# Attachment C, Memo No. 2019-2020-15

# September 20, 2019

## Direct Certification – Private SFAs

## Questions and Answers, Including Medicaid DC Free and DC Reduced Price

1. **What information will be in the direct certification (DC) file?**

A direct certification (DC) file of potentially DC eligible students will be returned to the private SFA after DOE-SNP compares the submitted enrolled student data to the statewide listing of eligible Virginia youth ages 4 through 21 who are part of a SNAP or TANF eligible household, who are placed in foster care, or who participate in Medicaid and are determined by DSS to be directly certified **for free or reduced price meals using Medicaid income and household data that was provided at the time of their Medicaid application.**

Enrolled students who match student name and at least one other identifier (date of birth, gender, address, parent/guardian name, last 4 digits of social security number) will be in the returned file and will be considered eligible for DC pending review by the SFA. The SFA must review the information in the file for each “matched” student and if the information is consistent with the SFA enrollment records, the student will be directly certified for free or reduced price meals by direct certification.

1. **Where is the DC category in the Excel spreadsheet?**

The type of DC for each potentially matched student will be included in their record and displayed in the next to last column, “Eligibility.”  The student’s DC eligibility type will be one of the following: **SN** (SNAP Free), **TO** (TANF Only Free), **MF** (Medicaid Free), **MR** (Medicaid Reduced), or **FC** (foster care).

1. **Can any student with a Medicaid case number be directly certified or automatically qualified for free meals by the SFA?**

No.

* Medicaid eligible students are only directly certified for automatic eligibility for free or reduced price meals based on the household size and income provided to DSS as part of their Medicaid application. Income eligible Medicaid students will appear as directly certified MF or MR in the matched direct certification file returned to the SFA for the current school year. These Medicaid Free (MF) or Medicaid Reduced Price (MR) students in the DC file will be directly certified when they are added to the SFA eligibility records; or,
* If the student is a member of a household in which another student has been directly certified MF or MR using a current DSS direct certification file.
* All other Medicaid eligible students, who do not appear in a current DC file as MF or MR or have not been extended DC from another household member, must submit an application with household income and household members listed. SFAs must determine if these Medicaid students are eligible for free or reduced price meals based on household income and size submitted on the application. If the Medicaid eligible student does not meet the USDA Income Eligibility Guidelines (IEG) for household size for free or reduced price meals, they must be denied.
1. **Can DC eligibility be extended to all members of the same household for any of the DC types in the file – SNAP, TANF, Medicaid Free, Medicaid Reduced, Foster Care?**

No.

* Foster care DC status may not be extended to other students living in the same household. Other students living in a household with a student who has been placed in foster care must complete a free and reduced price meal application if they were not directly certified by another method.

Yes.

* Students who are determined to be members of the same household based on school division enrollment records must be extended the same DC eligibility for SN, TO, MF or MR DC status.
* The students who receive “extended” DC eligibility from another student in the household who is directly certified, are also categorized as DC. Documentation for extension of DC eligibility (address records, parent/guardian, etc.) must be maintained by the SFA.
* If students who are members of the same household have been determined eligible with a different status, all members of the same household should be extended the highest benefit level.
* For example: one student is DC MF in the file and another, living in the same household according to school division enrollment records, is DC MR in the file, both students should be determined DC MF, with the second student documented as DC MF by extension from another household member.
1. **Must households be notified of a student’s DC status?**

Household notification of DC status for free meals (SNAP/TANF/Medicaid Free) or reduced price meals (Medicaid Reduced Price) is required. The reduced price income eligibility guidelines must also be included in the notification letter for Medicaid reduced price DC. **DOE prototype notification letters that meet these requirements are posted** to SNPWeb in Download Forms– Eligibility Notification Letters, Direct Certification Free and Direct Certification Reduced Price.

1. **Must SFAs track the type of DC for each student in their records**?

Yes. DC type must be identified in the student’s eligibility file so the division can report students directly certified by SNAP separately from those directly certified by any other method, including TANF, Medicaid Free, Medicaid Reduced Price, foster care, homeless, migrant, runaway, Head start, etc.

1. **What should an SFA do if an application is submitted for a student who is directly certified, or if a student is directly certified by one type and then is found to be DC by SNAP?**

DC must be used as the eligibility status for any student that is matched to the DC file, regardless of previous application. If a student is determined eligible in the current school year for free meals by another method, such as application, homeless, migrant, runaway, Head start, etc., and the student is later found to be SNAP eligible in a DC file, the student’s eligibility status must be updated to DC by SNAP.

* SNAP is always the primary eligibility type for DC.
	+ The status of any student directly certified by SNAP at any time during the school year, regardless of their previous eligibility, must be updated to DC SNAP in the student’s eligibility record.
	+ If a student appears as DC Free by TANF or Medicaid or DC Medicaid Reduced Price in a subsequent DC file, but was previously, in the same school year, determined DC by SNAP, they would remain DC SNAP.
1. **What should an SFA do if a student was determined free eligible by DC in the current school year but later is listed in the DC file as MR or submits an application that is denied?**

Students must not receive a lesser benefit (reduced price or denied) based on subsequent DC files if they were previously determined free or reduced price by any method.

* For example: a student determined free by application who appears in a DC file during the same school year as Medicaid Reduced Price (MR) would not be directly certified and would remain free by application.
* For example: a student determined DC Medicaid Reduced (MR) who later submits an application that would be denied, would not change eligibility due to the application and would remain DC MR.
1. **How long does a student’s eligibility last?**

An eligibility determination made during the current school year lasts for the entire school year through the carry over period, which is the first 30 days of the next school year.