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Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2014–2015

Report to Congress

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ABSTRACT

This report responds to the legislative requirement of the Food, Conservation, and Energy Act of 2008 (Public Law 110-234) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP). Direct certification is a process conducted by the States and by local educational agencies (LEAs) to certify certain children for free school meals without the need for household applications. The Child Nutrition and WIC Reauthorization Act of 2004 (WIC is the Special Supplemental Nutrition Program for Women, Infants, and Children) required all LEAs to establish, by school year (SY) 2008–2009, a system of direct certification of children from households that receive Supplemental Nutrition Assistance Program (SNAP) benefits. The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires that States meet certain direct certification performance targets. Beginning in SY 2013–2014, States that fail to achieve a direct certification rate of at least 95 percent are required to develop and implement continuous improvement plans.

Ninety-five percent of LEAs that participate in the NSLP directly certified some SNAP participants and other categorically eligible students in SY 2014–2015. These LEAs enroll 99 percent of all students in schools that participate in the NSLP. This is an increase from SY 2004–2005, when 56 percent of LEAs, enrolling 77 percent of all students in NSLP schools, directly certified some categorically eligible students.

The number of school-age SNAP participants directly certified for free school meals, including those in schools participating in the Community Eligibility Provision (CEP) and those in other special provision schools in a non-base year, was 13.8 million for SY 2014–2015, an increase of 3.8 percent from SY 2013–2014.[1] This is the second year the methodology for calculating the direct certification performance rate made use of data elements collected in the Verification Collection Report (FNS-742) and the Direct Certification Rate Data Element Report (FNS-834). Therefore, direct certification performance rates presented in this report are not directly comparable to those in reports from prior years.

The results of the analysis in this report indicate that 91 percent of children in SNAP households were directly certified for free school meals. Twenty-four States achieved the HHFKA-mandated performance target of 95 percent, and no States had a direct certification rate lower than 60 percent.[2]

[1] In special provision schools, all students can receive free meals. These schools claim meals at the appropriate rates using the procedures established for the different methods. For example, under CEP, program meals are reimbursed at either the free or paid rate, with the free claiming percentage based on the percentage of enrolled students who are certified for free meals without application and not subject to verification, reflective of April 1 of the previous school year. Under Provisions 2 and 3, schools operate in a "base year" in which they serve all meals at no charge but use standard program procedures to certify free and reduced-price eligible students and count meals by eligibility category. In subsequent "non-base" years, the schools continue to serve all meals at no charge but do not have to certify students for free and reduced-price meals and take only a daily aggregate count of meals served.

[2] Although New York's performance rate exceeded 95 percent, the State was not fully able to distinguish students directly certified based on SNAP benefit receipt from those based on other program participation. For this reason, New York is not considered to have met the HHFKA-mandated performance target.

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GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey (U.S. Census Bureau)
CDE	Colorado Department of Education
CEP	Community Eligibility Provision
CIP	continuous improvement plan
CN	child nutrition
DOB	date of birth
DDHHS	Delaware Department of Health and Human Services
DSDOE	Delaware State Department of Education
EOHHS	Executive Office Health and Human Services (Massachusetts)
FCEA	Food, Conservation, and Energy Act of 2008
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
FNS-742	Verification Collection Report
FNS-834	Direct Certification Rate Data Element Report
FY	fiscal year
HHFKA	Healthy, Hunger-Free Kids Act of 2010
ID	identification
IMS	information management system
LDE	Louisiana Department of Education
LEA	local educational agency
MVG	Massachusetts Virtual Gateway
NSLA	Richard B. Russell National School Lunch Act
NSLP	National School Lunch Program
ODE	Oregon Department of Education
ODHS	Oklahoma Department of Human Services
OSDE	Oklahoma State Department of Education
P.L.	Public Law
POS	point-of-service
SBP	School Breakfast Program
SIPP	Survey of Income and Program Participation
SNAP	Supplemental Nutrition Assistance Program
SSIS	Statewide Student Information System
SSN	Social Security number
SY	school year
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

EXECUTIVE SUMMARY

This report responds to a legislative requirement of the Food, Conservation, and Energy Act of 2008 (FCEA) (Public Law [P.L.] 110-234, also known as the 2008 Farm Bill) to assess the effectiveness of State[3] and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP). The 2008 Farm Bill requires annual Reports to Congress. This is the eighth report in the series, covering school year (SY) 2014–2015. The Food and Nutrition Service (FNS) will use results from this report in identifying those States that must develop and implement direct certification continuous improvement plans (CIPs), as required by Section 101 of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 (P.L. 111-296). For the second year, this report uses a methodology for calculating direct certification performance that makes use of data elements collected in the Verification Collection Report (FNS-742) and the Direct Certification Rate Data Element Report (FNS-834).

The NSLP reimburses local education agencies (LEAs) for the cost of providing nutritious meals to children in public and private non-profit schools and residential child care institutions. Average daily participation across NSLP schools and institutions totaled approximately 30.5 million children in fiscal year (FY) 2015.

Participating schools and institutions receive cash reimbursements and foods donated by the U.S. Department of Agriculture (USDA) for each meal served. In exchange for Federal assistance, schools must serve meals that meet USDA nutrition and food safety standards. In addition, participating schools must serve meals at no cost or at reduced price to children certified for school meal benefits.

Eligibility for program benefits

Children from households with incomes at or below 130 percent of the Federal poverty level are eligible for free school meals. Children from households with incomes no greater than 185 percent of the Federal poverty level are eligible for reduced-price meals. All NSLP meals are subsidized by USDA, including those served to children with household incomes above 185 percent of the Federal poverty level. The subsidies provided for free and reduced-price meals are substantially larger than the subsidies provided for full-price meals.

Children from households that receive benefits under certain other Federal assistance programs are deemed categorically eligible for free meals under the NSLP. Participation in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) confers categorical eligibility for free meals. Effective with the start of SY 2009–2010, if one child in a household participating in one of these assistance programs is directly certified (see the next section) or is determined categorically eligible for free school meals by application, then all children in that household are categorically eligible for free meals.

[3] Throughout this discussion, we use the term State to refer to the one or more agencies that are responsible for NSLP.

In addition, certain children who are migrants, runaways, or homeless; who are in foster care; or who are enrolled in Head Start are categorically eligible for free school meals. However, their eligibility does not extend to other children in their household.

Direct certification

Students' eligibility for free meals is determined by application or by direct certification. The Child Nutrition and WIC Reauthorization Act of 2004 (the 2004 Reauthorization Act; WIC is the Special Supplemental Nutrition Program for Women, Infants, and Children) required all States to establish a system of direct certification of school-age SNAP participants by SY 2008–2009. The requirement applies only to children participating in SNAP; however, States and LEAs may also directly certify children from TANF and FDPIR households.

Although direct certification systems vary by State and LEA, all such systems substantially reduce the need for household applications. All States and most LEAs certify categorically eligible students through computer matching of program records against student enrollment lists. Those systems require no action by the children's parents or guardians. States and LEAs commonly incorporate participation data from programs other than SNAP, such as TANF, FDPIR, or foster care. In some States, SNAP, TANF or FDPIR agencies send letters to program participants indicating that any school-age children in the household are eligible for free school meals. Household members can forward these letters to LEA staff in order to be certified without an application. In the past, States and LEAs could consider these children directly certified. However, effective with SY 2012–2013, based on HHFKA provisions, States may no longer use the SNAP-letter method as a means of direct certification although they are required to continue to accept such letters in lieu of applications as documentation of categorical eligibility.

HHFKA requires that States meet certain direct certification performance targets. Beginning in SY 2013–2014, States that fail to achieve an annual direct certification rate of at least 95 percent of children in households receiving SNAP are required to develop and implement CIPs.

State performance measures

This report presents information on direct certification performance for SY 2014–2015. The methodology for calculating the performance measure, which was used for the first time in SY 2013–2014, makes use of data elements from the FNS-742 and the FNS-834. In order to calculate the performance rate, Mathematica Policy Research used State-reported counts of the number of school-age SNAP participants, the number of children directly certified for free school meals based on SNAP participation, and the number of SNAP children in schools participating in the Community Eligibility Provision (CEP) or in other special provision schools operating in non-base years. The formula provides a measure of the success of State and local systems to directly certify SNAP-participant children.

Mathematica also calculated the percentage of school-age SNAP, TANF, and FDPIR participants certified for free school meals by direct certification, application, or letter method. This measure provides a more comprehensive assessment of State efforts to ensure that all categorically eligible children are properly certified for free school meals.

Key findings

At the start of SY 2014–2015, States and LEAs directly certified more than 9.8 million children based on participation in SNAP and 1.3 million children based on participation in

programs other than SNAP, for a total of 11.1 million children. This total represents a decrease of just under 11 percent from the previous year. When the count of SNAP-participant students in CEP and special provision schools in non-base years is added to the total, 15.1 million children were directly certified in SY 2014–2015. This represents an increase of 4 percent over the comparable number in SY 2013–2014, which was 14.5 million children. The calculated percentage of SNAP-participant children directly certified for free school meals was 91 percent in SY 2014–2015. The direct certification performance rate in SY 2013–2014 was 87 percent, which represents a year-to-year improvement of 4 percentage points. Twenty-four States achieved the HHFKA-mandated performance target of 95 percent, which is twice as many as last year.

For 42 States in SY 2014–2015, the number of students certified using direct certification, application based on categorical eligibility, or letter method was at least 95 percent of the estimated number of school-age children categorically eligible for free school meals based on participation in SNAP, TANF or FDPIR. However, this measure may overstate the effectiveness of State efforts to ensure that all categorically eligible children receiving SNAP, TANF, or FDPIR benefits are properly certified for free school meals for several reasons. Most importantly, many States and districts have improved their certification processes to directly or categorically certify categorically eligible children from programs other than SNAP, TANF, or FDPIR, such as those receiving foster care or those directly certified based on Medicaid data in States participating in the Direct Certification-Medicaid demonstration. While these represent important improvements to direct certification systems, they may also have the effect of overstating the percentage of SNAP, TANF, or FDPIR recipients who were certified because it includes children certified through other programs that allow for direct certification or confer categorical eligibility.

The number of LEAs directly certifying categorically eligible children continues to increase. In SY 2004–2005, before the congressional mandate for direct certification, 56 percent of LEAs directly certified categorically eligible children on a discretionary basis. By SY 2014–2015, 95 percent of LEAs directly certified some categorically eligible children; those LEAs enrolled 99 percent of students in NSLP-participating schools.

State best practices and challenges

States and LEAs continue to find success with different direct certification models, and they are making investments in their direct certification systems that promise improved performance in the coming years.

Representatives from six States with successful or improved direct certification systems were interviewed for this report. Recent direct certification changes that States link to performance improvements include improving data system capability, such as increasing the use of automated processes and employing probabilistic matching. Others added tools to improve processes, for example, automated emails to remind LEAs to download match lists, or applications to validate street addresses. Many of these changes were made with an eye toward meeting the performance benchmarks set forth in HHFKA. In discussions surrounding challenges to meeting these benchmarks in future years, States frequently cited difficulties in the variation and inconsistency in program and enrollment data; as well as the existence of school-age SNAP recipients that either do not attend NSLP schools or are not integrated into State data systems. States also cited challenges associated with retaining and training child nutrition (CN)

and LEA staff, as well as the amount of technical assistance, training, and follow-up required for the smaller LEAs, charter schools, and private schools to administer direct certification.

Conclusion

States and LEAs have made significant progress in complying with the 2004 Reauthorization Act. An estimated 95 percent of LEAs, enrolling 99 percent of all children in NSLP-participating schools, directly certified SNAP participants in SY 2014–2015. Ninety-one percent of children from SNAP-participant households were directly certified for free school meals in SY 2014–2015. Twenty-four States achieved direct certification rates of at least 95 percent, the direct certification performance target set by HHFKA. No States had a direct certification rate lower than 60 percent.

DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM: STATE IMPLEMENTATION PROGRESS, SCHOOL YEAR 2014–2015

I. INTRODUCTION

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for the cost of providing nutritious low-cost or free meals to children in public and private non-profit schools and residential child care institutions. Participating schools and institutions receive cash reimbursements and foods donated by the U.S. Department of Agriculture (USDA) for each meal served. About 100,000 schools and institutions participate in the program. Average daily student participation totaled about 30.5 million in fiscal year (FY) 2015.[4]

In exchange for Federal assistance, participating schools and institutions serve meals that satisfy Federal nutrition and food safety standards. In addition, they must offer school meals at no cost, or at reduced price, to eligible children. Children from households with incomes at or below 130 percent of the Federal poverty level ($31,005 for a family of four during school year [SY] 2014–2015)[5] are eligible for free meals. Those from households with incomes from 130 to 185 percent of the Federal poverty level ($44,123 for a family of four during SY 2014–2015) are eligible for reduced-price meals. Students are determined eligible for free meals through application or direct certification; reduced-price eligibility is determined by application alone.

A. Eligibility determination through application

Most LEAs accept applications from households to establish the eligibility of the children who reside in them for free or reduced-price school meals.[6] Most applicants submit self-declared income and household size information, which is compared with the income thresholds for free and reduced-price benefits. Other applicants provide case numbers that demonstrate household participation in one of several other means-tested Federal assistance programs. Children in households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR) are categorically eligible for free school meals. Categorical eligibility through these assistance programs, whether determined by application or by direct certification, extends to all children in the same household. Foster children; certain children enrolled in Federally funded Head Start programs; and certain homeless, runaway, and migrant children are also categorically eligible for free school meals. Their eligibility is on an individual basis and does not extend to other children in the household.

[4] See http://www.fns.usda.gov/sites/default/files/datastatistics/keydata-september-2015.pdf.

[5] The income eligibility thresholds given here apply to households from the 48 contiguous States, the District of Columbia, Guam, and the other U.S. territories. The income thresholds are higher in Alaska and Hawaii. A table of income eligibility thresholds can be found at http://www.fns.usda.gov/sites/default/files/2014-04788.pdf.

[6] Some schools receiving reimbursements under special provisions do not collect applications. These include schools operating in a non-base year using provisions 2 or 3, as well as schools using the Community Eligibility Provision.

B. Eligibility determination through direct certification

Direct certification confirms a child's categorical eligibility for free school meals without the need for a household application. Direct certification typically involves matching SNAP, TANF, and FDPIR records against student enrollment lists, at either the State or the LEA level.[7] Parents or guardians of children identified through these matching systems are notified of their children's eligibility for free school meals.[8] They need not take action for their children to be certified.[9]

The Child Nutrition and WIC Reauthorization Act of 2004 (the 2004 Reauthorization Act; WIC is the Special Supplemental Nutrition Program for Women, Infants, and Children) requires that each State NSLP agency enter into an agreement with the State agency responsible for determining SNAP eligibility. The agreement must establish procedures to directly certify children from SNAP households for free school meals.[10] States may also directly certify children from TANF and FDPIR households; foster children; participants in Federally funded Head Start programs; and certain homeless, runaway, and migrant children, but are not required to do so.

C. Purpose of this report

This report responds to Section 4301 of the Food, Conservation, and Energy Act of 2008 (FCEA),[11] which calls for an assessment of the "effectiveness of each State in enrolling school-age children in households receiving … [SNAP] benefits" for free school meals.[12] Specifically, the law requires the following:

1. State-level estimates of the number of school-age children who received SNAP benefits at any time in July, August, or September (just before or at the start of the current SY).
2. Estimates of the number of SNAP-participant children who were directly certified for free school meals as of October 1.

[7] Federal law requires direct certification of SNAP-participant children. However, most State direct certification systems also extend to children in TANF households.

[8] Households must be given the opportunity to decline free school meal benefits.

[9] In the past, States and LEAs could opt to send letters to SNAP, TANF, and FDPIR households with school-age children. The letters served as proof of categorical eligibility for free meals and were forwarded by the households to their children's schools. By SY 2012–2013, States were required to phase out the use of the letter method and it could no longer be used to directly certify children receiving SNAP benefits.

[10] The 2004 Reauthorization Act's direct certification provision was phased in over a three-year period beginning with SY 2006–2007.

[11] Also known as the 2008 Farm Bill.

[12] This report includes analysis of the contiguous United States, Alaska, Hawaii, and Guam.

3. Estimates of the number of SNAP-participant students who were not candidates for direct certification because they attended Community Eligibility Provision (CEP) or special provision schools operating in non-base years.[13]

The Food and Nutrition Service (FNS) will use these estimates in identifying those States that must develop and implement direct certification continuous improvement plans (CIPs), as required by Section 101 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Public Law [P.L.] 111-296). Specifically, since SY 2013–2014, States that fail to achieve a direct certification rate of at least 95 percent are required to develop and implement CIPs. For the second year, we used a methodology to calculate State direct certification performance that makes use of data elements from the Verification Collection Report (FNS-742) and the Direct Certification Rate Data Element Report (FNS-834). As a result of the improved methodology, the performance measure currently reflects State-reports of key components of the measure. Prior to SY 2013-2014, the methodology overstated the percentage of SNAP participants who were directly certified by including children directly certified based on participation in other programs.

In addition to presenting direct certification performance measures, Section 4301 of the FCEA also calls for a discussion of best practices in States with successful direct certification systems.

II. HISTORY OF DIRECT CERTIFICATION

In the mid-1980s, program managers and policymakers recognized a duplication of effort in certifying school children for free meals under the NSLP and the School Breakfast Program (SBP),[14] and certifying families for what are now the SNAP and TANF programs (formerly the Food Stamp Program and Aid to Families with Dependent Children, respectively). All these programs have similar income-eligibility limits, and many school children participated in more than one. Further, the application processes for SNAP and TANF were, and remain, more detailed and rigorous than the certification process for free meals under the NSLP. Use of eligibility determinations for SNAP and TANF could improve the accuracy of certifications for NSLP.

Legislation taking a first step to link these programs was enacted in 1986. The Richard B. Russell National School Lunch Act (NSLA) was amended to make children who are members of

[13] In provision 2/3 and CEP schools, all students can receive free meals without applying or being directly certified in a current school year. Under CEP, program meals are reimbursed at either the free or paid rate, with the free claiming percentage based on the percentage of enrolled students who are certified for free meals without application and not subject to verification, reflective of April 1 of the previous school year. Other special provision schools operate in a "base year" in which they serve all meals at no charge but use standard program procedures to certify free and reduced-price eligible students and count meals by eligibility category. In subsequent "non-base" years, the schools continue to serve all meals at no charge but do not have to certify students for free and reduced-price meals and take only a daily aggregate count of meals served.

[14] Children certified for free or reduced-price meals under the NSLP are eligible for free or reduced-price breakfasts under the SBP. The two programs share a single application process. Throughout this report, certification for free or reduced-price benefits under the NSLP should be understood to mean certification for the SBP as well.

a household receiving assistance under SNAP and TANF automatically eligible for free school meals. This action paved the way for more simplified application and certification procedures for these children. Initially, families could put their case number from these programs on the application in lieu of providing income information.[15] Then, in 1989, P.L. 101-147 (Child Nutrition and WIC Reauthorization Act of 1989) allowed districts to certify children, without further application, by directly communicating with the appropriate State or local agency to obtain documentation that the children were members of a household receiving either SNAP or TANF benefits. This first statutory authorization of direct certification was made optional for districts.

The 2004 Reauthorization Act amended the NSLA to mandate direct certification with SNAP for all LEAs.[16] The 2004 act retained discretionary authority for TANF direct certification. Mandatory direct certification with SNAP was phased in over three years, beginning in SY 2006–2007. All LEAs, including private schools, were required to have direct certification systems in place for SY 2008–2009.

Because State agencies administering the NSLP and SBP recognized that direct certification would increase participation, ease the burden on families and LEAs, and result in more accurate targeting of free school meal benefits, many States chose to phase in the use of direct certification in advance of the mandate. State NSLP agencies worked in partnership with the agencies in their States that administered SNAP and TANF. At the outset, various methods were used, refined, and expanded. By the time direct certification with SNAP became mandatory, many State agencies had systems in place and were familiar with the process.

In the years since the statutory mandate, additional implementation requirements have been introduced with the intention of increasing the reach and effectiveness of direct certification. In August 2009, FNS issued guidance requiring that free meal eligibility apply to all children in a household if at least one child is certified for free meals based on receipt of SNAP, TANF, or FDPIR benefits. HHFKA required that State agencies no longer use the letter method as a means of direct certification with SNAP. This act also includes a provision that expands direct certification to include Medicaid in some districts via a demonstration project. In addition, starting in SY 2011–2012, FNS required that direct certification matching with SNAP records occurs at least three times per school year.

Even though all LEAs are now subject to the statutory direct certification mandate, there continues to be a need for household applications. Some households with incomes at or below 130 percent of the Federal poverty level do not participate in SNAP. Children from those households remain income-eligible for free school meals, but will not be identified through direct certification. In addition, because children from households with incomes from 130 to 185

[15] The option to provide a case number on the application has been retained to enable the LEAs to more easily process children who were not directly certified.

[16] This report focuses on the role LEAs play in certifying students for free school meals. We use the terms LEA and district interchangeably.

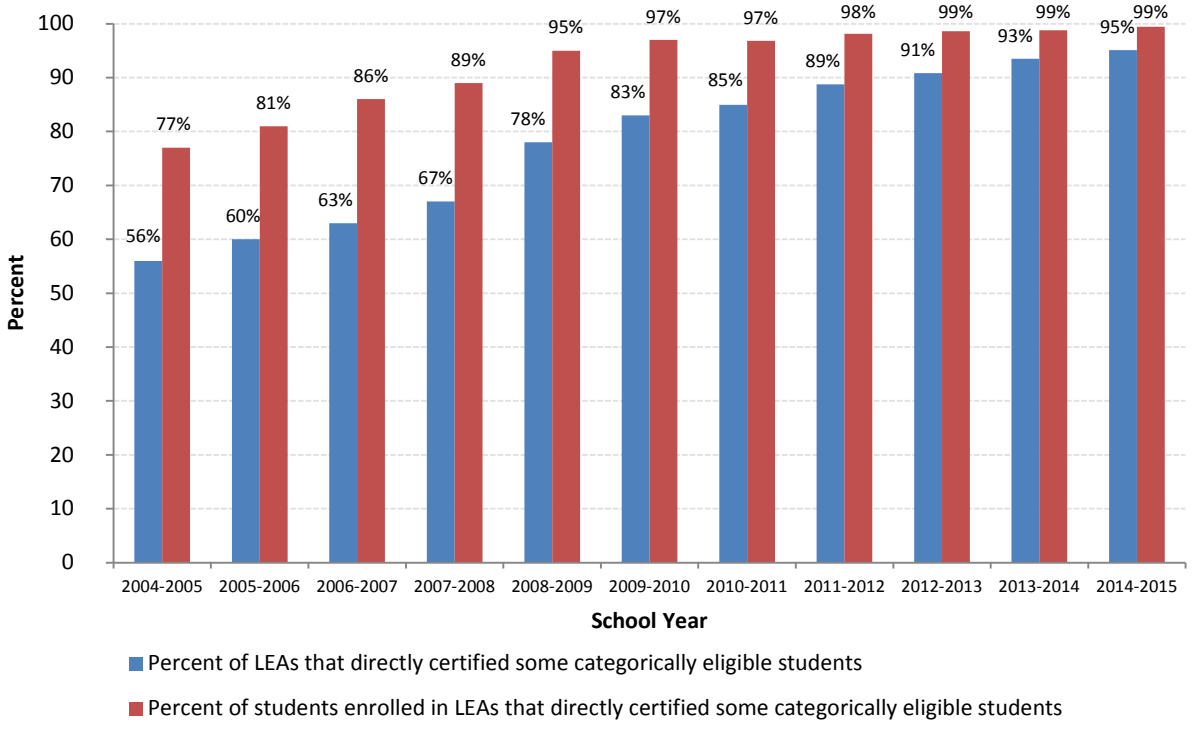
percent of the Federal poverty level might not be eligible for SNAP, direct certification cannot be used to certify children eligible for reduced-price school meals.

III. CURRENT STATUS OF DIRECT CERTIFICATION SYSTEMS

The 2004 Reauthorization Act required that all LEAs begin directly certifying children from SNAP-participant families by SY 2008–2009. The direct certification mandate was phased in over three years. LEAs with total enrollments of 25,000 or more students were required to establish direct certification systems no later than SY 2006–2007. LEAs with enrollments of 10,000 or more followed in SY 2007–2008. Phase-in was complete in SY 2008–2009, when all LEAs were subject to the statutory mandate.

Figure 1 and Table 1 illustrate the increases over time in both the percentage of LEAs that directly certified categorically eligible students—SNAP-participants and participants in other programs that allow for direct certification—and the percentage of students enrolled in those LEAs. For SY 2014–2015, 95 percent of LEAs directly certified some categorically eligible students, and those LEAs enrolled 99 percent of all students in NSLP-participating schools.[17]

Figure 1. Percent of LEAs that directly certified categorically eligible students and percent of students enrolled in LEAs that directly certified some categorically eligible students, SY 2004–2005 through SY 2014–2015



[17] Districts that include schools participating in CEP and those in other special provision schools in a non-base year are included as having conducted direct certification because all students in those schools receive free meals even though the schools are not required to conduct direct certification. See Table A.1 and Figure A.1 for figures that exclude these schools.

Note: The data since SY 2013–2014 distinguish students directly certified through SNAP and through other programs. Districts that directly certified SNAP participants and/or other program participants are included in this count. In previous years, the data were not broken out by program and may also include other students who were not directly certified, but were not subject to verification. In SY 2014–2015, about 5 percent of districts directly certified no SNAP participants but did directly certify some students based on participation in other programs.

Table 1. Number and percent of LEAs that directly certified categorically eligible students, SY 2012–2013 through SY 2014–2015

	SY 2012–2013			SY 2013–2014			SY 2014–2015		
		Direct certification or provision 2/3 LEAs			Direct certification or special provision LEAs			Direct certification or special provision LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**18,362**	**16,684**	**90.9**	**19,707**	**18,423**	**93.5**	**19,461**	**18,512**	**95.1**
Alabama	159	152	95.6	191	149	78.0	186	151	81.2
Alaska	69	48	69.6	68	68	100.0	68	68	100.0
Arizona	464	407	87.7	489	479	98.0	510	506	99.2
Arkansas	284	268	94.4	312	302	96.8	305	289	94.8
California	1,094	1,024	93.6	1,295	1,227	94.7	1,256	1,192	94.9
Colorado	209	201	96.2	231	224	97.0	224	202	90.2
Connecticut	188	186	98.9	202	197	97.5	201	198	98.5
Delaware	44	40	90.9	48	47	97.9	55	50	90.9
District of Columbia	63	63	100.0	67	67	100.0	68	67	98.5
Florida	226	185	81.9	277	261	94.2	289	288	99.7
Georgia	222	212	95.5	236	232	98.3	237	234	98.7
Guam	2	1	50.0	3	2	66.7	2	2	100.0
Hawaii	35	35	100.0	35	34	97.1	31	31	100.0
Idaho	149	149	100.0	162	159	98.1	158	156	98.7
Illinois	1,051	984	93.6	1,152	983	85.3	1,137	1,043	91.7
Indiana	504	447	88.7	550	539	98.0	539	535	99.3
Iowa	474	419	88.4	487	456	93.6	474	430	90.7
Kansas	398	378	95.0	415	402	96.9	412	400	97.1
Kentucky	188	186	98.9	200	199	99.5	192	192	100.0
Louisiana	114	107	93.9	140	130	92.9	150	146	97.3
Maine	189	182	96.3	205	192	93.7	213	197	92.5
Maryland	55	38	69.1	67	58	86.6	62	58	93.5
Massachusetts	363	324	89.3	464	448	96.6	485	466	96.1
Michigan	847	784	92.6	876	848	96.8	850	836	98.4
Minnesota	694	458	66.0	690	534	77.4	685	517	75.5
Mississippi	172	159	92.4	186	168	90.3	179	173	96.6
Missouri	762	711	93.3	777	737	94.9	760	731	96.2
Montana	239	206	86.2	239	215	90.0	241	217	90.0
Nebraska	370	337	91.1	391	378	96.7	385	355	92.2
Nevada	25	17	68.0	32	28	87.5	33	16	48.5
New Hampshire	98	82	83.7	107	106	99.1	108	96	88.9
New Jersey	699	680	97.3	729	717	98.4	724	714	98.6
New Mexico	205	143	69.8	222	113	50.9	216	179	82.9
New York	1,093	942	86.2	1,124	1,014	90.2	1,105	1,104	99.9
North Carolina	161	152	94.4	177	176	99.4	185	183	98.9
North Dakota	202	174	86.1	207	195	94.2	206	194	94.2
Ohio	1,219	1,146	94.0	1,305	1,270	97.3	1,293	1,262	97.6
Oklahoma	572	548	95.8	604	587	97.2	603	581	96.4
Oregon	239	204	85.4	280	256	91.4	275	245	89.1
Pennsylvania	853	790	92.6	894	854	95.5	856	827	96.6
Rhode Island	53	53	100.0	79	71	89.9	73	50	68.5
South Carolina	94	84	89.4	148	132	89.2	141	140	99.3
South Dakota	208	189	90.9	219	211	96.3	217	213	98.2
Tennessee	182	174	95.6	195	193	99.0	189	189	100.0
Texas	1,247	1,154	92.5	1,251	1,160	92.7	1,257	1,213	96.5
Utah	94	94	100.0	103	103	100.0	106	106	100.0
Vermont	88	82	93.2	92	79	85.9	87	78	89.7
Virginia	151	145	96.0	173	168	97.1	167	161	96.4
Washington	319	300	94.0	337	321	95.3	347	345	99.4
West Virginia	71	58	81.7	96	93	96.9	87	82	94.3
Wisconsin	799	728	91.1	809	777	96.0	766	743	97.0
Wyoming	62	54	87.1	69	64	92.8	66	61	92.4

About three-quarters of the LEAs that did not directly certify categorically eligible students in SY 2014–2015 are private, and 77 percent are single-school LEAs. These schools might be less likely to enroll categorically eligible children or could face greater barriers to implementing direct certification. The information-sharing relationship between private school LEAs and the States' NSLP agencies often differs from the relationship between public LEAs and the States. For this reason, private LEAs are sometimes excluded from State-level direct certification matching systems. Although small, single-school, and private LEAs might face special challenges in setting up direct certification systems, all are subject to the statutory mandate.

