type: none"> • Free eligibility • Extends to all children in HH
5 RM = reduced Medicaid	<ul style="list-style-type: none"> • Reduced-price eligibility • Extends to all children in HH

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Direct Certification with Medicaid: Steps to Consider when Working with Point-of-Sale (POS) Software Companies

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/DirectCert/Direct_Certification_Medicaid_Steps_POS_Software.pdf

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DC Web Application



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DC Web Application

Overview

School Nutrition Programs | Program Guidance | Forms | Resources | Nutrition Education

Direct certification is a process conducted by states and local educational agencies (LEAs) to identify eligible children for free meals without the need for household applications. The Connecticut State Department of Education provides the districts direct certification contact person with a login ID and password to access the Direct Certification Web Application each week. The Direct Certification Web Application provides information to the Supplemental Nutrition Assistance Program (SNAP), Temporary Family Assistance (TFA), and Medicaid (coded as Free Medicaid (FM) or reduced Medicaid (RM)) lists of children provided by the Connecticut Department of Social Services (DSS). On a monthly basis, the Direct Certification Web Application matches directly certified foster children (coded as Other or OTI) with the Connecticut Department of Children and Family Services. The district's direct certification contact person may access this information at any time.

[Direct Certification Web Application Sign In](#)

Reminder: The Web Application is updated on Monday unless Monday is a holiday. Please wait until Tuesday (or Wednesday for weeks with Monday holidays) to check for updates. Remember to check Case Management weekly.

<https://portal.ct.gov/SDE/Nutrition/Direct-Certification>

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DC Contact

- Each LEA has one designated DC contact who can access DC list

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Updates to DC List

- Updated every Monday (or Tuesday if Monday is a holiday)
 - CSDE matches student enrollment with DSS SNAP/TFA/Medicaid/foster benefits
- DC contacts must access list weekly to ensure children are awarded free or reduced benefits accurately and timely

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Check Case Management Weekly

Welcome to the CSDE Direct Certification System

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Check Case Management Weekly

Case Management

Click the "Details" link below to view the details of the ticket.

Number of Direct Certification records needing review: 25

Direct Certification

Select	Client ID	First Name	Last Name	MI	DOB	Street Address	City	Town Code	Au Num	Benefit Source
Details	1234567	Any	Child	X	5/4/2006	123 ABC Street	XYZ Town	1234	000000000	RM

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Check Case Management Weekly

Details

- If the Benefit Source Record is for one of the possible student matches from your district's PSIS Registration data, check the checkbox for the matching student and click **Save Match**.
- If the Benefit Source Record is not for a possible matching student in your district, check the checkbox for the incorrect possible match and click **No Match**.
- A grey background for a possible match means that it has already been either marked as not a match or claimed as this Benefit Source Record.

Benefit Source Record

Client Number	First Name	Last Name	MI	DOB	Street Address	City	Benefit Source
1234567	Any	Child	X	5/4/2006	123 ABC Street	XYZ Town	RM

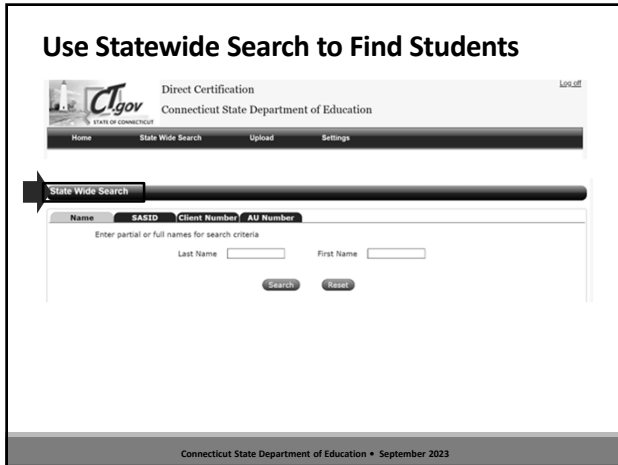
PSIS Possible Match

Select	Ticket Id	Match Score	Reporting District	SASID	First Name	Last Name	MI	DOB	School	Resident Town
<input type="checkbox"/>	000000	98	00	123456	Any	Child	X	5/4/2006	ABC High	XYZ Town

