



## Direct Certification Memo

Table 1: Direct Certification Definitions

DC Components	Definition
<b>SNAP</b>	Students living in a family unit receive Supplemental Nutrition Assistance Program (SNAP) food stamp benefits.
<b>TANF</b>	Students living in a family unit receive Temporary Assistance for Needy Families (TANF) benefits.
<b>Homeless, Foster or Migrant</b>	Students identified as homeless, unaccompanied youth, foster or migrant
<b>Medicaid</b>	Students living in a family unit with a Medicaid income that does not exceed free or reduced-price lunch eligibility standards.

*Note.* In the 2023-2024 school year, Georgia began participating in the U.S. Department of Agriculture's Medicaid Demonstration Project to allow Medicaid to determine students' free or reduced-price lunch eligibility.

### Direct Certification Use in Georgia

The definition of direct certification (DC) and its components are outlined in Table 1. DC determines eligibility for the U.S. Department of Agriculture's (USDA) [National School Lunch Program](#) (n.d.). DC students are eligible for free or reduced-price lunch. Schools with at least 25% DC students can adopt the [Community Eligibility Provision \(CEP\)](#), which allows schools to serve meals at no cost to all students and be reimbursed based on the percentage of DC students (Food Research & Action Center, n.d.). At 62.5% DC students, all meal costs are reimbursed. State law requires districts to establish school [breakfast programs](#) in schools with at least 25% DC (GA Code § 20-2-66, 2024).<sup>1</sup>

Georgia uses direct certification in school accountability and funding decisions. The Georgia College and Career Ready Performance Index (CCRPI) sets Closing Gap targets for DC students that factor into CCRPI Single Scores. State funding is available to DC students through the Realizing Educational Achievement Can Happen ([REACH scholarship](#)), and districts with at least 40% DC students are able to access [additional state funding](#) (Georgia Student Finance Commission, n.d.; Georgia Department of Education, 2025).<sup>2</sup> Some districts, including Atlanta Public Schools, incorporate DC measures into their [weighted student funding formulas](#) to allocate additional resources to schools serving higher concentrations of low-income students (Atlanta Public Schools, 2026).

# Average Direct Certification Drops 6 Percentage Points From 2023-2024 to 2024-2025 Driven Primarily by Medicaid Eligibility Redetermination

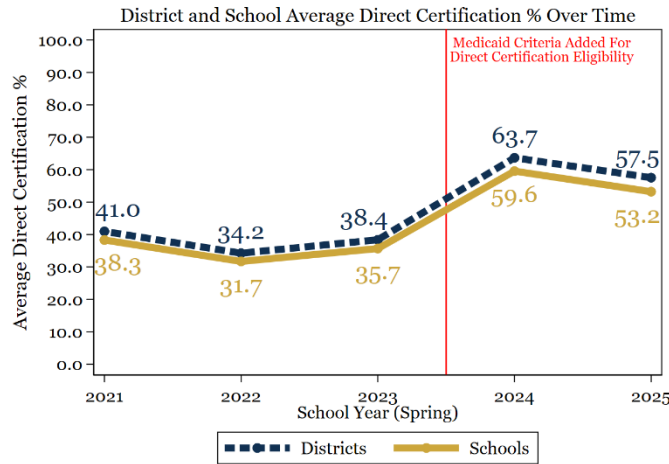


Figure 1: District and School Average Direct Certification % Over Time<sup>3</sup>

Figure 1 documents the average direct certification across all districts and schools in each school year. The average direct certification percentage in Georgia districts and schools decreased from the 2023-2024 to 2024-2025 school year. The change appears systematic. On average, districts’ (63.7% to 57.5%) and schools’ (59.6% to 53.2%) average direct certification dropped nearly 6 percentage points. This decrease, while not dramatically different to pre-Medicaid changes, is still meaningful. Approximately 110,000 fewer students in Georgia are directly certified in the 2024-2025 school year compared to the 2023-2024 school year.