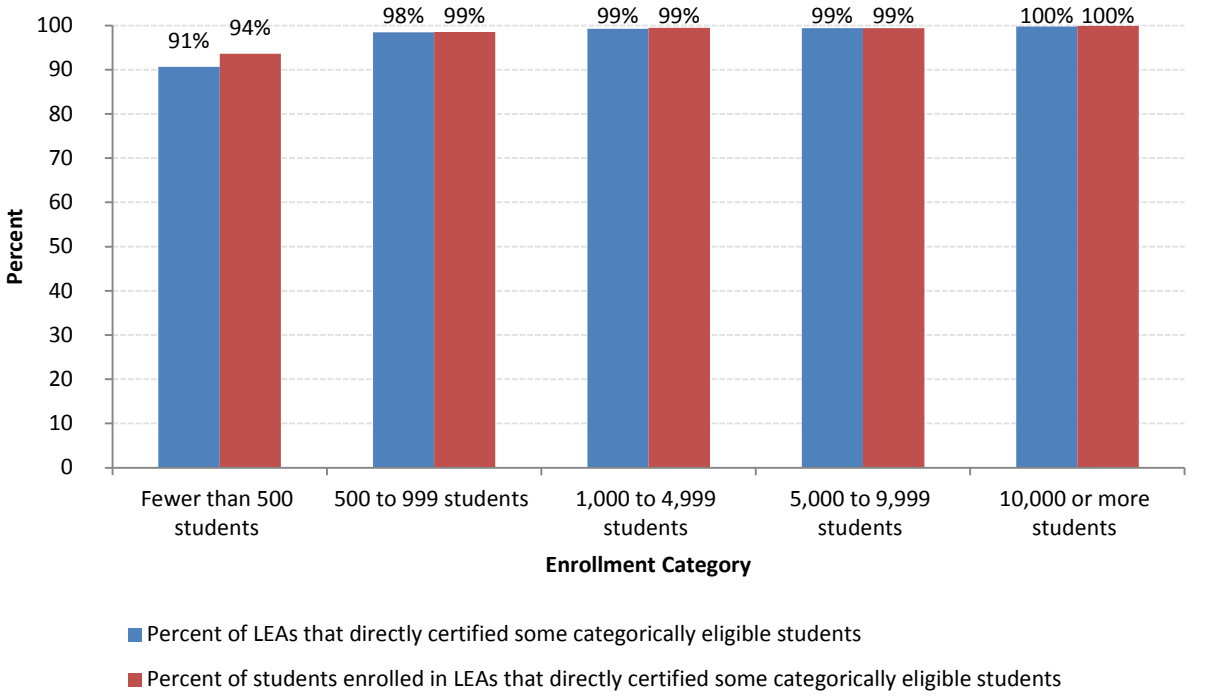
The 2004 Reauthorization Act's phased implementation of mandatory direct certification recognized that the fixed costs of establishing such a system would pose the greatest challenge to small LEAs. Although SY 2014–2015 is the seventh year that the smallest LEAs were subject to the statutory mandate, these LEAs continue to lag behind larger LEAs somewhat in adopting direct certification, and it remains useful to track the progress of that group separately.

Figure 2 shows estimates by LEA enrollment category of the percentage of LEAs that directly certified categorically eligible students and the percentage of students enrolled in LEAs that directly certified categorically eligible students in SY 2014–2015. Use of direct certification is nearly universal for larger LEAs; 99 percent of LEAs with enrollments of 1,000 or more students, and 98 percent of those with enrollments of 500 to 999 directly certified some categorically eligible students in SY 2014–2015. Although LEAs with enrollments of at least 500 make up about 53 percent of all LEAs, they enroll about 96 percent of students nationwide (Figure 3).

Direct certification is somewhat less prevalent among small LEAs; about 91 percent of LEAs with fewer than 500 students directly certified categorically eligible students in SY 2014–2015. Some of the LEAs might not have categorically eligible children among their enrollments, though it is also possible that technical or administrative challenges are among the reasons that these LEAs did not directly certify any categorically eligible students. The direct certification numbers for these small LEAs are a 1-percentage point improvement over the previous year (and 6 percentage points over two years). Therefore, the gap between the largest LEAs and those with fewer students continues to narrow.

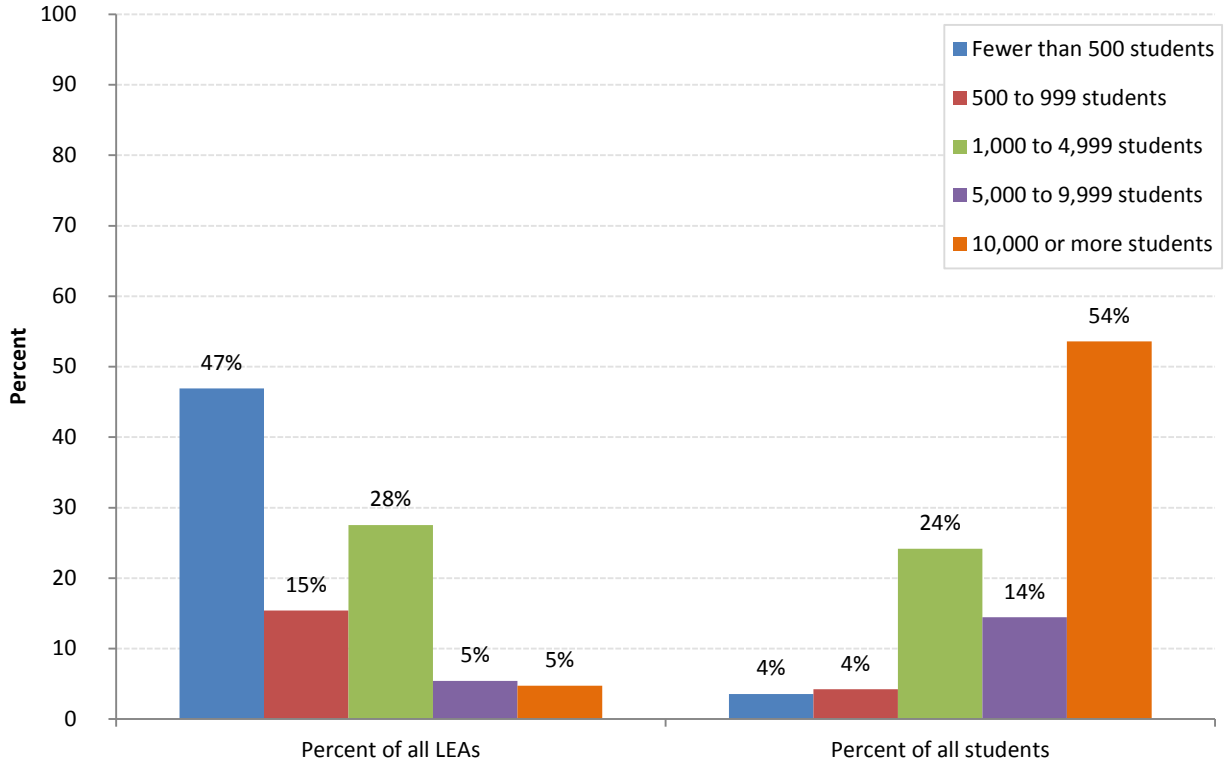
About 47 percent of all LEAs enroll fewer than 500 students; these LEAs account for only 4 percent of all enrolled students nationwide (Figure 3). Of the 1.7 million students enrolled in these LEAs, a large majority (94 percent) are enrolled in LEAs that directly certified at least some SNAP-eligible children.

Figure 2. Percent of LEAs that directly certified categorically eligible students and percent of students in LEAs that directly certified categorically eligible students by enrollment category, SY 2014–2015



Note: The percentages in this figure are rounded. For example, 99.8 percent of LEAs with 10,000 or more students directly certified some categorically eligible students in SY 2014–2015, which is rounded to 100 percent.

Figure 3. Percent of LEAs and students, by enrollment category, SY 2014–2015



A. Characteristics of LEAs that did not directly certify any SNAP children

Overall, 949 LEAs, or 4.9 percent of the total, did not directly certify SNAP-participant children in SY 2014–2015 (a decrease from 1,284 LEAs in SY 2013–2014). Although the NSLA does not exempt small or single-school districts from the direct certification requirement, both groups are overrepresented among LEAs with no directly certified students. Because they tend to be small, the 4.9 percent of LEAs that did not directly certify any SNAP children enroll only 0.6 percent of students in NSLP-participating schools.

Some additional details on LEAs that did not directly certify SNAP-participant students include the following:

- About 90 percent enrolled fewer than 500 students; only 45 percent of LEAs that did directly certify SNAP participants enrolled fewer than 500 students.
- About 77 percent are single-school LEAs; only 36 percent of LEAs that did directly certify SNAP participants are single-school LEAs.
- An estimated 74 percent are private LEAs; only 19 percent of LEAs that did directly certify SNAP participants are private.
- About 26 percent certified no students at all for free meals, either by direct certification or by application. FNS has no reason to believe that this small group of about 75 LEAs is not in full compliance with the direct certification requirement; these LEAs might enroll very few or no children from SNAP-participant households.
- About 41 percent certified some, but no more than 5 percent of their enrolled students for free meals; only 17 percent of LEAs that did directly certify SNAP participants reported having such a low concentration of students from low-income households. These LEAs have an unusually low concentration of students certified for free meals, and some might also be in compliance with the direct certification requirement, though their systems failed to identify any SNAP participants.

IV. DIRECT CERTIFICATION PERFORMANCE

For each State, Mathematica calculates a direct certification performance measure reflecting the percentage of school-age children in SNAP-participant households who were directly certified for free school meals. For the second year, this Report to Congress makes use of data sources for the components of this measure that differ in important ways from those used in Reports to Congress prior to SY 2013–2014:

1. **The number of SNAP participants directly certified by the State's LEAs for free school meals.** This value is based on LEA reports on the FNS-742. Beginning in SY 2013–2014, the FNS-742 was revised such that LEAs report direct certifications from SNAP separately from direct certifications based on other programs.
2. **The number of SNAP participants in the State's CEP and non-base year special provision schools.** This value is based on State reports on the FNS-834. In Reports to Congress prior to SY 2013–2014, this value was estimated based on secondary data sources.

3. **The number of school-age children in the State's SNAP-participant households.** This value is based on State reports on the FNS-834. In Reports to Congress prior to SY 2013–2014, this value was estimated based on secondary data sources.

Table 2 provides the values of these components for each State. To take advantage of the data sources and data reported directly from States, the measure of State direct certification effectiveness is computed as follows:

$$\text{Percent of SNAP children directly certified for free school meals} = \frac{\text{Students directly certified for free school meals based on SNAP participation} + \text{SNAP children in CEP and special provision schools operating in non-base years}}{\text{School-age children in SNAP households}}$$

Although the revised methodology is more straightforward than the one used in reports prior to SY 2013–2014 and addresses many of the limitations of the previous methodology, some limitations to measuring direct certification performance remain. These limitations are discussed in the next section.

A. Data limitations and special circumstances affecting direct certification performance measurement

The reliability of the performance measure depends on the accuracy of the underlying data. One source of potential inaccuracy is reporting error. For example, if some districts provide inaccurate counts of students who are directly certified based on SNAP participation on the FNS-742, then the State's calculation of students directly certified based on SNAP participation is incorrect—specifically this inaccuracy will affect the numerator of the performance rate equation. Reporting error can also occur if State agencies provide inaccurate counts of the number of school-age children in SNAP households or SNAP participants in CEP or special provision schools operating in non-base years. These types of errors may be relevant for SY 2014–2015 counts because this is just the second year that agencies have used the revised FNS-742 and the FNS-834.

It is likely that reporting error will decline as agencies and districts become more familiar with the steps needed to complete the FNS-742 and FNS-834. Additionally, to accelerate this continuous improvement, FNS worked proactively with States over the past year to assess the quality of FNS-742 and FNS-834 data submitted for SY 2014–2015. Specifically, Mathematica worked with FNS to devise an additional set of data quality checks beyond the existing edit checks in the electronic Food Program Reporting System through which State agencies submit their data to FNS for both FNS-742 and FNS-834 data. Based on the results of these checks, FNS worked with States to determine whether the data needed to be revised and, if so, to obtain corrected data. States now have access to these robust data checks and can use them independently to assess their own data prior to submissions, thereby further improving the accuracy of the data.

For the FNS-742 data quality checks, six internal consistency checks pertain specifically to data elements related to the calculation of the direct certification performance rates. Overall, errors were found to be uncommon: for two internal consistency checks, no districts were found to be in error; and for two other checks, less than one half of a percent of districts were found to

Table 2. SNAP participation, direct certifications, and SNAP-participant students in CEP and special provision schools in a non-base-year, SY 2014–2015 (thousands)

	School-age SNAP participants (from FNS-834)	NSLP direct certifications based on SNAP participation (from FNS-742)	SNAP-participant students in CEP or special provision schools in a non-base year (from FNS-834)
U.S. Total	**15,211.2**	**9,854.9**	**3,975.7**
Alabama	300.1	161.2	105.5
Alaska	30.0	16.0	14.0
Arizona	389.2	201.5	50.7
Arkansas	156.5	140.9	8.6
California*	1,688.9	1,022.7	232.9
Colorado	182.8	168.6	6.0
Connecticut	107.8	66.2	45.4
Delaware	51.9	23.3	25.9
District of Columbia	35.5	8.6	26.5
Florida	1,048.7	852.6	189.6
Georgia	655.6	333.4	268.7
Guam	17.4	6.7	7.7
Hawaii	54.1	44.9	2.5
Idaho	75.3	64.2	3.8
Illinois	657.2	313.3	316.4
Indiana	311.1	258.4	57.8
Iowa	134.7	102.7	0.0
Kansas	101.9	96.5	3.3
Kentucky	234.3	104.4	127.0
Louisiana	300.0	206.4	92.9
Maine	58.5	46.4	2.4
Maryland	233.8	209.5	3.8
Massachusetts	215.6	122.1	82.9
Michigan	468.6	245.6	138.2
Minnesota	171.0	160.2	12.4
Mississippi	218.8	90.3	94.7
Missouri	283.8	183.3	60.0
Montana	38.0	25.5	9.8
Nebraska	66.2	59.4	3.6
Nevada	128.6	94.0	13.5
New Hampshire	31.7	29.4	0.0
New Jersey	292.0	219.9	57.0
New Mexico	132.9	49.6	71.7
New York*	880.3	695.2	295.6
North Carolina	545.4	393.2	131.9
North Dakota	17.6	11.3	4.0
Ohio	561.9	314.8	171.6
Oklahoma	200.4	167.5	29.7
Oregon	204.9	136.5	65.8
Pennsylvania	529.7	250.7	187.7
Rhode Island*	45.5	39.5	0.4
South Carolina	283.7	185.6	59.6
South Dakota	34.6	22.3	7.4
Tennessee	369.5	159.4	246.2
Texas	1,597.0	942.3	462.4
Utah	94.6	88.6	3.1
Vermont	19.6	14.4	4.5
Virginia	295.2	242.4	27.0
Washington	292.7	240.2	33.2
West Virginia	100.0	45.8	56.0
Wisconsin	253.2	167.6	52.3
Wyoming	13.0	10.2	2.4

Note: The U.S. total for each column may not equal the sum of the individual State values due to rounding. Asterisks indicate that State was unable to distinguish all or some of the direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP. The count labeled “direct certifications based on SNAP participation” includes all direct certifications for these States. The true count of direct certifications based on SNAP participation is lower for these three States.

be in error. The remaining two errors affect less than 1.5 percent of districts each. The first of these identified districts with only CEP or special provision schools in non-base years that reported students as directly certified. This indicates a reporting problem as these schools should not have any directly certified students. The second identified districts that list mutually exclusive subtotals of students that sum to a number greater than the total number of students listed on the FNS-742. Both of these errors likely indicate double-counting on the FNS-742 and may inflate State direct certification performance.

For the FNS-834 data quality checks, one check pertains to the relationship with FNS-742 data. Overall, errors were again found to be uncommon, as only three states were flagged for potential inaccuracies.

To identify other potential data limitations, FNS asked States to indicate special circumstances in the data they submitted that would affect their performance rates.[18] Sixteen States cited such circumstances. FNS discussed these circumstances in detail with staff from the States, obtaining useful information about the challenges States face when collecting the data elements FNS requires. Special circumstances fell into three categories.

The first type of special circumstance States cited dealt with children in households receiving SNAP benefits who do not attend schools participating in the NSLP. These children appear in the denominator of the direct certification performance rate calculation because the children reside in SNAP households. However, they do not appear in the numerator because they cannot be directly certified or reported on the FNS-742. The result decreases State performance rates. States cited children in the following categories:

- Home-schooled students
- Virtual students (who attend classes online)
- Students attending schools that do not participate in the NSLP
- School-age children who do not attend school, including
    - School drop-outs
    - Students who graduated early
    - Children at least five years old but younger than the mandatory school-start age for their State
    - Some homeless and migrant children

The second type of special circumstance stemmed from data system limitations. Specifically, three States reported that their data systems prevented them from distinguishing direct certifications based on SNAP from direct certifications based on participation in programs

[18] States used the FNS-834 to report these special circumstances, although many of those circumstances pertained to limitations of the FNS-742 data. See Appendix C for more details.

other than SNAP.[19] The resulting performance rates calculated for these States, therefore, overstate their actual performance.

A third type of special circumstance States reported was mismatched timing between the CEP identified student percentage determination and the FNS-834 reporting deadline, which can lead to inaccurate reports for data element 2.[20]

Although only 16 States cited these circumstances, one or more are likely relevant to many, if not all, States. It is difficult to gauge the scope of this problem because many States do not collect individual-level data on children in these circumstances. A limited number of States offered estimated numbers for some of these populations. This provided a useful first step in determining how these challenges affect State performance. However, no firm, comprehensive counts exist for the number of school-age SNAP participants who do not attend NSLP schools. FNS continues to study this issue to determine the impact on State direct certification rates.

Other limitations of the data and methodology used to calculate State performance rates are discussed in Appendix C.

B. Calculations of State direct certification performance

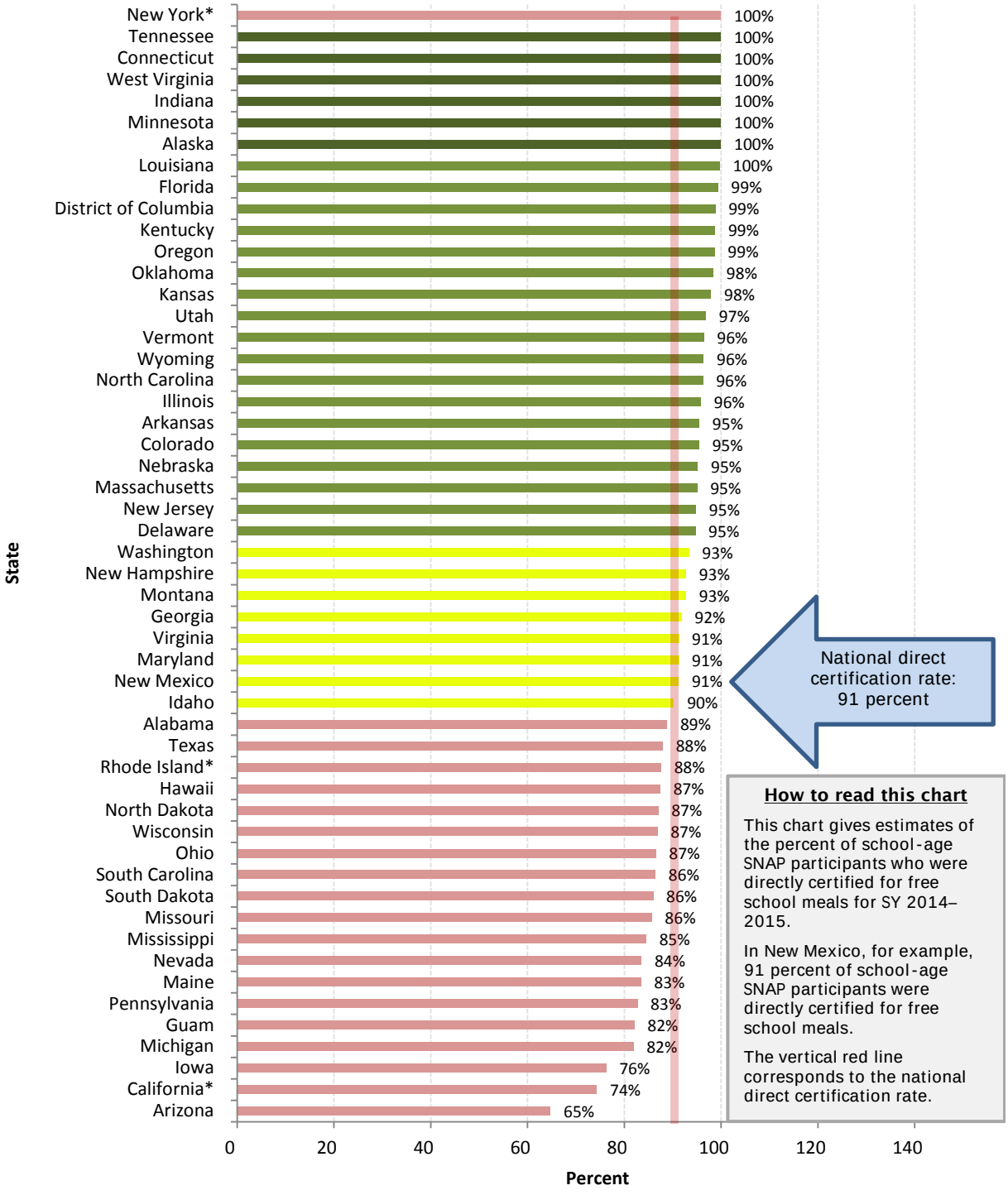
Figure 4 ranks the States according to direct certification performance, which is the percent of school-age SNAP participant children directly certified for free school meals.[21] When examining the percentage values associated with the States, readers should keep in mind that special circumstances might affect the measurement of direct certification performance and each of the component statistics of the measure might be subject to reporting error. For this reason, this report focuses primarily on the States' relative positions in the chart. States near the top of the chart are among the most successful at directly certifying SNAP-participant children for free school meals; relatively few SNAP households in those States are burdened with paper applications. Children from SNAP-participant households in those States are also among the least likely to be misclassified as ineligible for free school meals.

[19] California, New York, and Rhode Island could not distinguish all or some direct certifications based on SNAP participation from direct certifications based on participation in programs other than SNAP.

[20] Some States use the CEP individual student percentage to calculate the number of SNAP participants in CEP schools and use this figure to complete data element 2 on the FNS-834. However, the individual student percentage is determined in the spring (prior to the start of the SY) and must be calculated at least every four years. Therefore, by the time the FNS-834 is submitted in October of the current SY, the individual student percentage can be between six months and three-and-a-half years out of date. Whether this overstates or understates direct certification performance depends on whether SNAP enrollment among school-age children increased or decreased during the elapsed time.

[21] Three States were unable to distinguish some or all direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP. The direct certification performance rate calculations for these States includes all direct certifications, rather than only those that are based on SNAP. For each of the three States, then, their rate will overstate their actual performance. The national direct certification rate is not strongly sensitive to the treatment of direct certifications in these States. If we assume that for these States the percentage of direct certifications that were based on SNAP is the same as the median State, the national direct certification performance rate is 90 percent rather than 91 percent.

Figure 4. Percent of school-age SNAP-participant children directly certified for free school meals, SY 2014–2015



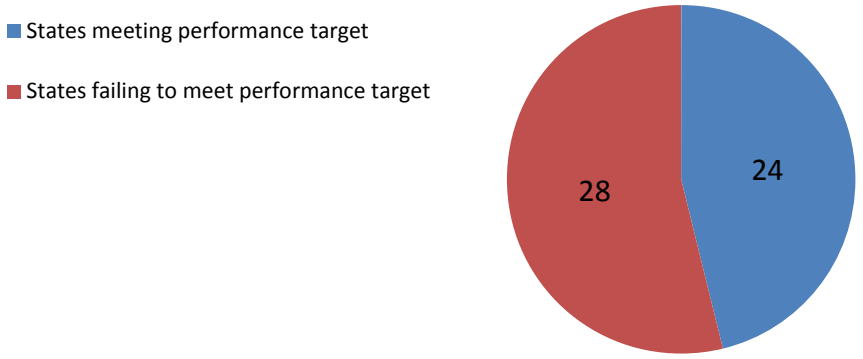
Note: Dark green shading indicates calculations that were greater than 100 percent. Light green shading indicates estimates of at least 95 percent and less than or equal to 100 percent. Yellow shading indicates estimates of at least 90 percent and less than 95 percent. Red shading indicates estimates less than 90 percent. Asterisks indicate that State was unable to distinguish some or all direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP. Performance rate calculations for these States are overstated because they include all direct certifications reported by these States. All three of these States are shaded as red.

The States that fall near the bottom of the chart directly certify relatively fewer SNAP-participant children. However, by this measure alone, it is not possible to conclude that SNAP-participant children in these States are at particular risk of being denied free meal benefits. LEAs in these States could operate effective school meal application systems. What can be concluded is that SNAP households and LEAs or school administrators in these States are burdened with more administrative paperwork than their counterparts in other States.

The potential for errors in measurement and State reporting minimize the significance of small differences in the percentage point scores of States that fall near one another in Figure 4, but the wide gap between States near the bottom of the chart and those near the top makes clear that some States' direct certification systems are simply less effective than other States' systems. Variation in direct certification effectiveness might be explained in part by differences in matching algorithms, use of probabilistic matching, the nature and quality of data used as input into the matching process, procedures for handling nonmatches, access to a supplemental student-level look-up system, or other system characteristics.

Figure 5 shows the number of States that met or exceeded the 95 percent direct certification performance target established by HHFKA. Nationally, 24 States were at or above this benchmark.[22] Regionally, there are differences in direct certification effectiveness (Figure 6). The seven regions shown in Figure 6 are those defined for FNS administrative purposes. Five of the seven regions have at least half of their States at or above the direct certification performance target in SY 2014–2015 (Mid-Atlantic, Midwest, Mountain Plains, Southeast, and Southwest regions).

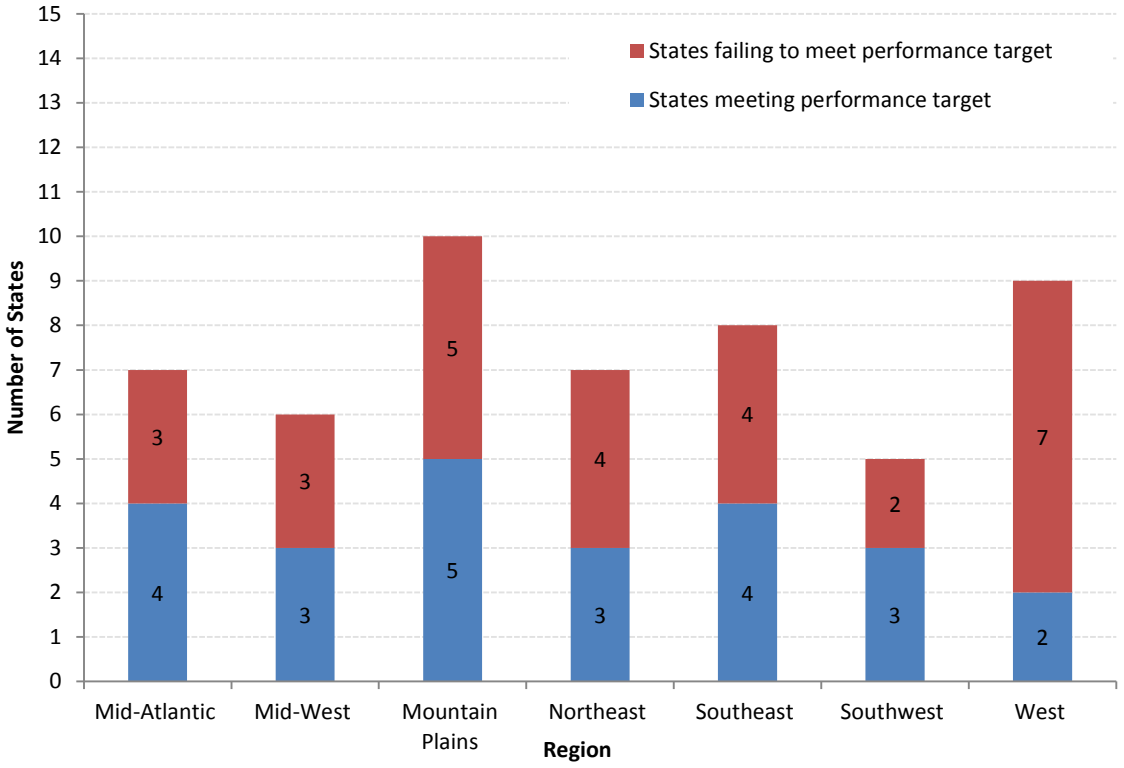
Figure 5. Number of States meeting direct certification performance target set by the Healthy, Hunger-Free Kids Act, SY 2014–2015



Note: States that were unable to distinguish some or all direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP are not counted as meeting performance targets. Performance rate calculations for these States are overstated because they include all direct certifications reported by these States.

