Direct Certification (DC) FAQs

Direct Certification matches on these benefits:

Code on DC match	Program Name
O or S	FoodShare (Wisconsin's SNAP program)
T	W-2 Cash Benefits (Wisconsin's TANF program)
G	Food Distribution Program on Indian Reservations (FDPIR)
M	Medicaid – Free
Z	Medicaid – Reduced Price
E	Foster - Free, but does not extend to others in household

Please refer to the most recent USDA Eligibility Manual for School Meals, which is posted on the Direct Certification webpage for more information on direct certification and meal benefit eligibility.

Frequently Asked Questions

1. **What if I am a new Direct Certification Program (DCP) User?**

   A new user for the DCP is required to create a login and password and submit a Request for Access form to DPI. Please refer to the DC User Guide, under New Users. Do not share DCP user names and passwords with co-workers. Note: DPI should be notified when there are staff that no longer need access to the DCP so they can be disabled.

2. **When should we complete our first DC run?**

   Running DC *before* you distribute school meal applications for the upcoming school year saves time and effort for you and families. You can run DC beginning the second week of July, even if your school enrollment process is not complete.

   DPI requires a full enrollment run close to the first day of school for reporting purposes.

   DC TIP: Running DC prior to the start of the school year will allow you to claim eligible students (those that match as an S, T, O, G, M, Z or E) beginning the first day of the school year. This is especially helpful for new students without carry over, since free or reduced price meals may only be claimed from the application approval or DC date.

   Exceptions for Provision Schools: Districts and private schools that do not use school meal applications (e.g., Community Eligibility Provision (CEP) district wide, Special Provision schools) are required to complete the first run during the month of October for DPI reporting purposes.

3. **How often should I run DC?**

   You may run DC as often as you like and frequent runs are encouraged. Schools that collect meal applications are required to run DC at least three times during the school

year: 1) at or around the beginning of the school year, 2) three months after the first run, and 3) six months after the first run. Running DC more often will help you use the process efficiently, make sure newly eligible students have access to meal benefits, and reduce paperwork all year.

DC TIP: In addition to the three mandated times, run DC right before October 1, when your pool of applications for verification is determined. Since directly certified students are eligible for free or reduced price meals without an application, they do not need to be included in the verification sample in October, which means fewer applications to verify.

Mark your calendar to complete a Full Enrollment Run right before April 1 for purposes of determining your SFA's eligibility for the Community Eligibility Provision (CEP).

Exceptions for Provision Schools: Provision districts and schools are required to run DC during the month of October and April.

Note: Residential Child Care Institutions (RCCIs) without day students and Special Milk Programs that do not collect meal applications do not need to run enrollment files and do not need access to the DC.

4. **I run direct certification often and always put my downloaded match file from the state's DCP into my school's software program. Should I be saving a copy of the match file before uploading it into my software program? Do I really need to save the file after every match I complete?**

   Yes, the match file should be downloaded and saved each time you run direct certification. It is very important to save the match file in a secure place. These files are as important as approved applications because they are your proof of eligibility. When the Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts your Administrative Review (AR), the consultant will ask to see the original match file. If the original file is not available, your School Food Authority (SFA) will be cited and corrective action will be required. There is also the potential for fiscal action, depending on the specific situation.

   The match output file from the DCP is in a "tab delimited text" (.txt) file format and the original match file should be saved to your computer. After you've saved the original match file, you can save it again in a different format, like Excel or any other software program you are using. You may also print the match files out and save them as a hard copy. It is important to save the file soon after you run DC, as match files are only available for download on the DCP for 14 days. Per record retention requirements, SFAs are required to retain DC records for 3 years plus the current year.

   DC TIP: Create a direct certification folder on your computer to store all electronic DC files and/or create a file folder to house all DC documents. This will be especially beneficial during your SFA's AR, as you will have quick access to any DC documentation that is requested.

