



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

3101 Park  
Center Drive  
Alexandria, VA  
22302-1500

DATE: July 1, 2013

MEMO CODE: SP 50-2013

SUBJECT: Release of the new *State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report* (Form FNS-834)

|     |   |  |
|-----|---|--|
| TO: | Regional Directors<br>Special Nutrition Programs<br>All Regions | Regional Directors<br>Supplemental Nutrition Assistance Program<br>All Regions |
|     | State Directors<br>Child Nutrition Programs<br>All States       | State Directors<br>Supplemental Nutrition Assistance Program<br>All States     |

The *Food, Conservation, and Energy Act of 2008* (Public Law 110-246) and the *Richard B. Russell National School Lunch Act*, as amended by the *Healthy, Hunger-Free Kids Act of 2010* (HHFKA, Public Law 111-296) require that children living in households receiving assistance under the Supplemental Nutrition Assistance Program (SNAP) be directly certified for free school meals under the National School Lunch Program (NSLP) and/or the School Breakfast Program. Each year, the Food and Nutrition Service (FNS) is required to assess State performance in directly certifying such children, to report the findings in a Report to Congress, and, with the advent of the HHFKA, to compare each State’s direct certification performance rate to certain mandated benchmarks (95% for school year (SY) 2013-2014 and beyond).

This memorandum provides information on the new form FNS-834—the *State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report*—which is to be used to report two of the three data elements needed to compute the State’s direct certification performance rates. The final rule—the *National School Lunch Program: Direct Certification Continuous Improvement Plans required by the Healthy, Hunger-Free Kids Act of 2010*, published on February 22, 2013—added a new section 7 CFR 245.12 to NSLP regulations and amended SNAP regulations at 7 CFR 272.5 to provide for this data collection. On April 30, 2013, the Office of Management and Budget (OMB) approved the new form. The FNS-834 will be used starting with SY 2013-2014.

**STATE AGENCY RESPONSIBILITIES**

The FNS-834 is an interagency form, and both the SNAP State agency and the NSLP State agency will complete separate submissions:

- **SNAP State Agency – Data Element #2** - The SNAP State agency must calculate the unduplicated count of school-aged children in households receiving SNAP benefits (not including households receiving zero benefits) during the months of July, August, and September, report that count on the FNS-834 as Data

Element #2, and submit the completed form both to FNS and to the NSLP State agency by December 1<sup>st</sup> each year. (Specific instructions for this calculation are on the FNS-834 and will be covered by Q-and-As that will soon follow.)

- **NSLP State Agency – Data Element #3** - The NSLP State agency must ensure that a “Special Provision Match” is run (no later than the last operating day in October) between SNAP records and student enrollment records from special provision schools operating in a **non-base** year. In addition, it must report the total number of SNAP children in the State found in this “Special Provision Match” as Data Element #3 on the FNS-834, and it must submit the completed FNS-834 to FNS by December 1<sup>st</sup> each year. If a State is not geared up to run this “Special Provision Match” for SY 2013-2014, the NSLP State agency may, for SY 2013-2014 only, utilize the alternative phase-in procedures for NSLP State agencies reporting Data Element #3 that are detailed in a separate section below. States with schools operating Community Eligibility have certain options available to them each year for complying with these requirements for Community Eligibility schools. (See further discussion on both of these options in the sections that follow as well as in the Q-and-As that will soon follow.)
- **NSLP State Agency or SNAP State Agency – Check Box** - In an effort to improve data sources to more closely approximate data elements, the SNAP State agency and NSLP State agency have the option of checking off the box on the FNS-834 to indicate that the State has special circumstances that may affect its direct certification rate calculation in a quantifiable way. If the box is checked, the appropriate State agency will be contacted and asked to forward a description of the circumstance, the count of the number of children affected by the circumstance, the methodology for estimating the count, and the source(s) of published State or Federal data used to support that methodology. FNS will consider these circumstances on a case-by-case basis, and will examine how the effect of such special circumstances could help keep FNS’s own methodology dynamic and better able to adapt to improved data sources.

The intent is for the FNS-834 to be incorporated into the Food Programs Reporting System (FPRS), but FNS does not expect this to be in place for the December 1, 2013, submission. Until reporting through FPRS is established, the NSLP State agency and the SNAP State agency are to submit their completed forms to FNS by email. To do so, each State agency should attach its form to an email (naming the file “**FNS-834 – [State’s Name] Submission from the [NSLP or SNAP] State agency**” and using the same filename in the subject line of the email) and send it to [CNStatesystems@fns.usda.gov](mailto:CNStatesystems@fns.usda.gov) by December 1<sup>st</sup>.

In addition, the SNAP State agency is to submit a copy of its completed form to the NSLP State Director no later than December 1<sup>st</sup> each year, in a manner agreed upon by both agencies, so that the NSLP State agency can use the reported count of the number of school-aged children in SNAP households in the State (Data Element #2) to monitor their own direct certification performance.

## **ALTERNATIVE PHASE-IN PROCEDURES FOR NSLP STATE AGENCIES REPORTING DATA ELEMENT #3, FOR SY 2013-2014 ONLY**

The preamble to the final rule, *National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, states that there will be alternative phase-in procedures for SY 2012-2013 for those States that are not geared up to run the “Special Provision Match” for the first year of the FNS-834. However, the final rule was not published until February 22, 2013, and the FNS-834 was not approved until April 30, 2013, so the form was not in effect for SY 2012-2013. As such, there will be alternative phase-in procedures that an NSLP State agency may choose to utilize for the phase-in year (SY 2013-2014) for any special provision school operating in a non-base year for which the State cannot ensure that a “Special Provision Match” can be performed, as follows:

- **“Base Year Percentage Option” for SY 2013-2014 Only** - The NSLP State agency may elect to use, for special provision schools operating in a non-base year—for SY 2013-2014 only—the most recent **base-year** direct certification percentage free rates for such schools in lieu of running the “Special Provision Match” for these schools. To do this, one would compare the number of children **directly certified as free in the base year** to the **total number certified as free in that same base year**, and apply that percentage to the number reported as free by the school in SY 2013-2014. This will yield the count that may be attributed to this school’s portion of Data Element #3. To be able to use this “Base Year Percentage Option” for a particular special provision school operating in a non-base year for SY 2013-2014, the school must have conducted direct certification in the base year and have access to this data.

To get the total count for Data Element #3 for the first year (SY 2013-2014), the NSLP State agency may use a combination of:

- “Special Provision Match” counts—from whatever special provision schools operating in a non-base year where the match can be run; and
- “Base Year Percentage Option” counts—from those special provision schools operating in a non-base year for which direct certification data during the base year is available and that are not in the “Special Provision Match” counts.

## **COMMUNITY ELIGIBILITY PROVISION SCHOOL OPTIONS**

Those schools operating under Community Eligibility are also considered to be special provision schools that fall under the guidance of this memorandum.

States that have special provision schools operating Community Eligibility may include these schools in the “Special Provision Match,” or, alternatively, may choose to include for these schools:

- the count of the number of identified students directly matched with SNAP used in determining the Community Eligibility claiming percentage for that school year; or

- the count from the SNAP match conducted by April 1 of the same calendar year, whether or not it was used in the Community Eligibility claiming percentages.

### **OTHER GUIDANCE**

The FNS-834 (see attached) provides instructions and additional information about the data elements being collected as well as the new formula for computing direct certification performance rates. The preamble of the final rule (see attached) provides a discussion of the new methodology and the reasons for its adoption.

To explain the new requirements in more detail and to answer any questions Regional or State staff may have, FNS will conduct webinars and issue Q-and-As in the coming weeks.

State agencies should direct any questions to the appropriate FNS Regional Office. Regional Offices with questions should contact the SNP Child Nutrition Division or the SNAP Program Development Division.

Sincerely,

**Original Signed**

For Cynthia Long  
Director  
Child Nutrition Division  
Special Nutrition Programs

**Original Signed**

Lizbeth Silbermann  
Director  
Program Development Division  
Supplemental Nutrition Assistance Program

Attachments:

Form FNS-834 - *State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report*

Final Rule - *National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*

|   |                    |   |
|---|--------------------|---|
| <p><b>U.S. DEPARTMENT OF AGRICULTURE</b><br/> <b>FOOD AND NUTRITION SERVICE</b><br/> <b>STATE AGENCY (NSLP/SNAP)</b><br/> <b>DIRECT CERTIFICATION RATE DATA ELEMENT REPORT</b></p> <p>This annual interagency report collects data elements from the State agencies that administer the Supplemental Nutrition Assistance Program (SNAP) and from the State agencies that administer the National School Lunch Program (NSLP).</p> <p>A separate, completed FNS-834 report must be submitted to the Food and Nutrition Service (FNS) no later than December 1st each school year by:</p> <ul style="list-style-type: none"> <li>• the SNAP State agency, providing Data Element #2 below; and</li> <li>• each State agency that administers the NSLP, providing Data Element #3 below.</li> </ul> <p>These data elements are needed to compute the Direct Certification Rate with SNAP that is required by the Food, Conservation, and Energy Act of 2008 (Public Law 110-246) and by the Richard B. Russell National School Lunch Act, as amended by the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296) and promulgated by the regulations published on February 22, 2013, the <i>National School Lunch Program: Direct Certification Continuous Improvement Plans required by the Healthy, Hunger-Free Kids Act of 2010</i>, which added a new section 7 CFR 245.12 to NSLP regulations and amended SNAP regulations at 7 CFR 272.5 to allow for this collection.</p> <p>For an understanding of the formula to calculate NSLP direct certification rate with SNAP, and to see how these data elements come into play, please refer to the reverse side of this form.</p> | <b>State</b>       | <div style="border: 1px solid black; width: 100%; height: 40px;"></div>   |
|   | <b>School Year</b> | <div style="border: 1px solid black; width: 100%; height: 40px; display: flex; align-items: center; justify-content: center;">20__ - 20__</div> |

|   |  |
|---|--|
| <b>State Agency Name and Address:</b>                   | <div style="border: 1px solid black; height: 30px;"></div> |
| <b>Contact Information:</b> (Name, Title, Email, Phone) | <div style="border: 1px solid black; height: 30px;"></div> |