[22] Although New York's performance rate exceeded 95 percent, the State was not fully able to distinguish students directly certified based on SNAP benefit receipt from those based on other program participation. For this reason, New York is not considered to have met the HHFKA-mandated performance target.

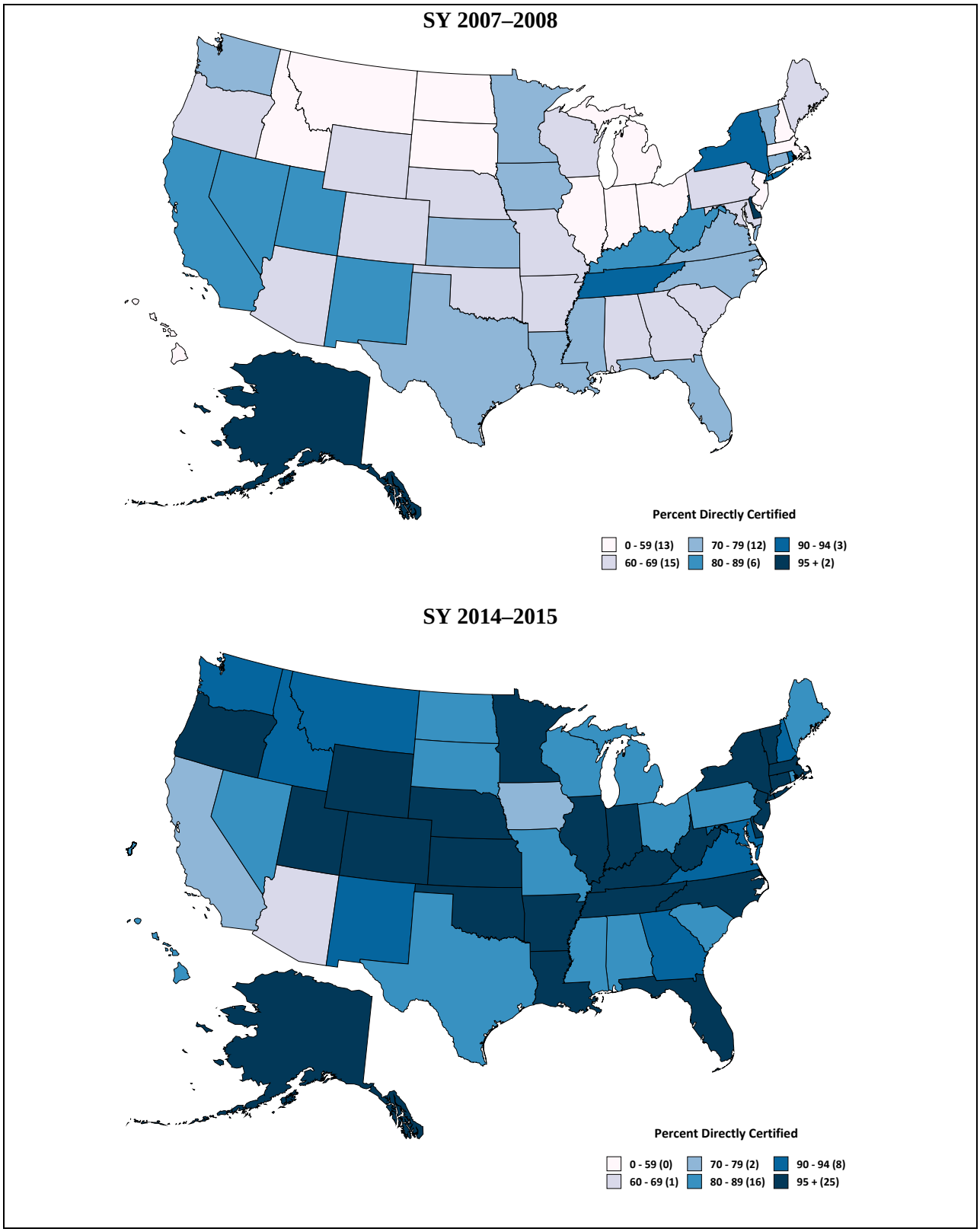
Figure 6. Number of States with direct certification performance rates above or below the mandated performance targets, by region, SY 2014–2015



Note: States that were unable to distinguish some or all direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP are not counted as meeting performance targets. Performance rate calculations for these States are overstated because they include all direct certifications reported by these States.

Regional differences in direct certification performance can be examined by plotting direct certification rates on a map of the United States. The top panel of Figure 7 shows the SY 2007–2008 direct certification performance measure for each State, whereas the bottom panel shows the SY 2014–2015 direct certification performance measure. The performance estimate for SY 2007–2008 was based on different data sources than the performance rate for SY 2014–2015 and overstated the percentage of SNAP-participant children directly certified for free school meals because it included students directly certified based on programs other than SNAP. Although the performance calculations used in this report are not directly comparable to the performance estimates from previous years, differences in the two panels in this Figure are consistent with a marked increase in direct certification performance over time across all States. This figure also confirms the existence of limited regional differences in State performance.

Figure 7. Percent of SNAP-participant children directly certified for free school meals, by State



Note: In SY 2014–2015, California, New York, and Rhode Island could not distinguish all or some direct certifications based on SNAP participation from direct certifications based on participation in programs other than SNAP. The resulting performance rates calculated for these States, therefore, overstate their actual performance.

C. Comparison with SY 2013–2014 direct certification performance

For the first time, we are able to make a year-to-year comparison of direct certification performance that incorporate the refinements made possible by the introduction of a revised FNS-742 and the new FNS-834 in SY 2013–2014. As discussed above, the FNS-742 now separates directly certified SNAP participant children from children certified without application through their participation in other assistance programs.

Figure 8 compares SY 2014–2015 State-level measures of direct certification effectiveness (from Figure 4) with the same measures computed using SY 2013–2014 data. Most States showed improved performance, although 16 States had a decline in performance of 1 percentage point or more. States near the top of Figure 8 achieved the largest percentage point growth in the share of SNAP-participant children who were directly certified for free school meals.

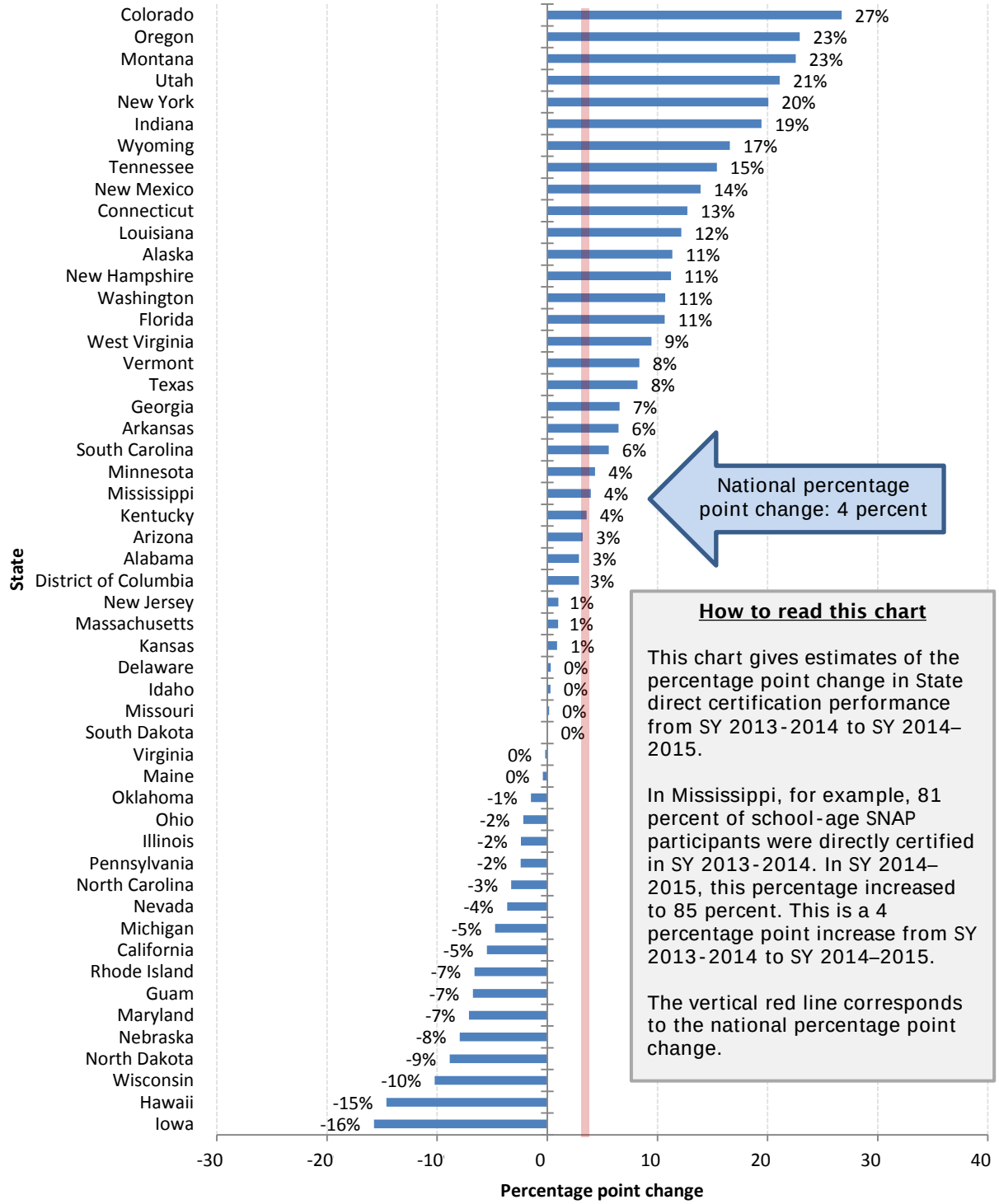
D. Calculations of certifying categorically eligible children

Next, we present a more comprehensive measure of the States' success in certifying all categorically eligible children for free school meals. This measure does not attempt to assess the effectiveness of the States' direct certification systems. Instead, it measures the States' success at certifying children, directly or by application, based on their participation in or association with any of the programs or institutions that confer categorical eligibility for free school meals.

The measure starts with the number of students who are directly certified based on SNAP participation. This is the same measure of directly certified SNAP participants used in the direct certification performance measure. Added to this are students directly certified based on participation in a program other than SNAP, students whose approval for free school meals is based on the household's submission of a SNAP, TANF, or FDPIR case number on an NSLP application, students certified for free school meals based on the letter method, and SNAP children in CEP or special provision schools that are operating in non-base years.

This count of children identified as categorically eligible for free meals is divided by an estimate of the combined SNAP, TANF, and FDPIR populations. The SNAP population count used here is the same one used in the performance measure developed earlier. The number of children in households that receive TANF but not SNAP benefits is estimated from data found in the ACS. The number of children who receive FDPIR benefits is estimated from FNS program and survey data.

Figure 8. Percentage point change in the share of SNAP-participant children directly certified for free school meals, SY 2013–2014 to SY 2014–2015



Note: For a tabular presentation of these data, see Table A.4. The percentages in Figure 8 are based on the performance measures computed from the component figures in Table 2, not the data in Figure 4 that are capped at 100 percent for several States.

Details of this computation are summarized in the following equation:

$$\text{Percent of SNAP, TANF, and FDPIR participants certified (directly or by application) for free school meals} = \frac{\text{Children directly certified for free school meals based on SNAP} + \text{Children directly certified for free school meals based on programs other than SNAP} + \text{Children certified for free school meals based on categorical eligibility by application} + \text{Children certified for free school meals through the letter method} + \text{SNAP children in CEP or special provision schools operating in non-base years}}{\text{School-age children in SNAP households} + \text{School-age children in TANF households that do not participate in SNAP} + \text{School-age children in FDPIR households}}$$

It is important to note that this measure may overstate the effectiveness of State efforts to ensure that all categorically eligible children are properly certified for free school meals for several reasons. Most importantly, many States and districts have improved their certification processes to directly or categorically certify children participating in programs other than SNAP, TANF, or FDPIR, such as those receiving foster care or those directly certified based on Medicaid data in States participating in the Direct Certification-Medicaid demonstration. While these are important improvements to direct certification systems, they will result in the measure overstating the percentage of SNAP, TANF, or FDPIR recipients who were certified because the measure includes children certified through other programs that allow for direct certification or confer categorical eligibility. In addition, the components of this measure are subject to reporting and estimation error. Please see Appendix C for further discussion of these limitations.

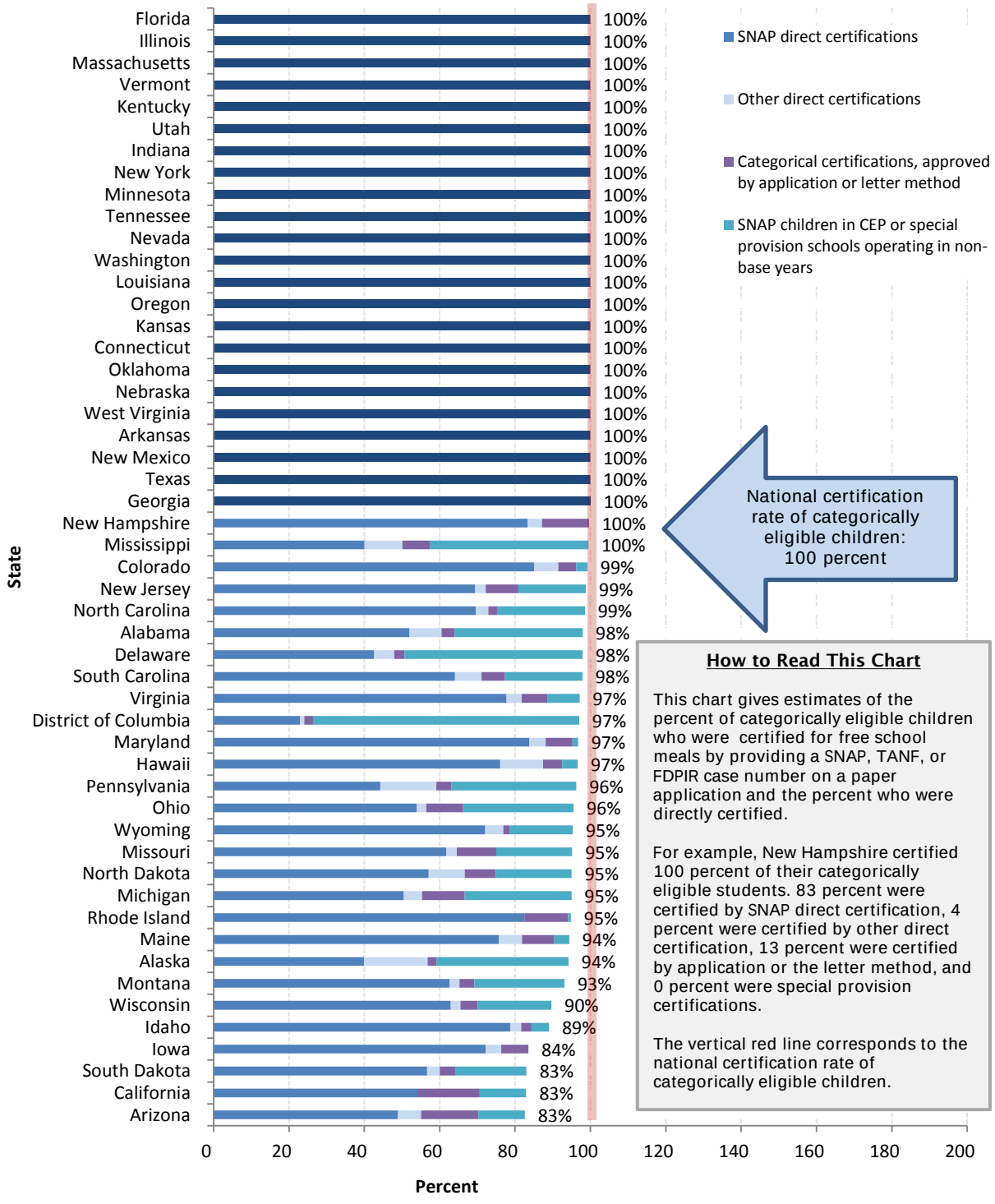
The components of the numerator and the sum of the values in the denominator are given for each State in Table 3. Figure 9 displays the same data graphically. Forty-two States were able to certify students using direct certification, application based on categorical eligibility, or letter method for at least 95 percent of the estimated number of school-age children categorically eligible for free school meals based on participation in SNAP, TANF or FDPIR. States at the bottom of Figure 9 are less successful at identifying and certifying these children.

Table 3. Students eligible for direct or categorical certification: Number directly certified and number approved by application, SY 2014–2015 (thousands)

	Number of children identified as categorically eligible	NSLP direct certifications based on SNAP participation	NSLP direct certifications based on other programs	Categorically eligible, approved by application or letter method	SNAP-participant students in CEP or special provision schools in a non-base year
U.S. total	**16,041.5**	**9,848.2**	**1,257.3**	**1291.6**	**3,968.0**
Alabama	309.9	161.2	26.4	10.7	105.5
Alaska	40.1	16.0	6.8	0.9	14.0
Arizona	411.6	201.5	25.2	62.6	50.7
Arkansas	161.1	140.9	7.9	8.3	8.6
California	1,890.1	1,022.7	0.0	312.5	232.9
Colorado	198.0	168.6	12.6	9.4	6.0
Connecticut	115.3	66.2	2.8	7.1	45.4
Delaware	54.6	23.3	2.9	1.5	25.9
District of Columbia	37.4	8.6	0.4	0.9	26.5
Florida	1,089.6	852.6	284.7	61.7	189.6
Georgia	675.0	333.4	34.3	39.4	268.7
Hawaii	59.0	44.9	6.7	3.0	2.5
Idaho	81.5	64.2	2.4	2.2	3.8
Illinois	690.2	313.3	200.8	16.9	316.4
Indiana	322.5	258.4	18.2	33.2	57.8
Iowa	142.3	102.7	5.9	10.3	0.0
Kansas	108.2	96.5	11.4	2.7	3.3
Kentucky	242.6	104.4	44.9	7.4	127.0
Louisiana	305.4	206.4	7.1	21.7	92.9
Maine	61.2	46.4	3.7	5.2	2.4
Maryland	250.0	209.5	10.8	17.9	3.8
Massachusetts	231.0	122.1	56.1	20.5	82.9
Michigan	486.9	245.6	23.8	55.0	138.2
Minnesota	185.5	160.2	8.6	23.5	12.4
Mississippi	225.4	90.3	22.7	16.6	94.7
Missouri	296.7	183.3	8.2	31.1	60.0
Montana	40.7	25.5	1.1	1.6	9.8
Nebraska	71.0	59.4	5.4	5.9	3.6
Nevada	138.2	94.0	32.3	9.5	13.5
New Hampshire	35.3	29.4	1.3	4.4	0.0
New Jersey	316.7	219.9	8.9	27.4	57.0
New Mexico	138.5	49.6	7.2	13.2	71.7
New York	926.6	695.2	0.0	51.4	295.6
North Carolina	565.0	393.2	18.7	13.2	131.9
North Dakota	19.8	11.3	1.9	1.6	4.0
Ohio	584.7	314.8	15.3	56.9	171.6
Oklahoma	219.1	167.5	10.1	22.2	29.7
Oregon	213.1	136.5	11.6	12.9	65.8
Pennsylvania	566.3	250.7	83.9	23.1	187.7
Rhode Island	47.9	39.5	0.0	5.6	0.4
South Carolina	289.8	185.6	20.6	17.9	59.6
South Dakota	39.4	22.3	1.3	1.7	7.4
Tennessee	380.2	159.4	7.3	5.9	246.2
Texas	1,650.1	942.3	134.4	144.7	462.4
Utah	101.7	88.6	6.0	19.6	3.1
Vermont	21.1	14.4	3.5	2.6	4.5
Virginia	311.9	242.4	12.6	21.1	27.0
Washington	310.3	240.2	27.7	33.8	33.2
West Virginia	102.6	45.8	3.0	1.2	56.0
Wisconsin	266.2	167.6	7.0	11.9	52.3
Wyoming	14.1	10.2	0.7	0.2	2.4

Note: The U.S. total for each column may not equal the sum of the individual State values due to rounding. Counts of students directly certified based on other programs includes those directly certified based on administrative data available through Medicaid in States participating in the Direct Certification-Medicaid demonstration. These students may not be categorically eligible for free school meals.

Figure 9. Percent of categorically eligible children certified for free school meals, SY 2014–2015



Note: Bars shaded dark blue represent estimates greater than 100 percent. See Appendix C for a discussion of data sources and data limitations. Counts of students directly certified based on other programs includes those directly certified based on administrative data available through Medicaid in States participating in the Direct Certification-Medicaid demonstration. These students may not be categorically eligible for free school meals.

E. Changes in certification based on categorical eligibility over time

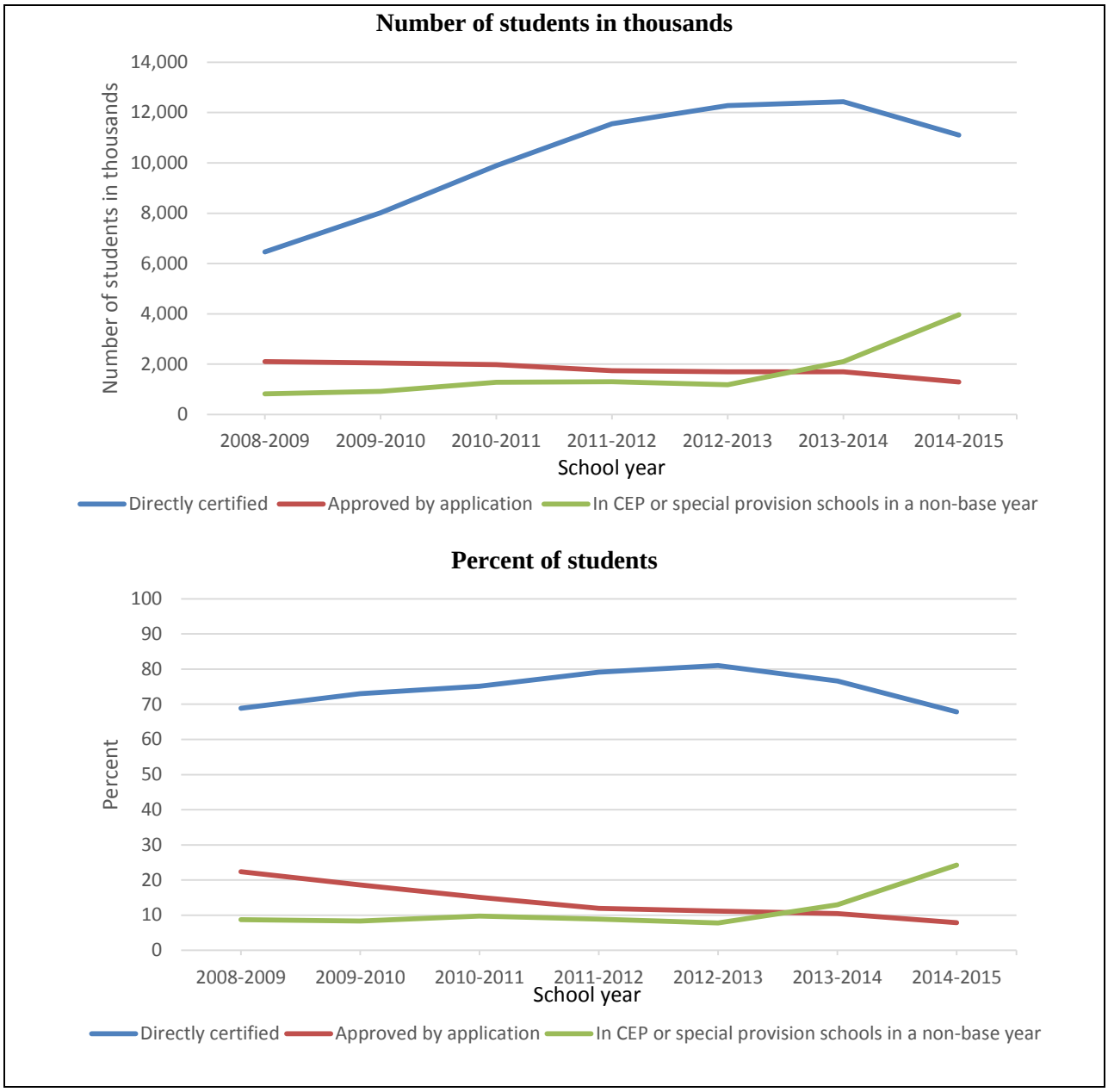
Results in the previous section indicate that direct certification is the most common way for categorically eligible students to be certified for free meals. However, with the nationwide rollout of CEP for SY 2014–2015, it is likely that the number of categorically eligible students who receive free meals as a result of attending a special provision school has increased. To investigate this possibility, we constructed a national time series from SYs 2008–2009 through 2014–2015 identifying the certification method for students certified for free meals based on categorical eligibility. These certification methods included (1) direct certification for free meals; (2) certification for free meals by application based on categorical eligibility[23]; or (3) receiving free meals by attending a school operating under a special provision.[24]

Figure 1 shows trends in the number of students benefiting from these certification methods over time, as well as trends in the percentage of categorically eligible students receiving free meals by each method listed above. This figure demonstrates the large and steady increase in direct certification, accompanied by the large and steady decrease in certification by application based on categorical eligibility. In SY 2008–2009 about 6.5 million students were directly certified (or 69 percent of all categorically eligible students receiving free meals). By SY 2012–2013 this number had increased to about 12.3 million (or 81 percent of all categorically eligible students receiving free meals). However, this trend began reversing with the introduction of CEP, as more categorically eligible children began receiving free school meals by virtue of attending CEP schools. By SY 2014–2015, the year of the national rollout of CEP, the number of directly certified students declined to 11.1 million (or 68 percent of all categorically eligible students receiving free meals). During this school year, the number of categorically eligible students receiving free meals in CEP and special provision schools not operating in a base year was about 4.0 million (or 24 percent of categorically eligible students receiving free meals), about twice as many as in the previous school year.

[23] For SYs 2013-2014 and 2014-2015, this category also includes students certified by the letter method. In previous school years, students certified by the letter method were categorized with direct certifications.

[24] The data source for counts of special provision students changes over time. For SYs 2008–2009 through 2013–2014, these counts are estimated using secondary data sources and do not include estimates of CEP students. For SYs 2013–2014 and 2014–2015, these counts are based on primary data from the FNS-834. Readers should focus on changes between SYs 2013–2014 and 2014–2015; these two data points are based on comparable data from the FNS-834 and correspond to the nationwide rollout of CEP.

Figure 10. Number and percent of students certified for free school meals based on categorical eligibility, by method of free school meal receipt



V. DIRECT CERTIFICATION BEST PRACTICES

The FCEA requires a discussion of best practices with States that have successful direct certification programs. To fulfill this requirement, FNS contracted with Mathematica Policy Research to conduct interviews with child nutrition (CN) administrators from six States with successful direct certification programs and two direct certification experts. Mathematica also hosted a roundtable discussion among FNS, Mathematica, and CN officials from eight States.

States were selected to participate primarily on the basis of direct certification performance during SY 2014–2015 or because they showed noteworthy improvement in their direct certification performance rates from SY 2013–2014 to SY 2014–2015. In addition, the selection reflected the diverse perspectives of States in different parts of the country and included States that had not been highlighted in this report in recent years.

We interviewed representatives from six States for this report: Colorado, Delaware, Louisiana, Massachusetts, Oklahoma, and Oregon. Representatives from all six States, plus New Mexico and Wyoming, also participated in a roundtable discussion about best practices in direct certification. We also interviewed two direct certification experts. One was a data partner at another State agency who helps manage the direct certification online data portal in Massachusetts. The other expert works for a private vendor contracted by the Louisiana Department of Education (LDE) to administer the State's new Statewide Student Information System (SSIS), a role that also entails assisting in the direct certification matching process.

The remainder of this chapter includes a description of (1) State practices (Section A), (2) recent and planned strategies for improving direct certification (Section B), (3) best practices and suggested improvements in implementing direct certification systems (Section C), and (4) challenges States face in meeting the direct certification benchmark rate and data collection requirements of the HHFKA (Section D).

A. Description of State practices

The primary goal of direct certification is to identify students categorically eligible for free school meals and certify them as such without a household application. To determine categorical eligibility, States can use information on children from households enrolled in qualifying programs, such as SNAP, TANF,[25] and FDPIR. A child's status as a foster child; an enrollee in a Head Start program; or certain homeless, migratory, or runaway children may also be categorically eligible for free school meals. Beginning in SY 2012–2013, five States were authorized to evaluate the use of Medicaid data for direct certification as part of a pilot demonstration. The following year, Massachusetts—one of the States studied for this report—joined the demonstration.