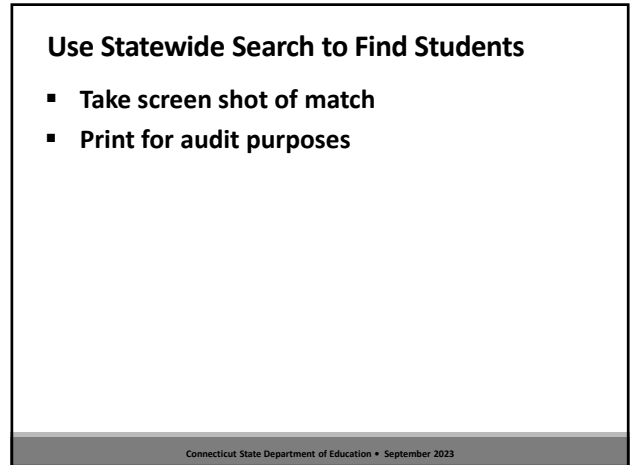
Return Save Match No Match

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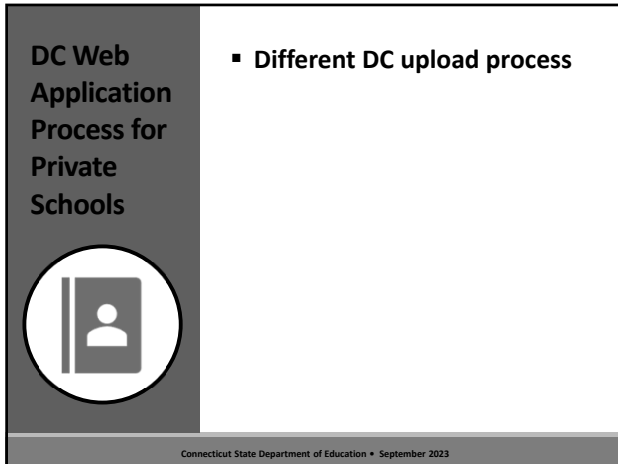
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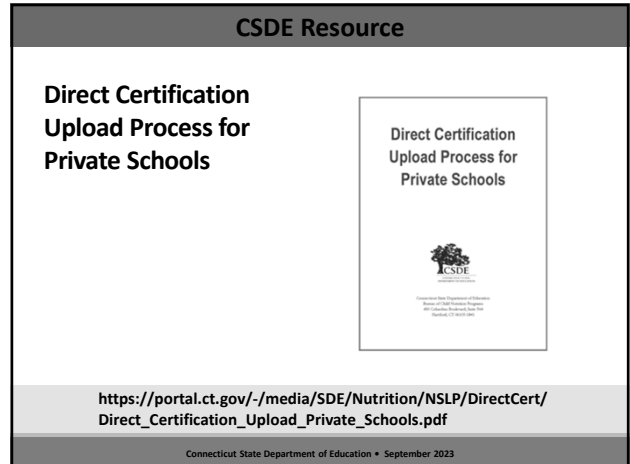
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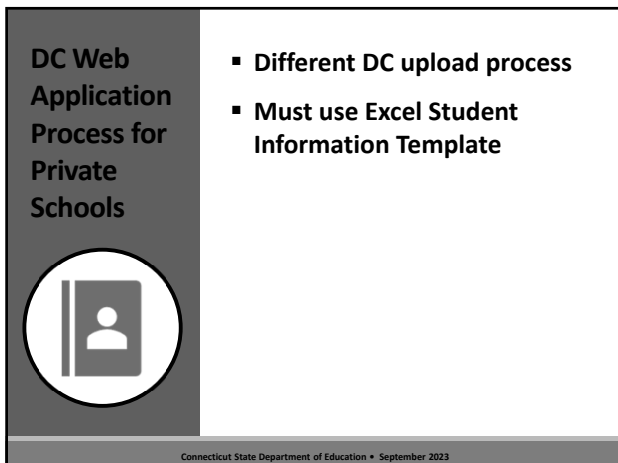
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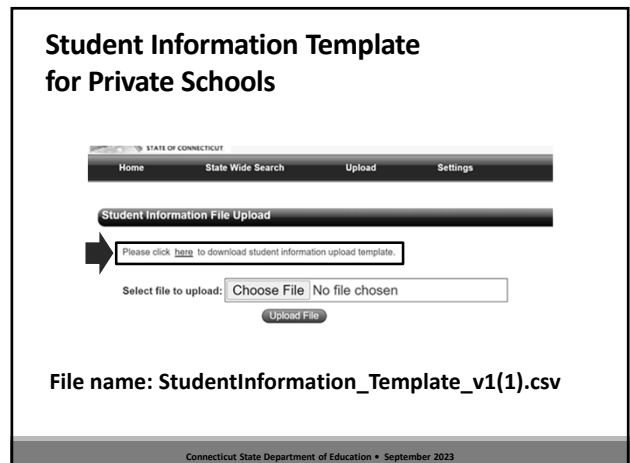
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DC Web Application Process for Private Schools