5. **Once we find out that students are eligible for free or reduced price meals via DC, are they eligible as of that day or can we back date to the start of school or first day of that month?**

   Approvals may not be backdated. For directly certified students, the approval date is the run date listed at the top of the matched list. If you receive notification that a student is a member of a matched student's household, you must use the date that you received this notification as the approval date. Be sure to keep documentation of all original DC matched lists before they are uploaded into any software program at your district. As with applications, once students are directly certified, they remain eligible for free or reduced price meals through the end of the school year and up to 30 operating days into the next school year, or until a new eligibility determination is made.

6. **A student who matches via DC also has an application submitted. Which one do I use?**

   DC overrides an application*. Even if the family completes an application, all students who match through DC, and students with the extended benefits should be noted as "directly certified" in your student database. You would also report these students as being *directly certified* when the online Verification Collection Report is completed. Keep the application on-site in a separate place; it should not be thrown away. File it with the SFA and follow record retention timeframes as required.

   Exception: Medicaid code "Z" (Reduced) on direct certification - if an application is approved free, then provide the greatest benefit to the student. Note that the application is kept with the other applications that can be selected for verification.

7. **Can I just submit the names of the new students during the year or must I send my entire enrollment again?**

   Yes, you can just submit a short run of new students, be sure to select the Partial Run button in DCP. But you should also still periodically run a list containing students who did not match in previous runs, as children frequently get signed up for FoodShare, W-2 Cash Benefits, FDPIR, or Medicaid throughout the year. Be sure to select "Partial Run" in the DCP.

8. **There is an Enrollment button to select when I run a file in DCP. Which do I select – Full Enrollment Run or Partial Enrollment Run?**

   The "Full Enrollment Run" button in DCP should be selected only when your input file includes all students enrolled in your district or SFA with access to lunch and/or breakfast. This includes Special Provision sites, like Community Eligibility Provision (CEP) and Provision 2 (P2). Your selection of Full or Partial Run indicates to DPI which of the output files will be reviewed. DPI will review three Full Enrollment Runs for reporting purposes (see question 3).

Select "Partial Enrollment Run" if your upload file does not include all enrolled students, or includes students without access to lunch and/or breakfast.

What is a Partial Enrollment Run? Some districts like to break up their students by buildings, some only run the students that have not previously matched, and some like to run just the one new student that enrolled that week – these are all "Partial Runs". Note: If your district or SFA includes schools that do not participate in Child Nutrition Programs (CNPs), you are allowed to run those students through DCP, but be sure to select "Partial Enrollment Run". This will insure DPI reviews accurate reports.

Important: Districts may not run students who are open enrolled in other districts. Districts may not run students that are enrolled in private schools (unless the district lists the school on their child nutrition contract as part of an Alternate School Food Authority Agreement or CESA).

9. **I know that free or reduced price meal eligibility can be extended to students who were not identified as directly certified, but are part of a household that is matched by DC through FoodShare, W-2 cash benefits, FDPIR or Medicaid. Are students in households of foster children also categorically eligible for free meals benefits?**

No, effective October 1, 2010, children formally placed in foster care are categorically eligible for free meals. However, having a foster child reside in a household *does not automatically extend benefits* to all children in the same manner as participation in FoodShare, W-2 cash benefits, FDPIR or Medicaid matched on DC. Benefits cannot be extended to students in households of foster children.

10. **What if I have summer school in July or August? What is my 30 day carry over period?**

The 30 operating (school) day carry over period begins on the school's first day of the school year, even if there are summer school days between July 1 and the first day of the regular school day. Any new benefit eligibility determinations made during the summer do not go into effect until the first day of the new school year.

11. **What about incoming PreK/4K students with other household members in the carry over of benefits period, are they extended benefits during the carry over?**

Yes, any household members of students in the carry over period may be extended meal benefits from the previous school year. Note: meal benefits given to a student by Foster eligibility are not extended to other household members.

12. **Students in a household have free benefits from prior school year. They are still in the carry over period, and none have matched on DC yet. Then one shows up on a DC match run with a Z code (meaning reduced price meal benefits). Can I wait until the end of carry over period before switching all household member from free to reduced price?**

No, anytime a household student is matched on DC or application determined, the new

determination ends the carry over status. Remember, the N code in DCP is not considered a new determination until the end of the 30 day carry over.