There are two main methods for conducting direct certification:

1. **Central matching system.**[26] A State agency (usually the CN agency) is responsible for a system that matches a list of children attending schools participating in the NSLP with lists of children in households participating in SNAP and other programs conferring categorical eligibility. These systems use computer programs to conduct the matching. They then distribute match results to LEAs. This system can be set up in several ways. For example:

[25] TANF information can be used for direct certification of children for free school meals only in States with TANF income eligibility criteria comparable to or more restrictive than those in effect on June 1, 1995 (P.L. 104-193), when the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 replaced Aid to Families with Dependent Children with TANF.

[26] *Central* matching is sometimes referred to as *State-level* matching.

- A State agency matches State enrollment information with a State list of children in SNAP households. The State sends a list of students eligible to be directly certified on the basis of this match to each LEA. LEA staff certify these students and upload the matched lists into their point-of- service (POS) systems and notify the households of their children's certification status.
- A State agency conducts an initial match and sends a list of matched students to LEAs, which then verify the matches, obtain additional information on students who are potential matches—usually from their local enrollment files—or conduct other types of secondary matching.
- LEAs upload enrollment information into a State-maintained computer or web-based system and then initiate a match against a list of children in SNAP households. Students are directly certified on the basis of this match.
- Some States use a combination of these approaches.

Over time, many State have switched from local to central matching. As of SY 2012–2013, about one-fourth of States around the country used local matching for direct certification (Moore et al. 2014).

2. **Local matching system.** With local matching, LEAs have primary responsibility for matching, using at least one common identifier. LEA staff match a list of children enrolled in their schools with a list of children in SNAP households. Some States using local matching provide LEAs with a list limited to children in SNAP households in the LEAs' geographic area; others provide a full statewide list. LEAs can use manual methods or their own computer systems to conduct matching.

Within these two primary matching methods, actual processes and procedures for direct certification vary considerably, even among States with the same general method of matching. Our review of State systems is similar to the reviews conducted in previous years, focusing on six key questions about direct certification:

1. Which administrative entity is responsible for matching student records with program participation records from State and other programs that confer categorical eligibility (that is, does the State use central or local matching)?
2. How is a match made? What data elements and matching algorithms are used to form the match?
3. Is any attempt made to directly certify categorically eligible children initially unmatched or partially matched against school enrollment records?
4. When and how often are records matched?
5. How effective are the performance targets and CIPs as incentives for improving direct certification efforts? What are some challenges States face in meeting the performance targets?
6. What is the State perception of the recent changes to the FNS-742 and introduction of the FNS-834 and their impact on direct certification performance?

Table 4 summarizes State approaches for directly certifying students enrolled in public LEAs.

Table 4. Characteristics of the direct certification matching process for public LEAs in selected States, SY 2014–2015

State	Type of matching system	How does direct certification work?	Frequency of direct certification
Colorado	Central	The Colorado Department of Education receives SNAP data from the Colorado Department of Human Services monthly. These data are then passed to an outside vendor for matching to current enrollment data. The outside vendor produces match probabilities and provides a list of exact and possible matches. LEAs can then download their lists from a secure Information Management System for verification and certification.	Monthly
Delaware	Central	The Delaware State Department of Education (DSDOE) provides student data to the Delaware Department of Health and Social Services (DDHSS) monthly. DDHSS matches SNAP and TANF data against all enrolled students in the public school system. The match results are sent back to DSDOE and then placed in a secure identity management system where LEAs have access to matches found only in their district.	Monthly
Louisiana	Central	The Louisiana Department of Education (LDE) receives SNAP and TANF data from the Department of Child and Family Services five times per year for program participants up to 22 years of age. The LDE then probabilistically matches these data against current enrollment data and assigns a matched status to cases with a probability score above a given threshold. LEAs then receive a list of matches and a list of partial matches for students in their geographical area.	5 times per year
Massachusetts	Central	LEAs are able to upload their enrollment data directly to the Massachusetts Virtual Gateway (MVG) at any time. MVG is an online portal that links users with multiple State government databases. Once uploaded, the enrollment data are then matched against SNAP, TANF, Medicaid, and foster care records whose databases are accessed through MVG. LEAs then download the list of exact and partial matches, where LEA staff can then review partial matches. As needed, LEAs can upload corrected enrollment records to be matched again.	Available continuously Required 3 times per year
Oklahoma	Central	The Oklahoma State Department of Education (OSDE) receives SNAP and TANF data from the Oklahoma Department of Human Services monthly, beginning in August. OSDE matches the program data to student enrollment data in Statewide Student Information System using 27 different matching algorithms daily allowing LEAs to run reports for matches at any time during the month.	Available daily Required 3 times per year
Oregon	Central	Each week, the Oregon Department of Education (ODE) receives SNAP data from the Oregon Department of Human Services. The ODE matches them against the State enrollment data. The matching program then generates an automated email to each LEA indicating the number of matches found for them and providing a link to download the complete list from a secure portal.	Weekly

Source: Semistructured interviews with State CN direct certification staff.

LEA = local educational agency; SNAP = Supplemental Nutrition Assistance Program; SY = school year; TANF = Temporary Assistance for Needy Families.

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Overview of the matching process in six States

All six States interviewed for this report used central matching systems during SY 2014–2015,[27] and the matching occurred on State-maintained data systems. However, many differences emerged among the systems in, for example, the State-level entity that was responsible for the matching, the program data sources used, the source of the school enrollment data, and the specific algorithms used in matching. Matching rules ranged from simple

[27] Wyoming, which was one of the two additional States that participated in the roundtable discussion, provided a perspective on local matching systems.

deterministic algorithms, to more complex multi-tiered deterministic algorithms, to probabilistic systems. Matching frequency ranged from daily to three times per year. All six States were planning technology and process improvements to extend the reach of direct certification in future years. Three of the States—Colorado (2013), Massachusetts (2012 and 2014), and Oregon (2011 and 2015)—received FNS direct certification grants to fund these improvements. LEAs in all six States play important roles in direct certification, including initiating matching, confirming potential matches, extending categorical eligibility to other children in the household, and reporting on the FNS-742.

In three States—Louisiana, Oklahoma, and Oregon—the State departments of education oversee direct certification matching. In Delaware and Massachusetts, the State SNAP agencies maintain the matching server. A private vendor conducts the matching in Colorado. In addition to matching against SNAP data, four States—Delaware, Louisiana, Massachusetts, and Oklahoma—use TANF data for direct certification. Massachusetts also matches against Medicaid and foster care data.[28]

The source of school enrollment data varied across States. Louisiana, Oklahoma, and Oregon conduct matching against data in their SSIS. In Colorado and Massachusetts, LEAs send their enrollment files to the agency conducting the matching. In Delaware, the State Department of Education (DSDOE) sends the statewide enrollment file to the Department of Health and Social Services (DDHSS), which conducts the matching.

The States discussed in this chapter drew on many of the same data elements, but their specific matching algorithms varied. All six used student first name, last name, and student date of birth (DOB) for direct certification matching (Table 5). Five other data elements were used in four States' matching algorithms: middle initial, Social Security number (SSN), gender, address, and zip code. Colorado and Louisiana used probabilistic algorithms in SY 2014–2015. The other States used deterministic algorithms of varied complexity. Massachusetts' algorithm was very straightforward: students had to match exactly on first name, last name, and DOB to be directly certified. At the other end of the spectrum, Oklahoma allowed 27 different data element combinations in its deterministic algorithm. We describe the matching process, identifiers, and program data used to form direct certification matches in each State.

Colorado. The Colorado Department of Education (CDE) facilitates and oversees the direct certification process but does not conduct the actual matching. Instead, a third-party software vendor does the matching by taking the program data from a secure server. CDE receives a list of SNAP participants each month from the Department of Human Services beginning in July of the SY. After the vendor receives enrollment data—which are updated monthly from LEAs and sent

[28] Students receiving Medicaid are not categorically eligible for free meals, but States participating in the direct certification-Medicaid (DC-M) pilot were authorized to use income information from Medicaid enrollment or eligibility files to determine eligibility and directly certify students found to be eligible for free meals. Students cannot be directly certified for reduced-price meals through DC-M. Massachusetts participated in the DC-M pilot.

securely—they match the enrollment files on student full name, SSN, and DOB against the most recent statewide SNAP file. To be an exact match, either (1) the student's first name, last name,[29]

[29] Soundex—a phonetic tool—is used to assist the matching of non-exact last names.

Table 5. Primary matching criteria for States that use central matching systems

	Colorado	Delaware	Louisiana	Massachusetts	Oklahoma	Oregon
First name	●	●	○	●	○	○
Last name	●	●	○	●	○	○
Middle initial		●	○		○	○
Suffix				○		
Date of birth	●	●	○	●	○	○
Social Security number	●		○		○	○
Gender	○	○	○			○
Race/ethnicity			○			
Address		○	○		○	○
Zip code/location code		○	○		○	○
Parents' names			○		○	
Student ID	●				○	
Eligibility system personal ID number		●				

Source: Semistructured interviews with State CN direct certification staff.

Key: ○ Exact match can be used in identifying a definite match; inexact match can be used to identify a potential match.

● An exact match is required for the given field.

No symbol indicates that the element is not used or not available.

and DOB must match; or (2) the SSN and DOB must match. Matches are made available to LEAs on CDE's Information Management System (IMS) where LEAs log into their secure account and retrieve two lists, one containing exact matches and another containing potential matches. The potential matches are given a probability score between 99 to 37 percent indicating the likelihood of a match (those below the 37 percent probability are not included). LEA staff certify the students on the match list and manually review the list of potential matches for any students they believe should have been directly certified. LEA staff update IMS records for any students determined to be SNAP participants. They then export a file of the direct certification list to be imported into the LEA's POS system.

Charter schools participate in direct certification through the same process as public schools. Direct certification of nonpublic schools that participate in NSLP is overseen by the USDA regional office, not CDE.

In addition to the State-level matching process, LEAs and charter schools in Colorado can conduct matching using an individual lookup feature in the Information Management System where they can enter individual student name, SSN, and DOB. Once entered, the same matching rules apply, and they are given a probability of match score used in the manual review process.

Delaware. The DSDOE oversees Delaware's NSLP direct certification system. DSDOE provides student enrollment data to the DDHSS monthly. DDHSS, on behalf of DSDOE, uses an automated process to match a list of all enrolled public school students who have a student ID against current SNAP and TANF data. DDHSS staff send a file containing the matched records to DSDOE via secure transfer. DSDOE makes the results available for LEAs to review and confirm on DSDOE's identity management system. Students are matched on student ID, DHSS's Master Client Index number, first name, middle initial, last name, address (including zip code), DOB, and gender. Exact matches are required of student ID, first and last name, and DOB. LEAs can download the matched list by entering their log-in information into the identity management

system and selecting the month(s) they would like to view. LEAs can then download the information in a variety of file formats (Excel, text, .pdf, .csv) to upload into their POS systems.

Private schools in Delaware submit their enrollment lists monthly to DSDOE where students are matched individually by DSDOE staff via lookup and the matched lists are relayed to the schools via letter. Private school students that do not have a student ID are matched by student name and DOB. Charter and alternative schools participate in direct certification through the same process as public schools.

Louisiana. Louisiana's direct certification system was in transition during SY 2014–2015. The State modernized its matching system while preparing for a State law that would restrict access to personally identifiable student information for State education staff beginning in SY 2015–2016.

The Louisiana Department of Education (LDE) oversees direct certification. The Department of Children and Family Services provides LDE with data files containing names and selected other characteristics of SNAP and TANF participants up to age 22 five times a year (in June, September, October, January, and March). In SY 2014–2015, LDE staff matched these data six times a year against student enrollment data in their SSIS. LEA staff downloaded the match results from the SSIS and then validated the matches by uploading the records into their POS systems. In SY 2014–2015, LEA staff also conducted secondary matching for categorically eligible children not matched in the primary matching process. LDE staff provided lists of these children divided by parish of residence to LEA staff.

The State introduced probabilistic matching in SY 2014–2015 to improve the accuracy of their matches and to prepare for the new data privacy law to take effect the following year. State staff conducted extensive manual review of prospective matches to determine appropriate cutoff thresholds in the probability scores to delineate matches, potential matches, and non-matches. The matching algorithm included child first, middle, and last name; last four digits of SSN; gender; race/ethnicity; address; and parent name. To comply with the new law, LDE contracted with a private vendor to conduct the matching on LDE's behalf beginning in SY 2015–2016. Before the school year started, LDE staff worked with the vendor to make sure the vendor's probabilistic algorithms produced results comparable to those of the algorithms LDE had developed.

Massachusetts. Direct certification in Massachusetts is an interagency effort. The Department of Elementary and Secondary Education oversees the process, but staff from the Executive Office of Health and Human Services (EOHHS) maintain the matching software. LEA staff initiate the matching process by uploading enrollment data to the Massachusetts Virtual Gateway (MVG), housed at EOHHS. The MVG connects to program participation databases that reside in agencies within EOHHS. The Department of Transitional Assistance maintains SNAP and TANF data; MassHealth maintains Medicaid data; the Department of Children and Families maintains foster care data. The MVG matches school enrollment data against these records to identify categorically eligible students. The matching process uses a hierarchy based on assistance program in the following order: (1) SNAP, (2) TANF, (3) Medicaid, and (4) foster care. Students who match exactly on first name, last name, and DOB are eligible to be directly certified. Suffix can also be used but is not required.

After initiation of the match process, LEAs receive results, which include exact matches and partial matches. The match process results are available within a few minutes, but for larger LEAs, may take up to two hours. Upon receipt of results, LEA staff load exact matches into their local POS systems. For partial matches, LEA staff can see which students partially matched the program participation data, but they cannot see the participation data itself. The output indicates which data elements matched between the two sources. They can check for errors in the enrollment data, address them, and resubmit them to see if they match exactly.

Oklahoma. The Oklahoma State Department of Education (OSDE) developed and maintains the direct certification matching software that runs on their SSIS. Starting in August, on the first day of each month, OSDE receives SNAP and TANF program data from the Oklahoma Department of Human Services (ODHS) via secure handoff. The program data are loaded into the SSIS, and matches are run nightly against real-time, updated student enrollment data. LEAs can receive the matched lists electronically each day and compare to their student enrollment data. LEAs can also retrieve lists of unmatched students and look up students individually. Student enrollment data are matched to program data using 27 different matching algorithms. The initial match is made on first name, middle name, last name, DOB, and SSN. This exact match is then tied to the student ID, which follows the students throughout their time in the Oklahoma public school system. This coupling allows the State agency to track the students and enables matching if the students move between LEAs in the State. The other 26 matching rules seek to broaden the search by introducing other elements, such as street address and head-of-household information. To be considered a match, however, elements must be exactly matched.

Private schools participating in the NSLP are not matched in the SSIS but can participate in direct certification by sending enrollment files directly to ODHS, which manually matches private school children. This process is done only twice a year.

Oregon. Direct certification matching in Oregon happens automatically at the State level. The Oregon Department of Education (ODE) oversees the process and maintains the matching system. The Oregon Department of Health and Human Services provides updated SNAP participation data weekly, covering all participants aged 0 to 18. The system automatically matches the SNAP data against enrollment data contained in the SSIS, using a deterministic matching algorithm with student first name, last name, DOB, last four digits of SSN, gender, and address. The system incorporates several features that allow matching more sophisticated than that of some deterministic systems. The matching progresses in a stepwise process, allowing different combinations of the elements to count as a match. The system also incorporates phonetic tools as well as an application called *Smarty Streets* that standardizes addresses in data used in matching.

Each week the system automatically sends an email alerting LEA staff that the match results are ready. LEA staff download the results, which contain exact matches, and load them into their local POS systems. LEA staff can also download the statewide unmatched list, compare it against their enrollment data, and directly certify any additional children they match through this process.

Frequency of match

The frequency of data matching is an important characteristic of direct certification systems. Students transfer between schools throughout the school year, and families cycle on and off SNAP and other programs that confer categorical eligibility. Revisions to school enrollment or program participation data can also cause changes in match results. Therefore, States must conduct matching repeatedly throughout each school year to maximize the number of matches among categorically eligible children. As mentioned earlier, federal regulations require that States match a minimum of three times per school year. All States discussed in this chapter conduct matching more frequently,[30] and each State performs its first direct certification match before the school year begins.

Matching frequency among the six States ranged from daily to at least three times annually. Four States conduct matching statewide on a predetermined schedule, with Louisiana matching five times per school year, Colorado and Delaware monthly, and Oregon weekly. Massachusetts and Oklahoma have no set State schedule for LEAs to certify matches. In Massachusetts, LEAs trigger matching by uploading enrollment data; in Oklahoma, public LEAs have access to updated matches daily.

The direct certification matching frequency that five of the six States uses coincides with the frequency with which it receives (or merges with) program data from its partner agencies. Data updates—of either program participation or enrollment data—need to be at least as frequent as the matching schedule for States to identify additional matches. For example, a State will not benefit from weekly matching unless at least one of the underlying data sources is updated at least weekly. Among the six States interviewed for this report, Massachusetts uses the most up-to-date program data; LEAs upload their current enrollment data, which the State system matches against real-time SNAP, TANF, Medicaid, and foster care data. Oregon receives updated program data weekly; Colorado and Delaware receive updated program data monthly; and Louisiana receives program participation data five times per school year. Oklahoma receives program data monthly but performs matches to updated school enrollment data daily so their match frequency does not coincide with receipt of the program data.

School enrollment data updates vary just as widely. Enrollment data in Oklahoma and Louisiana are updated in real time, as both States have a centralized enrollment database. In Massachusetts and Oregon, LEAs can decide when to submit enrollment data updates, within State requirements. In Colorado, enrollment data used for direct certification matching are updated monthly. In Oregon and Massachusetts, LEAs can update enrollment data as often as they like but are required to do so at least twice a year in Oregon and three times a year in Massachusetts. In Delaware, enrollment data in the LEA are updated every night; however, for purposes of direct certification, the enrollment data used in matching are updated monthly.

[30] In Massachusetts, LEAs determine the match frequency and must trigger matches at least three times annually but may do so more frequently. In Oklahoma, matching occurs nightly but public LEAs determine the frequency of certification. They are required to access matches at least three times annually.

Methods to directly certify unmatched SNAP children

Despite increasingly sophisticated methods for identifying children categorically eligible for meal benefits, some of these children do not get certified in the primary match process. Some children in program participation files might be partially matched against school enrollment records, either by matching on some but not all required fields or by achieving a probability score below the required threshold for certification. Other children might not match any records on student enrollment files. Either circumstance results in school-age categorically eligible children not being certified for benefits. Addressing partially matched children generally requires reviewing a prospective match; the eligible child is associated with a student enrollment record and additional review is required to determine if it is a true match. Addressing unmatched children generally requires secondary matching; these children are not initially associated with an enrollment record.

Colorado, Louisiana, and Massachusetts all reported having processes to identify and adjudicate partial matches between records in enrollment data and SNAP or TANF data (Table 6). Colorado and Louisiana both use probabilistic matching to identify potential matches and give LEA staff lists of partial matches to review to determine whether they should be certified. In addition, Colorado offers LEA staff the ability to look up the eligibility of individual students by logging into CDE's IMS. Massachusetts allows LEAs to review and edit the enrollment records of partially matched students and resubmit them for matching.

Table 6. Approach for children with potential matches and for children not matched in the primary process

State	Approach for partial matches	Approach for unmatched children
Colorado	Partial matches are given to the LEA for individual follow-up and determination.	None.
Delaware	None.	None.
Louisiana	Partial matches are given to the LEA for individual follow-up and determination.	Lists of unmatched students were available for electronic download in SY 2014–2015. Beginning in SY 2015–2016, a new data privacy law will prohibit the State from compiling these lists for public LEAs.
Massachusetts	State staff provide training to LEA staff on how to review and correct common enrollment data errors that could cause a partial match. Once corrected, the enrollment data for partial matches can be re-run.	None.
Oklahoma	None.	LEAs can download a list of unmatched students as well as look up individual students
Oregon	None.	A list of students not matched to any LEA is available for LEA staff to download. They can match this against their enrollment data at the local level.

Source: Semistructured interviews with State CN direct certification staff.

LEA = local educational agency; SY = school year.

Louisiana, Oklahoma, and Oregon report having processes for LEAs to attempt to directly certify children enrolled in SNAP or TANF who are not matched to student enrollment records through the initial match procedure (Table 6). All three States offer a statewide no-match list to LEAs for secondary matching.

Extending categorical eligibility to additional children in a household

States and LEAs are required to extend categorical eligibility for free meals to all children in households that contain people enrolled in SNAP, TANF, or FDPIR. For most States studied in this report, LEAs are responsible for extending categorical eligibility to additional children in these households. States and LEAs commonly use parent/guardian name, address, or both to identify additional categorically eligible children. The specific methods and data sources States use vary based on State procedures and the capabilities of State and LEA data systems.

In four of the six States, LEA staff identify additional children in households containing directly certified students. Both Oklahoma and Colorado require that LEAs who extend categorical eligibility to other children in households document the process; CDE provides a template for LEAs to use for this documentation. In these States and Delaware, the process to extend eligibility is largely manual, though some LEAs might have automated processes. LEAs in Louisiana use their own local processes to extend categorical eligibility. Many have built this function into their local data systems.

In contrast, Oregon and Massachusetts identify children for extended categorical eligibility at the State level. Oregon uses the results of the State system to generate a list of household names and addresses with directly certified students. State staff then match this list against their enrollment data to identify any student who shares a household with an already-certified student. Massachusetts uses a similar process, but their results are given to LEA staff for final review.

Direct certification process for nonpublic and charter schools

Nonpublic and charter schools present special challenges for the direct certification process. Both are schools of choice, often without defined enrollment areas for prospective students. In general, they also are smaller entities than public school districts and might be more likely to employ manual processes for administering meal programs and collecting and reporting data. Charter schools may participate in direct certification by establishing themselves as independent reporting agencies or affiliating with an LEA, which acts as an authorizing agency for reporting purposes. Because private schools are not governed by the same regulations and reporting requirements as public schools and might not be included in State student information systems, States may find it difficult to incorporate private schools into their direct certification systems.

For most States studied for the best practices section, the process for directly certifying students in participating charter schools was the same as the process for certifying public school students (Table 7). Oregon was the lone exception. In that State, charter schools that participate in direct certification do so by working with their associated public school districts. Public district enrollment files include charter school students; these are matched through the standard process for public schools. Charter school staff then search their district's matched list to identify their own students. Private schools in Oregon that participate in direct certification search the State's non-matched lists to identify their own students and then directly certify them.

Table 7. Direct certification methods for private and charter schools

State	Direct certification process for private and charter schools
Colorado	Charter schools participate using the same method as other public schools. Private school direct certification matching is overseen by the USDA regional office.
Delaware	Charter schools participate using the same method as other public schools. Private school enrollment data are matched manually by the State agency.
Louisiana	Charter schools participate using the same method as other public schools. Small private schools use the same State matching procedures but submit enrollment data differently from the way public schools do. The five large dioceses are given the SNAP data of the students in their geographic locations and then do their own matching.
Massachusetts	Private and charter schools use the same process as standard public LEAs.
Oklahoma	Charter schools participate using the same method as other public schools. Private schools are administered by the ODHS and participate in a manual match process.
Oregon	The State has procedures in place for private and charter schools to participate in direct certification, although there are some challenges with full participation from the schools. Each charter school is associated with a public school district, and charter schools participating in direct certification do so through their districts. Public district enrollment files include charter school students; these are matched through the normal direct certification process: charter school staff search their district's matched list to identify their own students. Private schools participating in direct certification search the State's non-matched list and identify their own students.

Source: Semistructured interviews with State CN direct certification staff.

ODHS = Oklahoma Department of Human Services; LEA = local educational agency; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; USDA = United States Department of Agriculture

In Massachusetts, charter and private schools use the same direct certification system as public school districts: they upload enrollment data to initiate the match process. In Louisiana, charter and small private schools use a secure file transfer protocol to upload enrollment data. Their data are then matched using the same probabilistic algorithms as public schools. Parochial schools in the five large dioceses in Louisiana conduct their own matching using data on SNAP participants in their geographic locations.

In Colorado, Delaware, and Oklahoma, the matching methods rely on State data systems that exclude private schools, which therefore cannot use the same methods as public districts. In Delaware, private schools cannot upload enrollment data; instead, they search names individually every month. In Colorado and Oklahoma, private schools do not interact directly with the State CN office for direct certification. In keeping with State law, Colorado does not oversee direct certification in private schools. Nonpublic schools in Colorado work directly with the regional FNS office that receives the SNAP file and conducts the match; in Oklahoma, such schools submit enrollment lists directly to the ODHS, which performs a manual match against SNAP and TANF data.

B. Recent and planned strategies for improving direct certification

Continuous improvement is a strong theme in direct certification programs.[31] States strive to improve their data systems and procedures within the constraints of financial and staff resources. Most States interviewed for this report made recent changes to their direct certification programs, and all planned to make additional improvements (Table 8). The most common type of change

[31] Section 101(b) of the HHFKA requires States to develop continuous improvement plans if they do not meet performance rate benchmarks. Recommendations for best practices to include in these plans are described in Section C.

was improving direct certification data system capabilities. Colorado switched to a new automated matching system in SY 2014–2015; Louisiana introduced probabilistic matching the same year. Massachusetts added a feature to its MVG to filter out all previously matched students from each new upload, helping LEAs more easily identify new matches.

Table 8. Recent and planned strategies for improving direct certification

State	Recent changes	Planned changes
Colorado	SY 2014–2015 is the first year using current automated matching system.	Add additional data elements, such as gender. Add TANF program data to the matching process. Increase frequency to weekly matching.
Delaware	*No changes identified during interview.*	Automate the matching process for private schools participating in NSLP.
Louisiana	SY 2014–2015 is the first year using probabilistic matching.	Contract with outside vendor to build and maintain system for LEAs to upload data and have it matched against SNAP data.
Massachusetts	In SY 2014–2015 Massachusetts added a feature to its virtual gateway to filter out all previously matched students from each new upload, helping LEAs more clearly identify new matches.	Attach State-assigned student IDs to EOHHS data fields. Add the date a student was certified to the lookup feature on the secure portal. Incorporate partial matching into direct certification.
Oklahoma	*No changes identified during interview.*	Require LEAs to run a match report on April 1 to be used if the LEA wishes to apply for CEP certification.
Oregon	In recent years, Oregon has made the following improvements to direct certification: • Automated email with results of weekly matching process. • Automated email reminder to download match list after given period of time. • Instituted validation of street address using an application called *Smarty Streets.* • Employed phonetic tools. • Improved system for extending categorical eligibility by matching on head of household name and address. • Enabled LEA staff to download the entire State unmatched list.	Move to a probabilistic matching system. Create an enrollment upload function for LEAs to allow more timely updates and get feedback on quality of the matches made by the Department of Education. Improve the individual student searching function to produce near matches with the goal of ranking output based on closeness to search. Incorporate foster care data into direct certification.

Source: Semistructured interviews with State CN direct certification staff.

CEP = Community Eligibility Provision; EOHHS = Executive Office of Health and Human Services; LEA = local educational agency; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; SY = school year; TANF = Temporary Assistance for Needy Families.

Oregon reported the most changes to their direct certification process. These changes included an automated email to LEAs with results of weekly matching process and reminders to download match lists. They also implemented a validation process for street address using an application called *Smarty Streets* and phonetic tools for matching data fields. Oregon also improved their system for extending categorical eligibility by matching on head of household name and address. Finally, in SY 2014–2015 they added a feature that allows LEA staff to download the entire State unmatched list.

All six States planned additional improvements for future years, including system upgrades and procedural changes. One common planned change was incorporating additional data sources and elements into direct certification beyond what was used in SY 2014–2015. Oregon planned to incorporate foster care data in SY 2015–2016. Colorado planned to add to their matching process TANF program data as well as using gender as an additional matching data element.

Massachusetts planned to attach State-assigned student IDs to EOHHS data to allow the IDs to be used as an additional data element.

Most States also reported planning changes to their direct certification procedures (Table 8). In SY 2015–2016, Oklahoma plans to require LEAs to run a match report on April 1 and store it in case the LEA wishes to apply for CEP certification. Delaware plans to automate the matching process for private schools participating in NSLP.

Two States in this review reported planning enhancements to their matching procedures. Massachusetts plans to incorporate partial matching into their direct certification process but was still evaluating how best to do so. Oregon plans to move to a probabilistic matching system for SY 2015–2016.

Two States planned additional data system enhancements. For SY 2015–2016, Massachusetts plans to add the date a student was certified to the lookup feature on their secure portal. Oregon is developing a new enrollment data upload function for LEAs to allow more timely updates and get feedback on quality of the matches made by the ODE. Oregon also plans to update their individual student lookup function with the goal of (1) identifying near matches when an exact match is not found and (2) allowing the near matches to be ranked based on how closely the matches resemble each other.

Finally, Louisiana plans an administrative change to its direct certification system. Beginning in SY 2015–2016, the LDE plans to contract with an outside vendor to operate a system for LEAs to upload data and match them against SNAP data. This is in accordance with a new privacy law that prohibits the LDE from housing any personally identifiable student information at the State level.

