

DATE: October 25, 2011

MEMO CODE: SP 03-2012

SUBJECT: Direct Certification and Zero Benefit Households

TO: Child Nutrition Programs

Children in households receiving benefits from the Supplemental Nutrition Assistance Program (SNAP) are categorically eligible for free meals in the Child Nutrition Programs. However, under some circumstances, SNAP households may be eligible for “zero benefits.” Section 9(b)(12)(A)(i) of the Richard B. Russell National School Lunch Act restricts categorical eligibility for free school meals based on SNAP participation to children who are members of a household receiving assistance under SNAP. Therefore, a child who is a member of a household that is receiving “zero benefits” from SNAP is not categorically eligible for free meals, unless the child is categorically eligible for another reason. In these situations, the child’s eligibility for free or reduced price school meals must be determined by a household application or information from an appropriate source that establishes categorical eligibility for other reasons.

For the purposes of direct certification, State agencies (SAs) must ensure that SNAP matches do not identify children as categorically eligible for free meals when the children are members of a household eligible for zero SNAP benefits. SNAP defines benefits as allotments issued on electronic benefit transfer (EBT) cards, or other means approved by the Secretary, that can be used to purchase food at authorized retail food stores. SAs must work with their counterparts that administer SNAP to assure that direct certification matching only identifies children as categorically eligible when they are in households that actually receive SNAP benefits.

Any SA that has included children who are members of a household eligible for zero SNAP benefits in their direct certification matching must ensure that their matching process is revised to no longer identify these children as categorically eligible. This revision must be accomplished as soon as possible, but no later than the end of the current school year. Direct certification matching for the school year beginning July 1, 2012, and beyond, must not include children in households receiving zero SNAP benefits as categorically eligible for free school meals.

Parallel with this memorandum, the SNAP policy staff in the Food and Nutrition Service (FNS) is issuing guidance to their SAs requesting that they work together with their Child Nutrition Program counterparts to ensure that children from zero benefit households are excluded from direct certification matches as soon as possible.