- Different DC upload process
- Must use Excel Student Information Template
- May also use Statewide Search



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CSDE Webpage

Documents/Forms

- Direct Certification Contact List for School Nutrition Programs ^{TS} (CSDE)
- **Guidance**
 - **Completing Direct Certification**
 - Important Reminders for Completing Direct Certification ^{TS} (CSDE)
 - **Direct Certification and Medicaid**
 - Important Reminders for Direct Certification with Medicaid ^{TS} (CSDE)
 - Operational Memorandum No. 8-17 ^{TS} Update on the Direct Certification Process and Medicaid
 - Steps to Consider When Working with Point of Service (POS) Software Companies ^{TS} (CSDE)
 - **Eligibility**
 - Eligibility Manual for School Meals ^{TS} (SDE)
 - **Private Schools**
 - Direct Certification Upload Process for Private Schools ^{TS} (CSDE)
 - **Webinar**
 - The New Look of Direct Certification Webinar ^{TS} (CSDE)
 - The New Look of Direct Certification Webinar (CSDE)


<https://portal.ct.gov/SDE/Nutrition/Direct-Certification/Documents>

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Questions

DC Web Application	CSDE's CNP System
Help Desk 860-713-6681	CSDE school nutrition consultant




<https://portal.ct.gov/-/media/SDE/Nutrition/CNstaff/countyassign.pdf>

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Important Considerations




- Notifying households
- Carryover of DC eligibility
- Entering DC data
- Applications for directly certified children
- Refusing benefits

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Notifying Households

- Notify HH in writing anytime LEA approves child for free/reduced-price benefits
 - Includes approvals based on DC

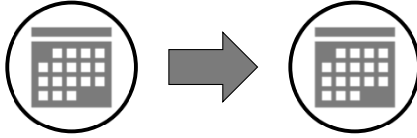


<https://portal.ct.gov/SDE/Nutrition/Eligibility-for-Free-and-Reduced-price-Meals-and-Free-Milk-in-School-Nutrition-Programs/Documents#ParentGuardianNotificationLetters>

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Carryover of Eligibility




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Carryover of Eligibility

- 30 operating days from first day of school OR
- Until name appears on new SY's DC list before end of carryover



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Carryover Quiz

June: Directly certified as free Medicaid
August: DC list as reduced Medicaid


- A. Change child to reduced Medicaid and extend benefits to all children in HH
- B. Keep child as free Medicaid for 30 operating days from first day of school in case their name shows up on DC list

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Entering DC Data

- Accuracy is only as good as
 - PSIS information
 - Information provided by parent/guardian on DSS application for SNAP, TFA, or Medicaid benefits




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Entering DC Data

Interschool Agreements

- Must include students in direct certification process to ensure eligible students are directly certified accordingly




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Entering DC Data

Enrollment

- Update by July 1 annually
- Date impacts number of students who are directly certified




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Entering DC Data

Enrollment

- Match total enrollment with DC list every week until end of October
- Helps ensure
 - all potential directly certified students are matched
 - students do not charge meals when eligible for free meals based on DC




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Applications for Directly Certified Child

- If HH submits application for directly certified child, disregard unless
 - application is approved for free meals and
 - DC shows reduced Medicaid eligibility
- Note changes on application and keep on file



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Applications for Directly Certified Child


- DC supersedes all application determinations

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Refusing Benefits

- HH qualifies for free or reduced-price meals but parent/guardian wants to pay full price or reduced price
- HH has right to refuse eligibility benefit
- Make note of request and claim meals as applicable



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CSDE Resource


Important Reminders for Completing Direct Certification

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/DirectCert/Important_Reminders_Completing_Direct_Certification.pdf

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Direct Certification of Foster Children



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Methods to Determine Foster Child's Eligibility for Free Meals

1. HH submits application
2. Direct certification
 - OT on DC list OR
 - DCF 603 form OR
 - List of foster children from LEA's foster care point of contact

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Three Ways to be Eligible with Method 2: Direct Certification of Foster Child

Name appears as OT on DC list	DO obtains copy of current SY DCF 603 form	LEA Point of Contact provides DO with list of foster children
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Knowledge Check



https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Training/ProcessingFR/Worksheet_Module_4_DC_Not_DC.pdf