C. Best practices in implementation of direct certification systems

Advice for low-performing States in meeting performance targets

Section 101(b) of the HHFKA requires that States develop CIPs if they do not meet the direct certification performance rate benchmarks. The CIPs must include step-by-step plans for implementing changes that will improve direct certification performance. In the best-practices interviews, State CN staff were asked what they would suggest to staff in a low-performing State in developing a CIP. Experts in direct certification were also consulted on this topic. Five of the six States provided suggestions, which can be grouped into three categories: (1) training and monitoring, (2) interagency relationships, and (3) matching procedures. Table 9 shows the specific recommendations by State.

The most common recommendation State staff gave pertained to training and monitoring LEA staff. Staff from Colorado stressed the importance of technical assistance and regular training for LEA staff, including one-on-one training. They cited these activities as the key factor in improving their direct certification rate. They also suggested having a technical point of contact for LEA staff. Staff from Massachusetts recommended making sure LEA staff understand why direct certification is important. Staff in both States pointed out that smaller LEAs—which generally have fewer staff and limited technical resources—probably need more intensive training and support. Louisiana highlighted the importance of both training and

Table 9. Suggestions for improving direct certification rates

State	Suggestions for improvement
Colorado	• Provide training and technical assistant to LEAs.
Delaware	• Maintain strong relationships with your data partners. It helps to have a dedicated person in the SNAP agency to contact when questions arise or when changes are needed.
Louisiana	• Increase matching frequency. • Add additional data elements to the matching algorithm. • Introduce partial matching using probability scores. • Add more training for LEA staff.
Massachusetts	• Provide regular training and technical assistance for LEAs. • Provide additional training and technical support to the smaller schools that might not have a dedicated direct certification person or necessary resources on site. • Stress the importance of accurate data to LEA staff.
Oklahoma	• Maintain strong relationships with program data partners to allow for clear communication and to overcome reporting challenges. • Have a system that operates in real time to identify problems quickly. • Communicate regularly with LEAs.
Oregon	• Increase match frequency.

Source: Semistructured interviews with State CN direct certification staff.

LEA = local educational agency; SNAP = Supplemental Nutrition Assistance Program.

monitoring of LEA direct certification activities. Making sure LEA staff understand direct certification procedures—and then monitoring to make sure they are adhering to them—are important aspects of successful direct certification systems. Oklahoma mentioned having a direct certification system that operates in real-time allows them to effectively communicate with LEAs and respond to issues in the process.

Staff in Delaware stressed the importance of collaboration within and across State agencies. It is important to identify staff with the right knowledge and position to support direct certification. They noted that State SNAP staff play essential roles in direct certification—providing program participation data and contributing to the FNS-834. They recommended convening staff from all participating agencies to help design an effective system. Oklahoma also mentioned having a good relationship with their data partner has helped them in overcome challenges in the reporting on the FNS-834.

Louisiana and Oregon recommended specific direct certification procedures intended to boost performance. Both States suggested matching frequently so that students are certified shortly after becoming categorically eligible. Staff in Louisiana also suggested avoiding restrictive deterministic matching algorithms. In their experience, investing the time and effort to design a probabilistic algorithm helped them certify some students who might not have been matched under a deterministic process. Finally, Louisiana recommended expanding the list of data elements used in the algorithm to maximize the number of matches.

In addition to the advice from State CN staff, outside direct certification experts suggested ways that States could improve their systems. A staff member from the Massachusetts EOHHS described one successful element of that State's direct certification system. Their MVG links many different data users with multiple sources of data. For direct certification purposes, it

provides a single platform that accesses four separate administrative data sources (SNAP, TANF, Medicaid, and foster care). One advantage of this arrangement is that it offers a single place where users' security credentials can be housed, resulting in a user-friendly, secure, and organized system. Similar arrangements might benefit other States that need secure ways to link data systems across agencies.

The other expert, a private vendor working with Louisiana, offered advice based on their experience conducting data matching in a variety of different contexts. They suggested that best practices in achieving high quality matches include matching frequently with timely data, ensuring overall data quality, and including key data elements, such as DOB and SSN, in addition to name. Student IDs can be added to SNAP records during matching. These can then be used for matching in future years. This can improve matching for students with data elements that change over time, such as address. It is particularly useful for students who move across LEAs within a State.

Performance targets and CIPs as incentives and tools for improvement

States studied for this report have changed their direct certification systems in an attempt to increase their performance rates. When asked how effective HHFKA performance targets and CIPs are as incentives for further improvements, most States said they found them helpful, though their specific views varied. Staff in one State said that the performance targets were very helpful because the targets prompted them to investigate their performance data much more closely to analyze trends and identify potential areas for improvement. Two other States said the targets helped them focus on improving their performance.

Staff in some States expressed reservations about the performance targets. Those in one State acknowledged that the targets provided an incentive but believed that many of the variables that affected the performance rate were not wholly in their control. Staff in another State said that they were strongly committed to providing meal benefits to eligible children and that the performance targets were a source of stress rather than a useful incentive.

In December 2012, FNS issued the *CIP Development Guide* to help States design and implement a CIP that would help them achieve the desired performance improvements. The first step in the guide is for the State agency to perform a self-assessment using a tool that lists components and features of strong direct certification systems. In the interviews, State staff were asked whether they were familiar with the tool and whether they had used it to plan changes to their direct certification system. Staff in five of the six States were familiar with the tool—staff interviewed in the sixth State had not drafted their State's CIP, but they assumed that their colleague had used it.[32] Staff in all five States that had used the guide found it helpful. Staff in one State said the guide helped them identify areas for improvement they had not previously considered. Staff in another State said it helped them convene people from their partner agencies to talk about how to improve direct certification. Staff in one State said the guide was useful when it first came out but was unnecessary in later years. Staff in another State said the guide

[32] The staff member who prepared the CIP in the past had left the department by the time of the interview.

was helpful, but they were frustrated that they had to complete a CIP after they had already made so many direct certification improvements.

D. Challenges in meeting performance rate targets

The HHFKA mandated that States meet direct certification performance targets. Since SY 2013–2014, the direct certification performance benchmark rate has been 95 percent. This means that 95 percent of school-age SNAP program records for the age range of 5 through 17 must be matched to student enrollment records. During interviews with State staff, we asked about the challenges they had experienced, or believe they might experience, in meeting this benchmark rate now and in the future. States interviewed are fully aware of the performance targets and the challenges they face in meeting them. As Table 10 shows, all States identified at least one challenge they were working to overcome. Challenges they cited fell into three distinct categories: (1) variations and inconsistencies in program and enrollment data (challenges 1–4); (2) school-age SNAP recipients neither attending NSLP schools nor integrated into State data systems (challenges 5–7); and; (3) challenges associated with retaining and training CN and LEA staff, particularly in small districts (challenges 8 and 9).

Table 10. Challenges identified by States in meeting direct certification rate target

	Colorado	Delaware	Louisiana	Massachusetts	Oklahoma	Oregon
1. Name variations		✓	✓	✓		✓
2. SNAP agency priorities and communication	✓	✓	✓			
3. SNAP data quality	✓		✓			✓
4. Incorporating data from divergent sources		✓			✓	✓
5. Private schools not integrated into State data systems		✓	✓			✓
6. Many charter schools do not participate in NSLP				✓		✓
7. Large homeschool population						✓
8. Many small LEAs	✓			✓		
9. CN and/or LEA staff attrition	✓				✓	
10. Frequent student transfers			✓			

Source: Semistructured interviews with State CN direct certification staff.

CN = Child Nutrition; LEA = local educational agency; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program.

The most commonly cited types of challenge pertained to variations and differences in program data and enrollment data. Varied spellings of students' names—especially last names, initials, or hyphenation—that are listed in the program and the enrollment data present challenges in States that use restrictive match criteria. These mismatches in the data used in matching are especially problematic in States that do not or cannot use individual identifiers such as SSN.

All States interviewed for this review described their relationships with other agency partners as collaborative and productive. However, staff in several States pointed out that those agencies (1) had their own priorities that might not align with those of the State NSLP agencies,

and (2) might not have much control over the program data used in the matching. One State noted that one of the largest challenges was finding the right person in the State SNAP agency to discuss direct certification, changes to the data, and other technical issues. Another State mentioned that the data coming from their program data partner are not standardized and thus limit their ability to match. A third State remarked that their relationship with their program data partner has improved over the past couple of years, and they continue to meet periodically with them to stress the importance of their role in the direct certification process and reporting. Although the data partner was a very willing partner, they ultimately have their own set of priorities on what to accomplish next with their data systems. A final State talked about the challenge of making the myriad software programs that the LEAs used in food service administration compatible with their SSIS in the receipt and acceptance of direct certification files.

The second type of challenge States commonly reported was the difficulty in identifying school-age SNAP recipients who attended private or charter schools not fully integrated into their State matching systems or SSIS. Staff in one State specifically mentioned that in SY 2014–2015, private school enrollment data were not collected by the State agency for the five large dioceses, so they depended on the school to do the administrative function of matching students. A few States also mentioned school-age SNAP recipients who did not attend NSLP-participating schools as a barrier to meeting the performance rate target. Staff in another State reported that because many charter schools do not participate in the NSLP, children from SNAP households attending these schools cannot be directly certified. The State also mentioned having a large number of homeschooled children.[33]

The last type of challenge States cited was with the challenges of retaining and training CN and LEA staff, particularly those in smaller districts. Many of the States interviewed cited the additional technical assistance, training, and follow-up required for the smaller LEAs, charter schools, and private schools to complete the administration of direct certification compared with larger public LEAs. Four States cited hurdles endemic to small schools participating in NSLP, whether from (1) lack of technology resources, (2) tight budgets, (3) focus on the administrative side of NSLP, or (4) general misunderstanding of the process and the importance of direct certification. Staff in another State mentioned the challenges in communication and cooperation between the State CN office and LEAs—LEA staff did not always know when lists were available or how to access them. Staff from one State stated the majority of their LEAs had enrollments of fewer than 1,000 students and thus administrators there have varied responsibilities and might not have the time, technology, or experience to fully understand the process and reporting aspects of direct certification. State agency officials in two States also reported key technical and program staff departures as a current challenge to overseeing and administering their direct certification processes.

[33] These types of challenges are discussed for States beyond just those selected for best practices interviews in Section A in Chapter IV of this report.

Challenges in meeting new data collection requirements

Beginning in SY 2013–2014, the key data elements used to determine the effectiveness of State direct certification efforts were collected and reported via new data collection forms. Specifically, the FNS-742 collects the count of children from SNAP households directly certified for free school meals (cell 3-2B). The FNS-834 collects two data elements separately: State SNAP agencies report the number of school-aged children in SNAP households (Data Element #2); State NSLP agencies report the number of SNAP children in special provision schools operating in a non-base year and CEP schools (Data Element #3). States interviewed seemed to be adjusting well to the new requirements this school year but also reported some challenges for SY 2014–2015 (Table 11).

The most common challenge States reported was conducting the training and technical assistance necessary to ensure that LEA staff completed the FNS-742 correctly. Most States conducted statewide webinars and one-on-one training to impress on LEAs, especially those with CEP schools, the importance of completing the FNS-742 accurately and timely. Staff in Delaware noted that first-year reporting challenges in some LEAs with special provision 2/3 schools have to be addressed through training during SY 2015–2016. Oregon reported that software used by the LEAs was initially unprepared for the changes to the FNS-742, so the results will have to be monitored. The State hopes to be able to utilize the SY 2015–2016 FNS-742 data soon to gauge and measure their performance once the issues are resolved. In addition to technical assistance, staff in Colorado provide trainings (including one-on-one) and compare report numbers submitted from LEAs with their own calculations.

Table 11. Key lessons and reporting challenges related to data collected on FNS-742 and FNS-834

State	FNS-742	FNS-834
Colorado	Getting the LEAs in their State to report on a timely basis was challenging.	No challenge reported.
Delaware	Correctly reporting special provision 2/3 counts on the FNS-742 was challenging.	Two different agencies provide the data. Challenge in reconciling reported numbers from SNAP agency.
Louisiana	They found it challenging to report using the revised FNS-742 the first year because they did not have adequate time to revise local data systems.	Reporting on the FNS-834 was challenging initially because the State had not previously operated special provision schools.
Massachusetts	Some LEAs report current numbers rather than numbers as of the due date on the form, leading to inaccurate reports.	No challenge reported.
Oklahoma	Continuous training for LEAs has been an effective tool.	No challenge reported.
Oregon	Software companies at the LEA level are sometimes unprepared for new reporting requirements. Communicating that all LEAs still need to report, even those operating CEP was challenging.	Providing an accurate count for data element 2 is challenging because the LEAs do not validate the matches as they do when they load direct certification matches into their point-of-sale systems.

Source: Semistructured interviews with State CN direct certification staff.

CEP = Community Eligibility Provision; FNS = Food and Nutrition Service; LEA = local educational agency.

Two States also reported specific challenges with the FNS-834. Staff in Delaware mentioned that their numbers in the report item on the FNS-834 do not reconcile with the numbers provided by the State SNAP agency. They are working with the agency to understand how they derive

their numbers to validate the information on subsequent reports. Louisiana said that transition to CEP and the new FNS-834 was challenging for them because they had not previously had special provision schools. State staff were not accustomed to differentiating directly certified students from SNAP students attending special provision schools. Further, identifying students to report on the FNS-834 does not require the final validation step that takes place with directly certified students—when LEAs reconcile them with their local enrollment lists. Despite the challenges associated with adopting the revised FNS-742 and new FNS-834, most States commented that the new direct certification performance rate calculation is easier to interpret. The new reporting forms allow States to understand more clearly which data elements are used in the calculation compared to the formula used in previous years.

Additional training and technical assistance for LEAs with CEP schools

A consistent theme throughout the interviews with States is the time and resources they expend on providing guidance to LEAs on the importance of and need to report the number of directly certified students in their schools, particularly those in the CEP. Many States reported that CEP schools did not always understand the regulations—specifically, whether they needed to conduct direct certification and how to report their students. This underscored the importance of technical assistance and training. Oklahoma estimated that there were close to three times as many LEAs participating in CEP in SY 2014–2015 than in SY 2013–2014 and that they needed to establish guidance for those schools in complying with requirements for reporting. Massachusetts mentioned the need to emphasize the tremendous potential benefit, especially for large LEAs, of having their staff work through their partial matches to gain eligibility for CEP.[34]

VI. CONCLUSION

The number of students with access to free school meals continues to grow with the expanded use of direct certification and the improved performance of direct certification systems. As of SY 2014–2015, 98 percent of students nationwide are enrolled in districts that conduct direct certification.

For just the second year, the methodology for calculating direct certification performance made use of data elements collected in the FNS-742 and the FNS-834. States and LEAs directly certified 91 percent of school-age children from SNAP-participant households in SY 2014–2015, up from 87 percent for the previous year. Twenty-four States achieved direct certification rates of at least 95 percent, the direct certification target set by HHFKA. No States had a direct certification rate lower than 60 percent. With both direct certification and paper applications, States and LEAs certified 100 percent of all categorically eligible SNAP, TANF, and FDPIR children for free school meals in SY 2014–2015; this is the same percentage as the previous year.

States and LEAs continue to find success with different direct certification models. States and LEAs are making investments in their direct certification systems that promise improved performance in the coming years. Among the six States interviewed for the best practices section

[34] FNS has a website dedicated to CEP that includes information about the provision and a comprehensive set of materials to facilitate successful implementation: http://www.fns.usda.gov/school-meals/community-eligibility-provision.

of this report, recent direct certification changes that States link to performance improvements most commonly involved improving data system capabilities. Examples of such improvements include increasing the use of automated matching systems; employing probabilistic matching, filtering tools to identify new matches, and adding tools to improve processes, such as automated emails to remind LEAs to download match lists and applications to validate street addresses. States made many of these changes to help meet the 95 percent performance benchmark set forth in HHFKA. In discussions surrounding challenges to meeting these benchmarks in future years, States reported challenges in providing the training and technical assistance necessary to ensure that LEA staff completed the FNS-742 correctly. More specifically, States highlighted the time and resources they expend on providing guidance to LEAs on the importance of reporting students in the correct FNS-742 fields. This was particularly a problem for districts containing CEP schools. Several States reported that CEP schools did not always understand the regulations—specifically, whether they needed to conduct direct certification and how to report their students.

VII. REFERENCES

Moore, Quinn, Andrew Gothro, Kevin Conway, and Brandon Kyler. *National School Lunch Program Direct Certification Improvement Study.* Prepared by Mathematica Policy Research under contract no. AG-3198-D-10-0074. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, 2014. Project Officer: Joseph F. Robare.

U.S. Census Bureau. "American Community Survey, Puerto Rico Community Survey, 2011 Subject Definitions." Washington, DC: U.S. Census Bureau, 2012.

U.S. Department of Education, National Center for Education Statistics, Institute of Education Sciences. "Issue Brief: 1.5 Million Homeschooled Students in the United States in 2007." Washington, DC: ED, NCES, IES, 2008. Available at http://nces.ed.gov/pubs2009/2009030.pdf.

Usher, Charles L., David S. Shanklin, and Judith B. Wildfire. "Evaluation of the Food Distribution Program on Indian Reservations." Washington, DC: U.S. Department of Agriculture, Food and Nutrition Service, 1990. Available at http://www.fns.usda.gov/evaluation-food-distribution-program-indian-reservations-volume-i-final-report.

APPENDIX A

ADDITIONAL TABLES AND FIGURES

Table A.1.a. Number and percent of LEAs that directly certified categorically eligible students, SY 2009–2010 through SY 2011–2012

	SY 2009–2010			SY 2010–2011			SY 2011–2012		
		Direct certification or special provision 2/3 LEAs			Direct certification or special provision 2/3 LEAs			Direct certification or special provision 2/3 LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**18,461**	**15,258**	**82.6**	**18,574**	**15,778**	**84.9**	**18,643**	**16,545**	**88.7**
Alabama	151	137	90.7	151	141	93.4	156	145	92.9
Alaska	49	48	98.0	51	49	96.1	50	49	98.0
Arizona	428	357	83.4	430	365	84.9	456	404	88.6
Arkansas	300	265	88.3	290	279	96.2	289	279	96.5
California	1,057	839	79.4	1,078	806	74.8	1,094	872	79.7
Colorado	218	202	92.7	207	191	92.3	214	204	95.3
Connecticut	188	174	92.6	186	176	94.6	185	183	98.9
Delaware	34	31	91.2	34	32	94.1	42	35	83.3
District of Columbia	62	61	98.4	57	57	100.0	61	60	98.4
Florida	170	122	71.8	190	133	70.0	223	178	79.8
Georgia	221	199	90.0	229	207	90.4	229	219	95.6
Guam	NA	NA	NA	NA	NA	NA	3	1	33.3
Hawaii	37	26	70.3	36	26	72.2	35	25	71.4
Idaho	142	103	72.5	144	137	95.1	148	141	95.3
Illinois	1,123	880	78.4	1,119	968	86.5	1,126	1,039	92.3
Indiana	498	405	81.3	501	424	84.6	496	429	86.5
Iowa	495	421	85.0	494	435	88.1	477	428	89.7
Kansas	405	345	85.2	399	340	85.2	400	362	90.5
Kentucky	197	176	89.3	189	178	94.2	189	178	94.2
Louisiana	109	95	87.2	114	102	89.5	113	106	93.8
Maine	194	177	91.2	192	174	90.6	187	170	90.9
Maryland	49	42	85.7	49	43	87.8	55	47	85.5
Massachusetts	431	303	70.3	421	311	73.9	422	355	84.1
Michigan	855	717	83.9	853	736	86.3	845	762	90.2
Minnesota	662	457	69.0	706	471	66.7	697	472	67.7
Mississippi	177	157	88.7	176	160	90.9	175	159	90.9
Missouri	765	678	88.6	761	684	89.9	755	704	93.2
Montana	239	190	79.5	240	209	87.1	240	212	88.3
Nebraska	383	304	79.4	379	317	83.6	374	320	85.6
Nevada	18	17	94.4	20	16	80.0	20	15	75.0
New Hampshire	94	75	79.8	91	82	90.1	100	88	88.0
New Jersey	677	619	91.4	694	665	95.8	697	683	98.0
New Mexico	176	132	75.0	187	134	71.7	202	147	72.8
New York	1,113	989	88.9	1,106	985	89.1	1,101	1,001	90.9
North Carolina	165	151	91.5	165	154	93.3	162	152	93.8
North Dakota	202	171	84.6	204	181	88.7	203	179	88.2
Ohio	1,188	816	68.7	1,192	869	72.9	1,214	1,043	85.9
Oklahoma	566	458	80.9	577	496	86.0	573	545	95.1
Oregon	245	196	80.0	250	203	81.2	244	205	84.0
Pennsylvania	851	730	85.8	853	733	85.9	853	768	90.0
Rhode Island	55	53	96.4	56	53	94.6	54	49	90.7
South Carolina	93	85	91.4	100	85	85.0	106	84	79.2
South Dakota	216	196	90.7	213	197	92.5	210	194	92.4
Tennessee	165	149	90.3	175	161	92.0	183	174	95.1
Texas	1,263	1,119	88.6	1,260	1,138	90.3	1,259	1,148	91.2
Utah	75	72	96.0	81	75	92.6	85	81	95.3
Vermont	225	205	91.1	238	208	87.4	218	203	93.1
Virginia	153	141	92.2	154	145	94.2	155	146	94.2
Washington	329	286	86.9	330	295	89.4	326	296	90.8
West Virginia	73	55	75.3	72	56	77.8	72	57	79.2
Wisconsin	822	584	71.0	822	650	79.1	812	698	86.0
Wyoming	58	48	82.8	58	46	79.3	58	51	87.9

Table A.1.b. Number and percent of LEAs that directly certified categorically eligible students, SY 2012–2013 through SY 2014–2015

	SY 2012–2013			SY 2013–2014			SY 2014–2015		
		Direct certification or special provision 2/3 LEAs			Direct certification or special provision 2/3 LEAs			Direct certification or special provision LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**18,362**	**16,684**	**90.9**	**19,707**	**18,423**	**93.5**	**19,461**	**18,512**	**95.1**
Alabama	159	152	95.6	191	149	78.0	186	151	81.2
Alaska	69	48	69.6	68	68	100.0	68	68	100.0
Arizona	464	407	87.7	489	479	98.0	510	506	99.2
Arkansas	284	268	94.4	312	302	96.8	305	289	94.8
California	1,094	1,024	93.6	1,295	1,227	94.7	1,256	1,192	94.9
Colorado	209	201	96.2	231	224	97.0	224	202	90.2
Connecticut	188	186	98.9	202	197	97.5	201	198	98.5
Delaware	44	40	90.9	48	47	97.9	55	50	90.9
District of Columbia	63	63	100.0	67	67	100.0	68	67	98.5
Florida	226	185	81.9	277	261	94.2	289	288	99.7
Georgia	222	212	95.5	236	232	98.3	237	234	98.7
Guam	2	1	50.0	3	2	66.7	2	2	100.0
Hawaii	35	35	100.0	35	34	97.1	31	31	100.0
Idaho	149	149	100.0	162	159	98.1	158	156	98.7
Illinois	1,051	984	93.6	1,152	983	85.3	1,137	1,043	91.7
Indiana	504	447	88.7	550	539	98.0	539	535	99.3
Iowa	474	419	88.4	487	456	93.6	474	430	90.7
Kansas	398	378	95.0	415	402	96.9	412	400	97.1
Kentucky	188	186	98.9	200	199	99.5	192	192	100.0
Louisiana	114	107	93.9	140	130	92.9	150	146	97.3
Maine	189	182	96.3	205	192	93.7	213	197	92.5
Maryland	55	38	69.1	67	58	86.6	62	58	93.5
Massachusetts	363	324	89.3	464	448	96.6	485	466	96.1
Michigan	847	784	92.6	876	848	96.8	850	836	98.4
Minnesota	694	458	66.0	690	534	77.4	685	517	75.5
Mississippi	172	159	92.4	186	168	90.3	179	173	96.6
Missouri	762	711	93.3	777	737	94.9	760	731	96.2
Montana	239	206	86.2	239	215	90.0	241	217	90.0
Nebraska	370	337	91.1	391	378	96.7	385	355	92.2
Nevada	25	17	68.0	32	28	87.5	33	16	48.5
New Hampshire	98	82	83.7	107	106	99.1	108	96	88.9
New Jersey	699	680	97.3	729	717	98.4	724	714	98.6
New Mexico	205	143	69.8	222	113	50.9	216	179	82.9
New York	1,093	942	86.2	1,124	1,014	90.2	1,105	1,104	99.9
North Carolina	161	152	94.4	177	176	99.4	185	183	98.9
North Dakota	202	174	86.1	207	195	94.2	206	194	94.2
Ohio	1,219	1,146	94.0	1,305	1,270	97.3	1,293	1,262	97.6
Oklahoma	572	548	95.8	604	587	97.2	603	581	96.4
Oregon	239	204	85.4	280	256	91.4	275	245	89.1
Pennsylvania	853	790	92.6	894	854	95.5	856	827	96.6
Rhode Island	53	53	100.0	79	71	89.9	73	50	68.5
South Carolina	94	84	89.4	148	132	89.2	141	140	99.3
South Dakota	208	189	90.9	219	211	96.3	217	213	98.2
Tennessee	182	174	95.6	195	193	99.0	189	189	100.0
Texas	1,247	1,154	92.5	1,251	1,160	92.7	1,257	1,213	96.5
Utah	94	94	100.0	103	103	100.0	106	106	100.0
Vermont	88	82	93.2	92	79	85.9	87	78	89.7
Virginia	151	145	96.0	173	168	97.1	167	161	96.4
Washington	319	300	94.0	337	321	95.3	347	345	99.4
West Virginia	71	58	81.7	96	93	96.9	87	82	94.3
Wisconsin	799	728	91.1	809	777	96.0	766	743	97.0
Wyoming	62	54	87.1	69	64	92.8	66	61	92.4

Table A.2.a. Number and percent of LEAs that directly certified categorically eligible students, excluding CEP and special provision LEAs, SY 2009–2010 through SY 2011–2012

	SY 2009–2010			SY 2010–2011			SY 2011–2012		
		Direct certification LEAs			Direct certification LEAs			Direct certification LEAs	
	Number of non-provision 2/3 LEAs	Number	Percent	Number of non-provision 2/3 LEAs	Number	Percent	Number of non-provision 2/3 LEAs	Number	Percent
U.S. Total	**17,886**	**14,667**	**82.0**	**17,964**	**15,168**	**84.4**	**18,037**	**15,939**	**88.4**
Alabama	148	134	90.5	147	137	93.2	151	140	92.7
Alaska	41	40	97.6	41	39	95.1	44	43	97.7
Arizona	406	335	82.5	400	335	83.8	419	367	87.6
Arkansas	284	249	87.7	273	262	96.0	273	263	96.3
California	1,004	786	78.3	1,025	753	73.5	1,027	805	78.4
Colorado	208	192	92.3	205	189	92.2	205	195	95.1
Connecticut	188	174	92.6	186	176	94.6	184	182	98.9
Delaware	33	30	90.9	34	32	94.1	42	35	83.3
District of Columbia	62	61	98.4	57	57	100.0	61	60	98.4
Florida	170	122	71.8	190	133	70.0	223	178	79.8
Georgia	200	178	89	209	187	89.5	208	198	95.2
Guam	NA	NA	NA	NA	NA	NA	3	1	33.3
Hawaii	37	26	70.3	36	26	72.2	35	25	71.4
Idaho	138	99	71.7	141	134	95.0	145	138	95.2
Illinois	1,121	878	78.3	1,115	964	86.5	1,124	1,037	92.3
Indiana	498	405	81.3	501	424	84.6	496	429	86.5
Iowa	495	421	85.1	494	435	88.1	477	428	89.7
Kansas	405	345	85.2	399	340	85.2	400	362	90.5
Kentucky	194	173	89.2	188	177	94.1	189	178	94.2
Louisiana	109	95	87.2	114	102	89.5	113	106	93.8
Maine	188	172	91.5	186	168	90.3	181	164	90.6
Maryland	49	42	85.7	48	42	87.5	54	46	85.2
Massachusetts	431	303	70.3	420	310	73.8	419	352	84.0
Michigan	855	717	83.9	853	736	86.3	845	762	90.2
Minnesota	656	451	68.8	697	462	66.3	686	461	67.2
Mississippi	164	144	87.8	162	146	90.1	160	144	90.0
Missouri	765	678	88.6	758	681	89.8	753	702	93.2
Montana	220	171	77.7	221	190	86.0	219	191	87.2
Nebraska	381	302	79.3	377	315	83.6	372	318	85.5
Nevada	18	17	94.4	20	16	80.0	20	15	75.0
New Hampshire	94	75	79.8	91	82	90.1	100	88	88.0
New Jersey	677	619	91.4	694	665	95.8	697	683	98.0
New Mexico	104	60	57.7	115	62	53.9	135	80	59.3
New York	987	863	87.4	992	871	87.8	1,003	903	90.0
North Carolina	165	151	91.5	165	154	93.3	162	152	93.8
North Dakota	196	150	76.5	183	160	87.4	181	157	86.7
Ohio	1,181	809	68.5	1,182	859	72.7	1,199	1,028	85.7
Oklahoma	538	430	79.9	546	465	85.2	544	516	94.9
Oregon	238	189	79.4	246	199	80.9	236	197	83.5
Pennsylvania	850	729	85.8	850	730	85.9	850	765	90.0
Rhode Island	54	52	96.3	55	52	94.5	54	49	90.7
South Carolina	93	85	91.4	100	85	85.0	106	84	79.2
South Dakota	173	153	88.4	169	153	90.5	186	170	91.4
Tennessee	165	149	90.3	175	161	92.0	183	174	95.1
Texas	1,187	1,043	87.9	1,178	1,056	89.6	1,175	1,064	90.6
Utah	75	72	96	81	75	92.6	85	81	95.3
Vermont	227	206	90.8	237	207	87.3	217	202	93.1
Virginia	153	141	92.2	154	145	94.2	155	146	94.2
Washington	323	280	86.7	316	281	88.9	309	279	90.3
West Virginia	73	55	75.3	72	56	77.8	72	57	79.2
Wisconsin	809	571	70.6	811	639	78.8	806	692	85.9
Wyoming	56	45	80.4	55	43	78.2	54	47	87.0