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB number for this collection is 0584-0577. The time required to complete this information collection is 30 minutes per response, including the time to review instructions, to search existing data resources, to gather the data needed, and to complete and review the information collection.

|   |
|---|
| <b>SNAP State agency completes this section</b>   |
| <p><b>Data Element #2</b> – The number of school-aged children in SNAP households during the months of July, August, and September.</p> <p>Please enter, in the box provided below, the unduplicated count of the number of children ages 5 to 17 years at any time during the months of July, August, or September of this school year who were members of households receiving assistance under SNAP at any time during the months of July, August, or September of this school year. See reverse side for specific instructions.</p> |
| <p><b>Data Element #2</b></p> <div style="border: 1px solid black; width: 150px; height: 50px; margin: 0 auto;"></div>  |

|   |
|---|
| <b>NSLP State agency completes this section</b>   |
| <p><b>Data Element #3</b> – The number of SNAP Children in Special Provision Schools Operating in a Non-Base Year.</p> <p>Please enter, in the box provided below, the number of children from households receiving SNAP benefits that attend schools operating under the provisions of 7 CFR 245.9, if such schools were reporting in a year other than the base year. See reverse side for specific instructions.</p> |
| <p><b>Data Element #3</b></p> <div style="border: 1px solid black; width: 150px; height: 50px; margin: 0 auto;"></div>  |

|  |
|--|
| <b>Optional - The NSLP or SNAP State agency may complete this section, if applicable</b>   |
| <p><b>Special Circumstances</b></p> <p>If there are special circumstances that would affect the direct certification rate calculation for your State that you would like to bring to our attention, please let us know by marking an "X" in the box to the right. See reverse side for more instruction.</p> <div style="border: 1px solid black; width: 50px; height: 40px; float: right; margin-top: 10px;"></div> |

**STATE AGENCY (NSLP/SNAP) DIRECT CERTIFICATION RATE DATA ELEMENT REPORT (continued)**

**PURPOSE** - This report collects data elements necessary to compute direct certification rates for comparison with certain benchmarks required by 7 CFR 245.12(b). The benchmark for school year (SY) 2012-13 is 90%, and the benchmark for SY 2013-14 and every school year thereafter is 95%.

To promote transparency and to strengthen the direct certification process so that States can monitor their own performance using the same measures and methodology that FNS will use, this report identifies each of the data elements and its role in the formula to calculate a State's NSLP Direct Certification Rate with SNAP, even if, like Data Element #1, it is not collected on this form.

**Direct Certification Rate Formula:**

$$\begin{array}{r}
 \text{Percent of SNAP children} \\
 \text{directly certified for} \\
 \text{free school meals} \\
 = \\
 \text{SNAP children} \\
 \text{directly certified for} \\
 \text{free school meals} \\
 + \\
 \text{SNAP children in special} \\
 \text{provision schools operating} \\
 \text{in a non-base year} \\
 = \\
 \text{School-aged children in SNAP households during} \\
 \text{the months of July, August, and September} \\
 \text{\#1} + \text{\#3} \\
 \text{\#2}
 \end{array}$$

| Data Element                     | Instructions and additional information   |
|----------------------------------|---|
| # 1                              | <p><b>SNAP CHILDREN DIRECTLY CERTIFIED FOR FREE SCHOOL MEALS:</b> This is the number of children directly certified with SNAP for free school meals as of the last operating day in October. <b>THIS DATA ELEMENT #1 DOES NOT COME IN ON THIS FORM; it comes in instead on the FNS-742, line 3-2B. It is due to the NSLP State agency no later than February 1st and to FNS no later than March 15th each school year.</b></p>  |
| # 2                              | <p><b>SCHOOL-AGED CHILDREN IN SNAP HOUSEHOLDS:</b> For our direct certification rate formula, we define "school-aged" as 5 to 17 years old. A query on the database must yield any child in a household receiving assistance under SNAP during the months of July, August, or September and whose birthdate is between July 1st (of the SY-minus-18) and September 30th (of the SY-minus-5). For example, for SY 2012-2013, that would be children born between July 1, 1994 (2012 minus 18) and September 30, 2007 (2012 minus 5); and for SY 2013-14, that would be children born between July 1, 1995 (2013 minus 18) and September 30, 2008 (2013 minus 5). So long as the child's birthday falls within the birthdate age-range listed for the given school year, include the child in the count. Be careful, however, that you do not count the same child more than once. We are looking for the unduplicated count, so even if the child is in a SNAP household for each of the three months, s/he is counted only once. We need only the counts, not the list of names of such children. <b>THIS DATA ELEMENT #2 IS REPORTED ON THE FRONT OF THIS FORM BY THE SNAP STATE AGENCY in the space provided. It is due to FNS as soon as possible, but no later than December 1st of each school year.</b> In addition to submitting a completed report to FNS, you, as the SNAP State agency, must also send a copy of this completed report to the State agency that administers the NSLP in your State so that they will know the data element you are reporting to FNS. Reporting this data element as soon as it is available will allow these NSLP State agencies to better monitor their own performance.</p> |
| # 3                              | <p><b>SNAP CHILDREN IN SPECIAL PROVISION SCHOOLS OPERATING IN A NON-BASE YEAR -</b> To get this count, NSLP State agencies must ensure that a match is run between SNAP records and school enrollment records from schools operating under the provisions of 7 CFR 245.9 (special provision schools) in a year other than the base year. Although you will not actually directly certify children attending these schools in a non-base year, this process will provide a measure for the count of the number of children who could have been directly certified with SNAP had it been a base year when direct certification with SNAP is conducted. Such special provision school matching efforts should occur in or close to October, but must occur no later than the last operating day in October. (Please refer to the preamble of the final rule cited on the front of this form and to other FNS Guidance regarding special phase-in allowances and CEO school options.) <b>THIS DATA ELEMENT #3 IS REPORTED ON THE FRONT OF THIS FORM BY THE NSLP STATE AGENCY in the space provided. It is due by December 1st of each school year.</b> [Note: In a base year, actual SNAP direct certifications will be reported on the FNS-742, line 3-2B and included in Data Element #1 instead of in Data Element #3. If your State does not have any special provision schools operating in a non-base year for this school year, enter "0" in the box on the front of this form.]</p>   |
| Special Circumstances (Optional) | <p>If your State has special circumstances that you want us to consider to more closely approximate either of the two data elements collected on this form, please alert us by putting an "X" in the Special Circumstances box on the front of this form. FNS would then contact any State agency that marks this box, asking the State agency to forward a description of the circumstance they want FNS to consider, the count of the number of children affected by the circumstance, the methodology for estimating the count, and the source(s) of published State or Federal data used to support that methodology.</p>   |

**Please note that although this is an interagency form, it is not a shared form.** FNS expects separate forms to come in from each State agency. The SNAP State agency is to fill out the front of this form, completing Data Element #2 and leaving Data Element #3 blank. The State agency that administers the NSLP in the State is to complete the front of a separate form, completing Data Element #3 and leaving Data Element #2 blank. (If more than one State agency administers the NSLP in the State, they each are to submit separate forms.) Either State agency may mark the Special Circumstances (Optional) box.



## Rules of Behavior (ROB) - FNCS General User

### User ID and password

The User ID and password being issued to you must not be shared with or given to anyone else. FNCS Users who share their User ID or password will be in violation of the Computer Fraud and Abuse Act of 1986. If you forget your password or believe your password has been compromised, contact the ISO immediately. To have your account reset, contact IT Customer Support (1-888-OIT-4FNS) or open a ticket through the Help Desk ticketing system.

### Monitoring and Auditing of FNCS Information Resources

At anytime, FNCS/USDA may monitor and/or audit user activity and/or network traffic. In addition, USDA may access your system and disclose information obtained through audits to third parties, including law enforcement authorities. Acceptance of the warning banner prior to logging onto the FNCS network is your acknowledgment of the FNCS/USDA monitoring/auditing.

### Violations

Violations of information system security guidelines and procedures may lead to disciplinary action up to and including termination of employment.

### Manager/Supervisor Responsibilities

All persons in a management role at FNCS must be aware of and knowledgeable in information system security practices. Managers are responsible for enforcing these practices within their areas and will be held accountable for ensuring that users are aware of and acknowledge their responsibilities. FNCS Management is also responsible for ensuring that all FNCS Users, i.e. Employees, Contract Personnel and Official Visitors attend mandatory computer security training.

### FNCS User Responsibilities

FNCS User's access to information system resources indicates a level of trust between the User, FNCS Management and ISO. Therefore, FNCS Users are held accountable for the following:

- Ensure the ethical use of FNCS information resources in accordance with FNCS guidelines and procedures.
- Utilize all security measures that are in place to protect the confidentiality, integrity and availability of information and systems.
- Refrain from using FNCS information resources for inappropriate activities.
- Adhere to all licenses, copyright laws, contracts, and other restricted or proprietary information.
- Always safeguard User IDs, passwords, and smartcards.
- Protect FNCS information resources when working remotely by ensuring the latest patches and antivirus software are loaded on your Government Furnished equipment (GFE).
- Limited personal use of the Internet is allowed as long it does not interfere with official business or reflect adversely on FNCS Information Systems.
- Access only those information systems, networks, data, control information, and software that you are authorized to use.
- Know who your Information System Security Officers (ISSOs) are and how to contact them.
- Determine the sensitivity of the information and programs on your computing resources (e.g. *non-sensitive, sensitive but unclassified*).
- Avoid the introduction of harmful files/data that may contain spy-ware, viruses, etc. into any computing resource.
- Please refer to the Guidance on Acceptable Use of FNCS Information System in the 702 handbook for additional acceptable uses of the system.
- If you have any questions on FNCS Information Systems Security, please contact IT customer support (1-888-OIT-4FNS) or send an email to the Security Mailbox at [SecurityOfficers.Mailbox@fns.usda.gov](mailto:SecurityOfficers.Mailbox@fns.usda.gov).

