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United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

SUBJECT: Data Exchange between the Supplemental Nutrition Assistance Program (SNAP) and the National School Lunch Program (NSLP) for Direct Certification with SNAP

TO: Program Directors
All Regions

This memo is to inform you of recent changes related to data exchanges for the purposes of direct certification for NSLP with SNAP. Please share this information with State agencies administering SNAP and continue to encourage them to fully cooperate with their NSLP counterparts to improve the direct certification of children in SNAP households.

On February 22, 2013, the final rule, *NSLP: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, was published and amended SNAP regulations at 7 CFR 272.8(a) by adding paragraph (5):

(5) State agencies must provide information to the FNS and to the State agencies administering National School Lunch Program for the purpose of direct certification of children for school meals as described in §245.12(c)(2) of this chapter. In addition, State agencies must execute a data exchange and privacy agreement in accordance with §272.8(a)(4) and §272.1(c).

Along with strengthening the requirement that SNAP State agencies provide appropriate data to their NSLP counterparts in order to conduct direct certification matches, the final rule also revised the methodology used to calculate the percent of children in SNAP households directly certified for free school meals in order to improve the accuracy of a State's direct certification rate (please see the preamble to the final rule for more information on the new methodology). The new methodology requires changes to the FNS-742 and the creation of a new form FNS-834 to capture the three data elements required to calculate the direct certification rate. Each State's rate will determine if a State has met critical performance benchmarks or requires a continuous improvement plan. It is important that State SNAP agencies work closely with their NSLP counterparts to ensure a data exchange is established that provides accurate and timely data needed to determine a State's direct certification rate.

FNS-742 Revision: On April 19, 2013, the Office of Management and Budget approved a revised FNS-742 to capture data related to direct certification with SNAP required by the February 22, 2013, final rule. Starting with School Year (SY) 2013-2014, NSLP State agencies are required to report **separately** on the revised FNS-742 the count of those direct certifications **with SNAP** that are performed as of the last operating day in October. This count will be used as Data Element #1 for the new direct certification rate calculation.

The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

In order for the NSLP State agency to properly complete the revised FNS-742, each SNAP direct certification must be clearly identified so that it can be included in the count that is reported on the separate “SNAP Direct Certifications” line of the revised FNS-742. This will require the SNAP State agency and their NSLP counterpart to generate matching files that identify the SNAP matches separately from other programs (Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations, foster care, migrant workers, etc...).

Many SNAP State agencies have already worked successfully with their NSLP counterparts by adjusting their systems to accurately report the SNAP Direct Certifications on the FNS-742. For example, State agencies are coding the matched file (e.g. “1” or “S” for SNAP, “2” or “T” for TANF”, etc...) and retaining that coding down at the local level so that when it comes time to complete the FNS-742, the local educational agencies (LEA) can retrieve counts based on the program match from their point-of-sale systems.

FNS-834: As outlined in the July 1, 2013, joint NSLP/SNAP memorandum, the new form FNS-834 will capture the remaining two data elements needed to calculate a State’s direct certification rate. Data Element #2, the unduplicated count of school-aged children (5 to 17 years old) in SNAP households during the months of July, August, and September, is the **responsibility of the SNAP State agency** and is required to be reported to both the NSLP State agency and FNS by December 1st each year. Data Element #3, the number of SNAP children in special provision schools operating in a non-base year, is the responsibility of the NSLP State agency and is required to be reported to FNS by December 1st each year. Please refer to the July 1st memo for additional information.

Disclosure and Safeguards of Data: Finally, with the need to increase sharing of data between State agencies, it is important to remind SNAP State agencies that 7 CFR 272.1(c)(2) requires recipients of information released for the purposes of direct certification (e.g. NSLP State agencies, LEA’s) to adequately protect the information against unauthorized disclosure to persons or for purposes not specified in 272.1(c). In addition, the privacy safeguards provision in section 11(e)(8)(F) of the Food and Nutrition Act of 2008 (the Act) specifically states that privacy safeguards shall not prevent SNAP State agencies from establishing procedures for direct certification purposes outlined in section 11(u) of the Act.

Direct certification supports the Administration’s priority of ending childhood hunger by 2015 and ensuring that our children have access to nutritious food and nutrition education. It offers an effective, efficient way to certify eligible children for free school

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meals. Please advise your State SNAP agencies of the changes covered in this memo and encourage them to cooperate fully with their NSLP counterparts. You may contact Michael Ribar of my staff at (703) 305-2449 if you have questions about this matter. Thank you for your cooperation.

A handwritten signature in black ink, appearing to read "Lizbeth Silberman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lizbeth Silberman

Director

Program Development Division

Attachments:

- FNS-742 - *School Food Authority Verification Collection Report (Revised 4/19/2013)*
- FNS-834 - *State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report (4/10/2013, expiration date 4/30/2016)*
- *Memo - Release of the new State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report (7/1/2013)*
- *Final Rule - National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010 (2/22/2013)*