Table A.2.b. Number and percent of LEAs that directly certified categorically eligible students, excluding CEP and special provision LEAs, SY 2012–2013 through SY 2014–2015

	SY 2012–2013			SY 2013–2014			SY 2014–2015		
		Direct certification LEAs			Direct certification LEAs			Direct certification LEAs	
	Number of non-provision 2/3 LEAs	Number	Percent	Number of non-provision 2/3 LEAs	Number	Percent	Number of non-provision 2/3 LEAs	Number	Percent
U.S. Total	**17,744**	**16,066**	**90.5**	**17,220**	**15,936**	**92.5**	**15,459**	**14,510**	**93.9**
Alabama	157	150	95.5	191	149	78.0	155	120	77.4
Alaska	63	42	66.7	41	41	100.0	26	26	100.0
Arizona	427	370	86.7	375	365	97.3	381	377	99.0
Arkansas	270	254	94.1	268	258	96.3	262	246	93.9
California	1,038	968	93.3	1,053	985	93.5	991	927	93.5
Colorado	196	188	95.9	205	198	96.6	213	191	89.7
Connecticut	188	186	98.9	181	176	97.2	178	175	98.3
Delaware	41	37	90.2	39	38	97.4	29	24	82.8
District of Columbia	63	63	100.0	41	41	100.0	35	34	97.1
Florida	225	184	81.8	215	199	92.6	191	190	99.5
Georgia	199	189	95.0	167	163	97.6	130	127	97.7
Guam	2	1	50.0	2	1	50.0	18	18	100.0
Hawaii	33	33	100.0	28	27	96.4	125	123	98.4
Idaho	144	144	100.0	139	136	97.8	1,003	909	90.6
Illinois	1,051	984	93.6	1,152	983	85.3	449	445	99.1
Indiana	504	447	88.7	469	458	97.7	417	373	89.4
Iowa	474	419	88.4	425	394	92.7	388	376	96.9
Kansas	398	378	95.0	398	385	96.7	80	80	100.0
Kentucky	188	186	98.9	185	184	99.5	87	83	95.4
Louisiana	114	107	93.9	121	111	91.7	203	187	92.1
Maine	186	179	96.2	200	187	93.5	44	40	90.9
Maryland	54	37	68.5	51	42	82.4	397	378	95.2
Massachusetts	358	319	89.1	399	383	96.0	642	628	97.8
Michigan	847	784	92.6	719	691	96.1	622	454	73.0
Minnesota	681	445	65.3	652	496	76.1	118	112	94.9
Mississippi	157	144	91.7	159	141	88.7	654	625	95.6
Missouri	760	709	93.3	746	706	94.6	197	173	87.8
Montana	216	183	84.7	216	192	88.9	356	326	91.6
Nebraska	370	337	91.1	360	347	96.4	30	13	43.3
Nevada	25	17	68.0	21	17	81.0	108	96	88.9
New Hampshire	98	82	83.7	92	91	98.9	671	661	98.5
New Jersey	698	679	97.3	700	688	98.3	104	67	64.4
New Mexico	129	67	51.9	177	68	38.4	792	791	99.9
New York	1,002	851	84.9	915	805	88.0	107	105	98.1
North Carolina	161	152	94.4	163	162	99.4	172	160	93.0
North Dakota	179	151	84.4	174	162	93.1	946	915	96.7
Ohio	1,200	1,127	93.9	1,026	991	96.6	527	505	95.8
Oklahoma	543	519	95.6	549	532	96.9	187	157	84.0
Oregon	232	197	84.9	225	201	89.3	706	677	95.9
Pennsylvania	848	785	92.6	826	786	95.2	71	48	67.6
Rhode Island	53	53	100.0	58	50	86.2	69	68	98.6
South Carolina	94	84	89.4	114	98	86.0	162	158	97.5
South Dakota	179	160	89.4	173	165	95.4	91	91	100.0
Tennessee	182	174	95.6	179	177	98.9	991	947	95.6
Texas	1,157	1,064	92.0	1,097	1,006	91.7	93	93	100.0
Utah	93	93	100.0	94	94	100.0	73	64	87.7
Vermont	88	82	93.2	91	78	85.7	141	135	95.7
Virginia	151	145	96.0	156	151	96.8	260	258	99.2
Washington	303	284	93.7	297	281	94.6	31	26	83.9
West Virginia	71	58	81.7	70	67	95.7	681	658	96.6
Wisconsin	793	722	91.0	766	734	95.8	55	50	90.9
Wyoming	61	53	86.9	60	55	91.7	155	120	77.4

Table A.3. Enrollment of NSLP-participating LEAs, SY 2013–2014 (millions of students)

	LEAs that directly certified SNAP participants or in which all schools are CEP or special provision in a non–base year	All other LEAs	All NSLP-participating LEAs
All LEAs	50.7	0.3	51.0
Number of students in LEA			
10,000 or more	27.3	0.0	27.3
5,000 to 9,999	7.3	0.0	7.4
1,000 to 4,999	12.3	0.1	12.3
500 to 999	2.1	0.0	2.2
Fewer than 500	1.7	0.1	1.8

Note: Because of rounding, values in the All NSLP-participating LEAs column might not equal the sum of values in the other two columns.

CEP = Community Eligibility Provision; LEA = local educational agency; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; SY = school year.

Table A4. Percent of SNAP children directly certified for free school meals and percent of all categorically eligible children certified for free school meals SY 2014–2015

	Percent of school-age SNAP participants directly certified for free school meals, SY 2014–2015	Change in percent of school-age SNAP participants directly certified, SY 2013–2014 to SY 2014–2015	Percent of categorically eligible children certified for free school meals, SY 2014–2015
U.S. Total	**91**	**4**	**100**
Alabama	89	3	98
Alaska	100	11	94
Arizona	65	3	83
Arkansas	95	6	100
California	74	-5	83
Colorado	95	27	99
Connecticut	100	13	100
Delaware	95	0	98
District of Columbia	99	3	97
Florida	99	11	100
Georgia	92	7	100
Guam	82	-7	NA
Hawaii	87	-15	97
Idaho	90	0	89
Illinois	96	-2	100
Indiana	100	19	100
Iowa	76	-16	84
Kansas	98	1	100
Kentucky	99	4	100
Louisiana	100	12	100
Maine	83	0	94
Maryland	91	-7	97
Massachusetts	95	1	100
Michigan	82	-5	95
Minnesota	100	4	100
Mississippi	85	4	100
Missouri	86	0	95
Montana	93	23	93
Nebraska	95	-8	100
Nevada	84	-4	100
New Hampshire	93	11	100
New Jersey	95	1	99
New Mexico	91	14	100
New York	100	20	100
North Carolina	96	-3	99
North Dakota	87	-9	95
Ohio	87	-2	96
Oklahoma	98	-1	100
Oregon	99	23	100
Pennsylvania	83	-2	96
Rhode Island	88	-7	95
South Carolina	86	6	98
South Dakota	86	0	83
Tennessee	100	15	100
Texas	88	8	100
Utah	97	21	100
Vermont	96	8	100
Virginia	91	0	97
Washington	93	11	100
West Virginia	100	9	100
Wisconsin	87	-10	90
Wyoming	96	17	95

NA = not available.

Table A.5. States by FNS administrative region

FNS Region	State	FNS Region	State
Mid-Atlantic	District of Columbia	Northeast	Connecticut
	Delaware		Maine
	Maryland		Massachusetts
	New Jersey		New Hampshire
	Pennsylvania		New York
	Virginia		Rhode Island
	West Virginia		Vermont
Midwest	Illinois	Southeast	Alabama
	Indiana		Florida
	Michigan		Georgia
	Minnesota		Kentucky
	Ohio		Mississippi
	Wisconsin		North Carolina
			South Carolina
			Tennessee
Mountain Plains	Colorado	Southwest	Arkansas
	Iowa		Louisiana
	Kansas		New Mexico
	Missouri		Oklahoma
	Montana		Texas
	Nebraska	Western	Alaska
	North Dakota		Arizona
	South Dakota		California
	Utah		Guam
	Wyoming		Hawaii
			Idaho
			Nevada
			Oregon
			Washington

Figure A.1. Percent of LEAs that directly certified categorically eligible students and percent of students in LEAs that directly certified categorically eligible students, by enrollment category size: CEP and special provision LEAs excluded from direct certification counts, SY 2014–2015

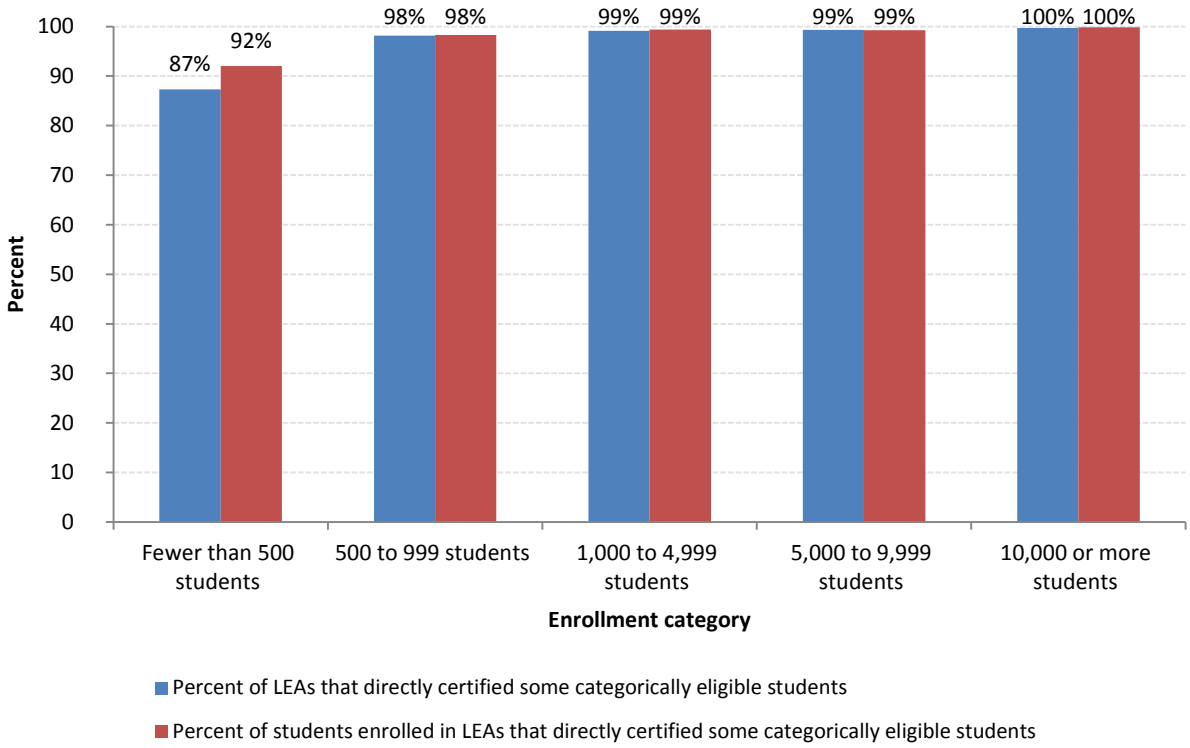


Figure A.2. Percent of SNAP-participant children directly certified for free school meals, SY 2007–2008

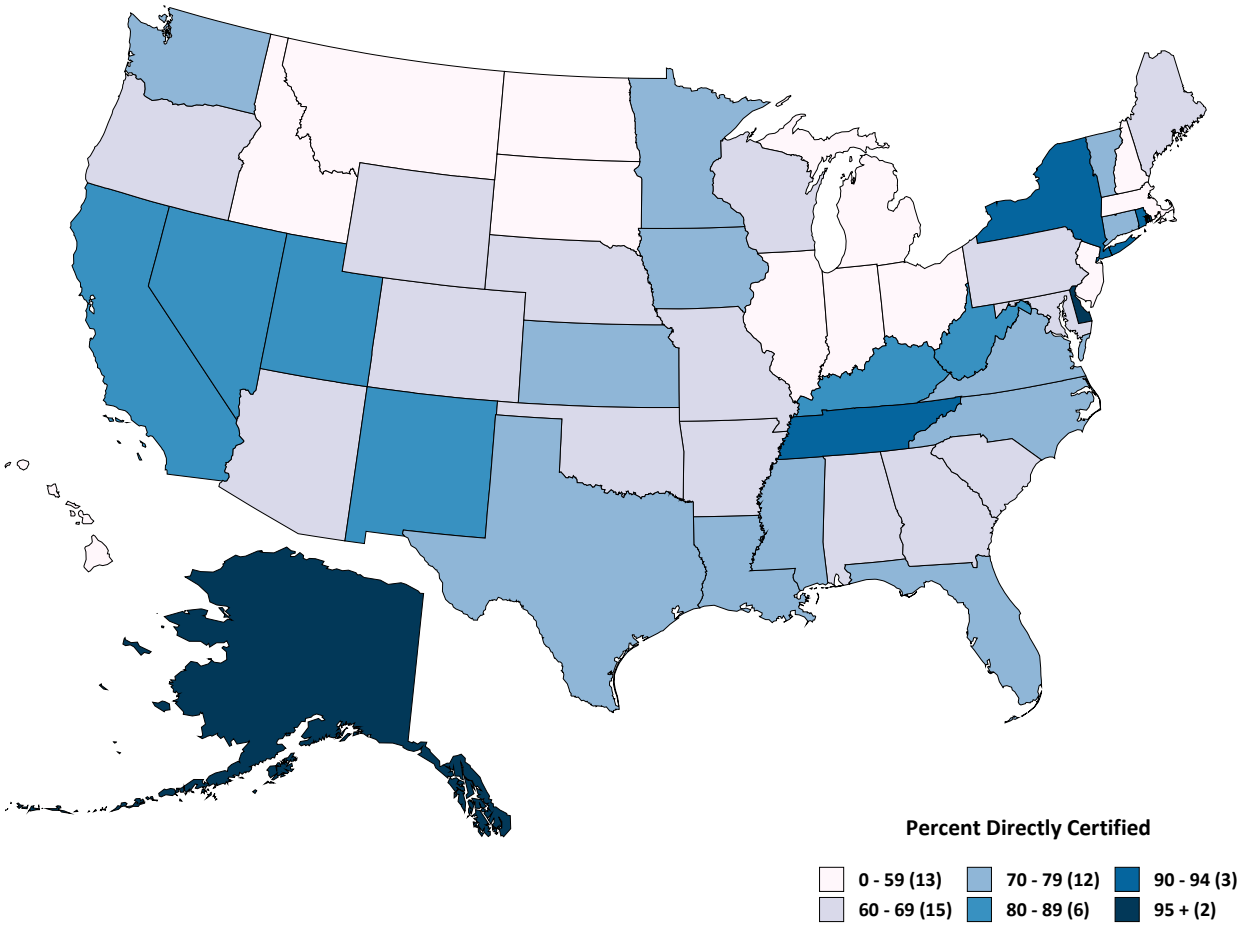


Figure A.3. Percent of SNAP-participant children directly certified for free school meals, SY 2008–2009

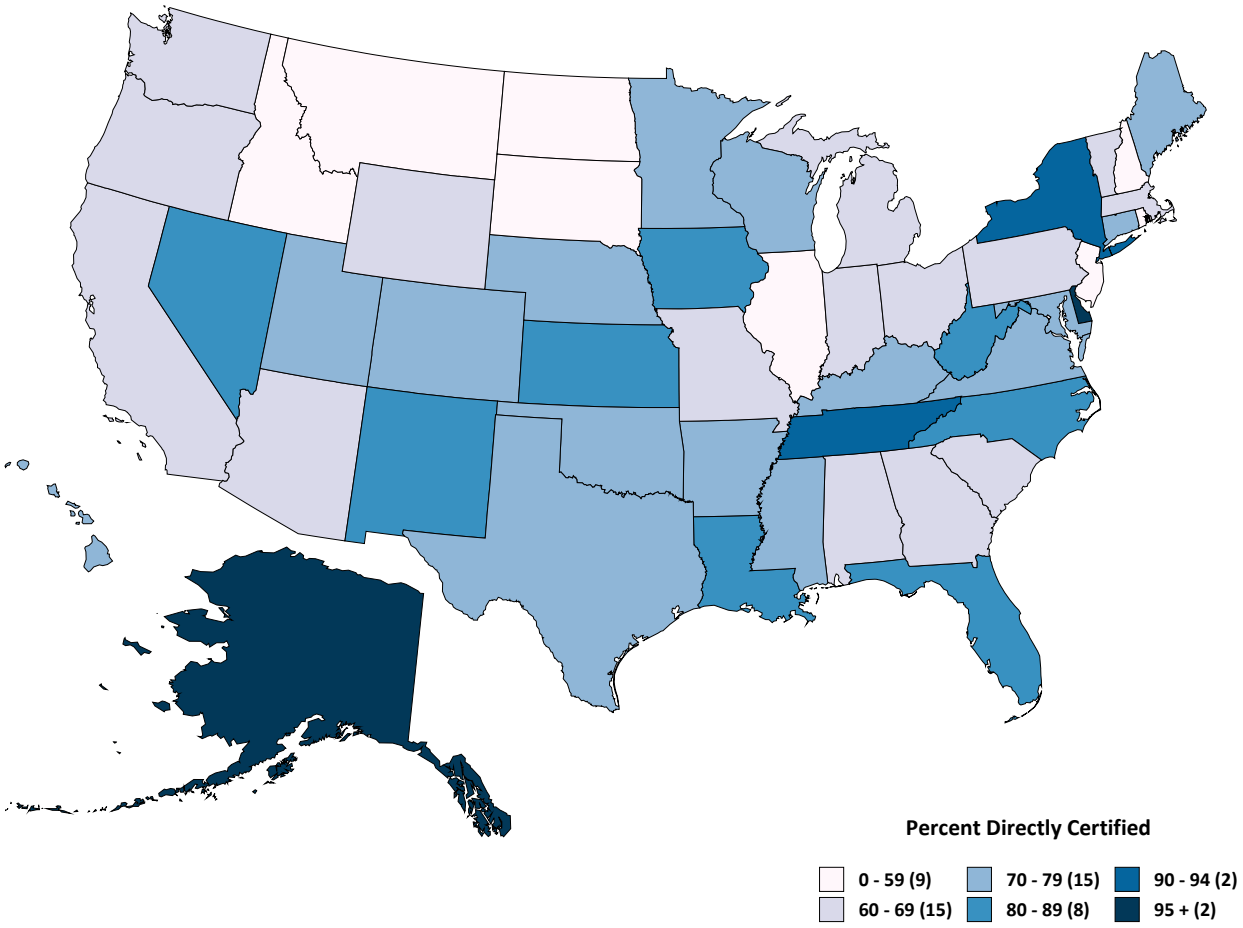


Figure A.4. Percent of SNAP-participant children directly certified for free school meals, SY 2009–2010

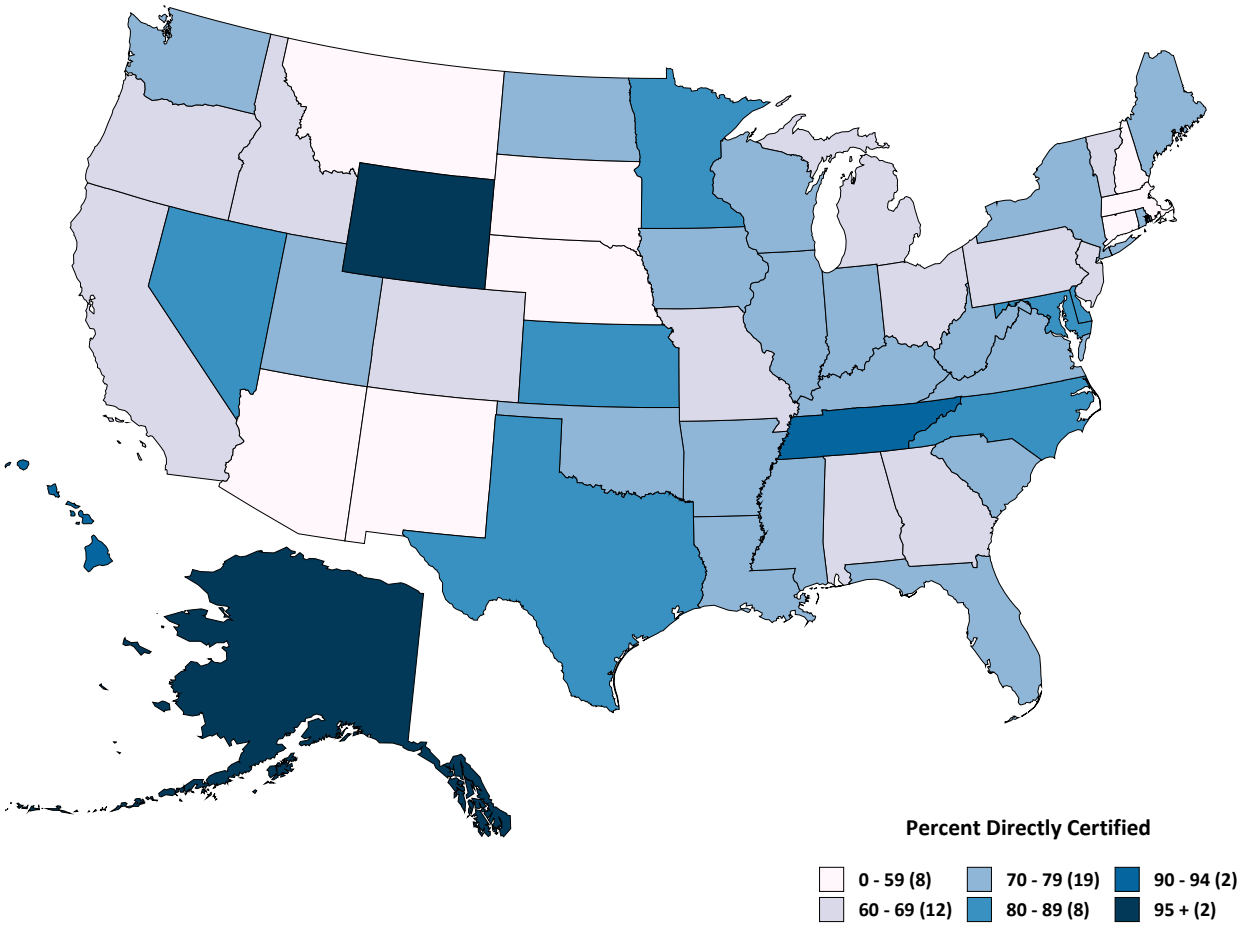


Figure A.5. Percent of SNAP-participant children directly certified for free school meals, SY 2010–2011

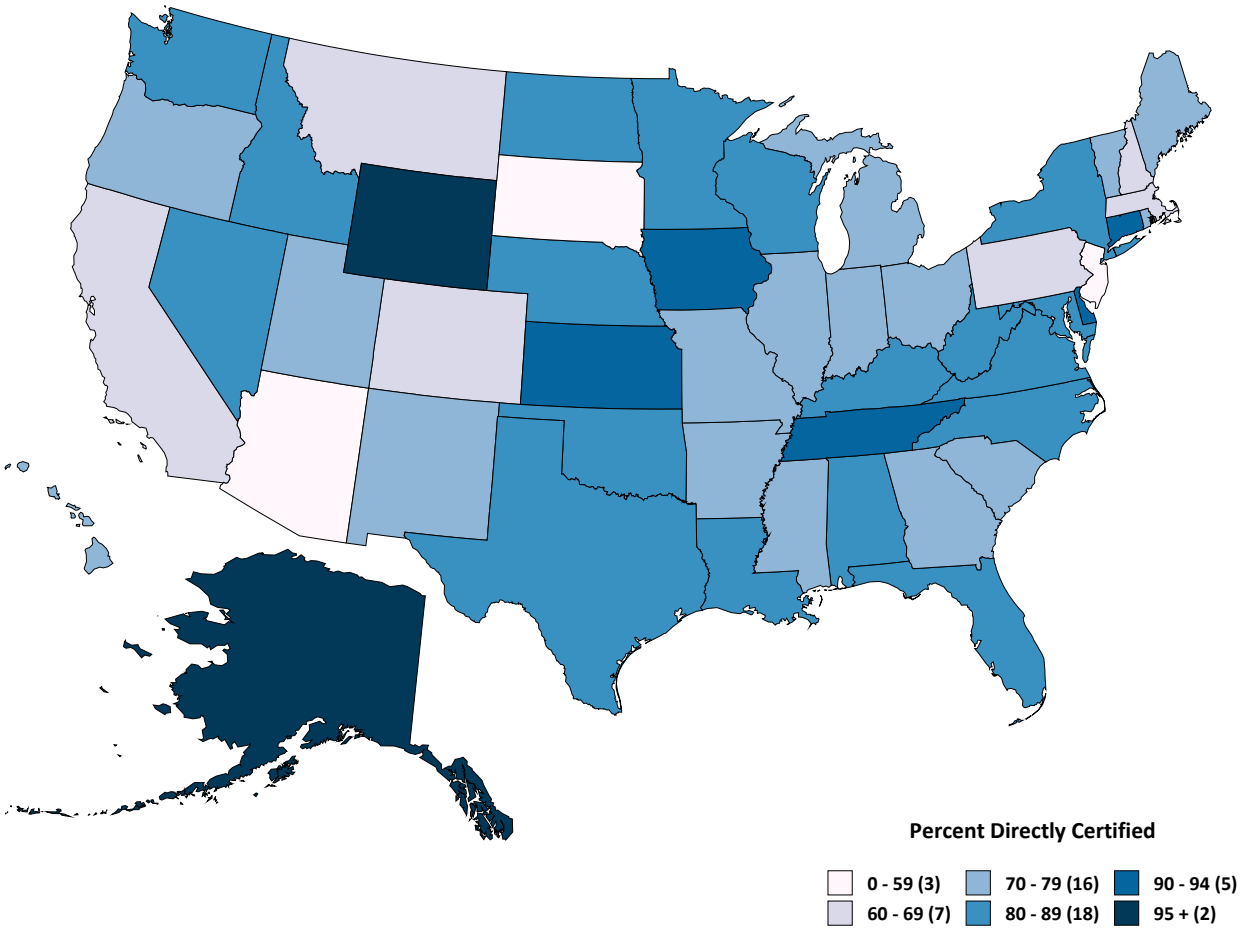


Figure A.6. Percent of SNAP-participant children directly certified for free school meals, SY 2011–2012

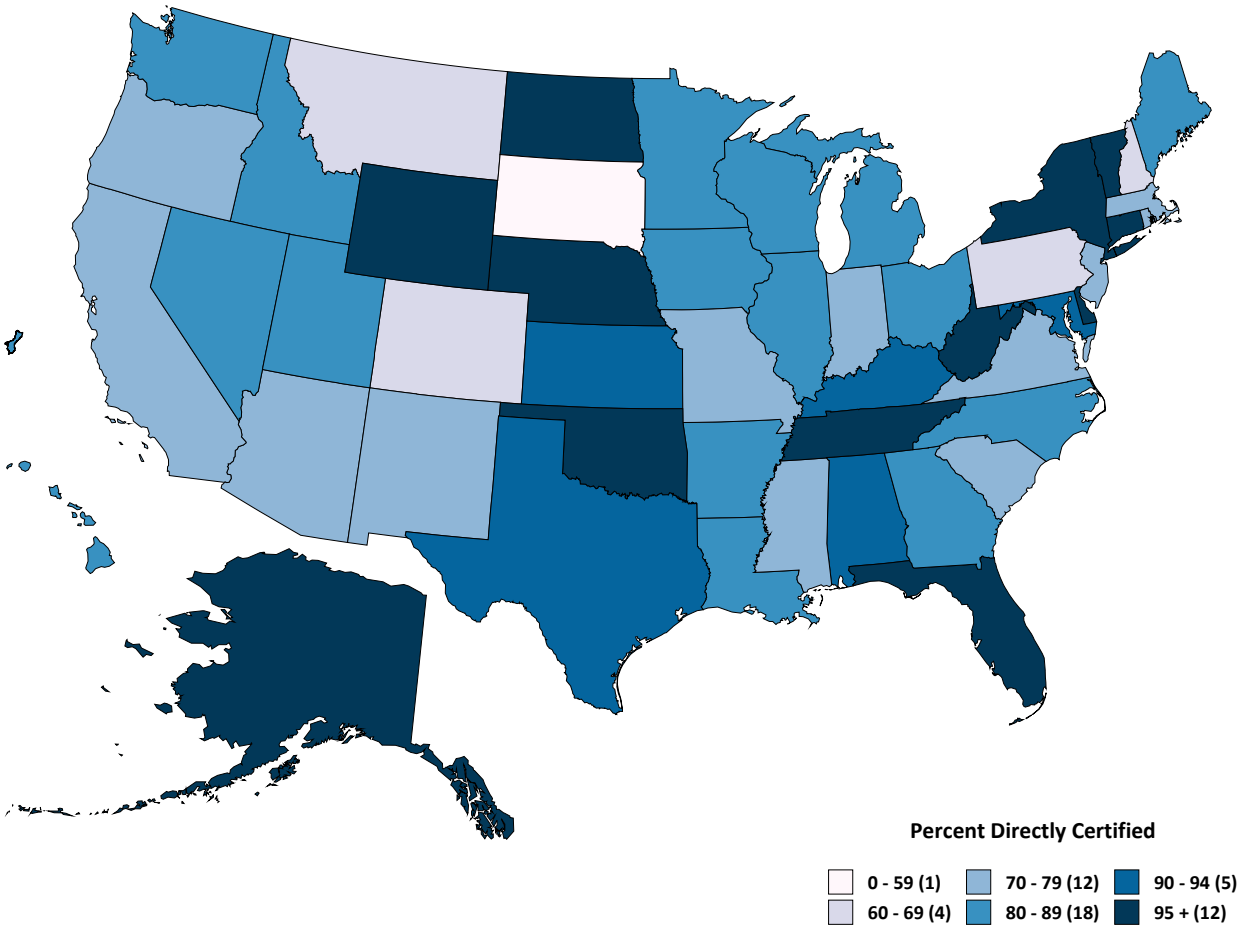


Figure A.7. Percent of SNAP-participant children directly certified for free school meals, SY 2012–2013