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Knowledge Check: DC or Not DC

Example 1

- DO finds child's name on DC list
- Child is coded as FS and is receiving SNAP benefits

DC Not DC

Free benefits extend to all children in HH

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Knowledge Check: DC or Not DC

Example 2

- Child is living in HH of another child who is on DC list as OT

DC Not DC

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Knowledge Check: DC or Not DC

Example 3

- DO obtains a list of homeless students that is dated and signed by district's homeless liaison

DC Not DC

Free benefits do not extend to all children in HH

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Knowledge Check: DC or Not DC

Example 4

- An application submitted by HH lists a SNAP/TFA case number

DC Not DC

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Knowledge Check: DC or Not DC

Example 5

- A child is enrolled in a federally funded Head Start Program

DC Not DC

Free benefits do not extend to all children in HH

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Knowledge Check: DC or Not DC

Example 6

- An application submitted by the HH lists a HUSKY Medical Number

DC Not DC

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Knowledge Check: DC or Not DC

Example 7

- A guardian submits an application for a foster child in their care

DC Not DC

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Knowledge Check: DC or Not DC

Example 8

- DO finds child's name on DC list as receiving RM (reduced Medicaid)

DC Not DC

Reduced benefits extend to all children in HH

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Knowledge Check: DC or Not DC

Example 9

- DO obtains current SY DCF 603 form from school administrator indicating that a child is a foster child


DC Not DC

Free benefits do not extend to all children in HH

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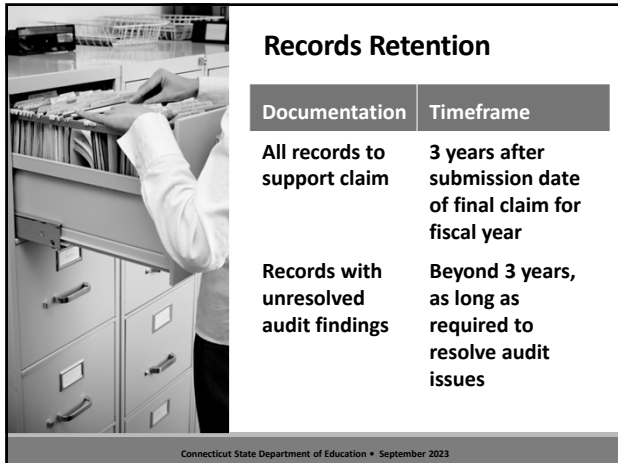
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Records Retention



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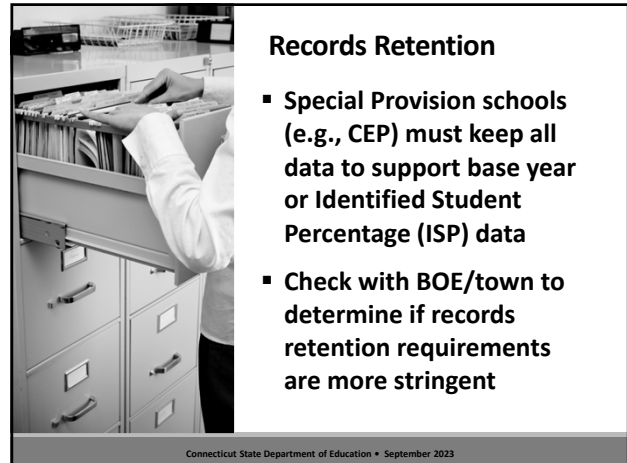


Records Retention

Documentation	Timeframe
All records to support claim	3 years after submission date of final claim for fiscal year
Records with unresolved audit findings	Beyond 3 years, as long as required to resolve audit issues

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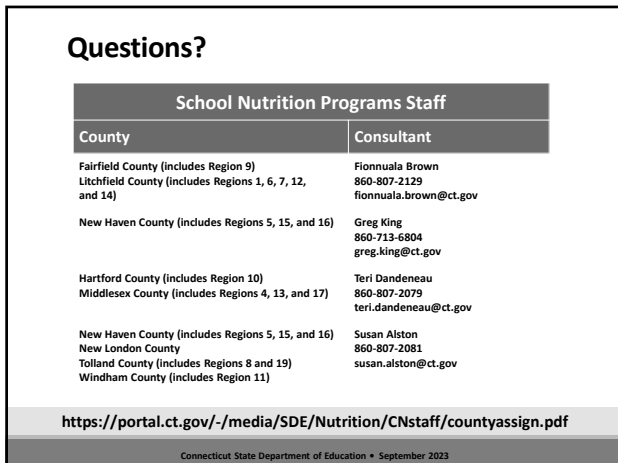