## Form Instructions

1. **LAST, FIRST, MIDDLE NAME** - Enter the last name, first name and middle name (*if applicable*) of the person requesting FNCS computer system access. If middle name does not exist, enter n/a.
2. **TITLE** - Enter current Title.
3. **DATE OF REQUEST** - Select from the calendar, the date you are requesting access to an FNCS system.
4. **EMAIL** - Enter the FNCS email address, if known.
5. **USDA E-AUTH ID** - Enter your official e-Authentication ID, (existing users).  
  
To obtain an e-Auth ID go to <http://www.eauth.egov.usda.gov/index.html> and click on "Create an Account"
6. **TYPE OF USER** - Select your user type from the drop-down menu; Federal, State, Contractor, JP Morgan or Other. "If "Other" was selected in this field, please provide an explanation in Field 22 of what "Other" means as well as the justification for the selection."
7. **TELEPHONE**- Enter telephone.
8. **CONTRACT EXPIRATION DATE** - If you are a Contractor, enter your Contractor Expiration Date. Please contact your COTR for this date.
9. **TEMPORARY EMPLOYEE EXPIRATION DATE** - If you are a Temporary Employee (*Intern*), enter your Expiration Date. Please contact your supervisor for this date.
10. **COMPANY** - Enter your company/agency affiliation.
11. **DIVISION** - Enter your division affiliation.
12. **DEPARTMENT** - Enter your department affiliation.
13. **OFFICE** - Select your office affiliation from the drop-down menu. Enter the street number, street name, suite number, city, state and zip code of the facility where the requesting user will be working. "If "Other" was selected in this field, please provide an explanation in Field 22 of what "Other" means as well as the justification for the selection."
14. **SYSTEM NAME** - Enter the system that you are requesting to access. "If "Other" was selected in this field, please provide an explanation in Field 22 of what "Other" means as well as the justification for the selection."
15. **TYPE OF ACCESS** - For the system, enter the type of access requested. Access types are system specific. Please check with the System Owner to determine the appropriate access type.
16. **FORM** - This field is needed for FPRS access only. Enter the form that the user has requested to access.
17. **ACTION REQUESTED** - Enter the type of access requested for this system, if you are not sure, please contact the system owner for the appropriate action.
18. **STATE/LOCALITY CODES** - Enter the state/locality codes that are needed for system access. State/Locality codes are FNCS organization codes that specific systems may require. If required, these codes will determine the information that you can access within the FNCS system. If you do not know your state/locality code, please contact the System Owner for the code.
19. **LOGIN ID** - For new accounts, the Agency will enter the login ID here. If an existing account, enter in your current login ID.
20. **SOCIAL SECURITY NUMBER (SSN)** - Enter your SSN if requesting access to the NFC only!
21. **HOME ZIP CODE** - Enter your home zip code if you are requesting access to JPMorgan only!
22. **COMMENTS, SPECIAL INSTRUCTIONS** - Enter any comments or special instructions that are needed for the completion of this request for system access.
23. **USER ACKNOWLEDGEMENT** - Read the Privacy Act Statement and the FNCS Rules of Behavior (*ROB*), sign and date the user acknowledgement statement. This must be completed prior to submitting this form to your supervisor.
24. **APPROVALS** - Prior to the user submitting the User Access Request form, it must be approved by the following: the user's Supervisor, the Authorizing Official for the system, the Information Security Office and the State Computer Security Officer, if applicable.
25. **SECURITY and PRIVACY TRAINING COMPLETE** - This section is for FNCS IT Customer Support and Information Security Office Staff use only.
26. **DATE RECEIVED** - This section is for FNCS IT Customer Support and Information Security Office Staff use only.
27. **PERSON RECEIVING REQUEST** - This section is for FNCS IT Customer Support and Information Security Office Staff use only.
28. **DATE COMPLETED** - This section is for FNCS IT Customer Support and Information Security Office Staff use only.

## Instructions for Accessing the FNS-834 in FPRS

**SNAP State agency and Regional office staff** must request permission to access the SNAP-OP, FNS-834 form in FPRS via the FNS-674. Please follow these **Instructions for Accessing the FNS-834 in FPRS**.

State agencies should access FPRS here: <https://fprs.fns.usda.gov/>. State agency users must have Level 2 Authority and submit an FNS-674 form (found on the “Welcome to FPRS” page) with their supervisor’s approval to their designated [Authorizing Official](#) at their FNS Regional Office.

SNAP State agencies can find their agency FPRS code(s) on the FY 14 SNAP Master Directory (Attachment H).

Regional office staff may access FPRS by clicking the link above or from the FNS intranet site by clicking the “Restricted Access Sites” section on the left menu and then clicking on “FPRS.” Regional office users must submit an FNS-674 form with their supervisor’s approval to their designated [Authorizing Official](#) at their FNS Regional Office.

Once the appropriate approvals are obtained, the Regional Authorizing Official should forward all approved FNS-674 forms for State agency and Regional office staff to FNS Headquarters.

Please note the approval process for the FNS-674 may take several days to complete.

Memorandums SP 50-2013 dated July 1, 2013; SNAP – *Data Exchange between the Supplemental Nutrition Assistance Program (SNAP) and the National School Lunch Program (NSLP) for Direct Certification with SNAP* dated July 16, 2013; SP 54-2013 dated August 16, 2013; and SP 20-2014 dated February 4, 2014 provide information on the regulations for this data collection and instructions for completing the FNS-834 form. There have been no changes to this data collection aside from this new reporting process.

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**Questions?** FNS-834 forms contact [CNstatesystems@fns.usda.gov](mailto:CNstatesystems@fns.usda.gov); FPRS contact [FPRS.support@fns.usda.gov](mailto:FPRS.support@fns.usda.gov) or call the FPRS Help Desk: 1-866-336-3777.



JUL 16 2013

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.

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 1<sup>st</sup> 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 1<sup>st</sup> each year. Please refer to the July 1<sup>st</sup> 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

Program Directors

Page 3

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.



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)*



United States Department of Agriculture

Food and Nutrition Service

3101 Park Center Drive Alexandria, VA 22302-1500

DATE: August 16, 2013

MEMO CODE: SP 54-2013

SUBJECT: Transmittal of the Questions and Answers on the Computation of the Direct Certification Performance Rate with the Supplemental Nutrition Assistance Program (SNAP)

TO: Regional Directors Special Nutrition Programs All Regions
Regional Directors Supplemental Nutrition Assistance Program All Regions
State Directors Child Nutrition Programs All States
State Directors Supplemental Nutrition Assistance Program All States

The attached Q-and-As are issued in follow-up to Policy Memorandum SP 50-2013, Release of the new State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report (Form FNS-834). This information more fully describes the process and data requirements for determining State performance in directly certifying children for free school meals under the National School Lunch Program (NSLP) and/or the School Breakfast Program if they live in households receiving assistance under the Supplemental Nutrition Assistance Program (SNAP).

The Q-and-As are organized by the three data elements required by the Final Rule— National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010. They show how each element fits into the new formula for computing State direct certification performance rates with SNAP, who is responsible for each data element, how the data element is captured, and how and when the data element is to be reported:

Table with 4 columns: Data Element, Who Reports, How Report, Reporting Requirements. It lists three data elements related to SNAP children and school meals, including who reports them, the form used, and the reporting deadline.

NOTE: SFA = School Food Authority; SNAP SA = SNAP State agency; NSLP SA = NSLP State agency

For a more complete look at these policies, please refer to:

- Joint NSLP and SNAP Policy Memorandum SP 50-2013, *Release of the new State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report (Form FNS-834)*, published July 1, 2013, and found at [http://www.fns.usda.gov/snap/rules/Memo/2013/DC\\_Memo-SP50-2013.pdf](http://www.fns.usda.gov/snap/rules/Memo/2013/DC_Memo-SP50-2013.pdf);
- Final Rule, *National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, published February 22, 2013, and found at [http://www.fns.usda.gov/cnd/governance/regulations/2013-02-22\\_AE10.pdf](http://www.fns.usda.gov/cnd/governance/regulations/2013-02-22_AE10.pdf);
- SNAP Policy Memorandum, *Data Exchange between the Supplemental Nutrition Assistance Program (SNAP) and the National School Lunch Program (NSLP) for direct Certification with SNAP*, published July 16, 2013, and found at [http://www.fns.usda.gov/snap/rules/Memo/2013/DC\\_Memo-071613.pdf](http://www.fns.usda.gov/snap/rules/Memo/2013/DC_Memo-071613.pdf);
- Form FNS-834, *State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report*, approved by OMB on April 30, 2013, and found at <http://www.fns.usda.gov/snap/rules/Memo/2013/FNS-834.pdf>;
- NSLP Policy Memorandum SP 38-2013, *Release of the new School Food Authority (SFA) Verification Collection Report (Form FNS-742)*, published April 29, 2013, and found at <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP38-2013os.pdf>;
- Form FNS-742, *School Food Authority (SFA) Verification Collection Report*, approved by OMB on April 19, 2013, and found at <http://www.fns.usda.gov/snap/rules/Memo/2013/FNS-742.pdf>.

State agencies should direct any questions to the appropriate FNS Regional Office. Regional Offices with questions should contact the SNP Child Nutrition Division or the SNAP Program Development Division.