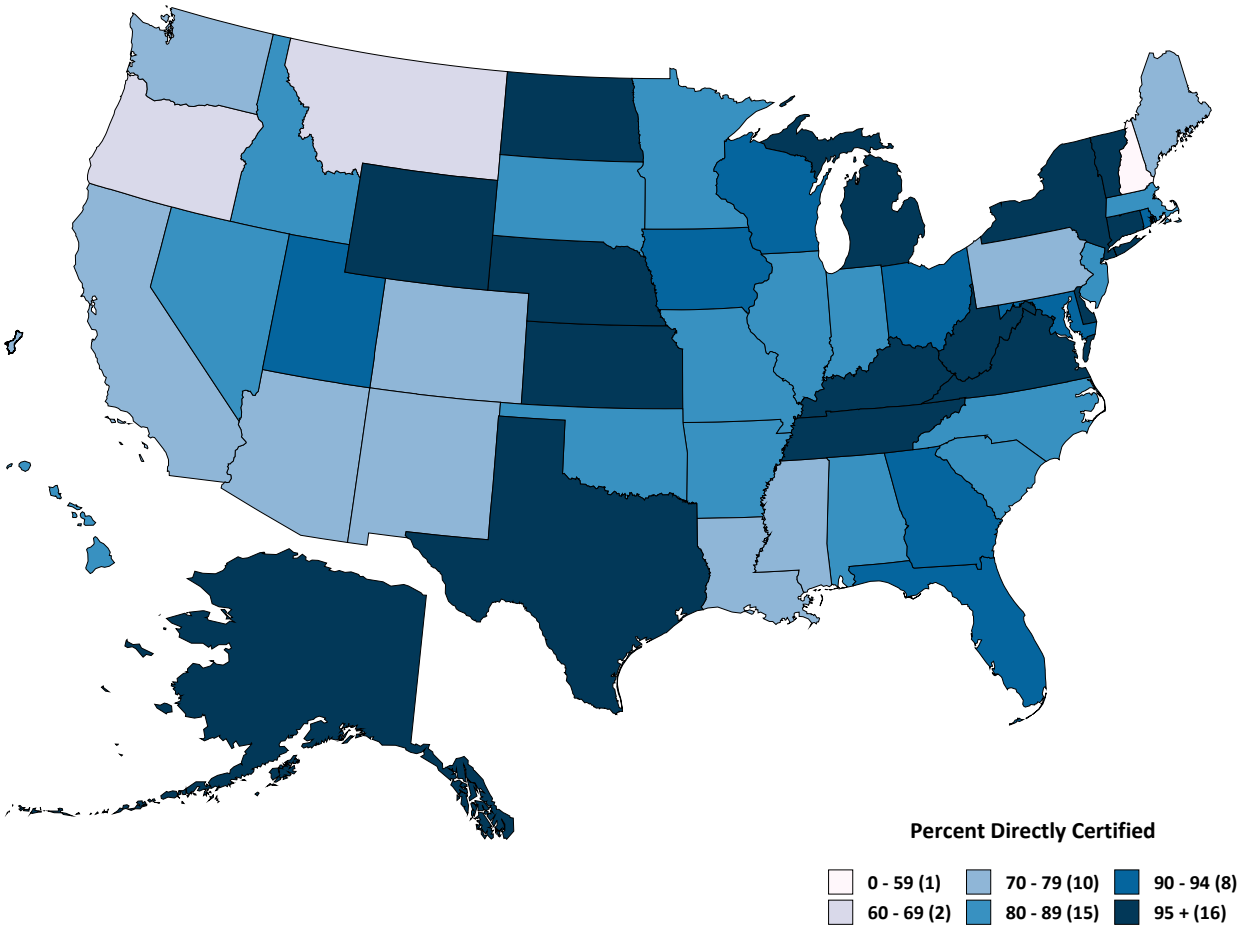
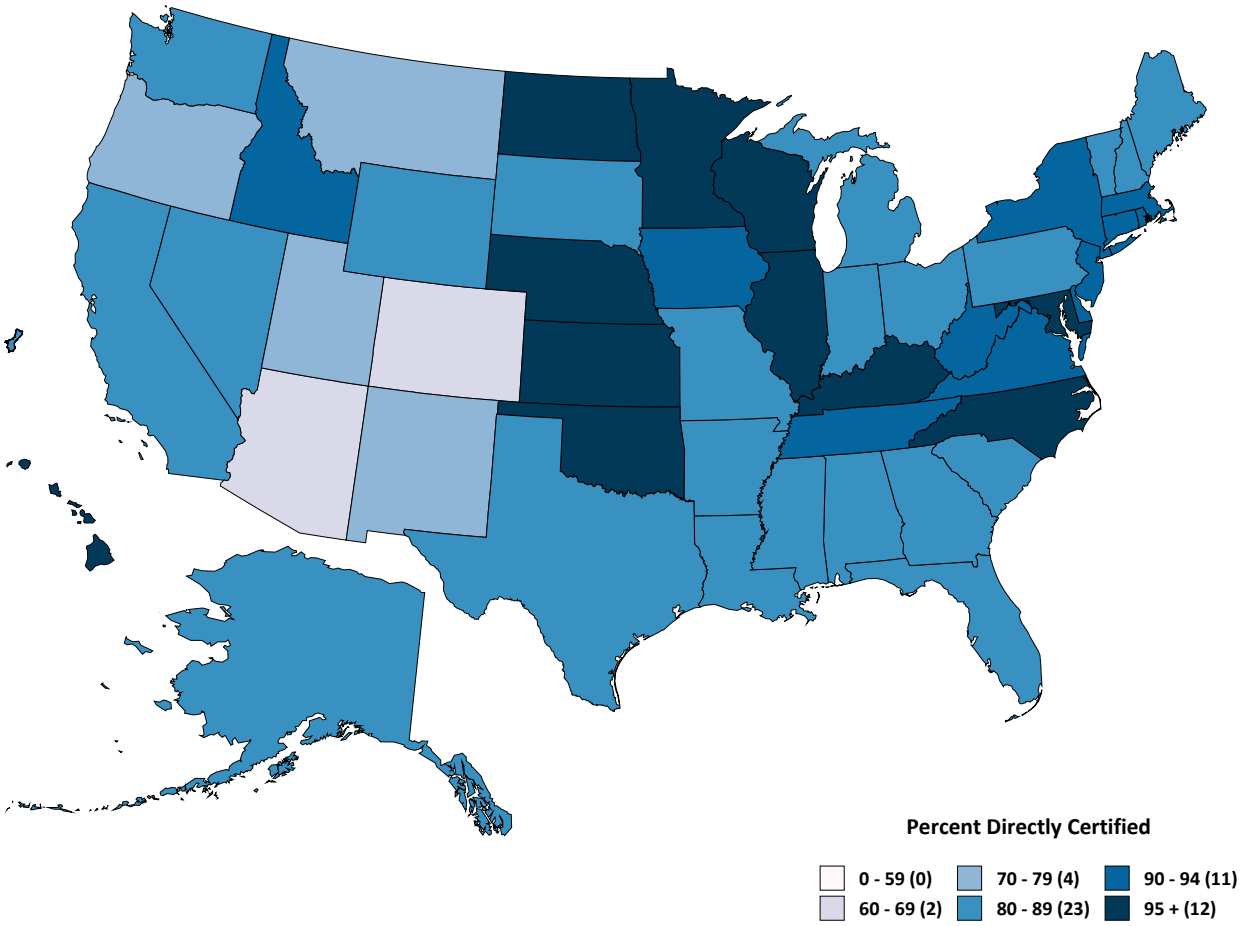
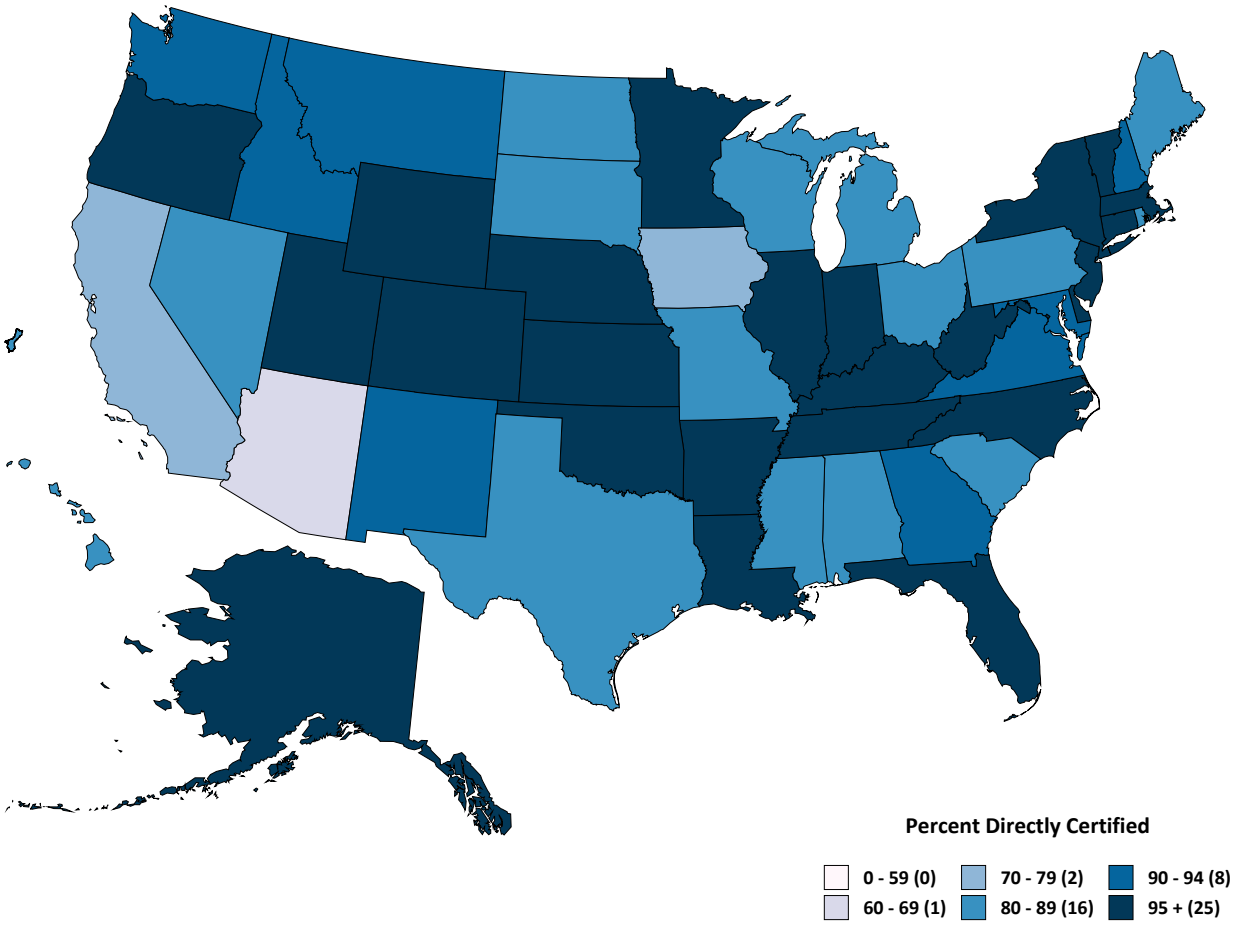


Figure A.8. Percent of SNAP-participant children directly certified for free school meals, SY 2013–2014



Note: In SY 2013-2014, Arizona, California, Connecticut, Hawaii, Ohio, Rhode Island, and Vermont could not distinguish direct certifications based on SNAP participation from direct certifications based on participation in programs other than SNAP. The resulting performance rates calculated for these States, therefore, overstate their actual performance.

Figure A.9. Percent of SNAP-participant children directly certified for free school meals, SY 2014–2015



Note: In SY 2014–2015, California, New York, and Rhode Island could not distinguish some or all direct certifications based on SNAP participation from direct certifications based on participation in programs other than SNAP. The resulting performance rates calculated for these States, therefore, overstate their actual performance.

Figure A.10. Percent of categorically eligible children certified for free school meals, SY 2007–2008

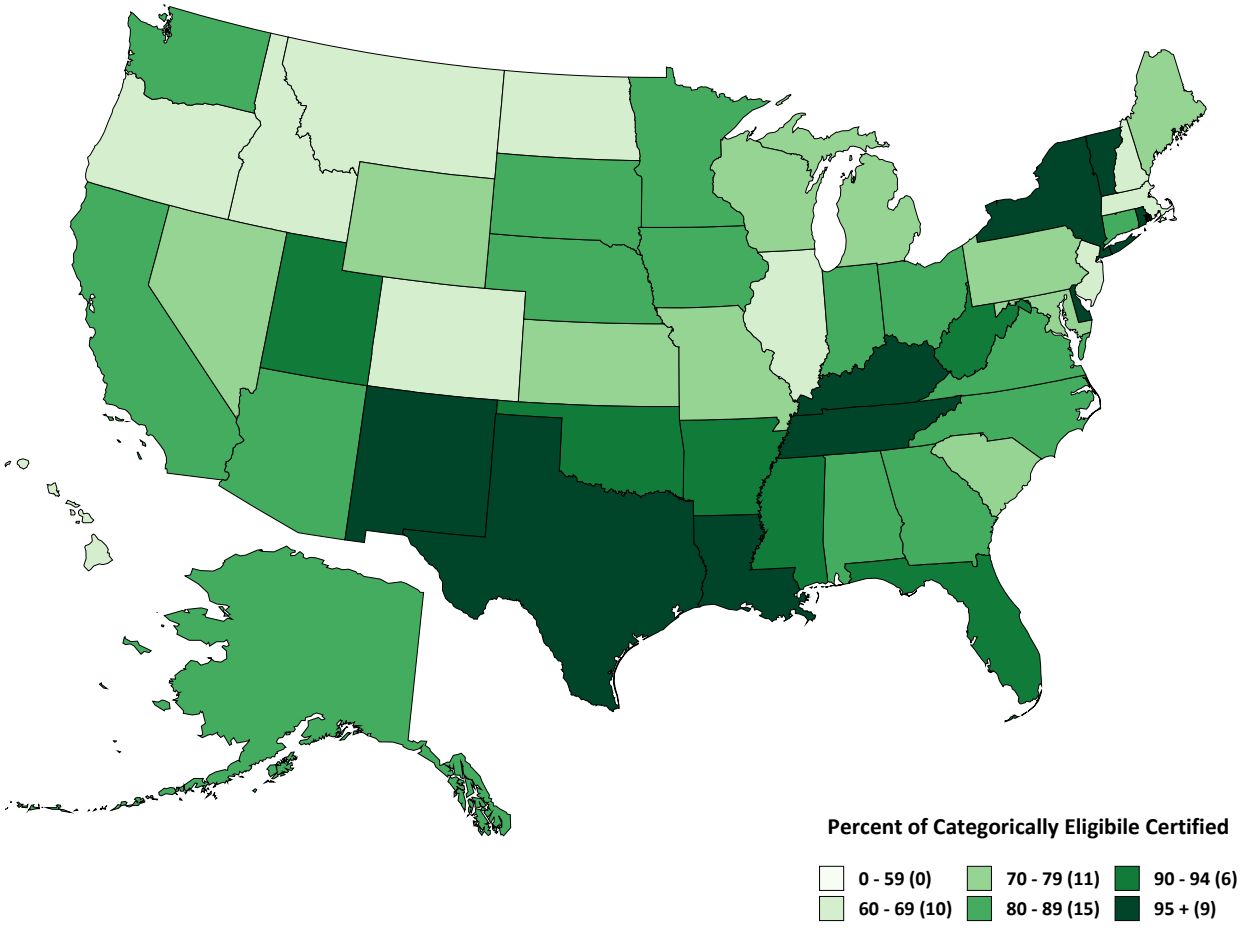


Figure A.11. Percent of categorically eligible children certified for free school meals, SY 2008–2009

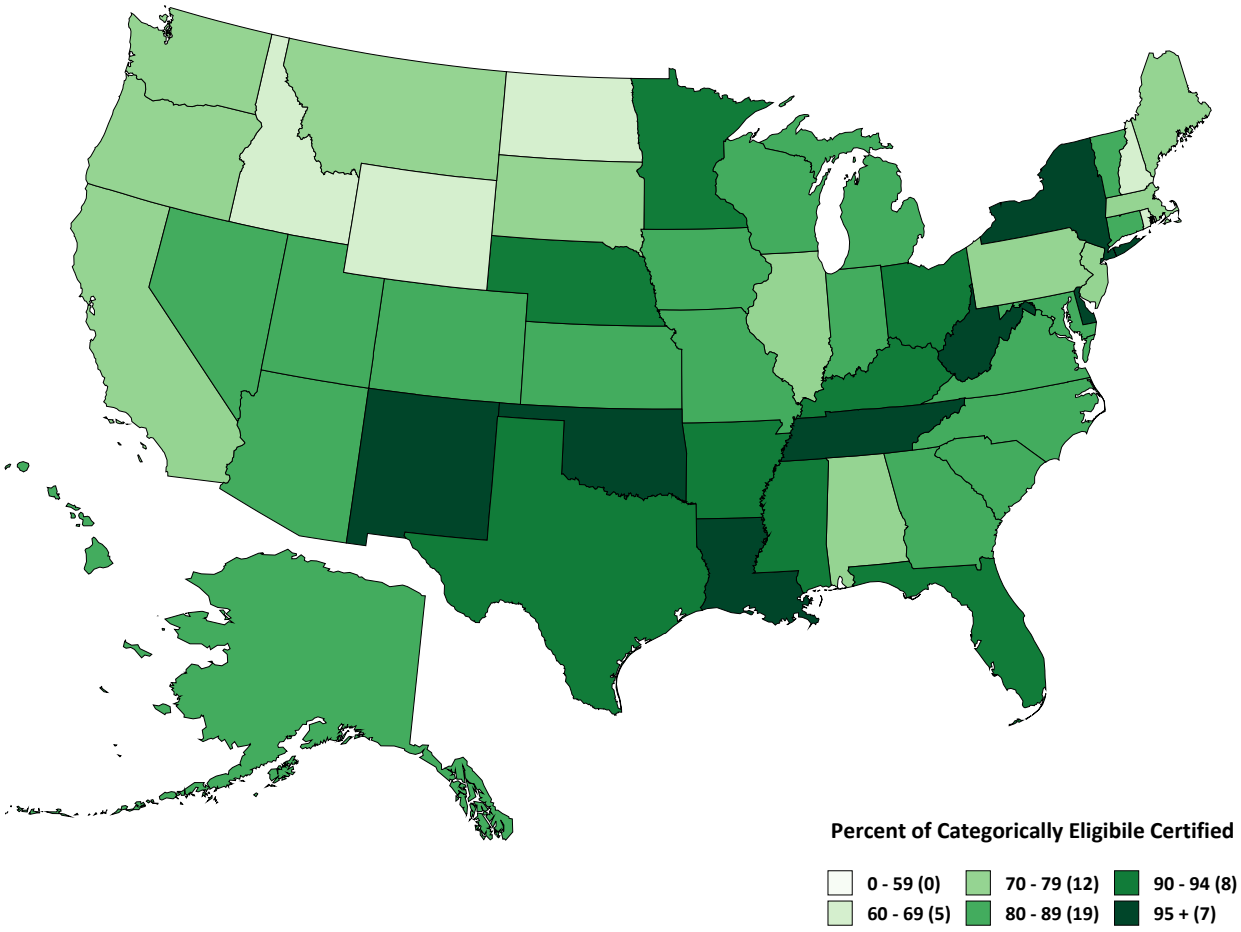


Figure A.12. Percent of categorically eligible children certified for free school meals, SY 2009–2010

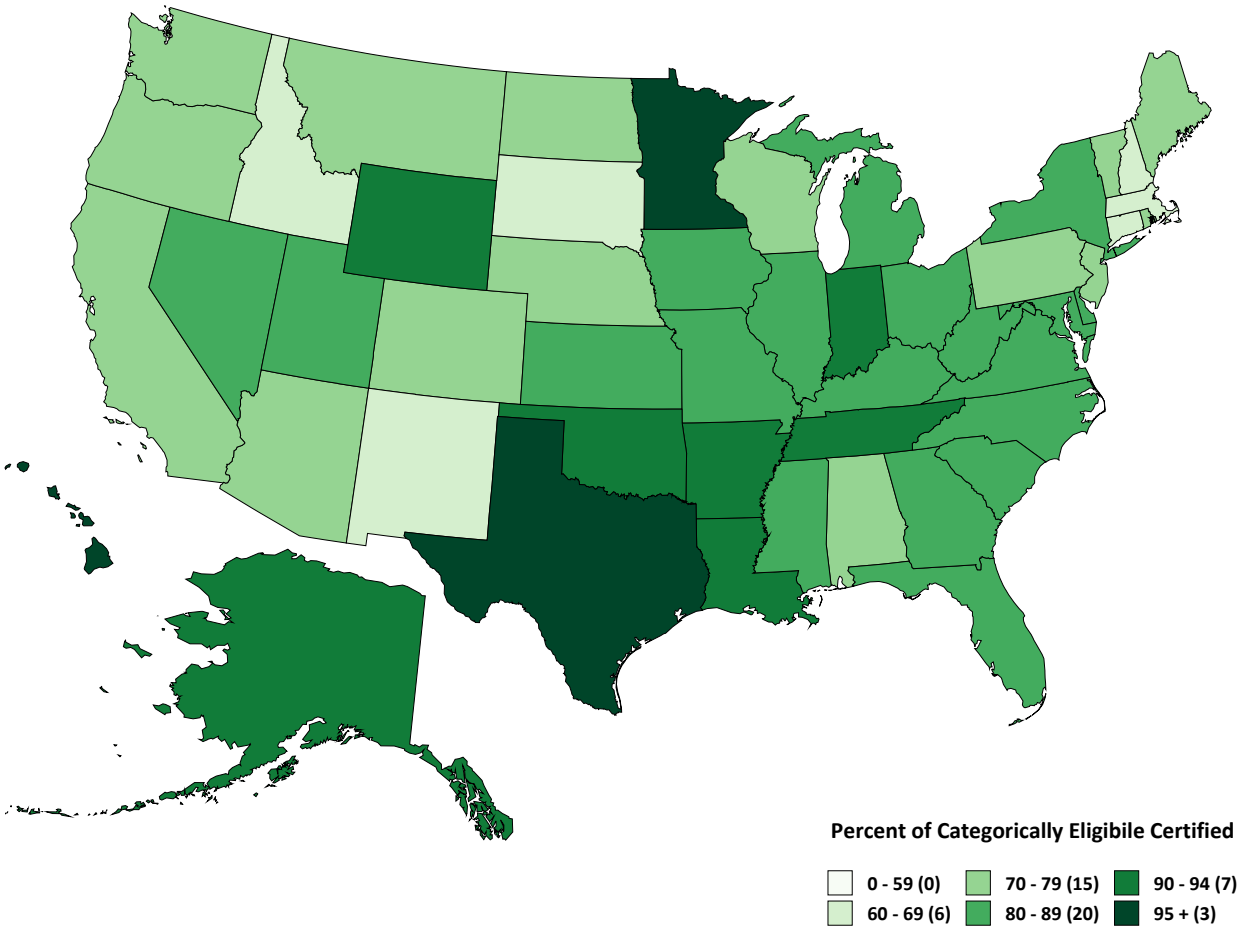


Figure A.13. Percent of categorically eligible children certified for free school meals, SY 2010–2011

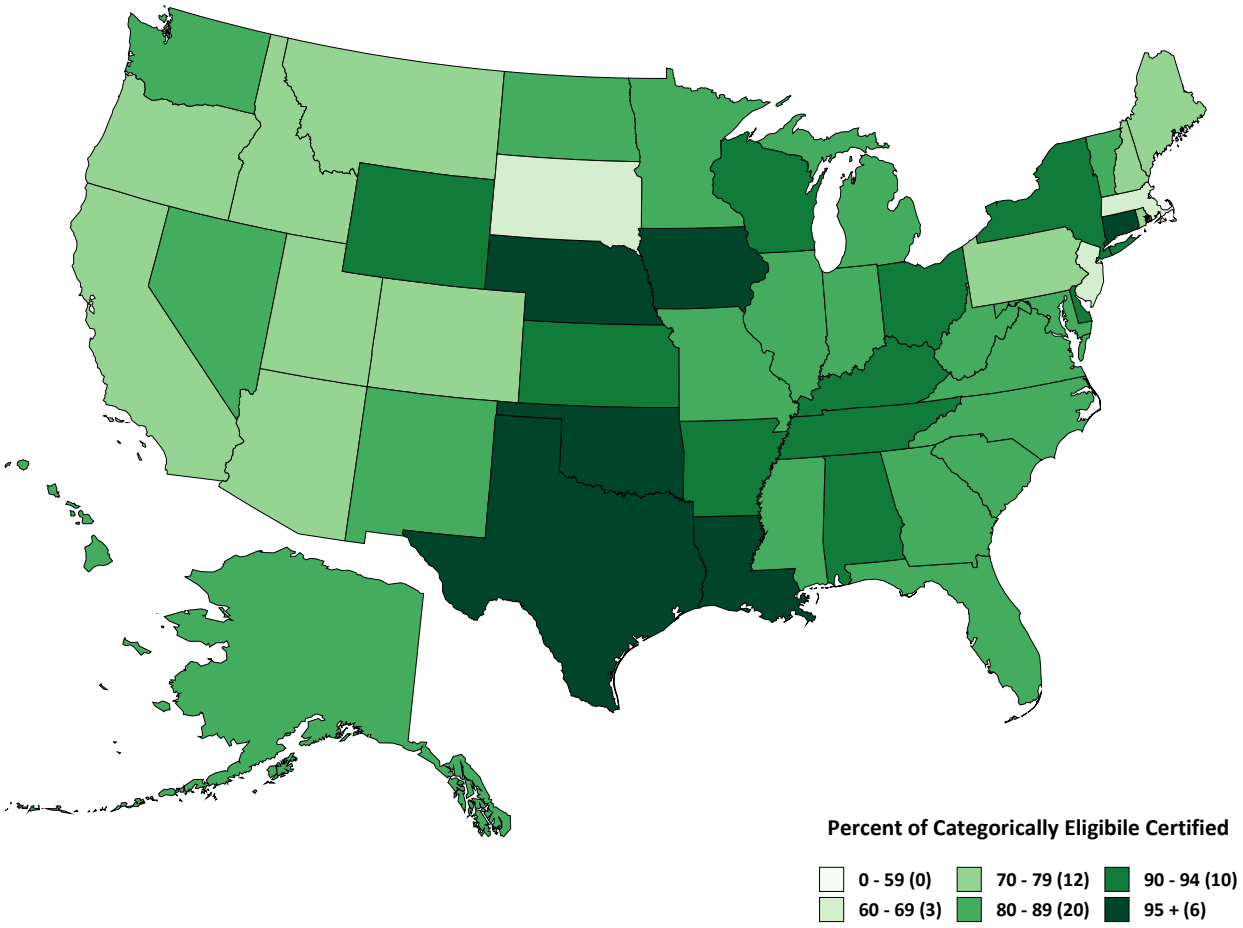


Figure A.14. Percent of categorically eligible children certified for free school meals, SY 2011–2012