Records Retention

- Special Provision schools (e.g., CEP) must keep all data to support base year or Identified Student Percentage (ISP) data
- Check with BOE/town to determine if records retention requirements are more stringent

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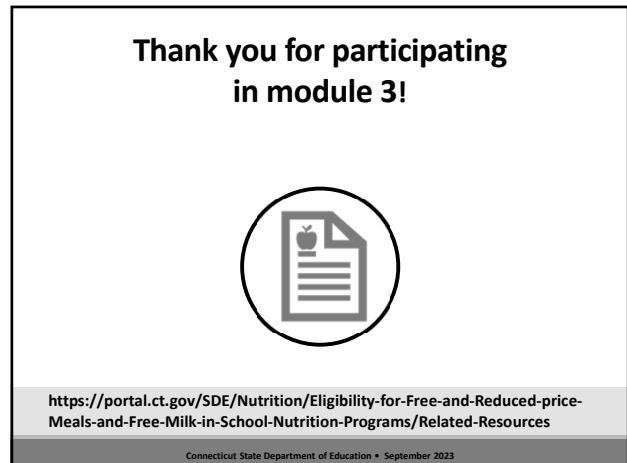
Questions?

School Nutrition Programs Staff	
County	Consultant
Fairfield County (includes Region 9) Litchfield County (includes Regions 1, 6, 7, 12, and 14)	Fionnuala Brown 860-807-2129 fionnuala.brown@ct.gov
New Haven County (includes Regions 5, 15, and 16)	Greg King 860-713-6804 greg.king@ct.gov
Hartford County (includes Region 10) Middlesex County (includes Regions 4, 13, and 17)	Teri Dandeneau 860-807-2079 teri.dandeneau@ct.gov
New Haven County (includes Regions 5, 15, and 16) New London County Tolland County (includes Regions 8 and 19) Windham County (includes Region 11)	Susan Alston 860-807-2081 susan.alston@ct.gov


<https://portal.ct.gov/-/media/SDE/Nutrition/CNstaff/countyassign.pdf>

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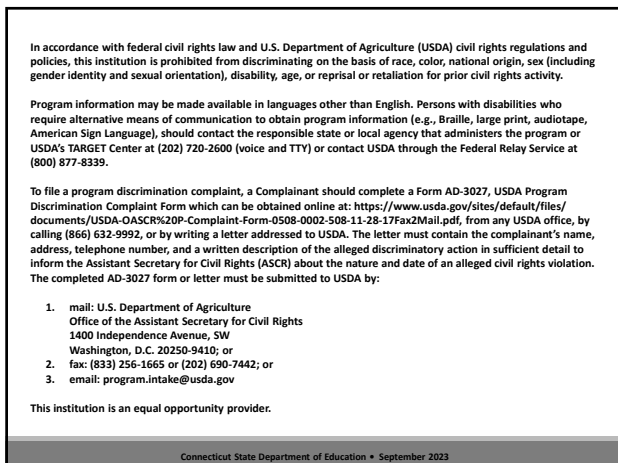
Thank you for participating in module 3!



<https://portal.ct.gov/SDE/Nutrition/Eligibility-for-Free-and-Reduced-price-Meals-and-Free-Milk-in-School-Nutrition-Programs/Related-Resources>

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In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

- mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
- fax: (833) 256-1665 or (202) 690-7442; or
- email: program.intake@usda.gov

This institution is an equal opportunity provider.

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The Connecticut State Department of Education is committed to a policy of equal opportunity/affirmative action for all qualified persons. The Connecticut Department of Education does not discriminate in any employment practice, education program, or educational activity on the basis of race; color; religious creed; age; sex; pregnancy; sexual orientation; workplace hazards to reproductive systems; gender identity or expression; marital status; national origin; ancestry; retaliation for previously opposed discrimination or coercion; intellectual disability; genetic information; learning disability; physical disability (including, but not limited to, blindness); mental disability (past/present history thereof); military or veteran status; status as a victim of domestic violence; or criminal record in state employment, unless there is a bona fide occupational qualification excluding persons in any of the aforementioned protected classes. Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Attorney Louis Todisco, Connecticut State Department of Education, by mail 450 Columbus Boulevard, Hartford, CT 06103-1841; or by telephone 860-713-6594; or by email louis.todisco@ct.gov.

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