Direct Certification: Best Practices for Feeding Students for Free

Both children and schools benefit from making sure all students receive healthy school meals. While federal nutrition programs are designed to feed students, they can also involve cumbersome paperwork for schools and parents that make it harder to reach all eligible students. School districts can help alleviate these challenges by effectively conducting direct certification. When school districts maximize their efforts to directly certify eligible children, they can ensure that their most vulnerable students receive healthy meals and also increase district funding to better serve their schools and communities.

Who Benefits from Direct Certification?

Direct certification helps students from low-income families who are at a higher risk for hunger.

These are students who have already qualified for need-based programs, where agencies determine eligibility under a rigorous and exhaustive process. Because agencies have already determined income eligibility for those need-based programs, students are also eligible for free meals at school when the local school district certifies them.

Direct certification is a way for Texas districts to better serve their students while they simultaneously better serve their school budgets. The more directly certified students, the more money schools can claim in reimbursements.

Direct certification is also an efficient process for families and the school meals system. When a student is directly certified, schools no longer have to collect meal applications from parents. This saves parents and school administrators time and allows for a uniform and efficient method for eligibility determinations.[1] Direct certification not only makes school meals processes less burdensome for schools, parents, and students, it also helps capture eligible students who may have been "missed" or unidentified under the meal application system.

Direct certification's effectiveness in identifying students who are eligible for free meals can also help high poverty schools qualify for federal nutrition program options like the Community Eligibility Provision (CEP). Through CEP, districts can provide free school

What is Direct Certification?

Direct certification is a federally mandated electronic data-matching process that determines the eligibility for free school meals based on student participation in other need-based programs.

Students are eligible for school meals through direct certification if they meet any of these criteria:

- Live in households receiving Supplemental Nutrition Assistance Program *(SNAP, formerly "food stamps")* benefits

- Live in households at or below 133 percent of the Federal Poverty Level and a child receives Medicaid benefits

- Live in households receiving Temporary Assistance for Needy Families (TANF) cash assistance

- Live in households receiving Food Distribution Program on Indian Reservations (FDPIR) benefits

- Are enrolled in foster care; migrant, homeless, or runaway programs; Head Start, or state-sponsored pre-kindergarten programs

meals (both breakfast and lunch) to all students in schools where at least 40 percent of students are directly certified. By investing in improving direct certification rates, eligible districts can increase the reimbursements they would receive under CEP and make it a financially viable option to implement. For more information on CEP, please refer to our new fact sheet.

Why Direct Certification?

INCREASES STATE FUNDING/REVENUE FOR SCHOOLS

The more kids directly certified, the more money available to schools.

Texas calculates State Compensatory Education (SCE) funding based on the number of children who are "educationally disadvantaged," as measured by the number eligible for free or reduced-price school meals. Students identified through direct certification are automatically classified as educationally disadvantaged and entitled to the enhanced SCE funding, which is currently 0.2 times the base level of per-student funding (basic allotment). A school can increase its total SCE funding by accurately identifying all of its directly certified students.

Schools that directly certify more students eligible for free meals may also see an increase in their total school nutrition funding because they maximize the share of students who qualify for the highest meal reimbursement level. Districts that have improved their direct certification rates have been able to spend less effort on collecting applications while increasing their

school food revenue. They can use the added revenue to pay staff, buy equipment, or improve food quality.

BENEFITS EVERYONE

Students and parents: All directly certified students get free school breakfast and lunch. Students who have access to better nutrition tend to perform better academically.

Efficient direct certification can allow schools to feed more kids healthy food, ease the burden on low-income parents, and improve focus and learning for all students.

Schools: School administrators no longer have to spend time chasing school meal applications, handling meal payment accounts or tracking whether each meal served was paid, reduced-price, or free. Effective direct certification can increase the number of identified students for nutrition programs like CEP, leading to improved claiming percentages and more state funding for schools.

Recommendations for an Effective Direct Certification Process

BUILD CAPACITY

School districts across Texas doing direct certification recommend investing in training and professional development of staff on Excel and the Texas Eligibility List Management System (ELMS).[2] These programs are essential to conducting direct certification. Trainings and capacity-building tools on direct certification can be accessed from the Texas Department of Agriculture (TDA) website as well as from regional Education Service Centers (ESCs).

School districts have also recommended that districts ("Contracting Entities") have staff members, preferably more than one, within their departments dedicated to working on direct certification processes.

> "We need someone who specializes in this area [direct certification] to do this work."
>
> — **RIO GRANDE CITY CISD**

WORK CLOSELY WITH PEIMS AND IT

Although district nutrition departments conduct most of the work on direct certification, there are key actors outside the department that play an integral role in facilitating this process. It is very important to have more than one person in the district who can do direct certification.