13. **Our school/district has students who qualify for free or reduced meal benefits via direct certification but other children "in the same family" didn't get a free or reduced price match code. How can that be possible?**

    If a student qualifies for free or reduced price meal benefits via direct certification with an S, T, O, G, M, or Z code, the Determining Official should extend eligibility for free or reduced price meals to all students in the household. These children are also considered directly certified.

    Siblings may be 'N' on the direct certification list; possibly they weren't listed on the FoodShare, W-2 cash benefits, FDPIR, or Medicaid account, or perhaps there was a misspelling of that student's name in the state system.

    While there is continual work to improve the direct certification system and make it as accurate as possible, technology is not always perfect. Safeguards are in place, like extending of eligibility for household members. Students in eligible households that show up as an 'N' on the DC list can be extended free or reduced eligibility from a household member; just be sure to document how you determined they were eligible. Date and initial each update. The Determining Official may be able to use school enrollment records to extend benefits to additional children who are part of a household.

    DC TIP: Set up additional match codes to indicate in your records when a student is a DC match by extension.

    Note: Students matched on the DC run with an "E" code do not extend benefits to other household members, as the "E" code is for "Foster child".

    Send out the current school year's *Direct Certification Notification letter* or consider contacting the parent or guardian to clarify specific names of children in their household.

14. **I have a family who submitted an application for school meals with a <u>case number</u>; however, the students showed up as 'N' on the direct certification list. Can you shed some light on this issue?**

    There are many reasons why these students may have shown up as an 'N' on the direct certification run.

    - It is possible that the particular household is on FoodShare, W-2 cash benefits or FDPIR, but the child on your roster is not listed on the qualifying account.
    - There may have been a misspelling of a student's name in the state system so that student was missed.

Regardless, as long as any household member is receiving FoodShare, W-2 cash benefits or FDPIR with a valid case number, you should take their application at face value and indicate they are eligible for free meal benefits. In Wisconsin, FoodShare and W-2 cash benefits case numbers are ten digits in length. FDPIR numbers vary in length, so they must be confirmed with the tribal agency.

The school should contact the household for further clarification. If the LEA still considers the application to be questionable, they should "verify for cause" per the Eligibility Manual.
Note: Medicaid may only provide benefits to a household through DC but not on an application.

15. We do not have any foster children at our school and only one family that receives FoodShare or W-2 cash benefits. This seems like a lot of work to do just for one family. Do we have to do DC?

Yes, running DC is a federal requirement for all schools participating in the School Meal Programs. In addition to the requirement to run DC at least three times during the school year, families enrolled in eligible programs may not realize their children are also eligible for free or reduced meals at school, or may not feel comfortable applying. DC can help ensure all children eligible for free or reduced price meals can receive them.

16. If we have a student whose parents are divorced or separated, but share joint physical custody, do we have to notify both households of the student's eligibility for free or reduced meals?

Yes, these situations should be handled in the same manner that the school notifies both parents about student grades, etc. The DC notification letter also gives both households the opportunity to identify if there are any other children living in either household that would then be eligible for free or reduced price meals based on extension of benefits.

TIP: There is a letter template called "Joint custody" on the DPI Free and Reduced Price Meals webpage you may use to communicate to the other joint household. The DC notification letters do not indicate the basis of the eligibility.

17. What if one parent wants to refuse the benefits in the situation described above?

This parent would only be able to decline the benefits of free or reduced price meals for this student when the student was actually residing with him/her and would need to provide the school with a schedule. Then the school would be able to correctly claim the child as paid when residing with this parent and free or reduced when residing with the other parent. Make sure to always get a request to decline meal benefits in writing and maintain that documentation with your other program records. A custodial parent may decline the benefits if they are the payor for the child's account or for the time the child resides with them, and they are paying for the child's meals.