Sincerely,

**Original Signed**

Cynthia Long  
Director  
Child Nutrition Division  
Special Nutrition Programs

**Original Signed**

Lizbeth Silbermann  
Director  
Program Development Division  
Supplemental Nutrition Assistance Program

Attachment: *Questions and Answers on the Computation of the Direct Certification Performance Rate with SNAP*

**USDA/FNS/Child Nutrition Division**

# **NSLP/SNAP: Questions and Answers on the Computation of the Direct Certification Performance Rate with SNAP**

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**The new formula, the data elements, and the reporting of these  
data elements on the revised FNS-742 and on the new FNS-834**

**8/19/2013**

**v.2**

Assessing the performance of States to directly certify children for free school meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) who live in households receiving assistance under the Supplemental Nutrition Assistance Program (SNAP).

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### I. New Formula to Compute Direct Certification Performance Rates

The same three data elements have been utilized since school year (SY) 2008-2009 to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP), if they live in households receiving assistance under the Supplemental Nutrition Assistance Program (SNAP). Beginning with SY 2013-2014, however, the three data elements will be collected and reported in a different way and will be used to compute direct certification performance rates using the following new formula:

|   |   |  |   |  |
|---|---|--|---|--|
| Percent of SNAP children directly certified for free school meals | = | $\frac{\text{SNAP children directly certified for free school meals} + \text{SNAP children in special provision schools operating in a non-base year}}{\text{School-aged children in SNAP households during the months of July, August, and September}}$ | = | $\frac{\mathbf{\#1} + \mathbf{\#3}}{\mathbf{\#2}}$ |
|---|---|--|---|--|

These changes are meant to increase the accuracy of the direct certification performance rates and to give States the tools to monitor their own performance.

### II. Data Element Reporting Requirements

| Data Element |   | Who Reports | How Report | Reporting Requirements                               |
|--------------|---|-------------|------------|--|
| <b>#1</b>    | # SNAP children directly certified for free school meals        | SFA         | FNS-742    | SFA to NSLP SA - Feb 1<br>NSLP SA to FNS - Mar 15    |
| <b>#2</b>    | # School-aged SNAP children in the state in July, Aug, and Sept | SNAP SA     | FNS-834    | SNAP SA to FNS - Dec 1<br>SNAP SA to NSLP SA - Dec 1 |
| <b>#3</b>    | # SNAP children in non-base year special provision schools      | NSLP SA     | FNS-834    | NSLP SA to FNSHQ - Dec 1                             |

SFA = School Food Authority, SA = State agency

### III. Data Element #1 – SNAP Children Directly Certified for Free School Meals

This data element will come from the revised FNS-742, the *School Food Authority (SFA) Verification Collection Report*, where, on Line 3-2, the SFAs will report the count of the number of children eligible for free school meals who were, as of the last operating day in October, directly certified using SNAP data.

[**NOTE:** The former version of the FNS-742, the *Verification Summary Report* (note the name change), collected this information on line 4-1, but line 4-1 also included other certifications—those based on categorical eligibility, such as direct certifications with other programs and the certifications via the “letter method”—and this resulted in an overstatement of the number of children directly certified with SNAP. The revised FNS-742, on the other hand, separates out this SNAP data element to give a more accurate computation of direct certification performance rates **with SNAP.**]

#### 1. **QUESTION:** *Who is responsible for collecting Data Element #1, and how is it reported?*

**ANSWER:** It is the National School Lunch Program School Food Authorities that are responsible for collecting and reporting the number of students in their schools who, **by the last operating day in October**, were directly certified for free school meals based on receipt of SNAP assistance. The SFAs complete their verification activities no later than November 15<sup>th</sup> (or up to December 15<sup>th</sup> if the State has granted an extension due to natural disaster, civil disorder, strike or other circumstances that prevent the SFA from timely completion of verification activities). Then, by February 1<sup>st</sup>, they report to the NSLP State Agency (or to the Regional Office in the case of SFAs where the NSLP and SBP are administered by the Regional Office) the count of SNAP direct certifications on line 3-2 of the form FNS-742, the *School Food Authority (SFA) Verification Collection Report*. [NOTE: some SAs have an earlier due date and some have a State version of this form, so the equivalent line number may be different for the SFAs in some States]. The NSLP State agency submits the FNS-742 data from each of its SFAs to FNS no later than March 15<sup>th</sup>.

#### 2. **QUESTION:** *What counts are included on line 3-2 of the FNS-742?*

**ANSWER:** The count for line 3-2 of the FNS-742 is the sum of the counts of all **direct certifications based on SNAP**. This would include:

- All SNAP direct certifications based on matching children from the SNAP database with children from the student enrollment database (including any “adjudicated” matches—those matches made after determining that non-matches or partial-matches from the unmatched list actually represent solid matches, often done by hand by looking at other available data elements outside of the primary match criteria, such as address information or names of other family members).

## NSLP/SNAP - Q & A: Direct Certification Performance Rate with SNAP

- All SNAP direct certifications that are based on SNAP-combo matches—that is, based on the matching of children who appear on the SNAP database who are also eligible for direct certification with some other categorically eligible program (such as on SNAP and on the Temporary Assistance for Needy Families Program (TANF)). If, for example, a child is matched with both SNAP and TANF, the SNAP designation takes precedence, so call it a SNAP direct certification (SNAP-DC). [NOTE: See 7 CFR 245.6(b)(2) for the list of the other programs for which a child may be directly certified for free school meals.]
- All SNAP direct certifications based on eligibility extended to other children of the household in which a SNAP directly-certified child resides. [NOTE: See 7 CFR 245.6(b)(7) for the list of the programs for which eligibility must be extended to other household members. Also see FNS policy memorandum SP 25-2010, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household found at [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP\\_25\\_CACFP\\_11\\_SFSP\\_10-2010\\_os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf).*]
- All SNAP direct certifications that are based on finding the child in the SNAP database—even if the child was originally certified in some other way, such as with an application or through some other eligible program—so long as the conversion to “SNAP directly certified” occurs before the last operating day in October.

### 3. QUESTION: What counts are **not** to be included on line 3-2 of the FNS-742?

**ANSWER:** Since it is only the sum of the counts of all SNAP direct certifications that is to be included on line 3-2 of the FNS-742, NSLP State agencies and SFAs must ensure that the following are **not** included on line 3-2, since these are **not** considered to be SNAP direct certifications:

- Certifications based on the use of the SNAP “letter method.” “Letter method” refers to the procedure whereby the SNAP State agency sends the household a letter indicating SNAP eligibility and directs the household to bring the letter to the school so the children in the household can receive free meals. With the implementation of the Healthy, Hunger-Free Kids Act of 2010, such certifications with SNAP are no longer to be considered as direct certifications since they require some action by the household. [SNAP “letter method” certifications should be reported instead on line 3-4.]
- Certifications based on a SNAP case number entered on an application. This is not direct certification. [SNAP case number certifications should be reported instead on line 4-1.]

- Certifications based on participation in any of the other allowable programs that confer categorical eligibility—these are also not to be included on line 3-2 unless the child was also matched with SNAP or was extended eligibility because of another household member’s receipt of SNAP benefits. [Certifications based on participation in any of the other allowable programs other than SNAP that confer categorical eligibility should be reported instead on line 3-3.]

**4. QUESTION:** *How does the SFA know whether or not a certification was a SNAP direct certification when it comes time to complete the FNS-742?*

**ANSWER:** It is vitally important that the School Food Authority (SFA) retain information as to the basis and the timing of when each certification is made. For instance:

- If the SNAP-to-Student-Enrollment match is made at the State level, some sort of coding for the SNAP match would need to accompany the match information sent to the local level so that the local level would know the basis by which a direct certification for free school meals could be made. Additionally, the local system would need to be able to retain this coding designation (SNAP direct certification through SNAP matching in this case) and be able to record and retain the timing of when the certification was made. This is important because the SFA needs to be able to query for and to retrieve all records with a **SNAP direct certification designation** where the certification was made **by the last operating day in October** in order to include those certifications in the count for line 3-2 of the FNS-742.
- If a SNAP-to-Student-Enrollment match is conducted at the local level, either through local level matching, “adjudication” of the unmatched list from the State, or from a “lookup” match, the SFA would need to designate the match as a **SNAP direct certification** and to retain the date of such certification to ensure that only those that were made by the last operating day in October would be included on line 3-2 of the FNS-742.
- For SNAP direct certifications based on a SNAP-combo match—that is, a SNAP-to-“Student Enrollment” match as well as a “Some Other Program”-to-“Student enrollment” match—then the SFA would need to be able to code and access the record as a **SNAP direct certification** match and to later retrieve this certification as a SNAP direct certification (if the certification occurs before the last operating day in October) when it comes time to complete line 3-2 of the FNS-742. [NOTE: If a State/SFA prefers to give it a SNAP-combo designation (like SNAP-TANF) instead of just SNAP-DC, ensure that the system can retrieve the SNAP-combo designations along with the SNAP-DC designations so that the pool for the counts for line 3-2 of the FNS-742 will include these SNAP-combo counts as well.]

- For SNAP direct certifications based on extended eligibility that occurred by the last operating day in October, the SFA would need to be able to retrieve these counts and include them in the total count for line 3-2 of the FNS-742.
- For SNAP direct certifications based on converting a child to SNAP direct certification by the last operating day in October, the SFA would need to be able to retrieve these counts and include them in the total count for line 3-2 of the FNS-742.
- Additionally, the SFA would need to be able to compute the total count of children directly certified with SNAP (summing up the SNAP direct certifications such as those listed above) and to report this total in line 3-2 of the FNS-742.