School districts have emphasized the importance of having open communication and coordination with their district's Public Education Information Management System (PEIMS) department.[3] Having accurate data on their enrollment rates is essential to getting the maximum benefit from direct certification.

> "The PEIMs coordinator, the Assistant Superintendent and the Director of Technology also helped us. One of the guys in technology who is good at programming, he went into e-school and made it easier to input data."
>
> — **SAN MARCOS CISD**

Information and Technology (IT) staff members can also play a significant role in helping districts navigate the technicalities of the programs necessary to do direct certification. Close relationships with the district's IT department are therefore encouraged.

USE DATA EFFECTIVELY

Successful direct certification for school nutrition programs depends on the effective use of data. When doing direct certification, school districts and TDA recommend that districts:

- Use data provided by the TDA through Texas ELMS
- Use the district's current enrollment data
- Use social security numbers, if available
- Use the Texas Education Agency (TEA) Unique student ID, if available
- Use data from the homeless, migrant, foster runaway, Head Start and Pre-Kindergarten student populations

> "Their matches are much better if they use social security numbers. They don't have to, but if they use the SSN they have a higher match rate."
>
> — **TEXAS DEPT. OF AGRICULTURE**

PROACTIVELY SEEK TO EXTEND CERTIFICATION TO MORE STUDENTS

Successful districts employ procedures to identify additional children who are categorically eligible for free meals because they live in households where at least one student has already been directly certified.

Districts can use their homeless, migrant, foster, and runaway student data as well as the Pre-K and Head Start data to determine categorical eligibility and extend eligibility to all children in a household receiving SNAP, TANF, FDPIR, or Medicaid. This would produce a higher number of directly certified students eligible to receive free meals, and would also increase revenue for schools.

INVEST IN A STRONG MATCHING SYSTEM

Direct certification relies on the use of data systems. School districts that actively engage in direct certification recommend investing in a strong matching system. For many districts, that means that their

> "Our programs [PEIMS and School Nutrition] are integrated and that has helped us greatly. Every morning we get a print out of all the students that have enrolled or withdrawn as of yesterday, any changes and transfers in campuses are also included in this report. This helps us track our numbers."
>
> **– ZAPATA CISD**

Point-of-Service (POS), Student Information, and PEIMS systems produce accurate student data that can be effectively matched with state data in the Texas ELMS. Integrating PEIMS with the school nutrition department's system has been useful for some districts and is also encouraged.

PERFORM DIRECT CERTIFICATION FREQUENTLY

By law, direct certification should happen monthly, which is the standard for districts in Texas. However, TDA recommends doing direct certification weekly and, if possible, daily, to ensure that the directly certified numbers are current and accurate.[4]

Part of doing direct certification frequently also entails having accurate current enrollment data. Various school districts recommend requesting daily reports on current enrollment numbers in order to identify new eligible students.

ENCOURAGE ELIGIBLE FAMILIES TO APPLY FOR SNAP

Eligibility for free meals through direct certification depends on a student's participation in other need-based programs such as SNAP, TANF, FDPIR, or Medicaid. Some districts have found it beneficial to encourage families to apply for such benefits, particularly SNAP. If families living in the district are encouraged to apply for SNAP, higher SNAP enrollment data will increase the number of students who are eligible for free meals at their schools/districts.

ENDNOTES

1   Texas Department of Agriculture. (n.d.). Texas ELMS: Direct Certification. Retrieved from: http://www.squaremeals.org/Programs/NationalSchoolLunchProgram/TexasELMS.aspx.

2   The Texas Eligibility List Management System (Texas ELMS) is the software system that the Texas Department of Agriculture has made available for school districts in Texas to directly certify their students.

3   The Public Education Information Management System (PEIMS) is a data collection system developed by the Texas Education Agency to provide a system and database for collecting and storing school district information. (Region One Education Service Center, n.d.).

4   L. A. Dumas, personal communication, August 27, 2018.

5   Texas Department of Agriculture. (n.d.1). Texas ELMS: Direct Certification. Retrieved from: http://www.squaremeals.org/Programs/NationalSchoolLunchProgram/TexasELMS.aspx.

6   Texas Department of Agriculture. (n.d.2). Texas ELMS Eligibility List Management System: Using Texas ELMS for direct certification and verification. Retrieved from: https://tdaeducationonline.articulate-online.com/p/1071808216/DocumentViewRouter.ashx?Cust=10718&DocumentID=207adb51-bf78-4bf9-ae90-a2bbf5a79595&Popped=True&InitialPage=/story_html5.html&v=16&.