TIP: The meal benefit may be reinstated any time during the rest of the eligibility school year and up to 30 operating days into the next school year.

18. **What is the Community Eligibility Provision (CEP)? How do I participate? And what does this have to do with direct certification?**

    The CEP is a 4-year reimbursement option for eligible schools participating in both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that wish to offer free school meals to all children in high poverty schools without collecting household applications. It is intended to improve access to free school meals in eligible schools. Instead of collecting meal applications, schools use data from the Direct Certification run (as well as other students eligible for free meals without a Free and Reduced Meal Application). A multiplier factor is applied, which is intended to estimate the number of free and reduced price meals that would have been served if applications were collected. The difference between the free claiming percentage and 100 percent represents the paid claiming percentage.

    For further information please visit DPI's [Community Eligibility](#) webpage where you will find helpful material on this provision.

    CEP district wide schools are only required to run a full enrollment in October and at the beginning of April. Districts that have some schools in CEP and some schools not in CEP, should do three required runs. Full Enrollment Runs are files that include all students in the district (from CEP and Non CEP schools).

19. **I have a student that was appointed to Kinship Care by the state. Is this considered a foster child? Is this student categorically (automatically) eligible for free meals?**

    Effective October 1, 2010, children formally placed in foster care are categorically (automatically) eligible for free meals. A foster child is one whose care and placement is the responsibility of the State, or who is formally placed by a court with a caretaker household through which the **State retains legal custody** of the child.

    Informal arrangements among relatives, such as Kinship, do not automatically qualify a child for free meals. A child may still be considered a foster child if placed with relatives, provided the placement is made by the State or local foster care system or courts. In order to be considered categorically eligible for free meals, the State must retain legal custody of the child.

    Children that show up as "E" codes on your direct certification match list are foster children matched with the State foster care system database, and they are automatically eligible for free meals without any further paperwork. Determinations may also be made by appropriate documentation from the State (or county) child welfare agency or a court, or by having the household complete an application.

20. **I have a family that was notified their child was qualified for free or reduced price lunch via direct certification, but they say they have never applied for the eligible programs and they want their name off the list. What should I do in this situation?**

It is likely that the child has the same (or similar) name and date of birth (DOB) as another student in Wisconsin that is receiving FoodShare, W-2 cash benefits, FDPIR or Medicaid benefits or is identified as a foster child. The DCP cannot distinguish a difference between two students with the same name and DOB on the match since it only matches on these two identifiers.

You can assure the parents that with the direct certification process, their child's personal information is not being compromised. There is no sensitive data that the system matches on or sends to anyone. The only matching criteria are Name and DOB. The other child with the same Name and DOB is receiving benefits under their own name and DOB (they just happen to be the same or very similar).

That said, we rely on the parents/guardians to correct these situations. In most cases, the family will let the school know their child is not eligible and, therefore, will decline the free or reduced price meal benefits. If the parents/guardians have declined benefits, you may exclude that student from future direct certification runs, except the three required Full Enrollment runs. Alternatively, you may also continue to include this student's name on future direct certification runs, but be sure to make a note to yourself that the parents/guardians have declined benefits so that this student does not receive the free or reduced price meal benefits. Remember, as with free and reduced price meal applications, a child's eligibility under direct certification is taken at face value. Therefore, if a child is identified as a match through direct certification, the child is automatically eligible for free or reduced meal benefits, regardless of any knowledge that the LEA may have about the household's circumstances.

21. **My school/district is not in the National School Lunch Program (NSLP), but we do participate in the Special Milk Program (SMP). Alternately, our LEA has half-day children with no access to NSLP or School Breakfast Program. These half-day children participate in the SMP. Are we required to run Direct Certification (DC) for SMP students?**

If your school/district provides milk free of charge to all students (non-pricing plan) or if all students must pay for their milk (pricing plan), you do not need to qualify students for free milk benefits (either via application or DC). However, if your school/district provides milk free of charge to **eligible** students, you need to determine if students are qualified for free milk benefits. You can do this either through an application or DC. While you are not required to run DC for SMP students, you are encouraged to do so, as DC is a fast and efficient means to identify students who qualify for "free milk" under the SMP. Free milk applications should be sent out at the start of the school year in addition to running direct certification. Parents may also complete an application for free milk which is posted on the DPI [Special Milk Program (SMP)](#) website.
TIP: SMP only allows for free milk. If a student is matched in DC with a "Z" code, that does not provide a free milk benefit in SMP.

