

## Direct Certification (DC) FAQs

Direct Certification matches on:

Code on DC match	Program Name
O or S	FoodShare (WI's SNAP program)
T	W-2 Cash Benefits (WI's TANF program)
G	Food Distribution Program on Indian Reservations (FDPIR)
M	Medicaid – Free
Z	Medicaid – Reduced
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. When is the best time to run DC?

Running DC *before* you distribute school meal applications for the upcoming school year saves time and effort for you and parents. You can run DC for the following school year beginning on July 1, even if your school enrollment process is not complete.

**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.

#### 2. How often should I run DC?

You may run DC as often as you like and frequent runs are encouraged. All schools participating in the School Meal Programs 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. Note: Residential Child Care Institutions (RCCIs) without day students do not need to run enrollment files and do not need access to the DC.

**DC TIP:** Along with the three mandated times, run DC right before October 1, when your pool of applications for verification is determined. Because 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.

**DC TIP:** 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).

3. I run direct certification often and always put my downloaded match file from the state's Direct Certification Program (DCP) into my school's software program. Should I be saving a copy of the match file that comes from the state's DCP before putting 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 every 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 paper applications because they are your proof of eligibility. When the Department of Public Instruction (DPI) comes in to conduct your Administrative Review (AR), the consultant(s) 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 file is returned from the DCP in a "tab delimited text" (.txt) file format and the original match file should be saved to your computer. Along with saving it in the original format, the match file can be saved in 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 direct certification, 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 direct certification files and/or create a file folder to house all paper 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.

4. Once we find out that students are eligible for free or reduced meals via DC, are they only 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 paper 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.

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

*DC overrides a paper application\**. Even if the family applies on paper, all students who match through DC 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.

\*Exception: Medicaid code “Z” (Reduced) on direct certification - if a paper application is approved free, provide the greatest benefit to the student. Note that this paper application is still kept with the other applications that can be selected for verification.

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

Yes, you may submit just the new names to see if they match. 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, FDPIR, or Medicaid throughout the year or you may catch a new foster child. Even if students did not match previously, they may match at the time of a subsequent DC run. There are three times a year when DPI requires districts to run a full enrollment for reporting purposes: 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.

7. What is the difference between a Full Enrollment Run and a Partial Enrollment Run?

The Full Enrollment Run should only be selected when your input file includes all students in your district or SFA (with access to lunch and or breakfast).

Different districts use the DCP in different ways. Some districts like to run a full enrollment every time, some like to break up their students by buildings, and some like to run just the one new student that enrolled that week.

There are three times a year when DPI requires districts to run a full enrollment for reporting purposes. Every time a district runs a file through DCP, DPI has access to every output file. Your selection of full or partial enrollment run indicates to DPI which of the output files will be reviewed.

8. 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 enrolled in FoodShare or W-2 cash benefits. Are students in households of foster children also categorically eligible for free meals benefits?

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 or W-2 cash benefits. Benefits cannot be extended to students in households of foster children unless that household is also enrolled in FoodShare or W-2 cash benefits.

9. 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 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 meals to all students in the household. These children are also considered directly certified.

Siblings may be ‘N’ on the direct certification list for the same reasons noted in the above question. It is possible that the sibling is not listed on the FoodShare, W-2 cash benefits or FDPIR 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, just remember to document how you determined they were eligible; and date and initial each update. The Determining Official may be able to use school enrollment records to find 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.

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.

10. I have a family who submitted a paper application for school meals with a case number; 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 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 LEA 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.

11. 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 School Food Authorities 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.

12. 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.

13. 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.

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

The Community Eligibility Provision (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.

15. 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 a paper application.

16. I have a family that was notified their child was qualified for free or reduced 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 the State of 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).

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. 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.

17. 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 a paper 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.

18. 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) unless that household is also enrolled in an eligible program. 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.

19. 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 same 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.

20. What happened to the B, F, and L codes? I ran DC and no longer see these codes.

The B, F, and L codes are still around, but they are no longer eligibility codes. They are now 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.

22. 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?

No, the household must receive written notification of eligibility based on DC. Using the DC [Parent/Guardian Notification Letter](#) allows households 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. It also has a place where the household can sign that they want to decline the 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.

23. 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](mailto:dpifns@dpi.wi.gov) or 608-267-9228. For **technical questions** related to your software, contact your software vendor.