> "I do have a process every morning. I import our student data every day, and if a new student enrolls in our district, I check the Texas ELMS to claim them. If a student leaves the district, I have to go to the Texas ELMS to unclaim them. The program that we have, it generates a report, once it goes through enrollment, and it tells you within one page who's new to the district."
>
> **– SAN MARCOS CISD**

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DIRECT CERTIFICATION:
BEST PRACTICES FOR FEEDING STUDENTS FOR FREE

Direct Certification Checklist

The Texas Eligibility List Management System (Texas ELMS), formerly known as DCDV (Direct Certification/Direct Verification) is the software system used by school districts in Texas to directly certify their students. The Texas ELMS aims to streamline the process of matching enrollment records with the students in households receiving assistance through need-based programs such as SNAP and/or TANF. It allows school districts (Contracting Entities) to upload enrollment files, download and search matches, download reports, and verify eligibility.

TDA has provided guidelines and recommendations to help Contracting Entities navigate the Texas ELMS system. Specific instructions can be found below: (bit.ly/2V6HmqN)

1. **FORMAT YOUR EXCEL FILE**

    To use the Texas ELMS system working knowledge of Excel is necessary. Properly preparing and formatting the current enrollment Excel file from your districts' POS, SIS, or PEIMS is the first step to using the Texas ELMS system.

    > *Need help formatting your Excel file?* CLICK HERE >>
    > (bit.ly/302vyJH)

2. **UPLOAD YOUR EXCEL FILE**

    Once you are in the Texas ELMS system:

    a. Make sure you are in the "**Direct Certification**" tab in the Texas ELMS homepage (DC/DV Homepage)

    b. Make sure your school district's name is showing as the "**Contracting Entity**". If you work in more than one Contracting Entity, you will have to upload each of their files separately.

    c. Select the "**Upload**" tab to import current enrollment file (enrollment file must be in Excel format).

    d. Click on the "**Browse**" button and select your current enrollment Excel file.

    e. Once your selected file appears in the "**Browse**" area, click the "**Upload**" button.

    f. If uploaded successfully, a "**File Successfully Uploaded**" message should appear.

    g. Use the Snipping Tool, for Windows, or Screen Shot option for MAC, to save a screenshot of the Upload results.

3. **DOWNLOADING YOUR MATCHES**

    a. Click on the "**Reports**" tab found in the Texas ELMS homepage (DC/DV Homepage)

    b. Make sure your school district's name is the "**Contracting Entity.**" *If you work in more than one Contracting Entity, you will have to download each of their files separately.*

    c. Proceed to the "**Reports for Direct Certification and Verification**" section. Click the "**CE Direct Certification Matches**". A message will prompt you to run the report.

    d. The report will be in the format of an Excel file. Make a copy of the spreadsheet within the Excel file. The duplicate will serve as a working copy while the original is kept for records. For instructions on how to make a copy, click here (bit.ly/2PQlMG9).

    e. You will also need to create an Excel table on your spreadsheet's copy to better manipulate your report's data. Instructions for creating an Excel table using your CE Match Report and guidance on filtering the data can be found here (bit.ly/2PQlMG9).

    f. To claim or unclaim students, use the search feature on the "**Direct Certification**" tab in the Texas ELMS homepage (DC/DV Homepage) to search for students. You can search by a) First & Last name, and Date of Birth, b) by SSN and Date of Birth, c) by EDG #.

Continue on back >>

4. **CODE IN POS**

- Consult with your Contracting Entity/district on your POS and school guidelines for instructions on how to properly code results in your POS.

5. **SEND OUT NOTIFICATIONS**

- Consult with your Contracting Entity/district on guidelines for how to notify certified households of eligibility.

6. **SEND OUT REPORT OF PARTICIPATING NUMBERS TO TDA**

- TDA provides deadlines for submitting various reports pertaining to direct certification.
  - Around mid-November, complete the Direct Certification Report via the JotForm.
  - By February 1, complete the School Food Authority (SFA) Verification Report via the TX-UNPS website.
  - Around mid-March, complete the Community Eligible Provision (CEP) Report via the TX-UNPS website.

Additional Resources:

- Texas ELMS Training: (bit.ly/2PQnUxA)

- DCDV Data Elements: (bit.ly/2Y8AH1a)

- Preparing Your Files for Texas ELMS Upload: (bit.ly/302vyJH)

When to Use Direct Verification

Direct certification can eliminate the need for school meal applications, however, schools may still need to collect applications to identify all eligible students for free and reduced meals. School food authorities are required to verify the information on a sample of meal applications.

Direct verification is a special process that may be used to expedite the verification of the sample of applications during the October – December time period without notifying households.

Like direct certification, this process uses public records of participation in need-based programs to verify eligibility. Using direct verification decreases the number of applications that the LEA must verify by contacting the household. If any student in the household is identified using the Direct Certification/ Direct Verification System in TX-UNPS, or with records provided by another governmental agency, all students in the household are directly verified without the need to notify households and request additional documentation.

It is important to remember, however, that direct verification should not be utilized to establish eligibility of students and should only be used when verification is required.