22. **I know free or reduced meal eligibility can be extended to students who were not identified as directly certified, but are part of a household that is enrolled in FoodShare, W-2 cash benefits, FDPIR or Medicaid (O, S, T, G, M or Z codes). I also know that benefits cannot be extended to students in households of foster children (E codes). What about other categorically eligible students not included on the DC match file, like Homeless, Migrant, Runaway, Head Start/Even Start? Can benefits be extended to other students in these households?**

No, benefits cannot be extended to children in households with an Other Source Categorical student. Similar to having a foster child reside in the home, having a Homeless, Migrant, Runaway, or Head Start/Even Start student reside in a household does not automatically extend benefits to all children in the same manner as participation in FoodShare, W-2 cash benefits, FDPIR or Medicaid.

23. **Do all households which receive Medicaid qualify for free or reduced price meals?**

No, school enrollment data will be matched with Medicaid eligibility data to identify children who receive Medicaid, or live with a child who receives Medicaid, and whose family income, before expenses and deductions, does not exceed:

  130% percent of the Federal Poverty Level (FPL) for free school meal eligibility; or 185% percent of the FPL for reduced price meal eligibility.

Eligible children identified through this matching process can be certified automatically to receive free or reduced price school meal benefits, without requiring the household to submit an application. Students that match with a "Z" code and qualify for reduced price benefits through direct certification extend benefits to other members of the household.

Note: Some households receive Medicaid benefits, but are outside of the income requirements to receive free or reduced meals and will not show up as a DC match code.

24. **A parent calls and asks why they did not qualify for DC Medicaid-Reduced this year, but did last year, and nothing has changed?**

Here is an example. DC was run back in December and January, the child was 5 years old. At that time, the family income was below 185% of the federal poverty limit (FPL) and the child was eligible for Medicaid as the income limit for children age 1 through 5 is 191% FPL. **However**, later in 2018 the child turned 6 years old. The Medicaid income limit for children ages 6 through 18 is only 156% of the FPL. So even though there was no change in family income, when the child turned 6, the child lost eligibility for Medicaid and became eligible for the CHIP program. Only children with family income below 185% of FPL, and who are eligible for Medicaid, qualify for the free and reduced lunch program. After a child is initially determined eligible for free and reduced lunches, the lunch benefits are allowed to continue throughout the school year, even after the child loses eligibility. However, we have

to make a new determination of eligibility for the lunch program at the start of the new school year. That is why the child is no longer eligible.

25. **What happened to the B, F, and L codes? I ran DC and no longer see codes.**
The B, F, and L codes are still around, but they are no longer eligibility codes. They are designated as error codes, along with #, and you should only see them in records where you have an error in formatting or missing data. They will appear at the top of the results file you receive from the match run. For further information on eligibility and error codes you may access the "Direct Certification Eligibility Codes" document online.

26. **Can I just call households and let them know that one or more of their students is eligible for free or reduced meals based on DC?**

The household must receive notification of eligibility based on DC. It is encouraged to send the DC Parent/Guardian Notification Letter to households by mail or email. The Notification Letter is a way for the household to notify the school if there are other students in the household not identified through DC that would now be eligible for free or reduced meals based on extension of benefits, should they choose to do so. Notification of free or reduced meal eligibility through DC may also be done through e-mail if the school has an e-mail address for a parent or guardian.

27. **Who should we contact for assistance or technical support?**

For technical questions with the **match process**, contact the DPI desk at dpifns@dpi.wi.gov or 608-267-9228. For **technical questions** related to your software, contact your software vendor.