**5. QUESTION:** *If the State has not sufficiently prepared for separate reporting of the SNAP-only counts on line 3-2 of the FNS-742, what should it do?*

**ANSWER:** The expectation is that the direct certification data reported on line 3-2 of the FNS-742 for each school year—including this first school year, SY 2013-2014—will be SNAP-DCs, not other certifications. Certifications that are not SNAP direct certifications should not be included on this line. The NSLP State agency should take whatever steps necessary to ensure that this is the case. States/LEAs should follow through with conducting direct certification without delay at the beginning of the school year to ensure that all eligible children receive free meals as early in the school year as possible regardless of any potential issues in separating the SNAP data when reporting on the FNS-742.

If any NSLP State agency anticipates difficulty complying with the requirement to report SNAP-DCs separately from other certifications—perhaps because of data programming timing issues or because it needs more cooperation with its SNAP State agency partners—it should ask for FNS assistance. If the problem is with data programming timing issues, the State may be able to come up with a way to determine the number of SNAP-DCs in retrospect (i.e. when the State does not have systems in place at the beginning of the school year to code and retain SNAP-DC designations but later is able to do a “look-back” once the necessary system changes are in place) so long as the NSLP State agency is able to identify SNAP-DCs that were made as of the last operating day in October.

If, by February 1, 2014, when it is time for the NSLP State agency to submit the FNS-742 to FNS for this first school year, the NSLP State agency is not able to affirm that the data on line 3-2 is indeed SNAP-DC data only, the NSLP State agency will need to inform FNS that this is the case, noting that it is a source of inaccuracy in the data. Such sources of inaccuracy will be noted in the Direct Certification Report to Congress and other appropriate follow-up actions may be initiated.

#### **IV. Data Element #2 – School-aged Children in SNAP Households during the Months of July, August, and September**

This data element will come from the new FNS-834, the *State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report*, and will be the unduplicated count of the number of children ages 5 to 17 years at any time during the months of July, August, or September of the given school year who were receiving assistance under SNAP at any time during the months of July, August, or September of the same school year.

**1. QUESTION:** *Who is responsible for computing Data Element #2 and for reporting it on the FNS-834?*

**ANSWER:** The SNAP State agency is responsible for computing Data Element #2 and reporting it on the FNS-834. The SNAP State agency is also responsible for submitting the completed FNS-834 both to FNS and to the NSLP State agency (or NSLP State agencies, if there is more than one NSLP State agency in the State) by December 1<sup>st</sup> each school year.

**2. QUESTION:** *How is the SNAP State agency to compute Data Element #2?*

**ANSWER:** To get Data Element #2, the SNAP State agency is to:

- **QUERY THE DATABASE** - Query the SNAP database to identify those children in households receiving SNAP benefits (not including households receiving zero benefits) at any time during the target months of July, August, and September who are aged 5 through 17 years at any time during these months and to sum up the number of such children in the State.

To ensure that the SNAP State agencies use the proper birth date range for the query, guidance is provided in the following chart:

**Example 1: Determining the proper “birth date range” for the SNAP Data Element #2 query of the SNAP database, by school year.**

| School Year (SY)            | First Part of SY (FP*)<br>(from which to subtract the 18 or the 5) | Beginning birth date<br>July 1 of (FP minus 18) | Ending birth date<br>Sept. 30 <sup>th</sup> of (FP minus 5) | Birth date range for the query                             |
|-----------------------------|--|---|---|--|
| Any SY                      | “FP”   | July 1, (FP - 18)                               | Sept. 30, (FP - 5)  | Children born July 1, (FP - 18) through Sept. 30, (FP - 5) |
| (Example 1)<br>SY 2013-2014 | 2013   | July 1, 1995<br>(since 2013 - 18 =1995)         | Sept. 30, 2008<br>(since 2013 - 5 = 2008)                   | July 1, 1995 through Sept. 30, 2008                        |
| (Example 2)<br>SY 2014-2015 | 2014   | July 1, 1996<br>(since 2014 - 18 =1996)         | Sept. 30, 2009<br>(since 2014 - 5 = 2009)                   | July 1, 1996 through Sept. 30, 2009                        |
| (Example 3)<br>SY 2020-2021 | 2020   | July 1, 2002<br>(since 2020 - 18 =2002)         | Sept. 30, 2015<br>(since 2020 - 5 = 2015)                   | July 1, 2002 through Sept. 30, 2015                        |

\*FP = Calendar year when the school year begins

- ENSURE UNDUPLICATED COUNTS** - Ensure that the count is an **unduplicated count of these children**. A child in a household that received SNAP benefits at any time during the target three months of July, August, or September must be counted only once. If the query of the database using the “birth date range” (see above) shows, for example, that children who receive SNAP benefits in each of the three months are listed more than one time, then the SNAP State agency will need to deduplicate the file when the query is run. [NOTE: Deduplication is usually accomplished via a data fusion process whereby records that have been classified as matches within a single database are merged. In this way, if a person is listed in a database more than one time, he/she is counted only once.]
- RECORD THE COUNT** - Record in the appropriate box on the FNS-834 the count of the number of children whose birth dates fall in the “birth date range” who lived in households receiving benefits at any time during July, August, or September, after making sure that it is an unduplicated count. It is only the count of these children that must be reported on the FNS-834, although the SNAP State agency is to retain for review the documentation that supports this count.

**3. QUESTION:** *If the query is supposed to be selecting for children ages 5 through 17, why does the formula to calculate the beginning birth date range say “the first part of the school year (FP) minus 18,” why not minus 17?*

**ANSWER:** A child is “17 years old” all the way up until his/her 18<sup>th</sup> birthday. Having the query set to “FP minus 18” keeps children who are still 17 in the count.

**4. QUESTION:** *If a child turns 18 years of age on July 1<sup>st</sup> or July 2<sup>nd</sup>, should the child still be in the select query?*

**ANSWER:** Yes. Any child born within the dates of the “birth date range” for the given school year should be included in the query, even if they are in the age range for only a day or two.

**5. QUESTION:** *Since Data Element #2 is based on the 5-17 age range, shouldn't the SNAP-to-Student-Enrollment match criteria for Data Element #1 also be using the 5-17 age range?*

**ANSWER:** No. The query that is run for Data Element #2 is based on the 5-17 age range because this data element provides FNS with the “universe” of school-aged children to which the State’s direct certification count is to be compared (the denominator of the new formula to compute direct certification performance rates). The Data Element #2 age range is narrower than the age range with which the SNAP-to-Student-Enrollment match is conducted to get Data Elements #1 or #3. In fact, when performing the match for Data Elements #1 and #3, the State is required to run the match across a wide enough age range that would be able to include all its students enrolled in schools through high school, and so the NSLP State agency has latitude for setting the age range to whatever makes sense for the State. [NOTE: some States choose 3-21, 4-18, 0-22, but it is up to the NSLP State agency to ensure that the age range for Data Elements #1 and #3 will include all of its students.] The age range for the Data Element #2 query, however, must be set as defined in the chart (in Example 1, above) to yield the “universe” that will be used in the rate calculation to reflect the number of children who could be directly certified with SNAP in the State.

## V. Data Element #3 – SNAP Children in Special Provision Schools Operating in a Non-Base Year

This data element is a more accurate way to estimate the number of children from households receiving SNAP benefits that attend schools operating in a non-base year under the special assistance provisions of section 11(a)(1) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1759a(a)(1)) and 7 CFR 245.9. The final rule, *National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, requires that a special match be run between SNAP records and student enrollment records from such schools and would allow the NSLP State agency to count all such “Special Provision Matches” (in addition to the counts of **actual** SNAP direct certifications from all other schools that are included in Data Element #1) when determining State direct certification rates. The count from the “Special Provision Match” is reported by the NSLP State agency on the new form FNS-834 as Data Element #3.

### 1. QUESTION: *Why do we need Data Element #3?*

**ANSWER:** Special provision schools operating in a base year take applications and conduct direct certification just as other schools do, so the counts of children directly certified with SNAP during base years would routinely come in through Data Element #1 counts, and no special adjustment would need to be made. When a special provision school is operating in a non-base year, however, applications are not taken and direct certification is not conducted, so although children living in households receiving SNAP benefits would show up in the “universe” of those school-aged children who should be directly certified for free school meals (Data Element #2), these children would NOT show up in the counts for Data Element #1 during a non-base year. If no adjustment is made, the direct certification performance rates for States with special provision schools operating in a non-base year would be understated, and this understatement would be increasingly more significant as the number of these children increases. To more accurately account for these children, the “Special Provision Match” is offered to provide a count for Data Element #3 that can be added in the numerator with Data Element #1 before comparing to Data Element #2 in the denominator, thus giving a truer picture of a State’s direct certification performance rate with SNAP. (Please see additional discussion, beginning with “QUESTION 10” of this section, about the special provision schools operating under Community Eligibility, which do not technically use the terms “base year” and “non-base” years.)

### 2. QUESTION: *Is the “Special Provision Match” something new? What was used in the past for Data Element #3?*

**ANSWER:** Yes, the “Special Provision Match” is something new. In the past, FNS estimated a value for Data Element #3 and subtracted it, in the denominator, from the “universe” of those school-aged children living in households receiving SNAP benefits. This value for

Data Element #3 was an estimate based on the number of free students reported in special provision schools on the FNS-742, adjusted to estimate the SNAP portion using general adjustment factors. The estimate had limitations, particularly where the number of SNAP-participant children had changed significantly since a school's most-recent base year.

[NOTE: See the sections entitled "*Estimate of SNAP Participants in Provision 2 and 3 Schools*" in "*Appendix C - Estimation of Component Statistics*" in the Reports to Congress for 2009 through 2012 for more information on the estimations, and "*Appendix D - Data Limitations*" of these same Reports for descriptions of these limitations.]

The new "Special Provision Match" gives maximum credit to the States for these students, and encourages States to develop matching systems that can account for these students during base years and non-base years, especially as States add Provision/Community Eligibility schools.