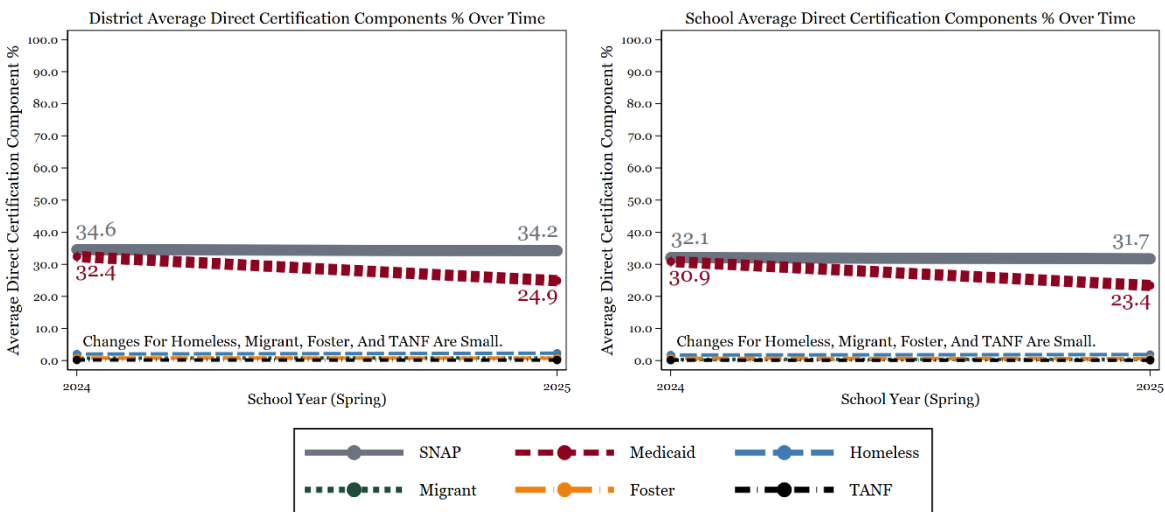


Figure 2: District (left) & School (right) Average Direct Certification Components % Over Time<sup>4</sup>

Figure 2 breaks down the average direct certification rates by component (SNAP, Medicaid, TANF, or students identified as homeless, unaccompanied youth, foster, or migrant) at the district (left) and school (right) level from the 2024 to 2025 school years. Both the district and school level figures indicate nearly identical findings: the primary reason for the decrease in DC rates is due to Medicaid disenrollment. Medicaid experiences the largest drop at approximately 7

percentage points. All other direct certification components, including the other long-standing component, SNAP, experience smaller changes ( $\pm 0.30$  percentage points).

The Medicaid enrollment changes are due to updates in the eligibility redetermination process. In March 2020, Congress enacted the Families First Coronavirus Response Act and required states to not disenroll any Medicaid members regardless of whether their eligibility status had changed during the Covid-19 pandemic. Then, in December 2022, Congress passed the Consolidated Appropriation Act and by April 2023 began gradually redetermining Medicaid member eligibility until May 2024. Medicaid eligibility rates, consequently, have returned closer to pre-Covid-19 levels.

### Decreases in Direct Certification Impacted Nearly Every District and School, Shifting Some Out of Eligibility Thresholds

