

**Direct Certification:
An Overview for Indian Tribal Organizations and State Agencies Administering the Food
Distribution Program on Indian Reservations (FDPIR)**

What Is Direct Certification?

Direct Certification (or “DC”) is the process through which States and Local Education Agencies (LEAs) may establish National School Lunch Program (NSLP) benefits based upon information provided by agencies administering the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR). Children determined eligible through direct certification are certified to receive free meal benefits without the household having to submit an application. Certain foster, migrant, runaway, and homeless children may also qualify in this way and become certified for free meals without submitting an application, based upon documentation submitted to the State or LEA by an appropriate State or local agency.

What are the Benefits of Direct Certification?

Students who are “directly certified” are determined eligible to receive free NSLP meal benefits without the household having to submit an application. This process ensures free meal benefits for the eligible child. Direct certification also reduces the administrative burden for schools by reducing the number of applications which must be processed. Direct Certification may also help increase a school’s NSLP funding level by increasing the number of reimbursable meals served. The reduction in administrative burden allows for resources to be reallocated to other efforts associated with meal service, and the increased meal reimbursement funding may assist the school in improving meal quality and other NSLP-associated areas.

Additionally, LEAs and schools with high percentages of directly certified students can take advantage of participation in the Community Eligibility Provision (CEP). CEP is a provision from the Healthy, Hunger-Free Kids Act of 2010 that allows schools and LEAs with high poverty rates and meeting certain requirements to provide free breakfast and lunch to all students. Additional information regarding CEP may be found at: <http://www.fns.usda.gov/school-meals/community-eligibility-provision>.

What is FDPIR-DC?

FDPIR-DC is the process of directly certifying students for free school meals utilizing participation files or lists provided by Indian Tribal Organizations (ITOs) and State agencies currently administering FDPIR.

How does FDPIR-DC work, and what is my role?

Much like Supplemental Nutrition Assistance Program and Direct Certification (SNAP-DC) where the State SNAP agency provides the State Child Nutrition Program SNAP data for school-aged SNAP participants, an FDPIR administering agency provides FDPIR participation data for school-aged children participating in their program. Once received, the State or LEA (depending on the State’s process) will conduct a “match” of student data with FDPIR participant data to identify children eligible to be directly certified (note – The entity who conducts the “match” is commonly referred to as the “matching agency”).

FDPIR ITOs and State agencies are therefore highly important to this process as they are the *originators* of the data which allows for their community members to be directly certified for NSLP free meal benefits.

Why does the data need to be in electronic form (versus the paper report that I have provided in the past)?

It is true that it is helpful for FDPIR administrating agencies to provide printed participation reports to area schools for direct certification purposes (as has been done by many several programs over the last several years). However, this manual process can be labor intensive for LEAs and result in missed matches as school staff are “eyeballing” the printed reports. Also FDPIR participants attending schools that are not receiving the participation reports do not have the opportunity to be “matched” and directly certified.

Providing State Child Nutrition Program agencies with electronic files overcomes these issues by allowing for computer matching. Computer matching not only removes the burden of school staff manually searching for student names, but computer matching also uses processes which overcome data entry errors and variations in names and addresses to find children which may otherwise be missed. Providing data in an electronic form also allows for children to be matched statewide, which allows children who may be enrolled in schools outside the Reservation area (e.g. the child is living with their grandparents and attending a school 100 miles away) to be located, and directly certified for NSLP benefits.

Additionally, providing FDPIR participation data in an electronic form removes the need for the FDPIR administrating agency to print out several reports and distribute to the local schools, saving both time and resources.

Where do I find the participation data needed by my State’s Child Nutrition Program and local LEAs?

All FDPIR administrating agencies using the Automated Inventory System (AIS) have access to the necessary data file (and associated printable report) under the Client Report Menu - 7. Participant by Birthdate/Direct Certification. Step-by-step user guidance regarding generating and accessing the file is available on the AIS Website Document Center at <http://www.fns.usda.gov/sites/default/files/ais/AISDirectCertification.pdf>.

Programs not using AIS should consult with their technical staff regarding their ability to retrieve the needed data.

What personal information is included in the file? The data fields needed by the matching agency to conduct the direct certification process are included in the Direct Certification Report. Specifically, these data fields are as follows:

First Name	City
Last Name	State
Date of Birth	Zip
Address	

Please note, Social Security Numbers **are not** included in this data file.

How do I provide the data?

The transmission of FDPIR participation data for direct certification may be conducted through several methods. These methods include (but are not limited to) encrypted email and secure file transfer protocol (FTP). The exact method will be dependent upon the State's process and should be defined in the Data Share Partnership Agreement - Memorandum of Understanding (see below). Prior to providing any participant data, all FDPIR administrating agencies should receive confirmation that transfer procedures are secure and all data will be properly safeguarded and used only for the purposes intended to prevent against the loss of personal information.

Do I need to establish a Memorandum of Understanding with my State's Child Nutrition Program?

It is ***strongly recommended*** that all FDPIR administrating agencies establish a Data Share Partnership Agreement - Memorandum of Understanding (MOU) prior to the exchange of any participant data. FNS has developed a template MOU that FDPIR administrating agencies may adopt or refer to when establishing this agreement.

Is my participation mandatory?

No. FDPIR administrating agencies are not required to share FDPIR participation data with your State's Child Nutrition Program agency (or local school). However, given the benefits to your community members and area schools FNS encourages all FDPIR programs to consider participating in this effort.