**3. QUESTION:** *What is the "Special Provision Match," and with which schools must it be conducted?*

**ANSWER:** The "Special Provision Match" is a match run between the SNAP database and school enrollment database(s) from special provision schools operating in a non-base year for the given school year. This includes Provision 1 schools, Provision 2 schools, Provision 3 schools, and schools utilizing the Community Eligibility provision, as well as any other schools that may operate under the special provisions outlined in the legislation and regulations cited in the first paragraph of Section V, above. (Please see additional discussion, beginning with "QUESTION 10" of this section, about the special provision schools operating under Community Eligibility, which do not technically use the terms "base year" and "non-base" years, and which have certain accommodations available to them regarding the "Special Provision Match.")

**4. QUESTION:** *Since special provision schools are not required to conduct direct certification when the schools are operating in a non-base year, how is performing a match for these schools different from conducting direct certification?*

**ANSWER:** Although direct certification involves matching, it goes beyond matching. For instance, to directly certify a student for free school meals based on SNAP, action needs to be taken after the match has been found. For example, if a match is made at the State level but it is never sent down to the local level or if the local level never processes it or enters it into its Point of Service (POS) system, then the child may have been matched, but he or she is not actually directly certified for free meals. The "Special Provision Match" does not require any of the processing or entry into POS system that comes with direct certification; the match is just performed and the number of matches counted. States are allowed to count in Data Element #3 all matches they find in the "Special Provision Match."

**5. QUESTION:** *When you say the State is allowed to count all matches found in the ‘Special Provision Match,’” what does this mean?*

**ANSWER:** If there is a match between the SNAP database and the student enrollment database for special provision schools operating in a non-base year—and this “match” is the result of an exact match, an acceptable probabilistic match, or an adjudicated match that meets the State’s criteria (or LEA’s criteria, if the match is at the local level) for a match that limits/excludes false positives—then the match can be included in the count for Data Element #3. This is in contrast to the counts for Data Element #1, where only those students who are directly certified with SNAP for free school meals may be counted (i.e., for Data Element #1, it is not the “matches” that are counted, it is the direct certifications that are counted). Allowing all “matches” to be counted for Data Element #3 gives the State an advantage, since ordinarily, even in base years, not all “matches” end up as direct certifications.

**6. QUESTION:** *Must the match between SNAP data and student enrollment data for this “Special Provision Match” be run at the State level? Must it be run at the district (or local) level?*

**ANSWER:** There is no prescribed methodology for performing this “Special Provision Match.” It is the NSLP State agency’s responsibility to ensure that the match is conducted, yet that does not mean that it is the NSLP State agency itself that must conduct the match, nor does it mean that the SFA/LEA must conduct the match. Additionally, even though the State may have one methodology for conducting the matching for the regular SNAP direct certification process, it does not mean that the NSLP State agency must utilize the same methodology for the “Special Provision Match”—the NSLP State agency may decide to use a different approach or a combination of approaches.

For some State-level matching States, it may be that the NSLP State agency is already running the matches for all the schools in the State—just not sending the match results down to the local level for those special provision schools operating in a non-base year, since in a non-base year no direct certification efforts are required for these schools. Getting the count for Data Element #3 for these States would mean just totaling the number of such matches and reporting the count on the FNS-834 after making sure that students are not counted more than once.

There may be some other States where the NSLP State agency uses State-level matching for its regular direct certification process, but some of their special provision schools may not be represented in its statewide student enrollment database—so, the regular match might not be sufficient. In this case, the NSLP State agency may decide to use a combination approach—using the established statewide system and supplementing it by uploading enrollment data

directly from such schools and running the match or using the statewide system for some of the schools and a local-level match for others.

Still other States may use local-level matching for the regular direct certification process, but decide for the “Special Provision Match” to run a combination of local-level matching for some of its special provision schools and a State-level match for the rest of its special provision schools operating in a non-base year.

FNS encourages the NSLP State agency to determine what methodology makes the most sense for its State from a business-practice standpoint—making sure that the count includes only those cases where an acceptable match was found between the SNAP database and student enrollment records from children attending special provision schools operating in a non-base year and making sure that the count of such children is not repeated in Data Element #3 and is not already represented in Data Element #1.

**7. QUESTION:** *If the NSLP State agency is unable to ensure a “Special Provision Match” for every special provision school in the State that is operating in a **non-base** year, what will the impact be on the direct certification rate?*

**ANSWER:** First, it is important to realize that providing an accurate count from each non-base-year special provision school in the State benefits the State. If a particular non-base-year special provision school’s match count is not included in the total number that the NSLP State agency reports on the FNS-834, then the State’s direct certification rate will be lower than it otherwise would be. The larger the population of children living in households receiving SNAP benefits attending non-base-year special provision schools that are not represented in the “Special Provision Match,” the greater the negative impact on the direct certification rate for the State. [See QUESTION 13 for the expectations for SY 2013-2014.]

**8. QUESTION:** *What about special provision schools operating in a **base** year? Is the “Special Provision Match” to be conducted with these schools as well?*

**ANSWER:** No, it is not. Remember, special provision schools operating in a **base** year are already processing applications and conducting direct certification with SNAP to establish the percentages that will be used for reimbursement in future, non-base years. The counts for these schools during the base year would naturally be included with the counts the School Food Authorities (SFAs) are reporting on line 3-2B of the Form FNS-742 – *School Food Authority (SFA) Verification Collection Report*, which will roll up into Data Element #1 in the above formula. As such, the counts from schools operating in a **base** year **must not** be included on the FNS-834 Data Element #3, since the count from Data Element #3 (the “Special Provision Match” count from the FNS-834) will be added to the count from Data Element #1 (the SNAP direct certification count rolled up from the SFAs on the FNS-742) in the formula to compute direct certification performance rates, and the same child must not be

represented in both data elements. [NOTE: Please see, in the questions and answers below, additional discussion about the special provision schools operating under Community Eligibility, which do not technically use the terms “base year” and “non-base” years and which have certain accommodations available to them regarding the “Special Provision Match.”]

**9. QUESTION:** *When must the “Special Provision Match” be run each year?*

**ANSWER:** In those States with special provision schools, the “Special Provision Match” must be run in or close to October each year, but no later than the last operating day in October. (However, for those special provision schools operating under Community Eligibility, the NSLP State agency may choose instead to use counts from the identified students matched with SNAP conducted by April 1—see more about the Data Element #3 options allowed for special provision schools operating under Community Eligibility in the questions below.)

**10. QUESTION:** *Special provision schools operating under Community Eligibility do not have base years and non-base years. How does this affect Data Element #3?*

**ANSWER:** Special provision schools operating under Community Eligibility may run a match by April 1 each year to establish claiming percentages for Community Eligibility. Even if the match is run by April 1, a school may elect not to reestablish claiming percentages in a given year. This affects Data Element #3 if the school/NSLP State agency elects to use this data in lieu of the “Special Provision Match.” (See the following question that also addresses this topic.)

**11. QUESTION:** *What are the data options for special provision schools operating under Community Eligibility with regard to Data Element #3?*

**ANSWER:** Comments received on the proposed rule, “*National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*,” recommended that FNS allow special provision schools operating under Community Eligibility to use the results of the match with SNAP that must be completed by April 1 for adjusting claiming percentages, in lieu of running a match again for Data Element #3 in or near October. In the final rule, FNS allows States that have special provision schools operating under Community Eligibility to establish the Data Element #3 count for these schools in one of three ways:

- 1. Performing the “Special Provision Match” in or near October (as for the other special provision schools operating in a non-base year)** [For example, if the current school year is SY 2015-2016, then the count for Data Element #3 would come from the “Special Provision Match” conducted in or near October 2015, but no later than the last operating day in October 2015]; **or**

- 2. Using the count of identified students matched with SNAP used in determining the Community Eligibility claiming percentage for that school year** [For example, if the current school year is SY 2015-2016, and the first year of the 4-year cycle was SY 2012-2013, then the count used in lieu of the “Special Provision Match” for Data Element #3 for SY 2015-2016 would be the count of identified students matched with SNAP by April 1, 2012]; **or**
- 3. Using the count from the identified students matched with SNAP conducted by April 1 of the same calendar year the FNS-834 is due, whether or not it was used in the claiming percentages** [For example, if the current school year is SY 2015-2016, the FNS-834 would be due by December 1, 2015, and the count used in lieu of the “Special Provision Match” for Data Element #3 for SY 2015-2016, would be the count of identified students matched with SNAP by April 1, 2015, whether or not the school elected to update its claiming percentages that year].

The NSLP State agency does not need to use the same option for every one of its Community Eligibility schools—it can use one option for some schools and another option (or options) for the other Community Eligibility schools each year. In any case, it is important that the count used represents students in Community Eligibility schools matched against SNAP records, without the inclusion of any letter method or non-SNAP matches. In other words, if either of the latter two options is selected, the NSLP State agency must ensure that the count includes only the SNAP matches from the matching efforts performed by April 1. The NSLP State agency also must ensure that students are not double counted.

**12. QUESTION:** *When do the requirements to conduct the “Special Provision Match” and to report the count for Data Element #3 on the new form FNS-834 go into effect?*

**ANSWER:** The requirement for conducting the “Special Provision Match” and reporting Data Element #3 on the FNS-834 goes into effect for SY 2013-2014, and the first FNS-834 must be submitted by December 1, 2013.

**13. QUESTION:** *What are the expectations for SY 2013-2014 for the utilization of the “Special Provision Match” to provide Data Element #3 for the FNS-834?*

**ANSWER:** The expectation for SY 2013-2014 is that States will perform the “Special Provision Match” to the extent possible, even in this first year of using the FNS-834, as this match will provide the most accurate estimate of the number of children in special provision schools operating in a base year. For those States with special provision schools that cannot properly compute Data Element #3 for this first school year, the NSLP State agency may use the alternative phase-in procedures (discussed in the questions below) for the “Special Provision Match” for the schools for which matching cannot yet be performed.