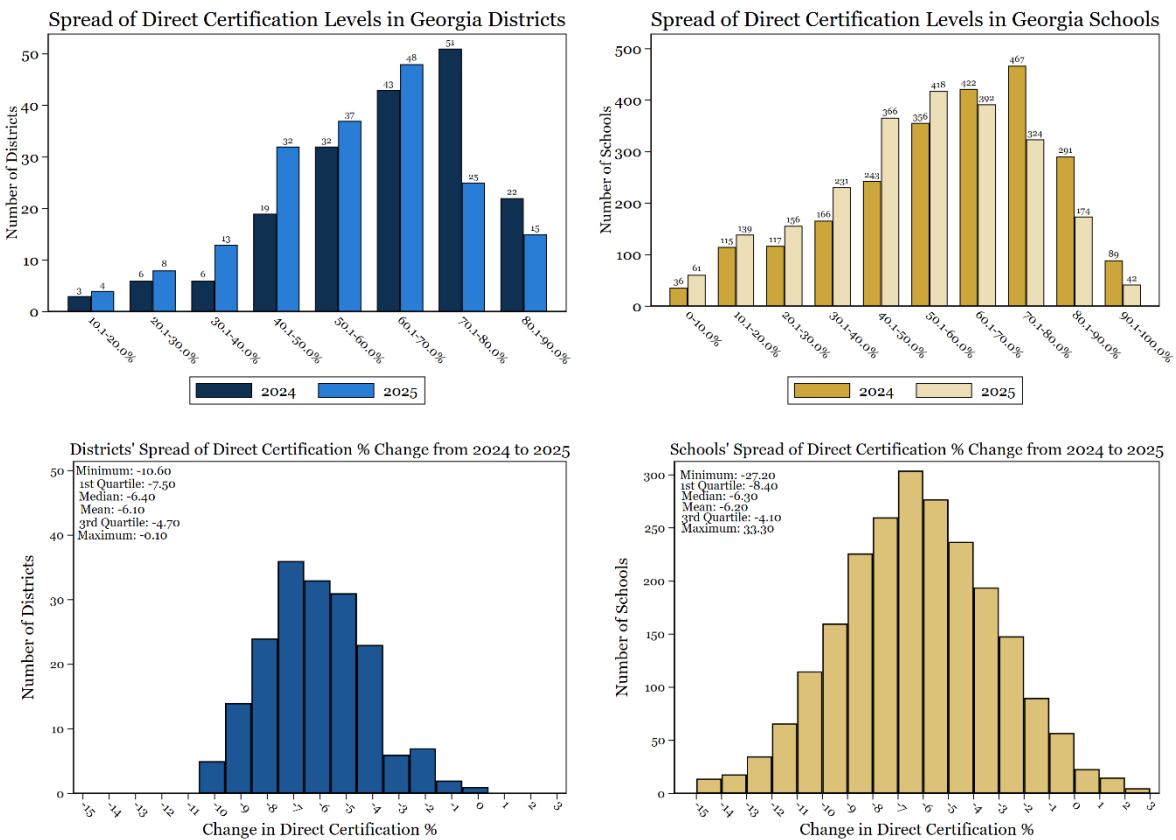


Figure 3: Spread of Direct Certification Change from 2024 to 2025 in Georgia Districts (left) & Schools (right)

Figure 3 plots the spread of direct certification changes from the 2023-2024 to 2024-2025 school years for districts and schools. Almost every single district and school show a decrease in direct certification. The few schools that increased the percentage of direct students either had negligible increases or were alternative schools with very small student populations.

Threshold	2023-2024 School Eligible Count	2024-2025 School Eligible Count	Changes in School Eligibility County	Change in Student Eligibility Count
School Meets USDA CEP 25%	2,127	2,061	-66	-68,860 <sup>5</sup>
School Meets USDA CEP 62.5%	1,201	868	-333	-234,976 <sup>6</sup>

The decreases in direct certification rates render some schools ineligible for USDA's Community Eligibility Provision. Previously in 2023-2024, as seen in Table 2, there were 2,127 schools allowed to adopt the USDA's Community Eligibility Provision. For 2024-2025, that number drops to 2,061, a 66-school decrease impacting nearly 69,000 students. At the 62.5% USDA threshold under CEP, there is also a substantial decrease in the number of schools (n=333) and students (n=234,976) that are guaranteed complete reimbursement.

### Summary

Changes in direct certification culminate in downstream consequences for the ability of schools and districts to support their students. For instance, the shift in DC eligibility may require schools and districts to use local or alternative funds to [bridge revenue gaps](#) (Gutierrez, 2025). Future changes in the definition of DC or eligibility criteria will continue to impact direct certification rates for schools and districts.



### Notes

- 1) In all schools not containing K-8, a 40% threshold is used to determine whether school breakfast programs must be established.
- 2) General Assembly's calculation defines "economically disadvantaged students" as those who are eligible to participate in the Free and Reduced-Price Lunch program through SNAP/TANF Direct Certification.
- 3) District and school results will differ from previous years. The district results previously included state charter schools, which are also included in the school results. State charter schools were therefore double counted in the previous analyses. To maintain consistency with other GOSA products (e.g., Per-Pupil Expenditures), state charter schools are reported with schools in this analysis. The school results also slightly differ. Previous years did not always remove residential treatment facility/centers. All analyses rectify the issue by removing all residential treatment facilities/centers across all years.
- 4) Students that are directly certified may be eligible for more than one program (e.g., SNAP and Medicaid). Direct certification components in this figure may feature the same student more than once. As a consequence, direct certification components will not add up to the direct certification results from Figure 1.
- 5) 2023-2024 Student Eligible Count: 1,503,132. 2024-2025 Student Eligible Count: 1,434,272.
- 6) 2023-2024 Student Eligible Count: 672,579. 2024-2025 Student Eligible Count: 437,603.



## References

- Atlanta Public Schools. (2026). *FY2026 Adopted Budget*.  
<https://resources.finalsite.net/images/v1756309663/atlantapublicschoolsus/oarqvwtrd2evlix7u6be/FY2026AdoptedBudgetBook.pdf>
- Food Research & Action Center. (n.d.). *Community Eligibility*. <https://frac.org/community-eligibility>
- Ga. Code Ann. § 20-2-66 (2024)
- Georgia Department of Education. (2025). *Georgia schools receive additional funds to support mental health, students in poverty* [Press release]. <https://gadoe.org/press-releases/georgia-schools-receive-additional-funds-to-support-mental-health-students-in-poverty/>
- Georgia Student Finance Commission. (n.d.). *REACH Georgia Scholarship Program*.  
<https://www.gafutures.org/hope-state-aid-programs/scholarships-grants/reach-georgia/>
- Gutierrez, E. (2025). *Changes to SNAP and Medicaid Would Have Implications for Student Access to School Meals*. Urban Institute.  
[https://www.urban.org/sites/default/files/2025-06/Changes to SNAP and Medicaid Would Have Implications for Student Access to School Meals.pdf](https://www.urban.org/sites/default/files/2025-06/Changes%20to%20SNAP%20and%20Medicaid%20Would%20Have%20Implications%20for%20Student%20Access%20to%20School%20Meals.pdf)
- U.S. Department of Agriculture. (n.d.). *National School Lunch Program*.  
<https://www.fns.usda.gov/nslp>

