

**DEPARTMENT OF SOCIAL SERVICES**

744 P Street, Sacramento, California 95814



May 14, 2007

ALL COUNTY LETTER NO. 07-16

TO: ALL COUNTY WELFARE DIRECTORS  
 ALL FOOD STAMP COORDINATORS  
 ALL CalWORKs PROGRAM SPECIALISTS  
 ALL COUNTY CONSORTIUM PROJECT MANAGERS

**REASON FOR THIS TRANSMITTAL**

- State Law Change  
 Federal Law or Regulation Change  
 Court Order  
 Clarification Requested by  
 One or More Counties  
 Initiated by CDSS

SUBJECT: DIRECT CERTIFICATION AND DIRECT VERIFICATION OF  
 SCHOOL AGED CHILDREN IN FOOD STAMP HOUSEHOLDS OR  
 CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO  
 KIDS (CalWORKS) ASSISTANCE UNITS FOR FREE SCHOOL  
 MEALS

REFERENCE: ACIN NO. I-69-90, DATED SEPTEMBER 10, 1990;  
 ACIN NO. I-72-99, DATED OCTOBER 5, 1999

This letter advises County Welfare Departments (CWDs) of recent federal and state legislation concerning the direct certification and direct verification of school aged children in food stamp households and CalWORKs assistance units for free school meals.

The Child Nutrition and WIC Reauthorization Act of 2004, Public Law 108-265 (June 30, 2004), amends the Richard B. Russell National School Lunch Act to mandate that local educational agencies (LEAs) implement direct certification for free school meals for school aged children in food stamp households and modifies direct verification procedures used by LEAs to verify school meal eligibility. The Reauthorization Act also amends the Food Stamp Act to require that the state/local food stamp agency cooperate with LEAs to implement direct certification. Assembly Bill (AB) 1385 (enacted September 28, 2005) added Section 49561 to the Education Code to mandate that the California Department of Education (CDE) develop a computerized data match system using the existing database to be used by LEAs to directly certify school children receiving food stamp or CalWORKs benefits for free school meals.

Prior to the passage of this recent legislation, CWDs were encouraged, but not required, to exchange data with LEAs on school children receiving food stamp or CalWORKs benefits. Many CWDs have exchanged food stamp and CalWORKs data with LEAs for years in an effort to ensure that eligible children receive the free school meals to which they are entitled.

## **DIRECT CERTIFICATION**

Direct certification is the process by which LEAs certify school aged children in food stamp households as eligible for free school meals without further application by the household based on eligibility information provided by the state/local food stamp agency. As there are instances where school aged children meeting eligibility requirements for free school meals are in CalWORKs households that do not receive food stamps, CalWORKs eligibility information is also included for the purposes of direct certification. Only food stamp and CalWORKs eligibility information should be provided; no other programs are included. The Reauthorization Act mandates that LEAs implement direct certification and that the state/local food stamp agency work with LEAs to achieve implementation in accordance with the following timeline:

- Large sized LEAs (25,000 or more students)—July 2006
- Medium sized LEAs (10,000 to less than 25,000 students)—July 2007
- Small sized LEAs (less than 10,000 students)—July 2008

Due to the cooperative efforts of LEAs and CWDs, California currently is in compliance with the Federal mandate for large sized LEAs. CWDs need to continue to exchange data with large LEAs in order to remain in compliance.

To meet the mandate of AB 1385, the California Department of Social Services is collaborating with CDE to allow a state level match of food stamp and CalWORKs data with CDE student data to directly certify eligible students for the free school meals program. The California Department of Health Services is developing a data match system using food stamp and CalWORKs data from the Medi-Cal Eligibility Data System (MEDS) to do direct certification. Data from MEDS will be matched with data from the California School Information Services (CSIS). The results of the match will be accessed by LEAs through the database maintained by CSIS. Implementation of this system will be phased in for the 2007/08 school year, with data available first for medium sized LEAs.

While CDE will strongly encourage LEAs to use the above state level match, its use is not required. Where LEAs choose not to use the state level match, CWDs will need to continue and in some cases begin to share data at the local level in order to meet federal implementation timelines for direct certification. In addition to large sized LEAs, this includes medium sized LEAs required to implement for the 2007/08 school year beginning July 1, 2007, and all remaining LEAs for the 2008/09 school year beginning July 1, 2008.

## **DIRECT VERIFICATION**

Direct verification is the process by which LEAs verify eligibility for free school meals by requesting that the state/local food stamp agency provide information to verify the

household's food stamp and CalWORKs eligibility. LEAs must verify eligibility for a sample (between 0.5 percent and 3 percent) of the total of free meal recipients each year. The data used to verify eligibility may not be more than 180 days old. The LEA has the option to directly verify eligibility or to request that the family provide verification. When a LEA chooses to directly verify eligibility, the Reauthorization Act requires that the State/local Food Stamp Agency comply with the request to verify food stamp and CalWORKs eligibility. Once eligibility is verified, verification is complete.

### **RELEASE OF INFORMATION**

Regulations at Manual Policies and Procedures (MPP), 63-201.3 (Food Stamps) and MPP 19-004.61 (CalWORKs) authorize CWDs to release food stamp and CalWORKs information to LEAs in order to comply with direct certification and verification requirements.

If you have questions concerning this letter, please contact Charlotte Doisy at (916) 657-3356. If you have questions regarding CalWORKs, please contact your county consultant.

Sincerely,

***Original Document Signed By:***

CHARR LEE METSKER  
Deputy Director  
Welfare-to-Work Division