**14. QUESTION:** *For those States not geared up to run the “Special Provision Match,” what is the school year where alternative phase-in procedures will be allowed?*

**ANSWER:** The preamble to the final rule, *National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, states that there will be alternative phase-in procedures for SY 2012-2013 for those States that are not geared up to run the “Special Provision Match,” the first year of the FNS-834. However, the final rule was not published until February 22, 2013, and the FNS-834 was not approved until April 30, 2013, so the form was not even in effect for SY 2012-2013. As such, alternative phase-in procedures will be allowed for **SY 2013-2014**—the first year of the form FNS-834—instead of SY 2012-2013.

**15. QUESTION:** *What are the alternative phase-in procedures for the “Special Provision Match” for Data Element #3 for the FNS-834 for SY 2013-2014?*

**ANSWER:** For any special provision school operating in a non-base year for which the NSLP State agency cannot ensure that a “Special Provision Match” can be performed, the NSLP State agency, for SY 2013-2014 only, may use the following “Base Year Percentage Option” to get some credit for these schools:

*The NSLP State agency may elect to use the most recent **base-year** SNAP direct certification percentage free rates for such schools in lieu of running the “Special Provision Match” for these schools. To do this, compare the number of children **directly certified as free in the base year** to the **total number certified as free in that same base year**, and apply that percentage to the number reported as free by the school in SY 2013-2014. This will yield the count that may be attributed to this school’s portion of Data Element #3 for the first year, SY 2013-2014.*

**This “Base Year Percentage Option” is available only for SY 2013-2014.** To use this option, the school would have to have conducted direct certification in the base year and still have access to this data. To get the total count for Data Element #3 **this first year**, the NSLP State agency may use a combination of:

- “Special Provision Match” counts—from whatever special provisions schools operating in a non-base year where the match can be run; and
- “Base Year Percentage Option” counts—from those special provision schools operating in a non-base year for which direct certification data during the base year is available and that are not in the “Special Provision Match” counts

In the example below, the sample State had 13 special provision schools operating in a non-base year for SY 2013-2014. Of these, the State was able to run the new “Special Provision Match” (or ensure that matches are run) with student enrollment data from 10 of the

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schools—and got a total count of 9,475 matched students from these 10 schools—but was not able to run the “Special Provision Match” with the other three of its non-base-year special provision schools. Of these remaining three, two schools were able to provide the needed information for the calculation (Special Provision Schools A and B), but the third school (Special Provision School C) was neither able to be included in the “Special Provision Match” nor had the appropriate data available for utilizing the “Base Year Percentage Option.” See the chart below to see how the sample State determined the count of “9,642” to report as Data Element #3 on the FNS-834 for SY 2013-2014.

**Example 2: How to compute NSLP Data Element #3 in a State utilizing the first year "Base Year Percentage Option," an alternative phase-in option for SY 2013-2014 only, for some of its special provision schools operating in a non-base year.**

| Which Schools   | Base Year # <u>directly certified as FREE</u>   | Base Year <u>total # certified as FREE</u> | Percentage Factor | SY 2013-2014 # reported as Free | Apply Percentage Factor      | Total        |
|---|---|--|-------------------|---------------------------------|------------------------------|--------------|
| Special Provision Match Results                           | The total count of matched children from the 10 non-base-year special provision schools where the “Special Provision Match” was able to be performed. |  |                   |                                 |                              | 9,475        |
| Special Provision School A                                | 102   | 271  | $\frac{102}{271}$ | 343                             | $343 \times \frac{102}{271}$ | 129          |
| Special Provision School B                                | 32  | 57   | $\frac{32}{57}$   | 68                              | $68 \times \frac{32}{57}$    | 38           |
| Special Provision School C                                | Did not conduct direct certification in the base year, or no access to data   |  |                   |                                 |                              | 0            |
| <b>Total to report for Data Element #3 on the FNS-834</b> |   |  |                   |                                 |                              | <b>9,642</b> |

Of course, an NSLP State agency may need to use the “**Base Year Percentage Option**” for each of its schools this first year and not just for some of them for SY 2013-2014. [NOTE: After SY 2013-2014, the NSLP State agency’s reporting of Data Element #3 is to come from the “Special Provision Match” counts only.]

The NSLP State agency must retain the documentation to account for the determination of the count for Data Element #3.

**16. QUESTION:** *What is the expectation for the “Special Provision Match” to provide Data Element #3 for the school years after SY 2013-2014?*

**ANSWER:** For the school years after SY 2013-2014 (that is, for SY 2014-2015 and beyond), the NSLP State agency is expected to have a system fully phased in to do the “Special Provision Match,” without the use of the alternative phase-in procedures described above. The alternative phase in procedures may be used by NSLP State agencies for SY 2013-2014 only.

**17. QUESTION:** *Is the count from the “Special Provision Match” for Data Element #3 on the FNS-834 supposed to be reported by the individual SFA/school?*

**ANSWER:** No, the FNS-834 is a State agency form, not an SFA-level form, and the NSLP State agency completes the form providing Data Element #3 for the entire State—that is, the total number of matches made between SNAP data and student enrollment data from every special provision school in the State that is operating in a non-base year (plus, for SY 2013-2014 only, the count determined from the use of the alternative phase-in “Base Year Percentage Option” procedures). The NSLP State agency may need to get input from the schools, but the reporting to FNS comes from the State only—one number for Data Element #3 on the FNS-834 for the entire State.

## VI. FNS-834 Form-Specific Questions for NSLP and SNAP State agencies

### 1. QUESTION: *Do the SNAP State agency and the NSLP State agency fill out the same FNS-834?*

**ANSWER:** Yes and No. The FNS-834 is an interagency form, so both the SNAP State agency and the NSLP State agency are to use the FNS-834, but they **do not** jointly submit the form;

The SNAP State agency is to complete the FNS-834 to report Data Element #2 and, by December 1<sup>st</sup>, submit the FNS-834 to FNS (and also to the NSLP State agency by the same date, so that the NSLP State agency will be able to know the denominator of the formula—the “universe” to which their State will be compared).

The NSLP State agency is to complete and submit directly to FNS, also by December 1<sup>st</sup>, a separate FNS-834 (not the one forwarded to the NSLP State agency by the SNAP State agency) providing Data Element #3. So, there will be two FNS-834s submitted for each State (three if there are two NSLP State agencies in the State, since each NSLP State agency would submit a separate form).

### 2. QUESTION: *What is the purpose of the check box on the new FNS-834?*

**ANSWER:** The check box on the new form FNS-834 is there for either the NSLP State agency or the SNAP State agency to indicate that the State has special circumstances that may affect the State’s direct certification performance rate calculation in a quantifiable way. If the box is checked, FNS will contact the appropriate State agency and ask for a description of the circumstance, the count of the number of children affected by the circumstance, the methodology for estimating the count, and the source(s) of published State or Federal data used to support that methodology. FNS will consider these circumstances on a case-by-case basis, and will examine how the effect of such special circumstances could help keep FNS’s own methodology dynamic and better able to adapt to improved data sources. This check box was added in an effort to improve data sources to more closely approximate the data elements needed to accurately compute direct certification performance rates.

### 3. QUESTION: *How is the FNS-834 to be submitted to FNS?*

**ANSWER:** The intent is for the FNS-834 to be incorporated into the Food Programs Reporting System (FPRS), but FNS does not expect this to be in place for the December 1, 2013, submission. Until reporting through FPRS is established, the NSLP State agency and the SNAP State agency are to submit their completed forms to FNS by email. To do so, each State agency should attach its form to an email (naming the file “FNS-834 – [State’s Name] Submission from the [NSLP or SNAP] State agency” and using the same filename in the subject line of the email) and send it to [CNStatesystems@fns.usda.gov](mailto:CNStatesystems@fns.usda.gov) by December 1st.



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

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Alexandria, VA  
22302-1500

**DATE:** February 4, 2014

**MEMO CODE:** SP 20 - 2014

**SUBJECT:** Reporting Guidance for the 2013-2014 School Year (SY) Direct Certification Performance Measures

**TO:** Regional Directors  
Special Nutrition Programs  
All Regions

State Agencies  
Child Nutrition Programs  
All States

*The Transmittal of the Questions and Answers on the Computation of the Direct Certification Performance Rate with the Supplemental Nutrition Assistance Program (SNAP) (SP 54-2013) memorandum provides detailed information pertaining to the performance measures, data elements, and reporting process for the FNS-742 (School Food Authority (SFA) Verification Collection Report) and the FNS-834 (State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report). This memorandum will provide further guidance for State agencies not able to meet the requirement for identifying SNAP directly certified students separately from other program categories. It also provides reporting clarifications on SNAP data matches for provision schools in a non-base year and for State agencies with Local Educational Agencies (LEAs) participating in the Community Eligibility Provision (CEP).*

**FNS-742 Reporting Procedures for State Agencies Unable to Obtain SNAP-Only Direct Certification Counts**

State agencies are required to report to FNS a SNAP-only direct certification count starting in SY 2013-2014 for all SFAs required to conduct direct certification. States' inability to meet this requirement will limit FNS' capacity to accurately measure the State's direct certification rate with SNAP for the purposes of performance measurement and continuous improvement plan development requirements.

To ensure that data is reported as accurately as possible, we are providing additional instructions for those State agencies not prepared to report a SNAP-only direct certification count for all SFAs required to conduct direct certification in SY 2013-2014. State agencies not able to provide a SNAP-only direct certification count for SY 2013-2014 must follow these instructions for reporting on the FNS-742:

- Report a “0” in field **3-2: “Students directly certified through Supplemental Nutrition Assistance Program (SNAP)”** for all SFAs.
- Report ALL direct certification data (including any direct certifications with SNAP) in field **3-3: “Students directly certified through other programs.”**
- In the Remarks section of the data entry screen in the Food Program Reporting System (FPRS) FNS-742 reporting module, notify FNS that the “0” reported in field 3-2 is due to the inability to obtain a SNAP-only count for all SFAs conducting direct certification, and that the total count of all students directly certified for all programs is reported in field 3-3. Users will be directed to this screen after data is uploaded in FPRS.
- Notify the Regional Office of the data inaccuracies and confirm the above steps are complete.

### **FNS-742 Reporting Procedures for States with Schools Participating in Provision 2/3 in a Base Year**

Schools operating provision 2/3 in a base year are required to collect individual household applications and conduct direct certification. Data for base year schools should be reported the same as schools processing applications and conducting direct certification. Follow these procedures for reporting FNS-742 data for provision 2/3 schools in a base year:

- Report in Sections 1 and 2 of the FNS-742 for all schools as applicable.
- Report SNAP direct certification counts for provision 2/3 base year schools in field **3-2: “Students directly certified through Supplemental Nutrition Assistance Program (SNAP).”**
- Report the remaining fields of Section 3 and all other Sections of the FNS-742 as applicable.
- Do NOT report data for provision 2/3 base year schools on the FNS-834.

### **FNS-742 and FNS-834 Reporting Procedures for States with Schools Participating in Community Eligibility (CEP) or Provision 2/3 in a Non-Base Year**

Children enrolled in schools participating in provision 2/3 in a non-base year or in CEP are receiving free meals through the provision and not through the process of direct certification. States are required to report SNAP match data for students in CEP and non-base year provision 2/3 schools separately from schools not operating special provision or base year schools to properly account for the number of students receiving SNAP benefits for direct certification performance estimates. Follow these procedures for reporting FNS-742 and FNS-834 data for provision 2/3 non-base year schools and CEP schools.

FNS-742 procedures for SFAs and States:

- Report in Sections 1 and 2 of the FNS-742 for all schools as applicable.
- If all schools in the LEA are participating in CEP or provision 2/3 in a non-base year, check box 3-1 and report “0’s” for the remaining Sections of the FNS-742.
- If only some schools in the LEA are participating in CEP or provision 2/3 in a non-base year, report on the FNS-742 as follows:
  - Report SNAP-only direct certification data for the schools NOT participating in CEP or provision 2/3 in a non-base year in field **3-2: “Students directly certified through Supplemental Nutrition Assistance Program (SNAP)”** on the FNS-742.
  - Report the remaining fields of Section 3 and all other Sections of the FNS-742 for schools NOT participating in CEP or provision 2/3 in non-base as applicable.

FNS-834 procedures for States:

- Report a statewide count of students matched with SNAP for all provision 2/3 non-base year schools and any schools participating in CEP combined on the FNS-834 in the **Data Element #3** box for “**The number of SNAP Children in Special Provision Schools Operating in a Non-Base Year.**”
- Do not report data on the FNS-834 for provision 2/3 schools in a base year.

State agencies are strongly encouraged to review the detailed guidance in SP54-2013. Question 5 in *Section III. Data Element #1 – SNAP Children Directly Certified for Free School Meals* provides information for State agencies not prepared to report SNAP-only counts of directly certified students and *Section V. Data Element #3 – SNAP Children in Special Provision Schools Operating in a Non-Base Year* provides detailed information for conducting matches with SNAP in special provision schools.

Please distribute this memorandum to program operators immediately. SFAs should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate Food and Nutrition Service Regional Office.

**Original Signed**

Cynthia Long  
Deputy Administrator  
Child Nutrition Programs

FY 2014 SNAP MASTER DIRECTORY

Attachment H

| Region | ST | NAME  | AGENCY CODE |
|--------|----|---|-------------|
| MARO   | DE | DE DEPARTMENT OF HEALTH & SOCIAL SERVICES                           | 1092301     |
| MARO   | DC | DC DEPARTMENT OF HUMAN SERVICES                                     | 1192901     |
| MARO   | MD | MD DEPT. OF HUMAN RESOURCES   | 2493501     |
| MARO   | NJ | NJ DEPT. OF HUMAN SERVICES  | 3492901     |
| MARO   | PA | PA DEPT OF PUBLIC WELFARE   | 4292501     |
| MARO   | VA | VA DEPT. OF SOCIAL SVCS.  | 5192501     |
| MARO   | VI | VI DEPT OF HUMAN SERVICES   | 5292901     |
| MARO   | WV | WV DEPT OF HEALTH & HUMAN RES.                                      | 5494101     |
| MPRO   | CO | CO DEPT OF HUMAN SERVICES   | 0892501     |
| MPRO   | IA | IA DEPT OF HUMAN SERVICES<br>BUREAU OF FINANCE                      | 1992901     |
| MPRO   | KS | Kansas Department for Children and Families                         | 2092701     |
| MPRO   | MO | MO DEPT. SOCIAL SERVICES<br>DIV. OF BUDGET AND FINANCE              | 2992501     |
| MPRO   | MT | MT DEPT OF PUBLIC HEALTH AND HUMAN SERVICES<br>FISCAL BUREAU        | 3092101     |
| MPRO   | NE | NE DEPT OF HEALTH AND HUMAN SERVICES<br>FINANCE AND SUPPORT         | 3193901     |
| MPRO   | ND | ND DEPT OF HUMAN SERVICES<br>FINANCE DIVISION                       | 3892901     |
| MPRO   | SD | SD DEPT OF SOCIAL SERVICES  | 4692501     |
| MPRO   | UT | UT DEPT OF WORKFORCE SVCS   | 4992501     |
| MPRO   | WY | WY DEPT OF FAMILY SERVICES<br>FINANCIAL SERVICES DIVISION           | 5693301     |
| MWRO   | IL | IL DEPT. OF HUMAN SERVICES  | 1792501     |
| MWRO   | IN | IN FAMILY & SOC.SERV.ADM.   | 1892501     |
| MWRO   | MI | MI DEPT. OF HUMAN SERVICES  | 2692501     |
| MWRO   | MN | MN DEPT OF HUMAN SERVICES   | 2792501     |
| MWRO   | OH | OH DEPARTMENT OF JOB AND FAMILY SERVICES                            | 3992501     |
| MWRO   | WI | WI DEPT OF HEALTH SERVICES  | 5592301     |
| NERO   | CT | CT DEPT OF SOCIAL SERVICES  | 0992501     |
| NERO   | ME | ME DEPT OF HEALTH AND HUMAN SERVICES                                | 2392901     |
| NERO   | MA | MA Department of Transitional Assistance<br>DEPT. OF PUBLIC WELFARE | 2592901     |
| NERO   | NH | NH Department of Health and Human Services<br>DIV. OF H&HS          | 3392901     |

| Region | ST | NAME  | AGENCY CODE |
|--------|----|---|-------------|
| NERO   | NY | NY Office of Temporary and Disability Assistance<br>FOOD STAMP BUREAU                     | 3692501     |
| NERO   | RI | RI Department of Human Services<br>DEPT. OF HUMAN SERVICES                                | 4492901     |
| NERO   | VT | VT Department of Social Welfare<br>DEPT. OF SOCIAL WELFARE                                | 5092501     |
| SERO   | AL | AL DEPT. OF HUMAN RESOURCES   | 0192901     |
| SERO   | FL | FL DEPT OF CHILDREN & FAMILIES  | 1291901     |
| SERO   | GA | GA DEPT OF HUMAN SERVICES   | 1393501     |
| SERO   | KY | KY CABINET FOR HEALTH & FAMILY SVCS<br>DIVISION OF FINANCIAL MANAGEMENT                   | 2193501     |
| SERO   | MS | MS DEPT OF HUMAN SERVICES<br>DIV OF ECONOMIC ASSISTANCE                                   | 2893501     |
| SERO   | NC | NC DEPT OF HEALTH & HUMAN SVCS<br>DIVISION OF SOCIAL SERVICES                             | 3792501     |
| SERO   | SC | SC DEPT OF SOCIAL SERVICES  | 4592501     |
| SERO   | TN | TN DEPT OF HUMAN SERVICES   | 4792901     |
| SWRO   | AR | AR DEPT OF HUMAN SERVICES   | 0592501     |
| SWRO   | LA | LA DEPT OF CHILDREN AND FAMILY SERVICES<br>OFFICE OF FAMILY SUPPORT                       | 2292501     |
| SWRO   | NM | NM DEPT OF HUMAN SERVICES   | 3592901     |
| SWRO   | OK | OK DEPT. OF HUMAN SERVICES  | 4092901     |
| SWRO   | TX | TX HEALTH & HUMAN SERVICES  | 4892901     |
| WRO    | AK | AK DEPT OF HEALTH & SOCIAL SERVICES   | 0292301     |
| WRO    | AZ | AZ ECONOMIC SECURITY<br>DEPT OF ECONOMIC SECURITY   | 0493701     |
| WRO    | CA | CA Dept. of Social Services<br>Food Stamp Branch  | 0692501     |
| WRO    | GU | Guam Dept. of Public Health & Social Services   | 1493901     |
| WRO    | HI | HI Benefit, Employment and Support Services Div.<br>Dept. of Human Services               | 1592501     |
| WRO    | ID | ID HEALTH & WELFARE<br>BUREAU OF BUDGET & MANAGE  | 1692301     |
| WRO    | NV | NV Department of Health and Human Services<br>Division of Welfare and Supportive Services | 3292501     |
| WRO    | OR | OR DEPT HUMAN SERVICES<br>TREASURER, STATE OF OREGON<br>ADULT AND FAMILY SERVICES         | 4193301     |
| WRO    | WA | WA DEPARTMENT OF SOCIAL & HEALTH SERVICES<br>FOOD STAMP ACCOUNTING UNIT                   | 5392301     |