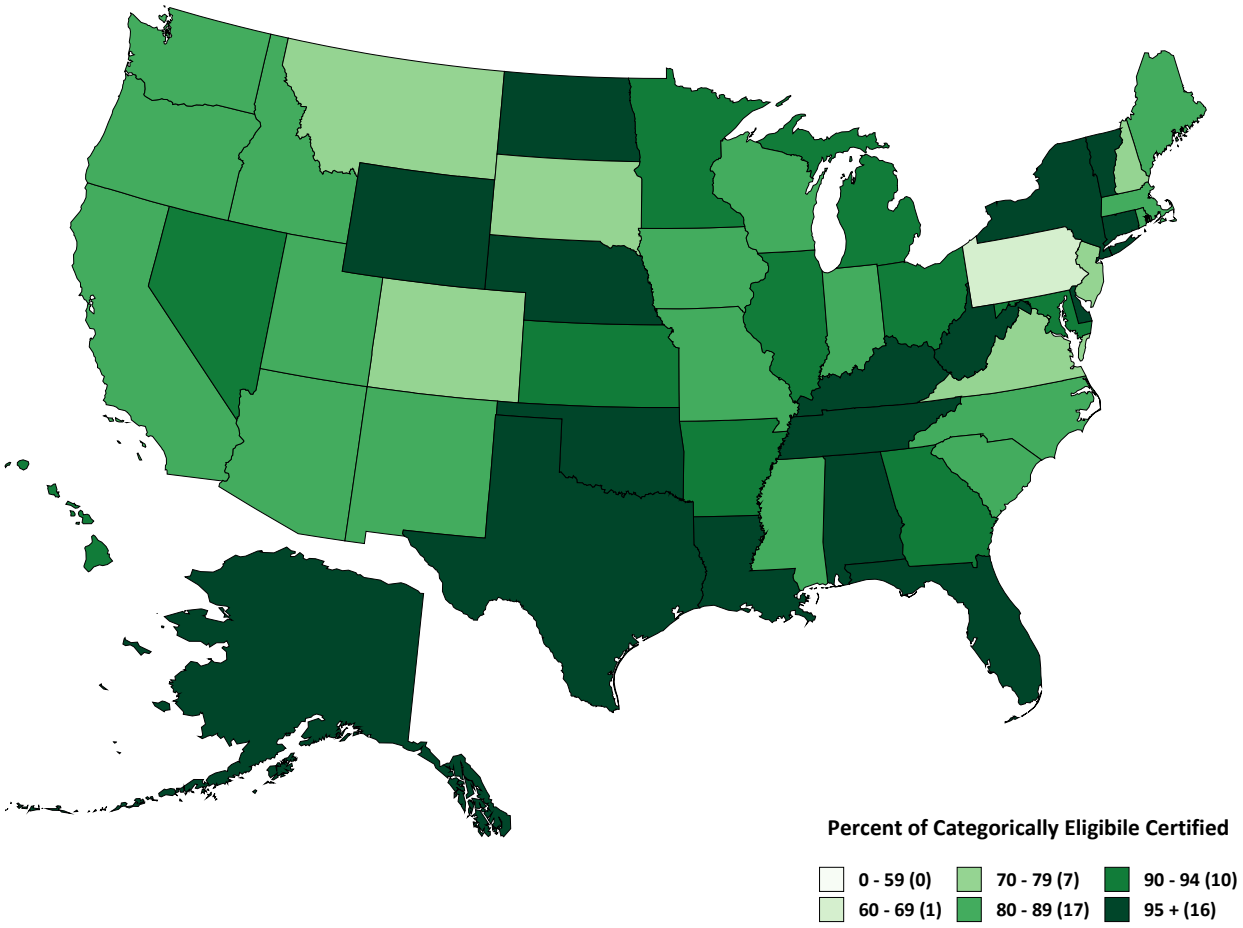


Figure A.15. Percent of categorically eligible children certified for free school meals, SY 2012–2013

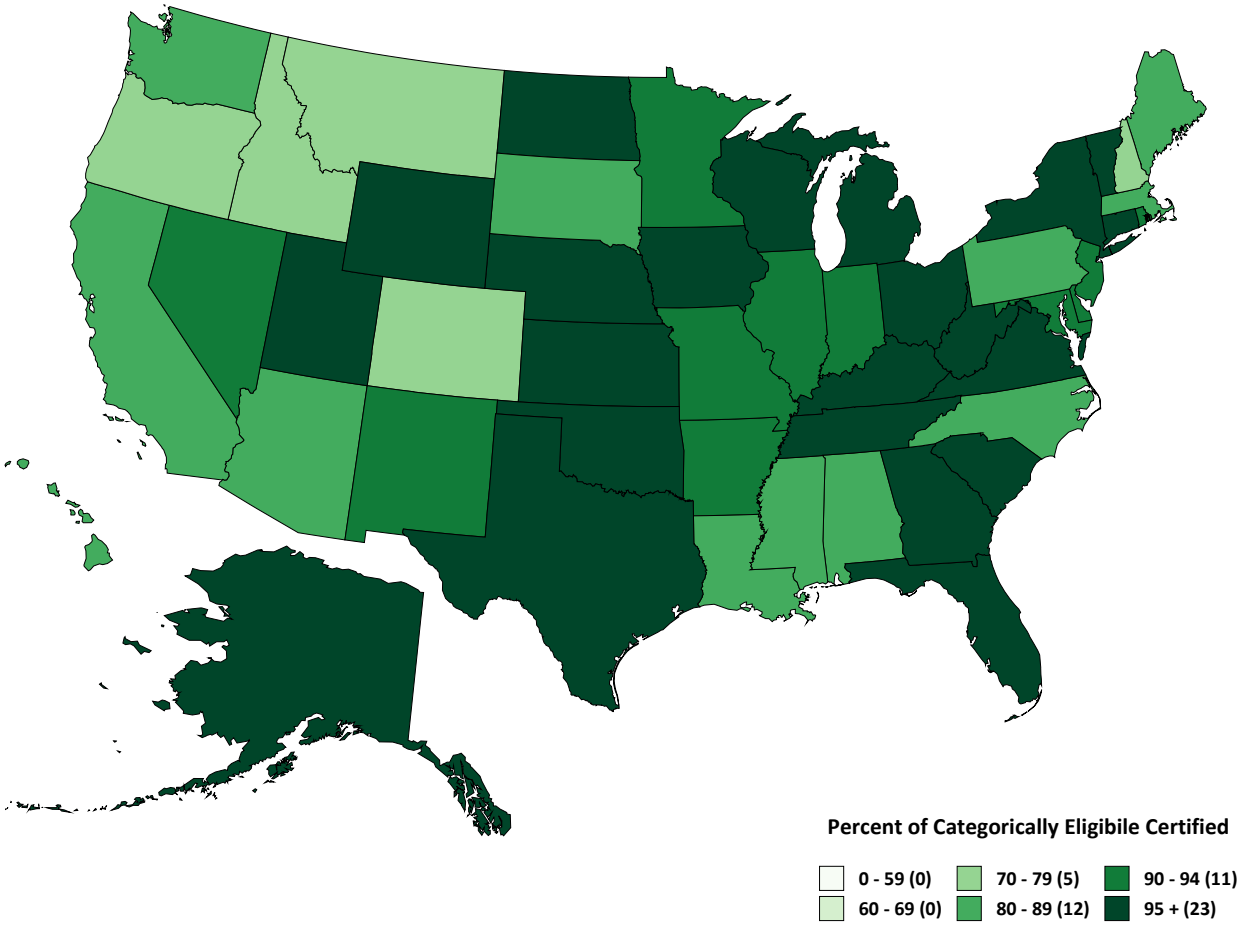


Figure A.16. Percent of categorically eligible children certified for free school meals, SY 2013–2014

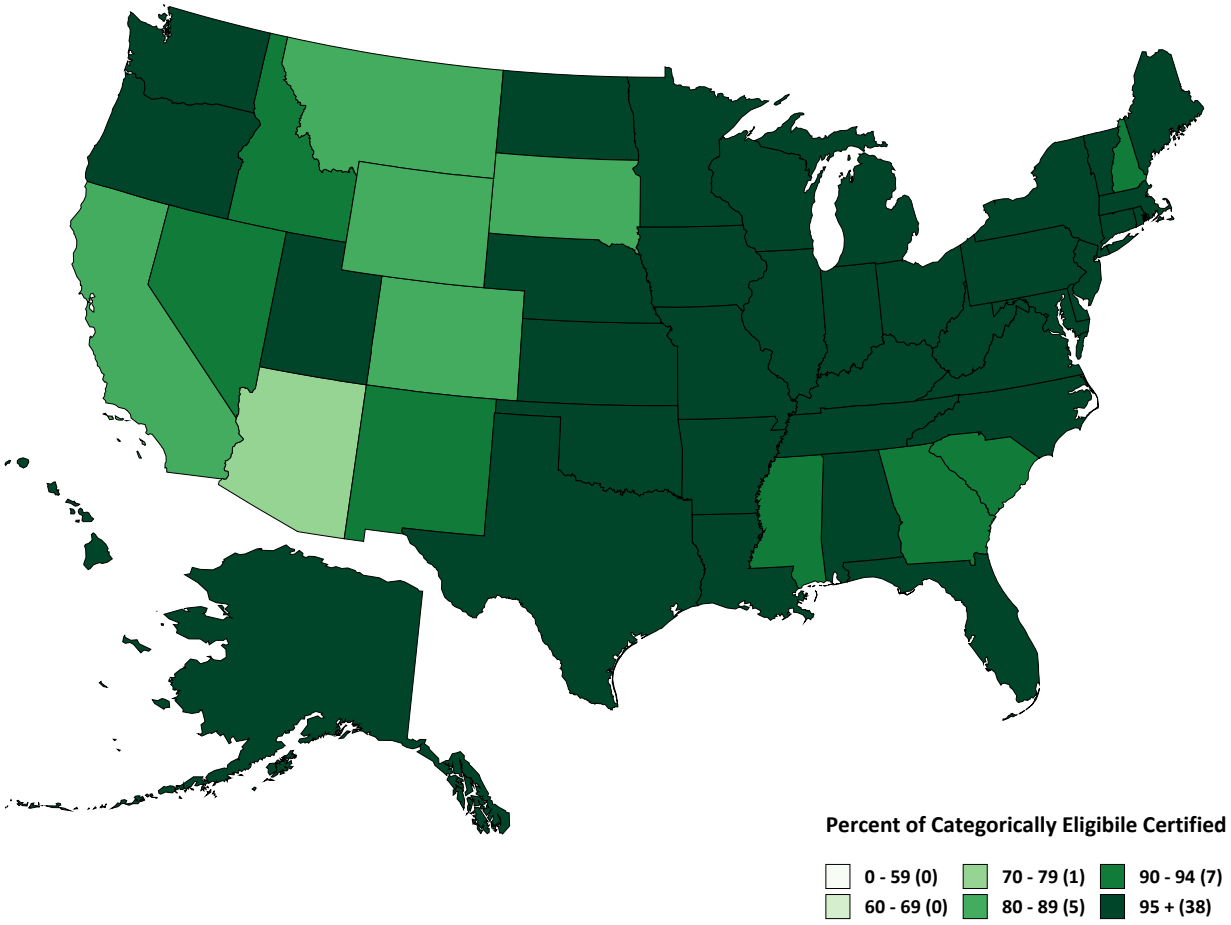
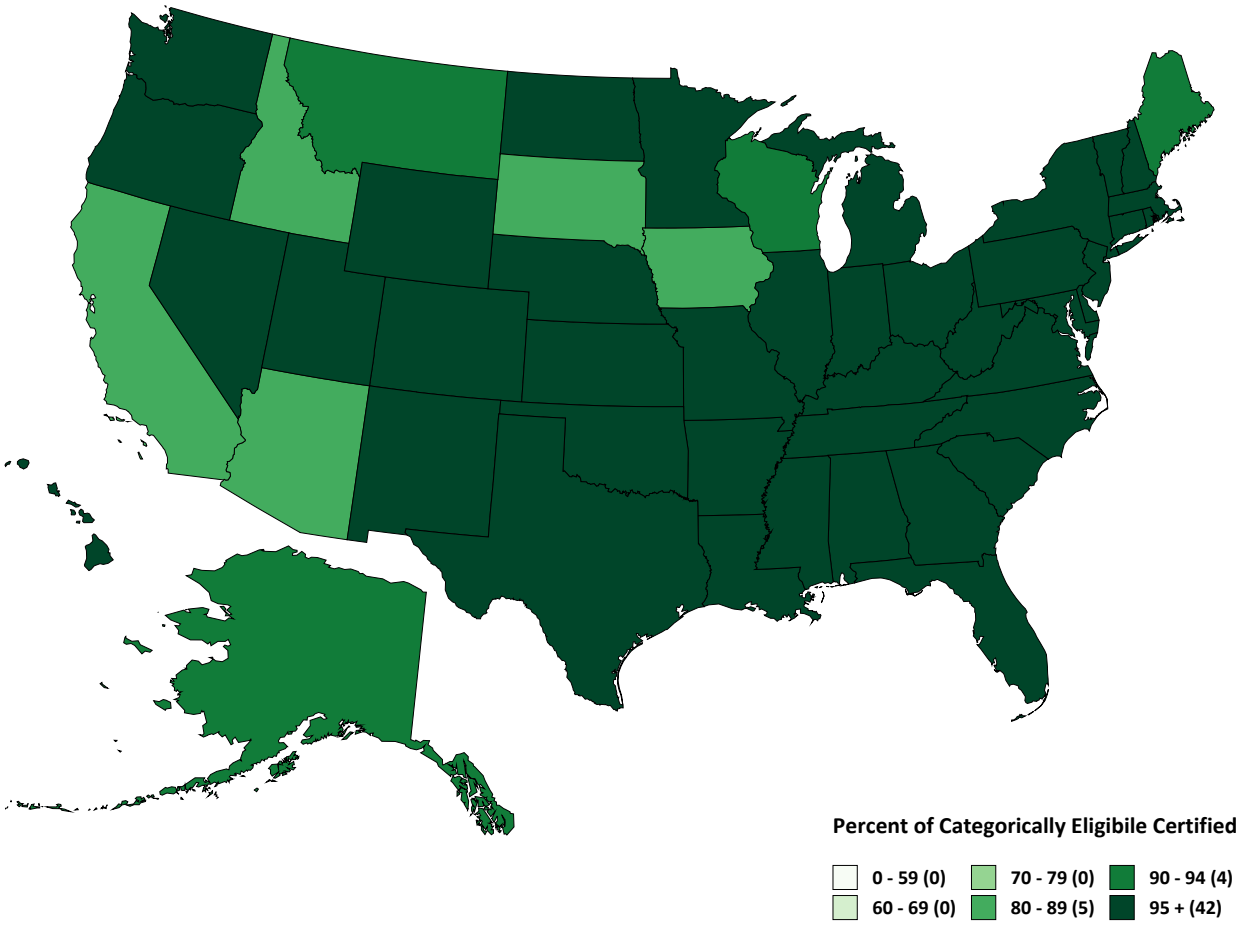


Figure A.15. Percent of categorically eligible children certified for free school meals, SY 2014–2015



APPENDIX B

SCHOOL FOOD AUTHORITY VERIFICATION COLLECTION REPORT (FNS-742)

AND

STATE AGENCY (NSLP/SNAP) DIRECT CERTIFICATION RATE DATA ELEMENT REPORT (FNS-834)

OMB APPROVED NO. 0584-0026
Expiration Date: 04/30/2016

Department of Agriculture, Food and Nutrition Service

School Food Authority (SFA) Verification Collection Report

State agencies must report the information on this form ANNUALLY for each SFA with schools operating the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP).
All SFAs, including SFAs with all schools exempt from verification requirements, must complete applicable sections.

State Agency Name:	**SFA ID#:**	**Type of SFA:** ☐ Public ☐ Nonprofit/Private	**School Year:** **From:** 20 **To:** 20
SFA Name:		**SFA City:**	**SFA Zip code:**

			A. Number of Schools OR Institutions	**B. Number of Students**
Section 1	**Total Schools, Residential Child Care Institutions (RCCIs) and Enrolled Students**	*****All SFAs must report Section 1*****		
		1-1: Total schools *(Do not include RCCIs):*		
		1-2: Total RCCIs *(Do not include schools counted in 1-1):*		
		1-2a: RCCIs with day students *(Report ONLY <u>day</u> students in 1-2aB):*		
		1-2b: RCCIs with NO day students:		

			A. Number of Schools AND Institutions	**B. Number of Students**
Section 2	**SFAs with schools operating alternate provisions**	*****ONLY SFAs with alternate provisions must report Section 2*****		
		2-1: Operating Provision 2/3 in a BASE year for NSLP and SBP:		
		2-2: Operating Provision 2/3 in a NON BASE year for NSLP and SBP:		
		2-2a: Provision 2/3 students reported as FREE in a NON BASE year:		
		2-2b: Provision 2/3 students reported as REDUCED PRICE in a NON BASE year:		
		2-3: Operating the Community Eligibility Option:		
		2-4: Operating other alternatives for NSLP and SBP:		
		2-5: Operating an alternate provision(s) for only SBP or only NSLP:		

			B. Number of FREE Students
Section 3	**Students approved as FREE eligible NOT subject to verification**	*****ALL SFAs must report Section 3 or check box 3-1 if applicable***** **3-1:** ☐ Check the box only if all schools and/or RCCIs in the SFA were not required to perform direct certification **with SNAP** *(i.e. NON BASE year Provision 2/3 for all schools)*	
		3-2: Students directly certified through Supplemental Nutrition Assistance Program (SNAP): *Do **<u>not</u>** include students certified with **SNAP** through the letter method.*	
		3-3: Students directly certified through other programs: *Include those directly certified through Temporary Assistance for Needy Families **(TANF)**, Food Distribution Program on Indian Reservations **(FDPIR)**, or Medicaid (if applicable); those documented as homeless, migrant, runaway, foster, Head Start, Pre-K Even Start, or non-applicant but approved by local officials. **DO NOT include SNAP students already reported in 3-2.***	
		3-4: Students certified categorically FREE eligible through SNAP letter method: *Include students certified for free meals through the family providing a letter from the **SNAP** agency.*	

			A. Number of Applications	**B. Number of Students**
Section 4	**Students approved as FREE or REDUCED PRICE eligible through a household application**	*****ALL SFAs collecting applications must report Section 4*****		
		4-1: Approved as categorically FREE Eligible: *Based on those providing documentation (e.g. a case number for SNAP, TANF, FDPIR on an application)*		
		4-2: Approved as FREE eligible: *Based on household size and income information*		
		4-3: Approved as REDUCED PRICE eligible: *Based on household size and income information*		

T-1: Total FREE Eligible Students		**T-2: Total REDUCED PRICE Eligible Students**	

Section 5

ALL SFAs must report Section 5 or check box 5-1 if applicable*

5-1: ☐ **Check the box if ALL schools and/or RCCIs are exempt from verification** *(see instructions for list of exemptions).*
If 5-1 is checked, no further reporting in Section 5 is required.

5-2: Was verification performed and completed?

- ☐ Yes, completed by November 15th
- ☐ Yes, completed after November 15th
- ☐ No, verification was NOT performed or the process was not completed.

5-3: Type of Verification process used:

1. ☐ Standard (Lesser of 3% or 3,000 error-prone)
2. ☐ Alternate one (Lesser of 3% or 3,000 selected randomly)
3. ☐ Alternate two (Lesser of 1% or 1,000 error prone applications PLUS lesser of one-half of one percent or 500 applications with SNAP/TANF/FDPIR case numbers)

If 1 or 3 is checked in **5-3**, report **5-4**. If 2 is checked in **5-3**, enter "N/A" in **5-4**.	**5-4: Total ERROR PRONE applications:** *Report all applications as of October 1st considered error prone*		**5-5: Number of applications selected for verification sample:**	

ALL SFAs must report 5-7 or check box 5-6 if applicable*

5-6: ☐ **Check the box if direct verification was not conducted in the SFA,** (i.e. not one of the schools and/or RCCIs in the SFA performed direct verification). **If 5-6 is checked, skip 5-7.**

		A. Number of Applications	**B. Number of Students**
Report if FREE and/or REDUCED PRICE eligibility is confirmed through direct verification with SNAP/TANF/FDPIR/MEDICAID as of November 15th	**5-7: Confirmed through direct verification:**		

5-8: Results of Verification by Original Benefit Type

For each original benefit type **(A, B, & C)**, report the number of applications and students as of November 15th for each result category **(1, 2, 3, & 4)**. Do NOT include students and applications already reported in 5-7A or 5-7B.

A. FREE-Categorically Eligible *Certified as FREE based on SNAP/TANF/FDPIR documentation (e.g. case number) on application*			**B. FREE-Income** *Certified as FREE based on income/household size application*			**C. REDUCED PRICE-Income** *Certified as REDUCED PRICE based on income/household size application*		
Result Category	**a. Applications**	**b. Students**	**Result Category**	**a. Applications**	**b. Students**	**Result Category**	**a. Applications**	**b. Students**
1. Responded, NO CHANGE:			**1. Responded, NO CHANGE:**			**1. Responded, NO CHANGE:**		
2. Responded, Changed to REDUCED PRICE:			**2. Responded, Changed to REDUCED PRICE:**			**2. Responded, Changed to FREE:**		
3. Responded, Changed to PAID:			**3. Responded, Changed to PAID:**			**3. Responded, Changed to PAID:**		
4. NOT Responded, Changed to PAID:			**4. NOT Responded, Changed to PAID:**			**4. NOT Responded, Changed to PAID:**		

VC-1: Total questionable applications verified for cause (Enter "N/A" if not applicable)**:** *Report the number of applications as of November 15th verified for cause in addition to the verification requirement.*	

Additional Instructions for Reporting the FNS-742

For additional guidance on verification requirements and procedures, refer to the Eligibility Manual (http://www.fns.usda.gov/cnd/guidance/EliMan.pdf). Enter the State agency name, SFA name, SFA ID, SFA city, SFA zip code for each SFA with schools and/or RCCIs operating the NSLP and/or SBP. Select if the SFA overall is a public or a private/nonprofit entity and enter the school year for which the report is completed. Include schools and/or RCCIs and the enrolled students **only once** if operating both NSLP and SBP.

Section 1

All SFAs with schools or RCCIs operating the NSLP and/or SBP must complete this section regardless if all schools are exempt from verification. Report schools or institutions operating the NSLP and/or SBP and students with access to the NSLP and/or SBP as of the **last operating day in October.**

1-1**A & B:** TOTAL number of schools (not including RCCIs) operating the NSLP and/or SBP and the TOTAL number of enrolled students with access to the NSLP and/or SBP.

1-2**A & B:** TOTAL number of RCCIs operating the NSLP and/or SBP and the TOTAL number of enrolled students with access to the NSLP and/or SBP in RCCIs.

1-2aA & 1-2aB: Of the RCCIs reported in **1-2A**; enter the number of RCCIs with DAY students and ONLY the DAY students with access to the NSLP and/or SBP in RCCIs **(day students are those students NOT institutionalized and eligibility is determined individually by application or direct certification as applicable).**

1-2bA & 1-2bB: Of the RCCIs reported in **1-2A**; enter the number of RCCIs with NO day students and the TOTAL number of institutionalized students.

NOTE: The sum of the students reported in 1-2aB and 1-2bB will NOT equal the total in 1-2B.

Section 2

All SFAs with some or all schools and/or RCCIs operating under an alternative provision must complete this section. For RCCIs operating an alternate provision, include both day and residential students. Report students with access to the NSLP and/or SBP as of the **last operating day in October**. 2-1 through 2-4 should be reported only if the school operates alternate provisions for BOTH programs resulting in no collection of applications for the school. Schools operating Provision 2/3 for only one program and collecting household applications for the other program should report applicable provision data in 2-5.

2-1**A & B:** BASE year is when certification procedures are conducted.

2-2**A & B:** NON BASE year is when no certification procedures are conducted.

2-2**aB, 2-2bB:** Multiply the most recent base year FREE percentage by the enrollment reported in **2-2B** to determine **2-2aB**. Multiply the base year REDUCED PRICE percentage by the enrollment reported in **2-2B** to determine **2-2bB.**

2-3**A & B:** Number of schools operating the Community Eligibility Option and the number of enrolled students in the schools with access to the NSLP and/or SBP.

2-4**A & B:** Other alternatives include Provision 1 and universal meal service through census data or socioeconomic surveys.

2-5**A & B:** Enter the number of schools and/or RCCIs and students enrolled operating an alternate provision for **ONLY SBP or ONLY NSLP**. Include schools/RCCIs operating in both a base year and non base year.

Section 3

All SFAs must complete this section. If all schools and/or RCCIs in the SFA were not required to perform direct certification with SNAP, then check box 3-1. Direct certification is the process by which the student is certified eligible based on documentation received directly from the applicable program (e.g. SNAP or TANF agency). This process eliminates the need for the household to submit an application. Report students approved FREE eligible as of the **last operating day in October**.

3-2**B:** Include students directly certified with SNAP. If a student is directly certified with SNAP as well as with another program (e.g. TANF/eligible homeless), include the student in this SNAP count (3-2B). Also include in this count any student in the SFA deemed eligible based on extended categorical eligibility via an eligible student in the primary household who has been directly certified with SNAP. DO NOT include SNAP letter method certifications in this SNAP count, report these in 3-4B below. (SNAP letter method certifications are when the family submits a letter from the SNAP agency to document receipt of SNAP benefits. This is no longer considered to be direct certification.)

3-3**B:** Include students directly certified through programs other than SNAP. Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household directly certified with TANF or FDPIR. DO NOT include SNAP students already reported in 3-2 or to be reported in 3-4 as certified categorically through SNAP letter method.

3-4**B:** Include ONLY students certified as categorically FREE eligible based on a letter submitted by family from the SNAP agency. Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household certified as FREE categorically eligible with the letter method with SNAP.

Section 4

All SFAs with schools and/or RCCIs collecting individual household applications must report this section, including schools and/or RCCIs in a Provision 2/3 base year. Report number of **applications (A)** approved as of **October 1st**. Report number of **students (B) as of the last operating day in October**.

4-1**A & B:** Number of **applications** approved FREE eligible based on documentation submitted on an application (i.e. case number for SNAP, TANF, or FDPIR on an application) on file as of **October 1st** and the number of **students as of the last operating day in October** approved FREE eligible based on documentation submitted on an application (i.e. case number for SNAP, TANF, or FDPIR on an application). *Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household categorically FREE eligible with SNAP, TANF, or FDPIR.*

4-2**A & B:** Number of **applications** approved FREE eligible based on income information submitted by the household on file as of **October 1st** and the number of **students as of the last operating day in October** approved FREE eligible based on income information submitted by the household.

4-3A & B: Number of **applications** approved REDUCED PRICE eligible based on income information submitted by the household on file as of **October 1st** and the number of **students as of last operating day in October** approved REDUCED PRICE eligible based on income information submitted by the household.

T-1: Enter the total number of students reported as FREE eligible.
(3-2B) + (3-3B) + (3-4B) + (4-1B) + (4-2B) + (2-2aB, if applicable)

T-2: Enter the total number of students reported as REDUCED PRICE eligible.
(4-3B) + (2-2bB, if applicable)

Section 5

If **ALL** schools and/or RCCIs in the SFA are exempt from verification activities, check box **5-1** and no further reporting is required in Section 5. Verification activities are NOT required for:

- schools/RCCIs in which all children have been certified under direct certification procedures including children documented as eligible foster, migrant, runaway or homeless children;
- RCCIs which do not have day students;
- schools electing the Community Eligibility Option;
- schools/RCCIs in which FNS has approved universal meal service through census data or using socioeconomic surveys; e.g., special cash assistance claims based on economic statistics regarding per capita income (Puerto Rico and the Virgin Islands);
- schools participating only in the Special Milk Program;
- schools in which all children are served with no separate charge for food service and no special cash assistance is claimed, (i.e., non- pricing programs claiming only the paid rate of reimbursement);
- all schools are Provision 2/3 schools in a non base year;
- schools which do not have any free or reduced price eligible students;
- other FNS determined exemptions on a case-by-case basis.

5-2**:** Indicate whether verification was performed and completed by the deadline of November 15th. If verification was completed after the deadline, report the remainder of Section 5 as applicable.
5-3**:** If verification was completed, check the type of verification process used to comply with the requirements of 7 CFR 245.6a. Please note the qualification requirements in 7 CFR 245.6a(d) must be met to use the two alternate sample sizes.

- *Standard*: Verify 3% or 3,000 of approved applications, whichever is less, selected from error-prone applications on file as of **October 1st**. If there are not enough error-prone applications, LEAs must select at random additional applications to complete sample size.
- *Alternate one:* Verify 3% or 3,000, whichever is less, of all randomly selected approved applications on file as of **October 1st**.
- *Alternate two:* Verify the lesser of 1% or 1,000 approved applications as of **October 1st** selected from error prone applications PLUS the lesser of one-half of one percent or 500 applications approved as of **October 1st** that provided a case number in lieu of income.

5-4**:** Error-prone applications are household applications approved as of **October 1st** indicating monthly income within $100 of the monthly limit or annual income within $1,200 of the annual limit of the applicable income eligibility guidelines.
5-5**:** Enter the total number of applications initially selected for the verification process as indicated in 5-3.
5-6**:** Check if direct verification was not conducted in the SFA (not one school in the SFA conducted direct verification). Direct verification is using records from public agencies to verify income and/or program participation.
5-7**A & B:** Only report applications and students if FREE and/or REDUCED PRICE eligibility is confirmed through direct verification. Report applications and students not directly verified in the appropriate category in **5-8.**
5-8**:** For the purposes of this report verification is complete:

- for households whose eligibility does not change as of the date of the confirmation of eligibility by a reviewing official;
- for households which do not appeal a change in eligibility as of the first operating day following the last date for filing an appeal in response to a notice of change in eligibility;
- for households which appeal a change in eligibility as of the first operating day following a decision by the hearing official.

Responded: The household provided sufficient documentation. This includes verbal or written notification that the household declines benefits.
NOT Responded: The household did not provide sufficient documentation or the household did not provide a response.
A1, B1, & C1: Number of applications with no change and the number of students on these applications.
A2 & B2: Number of applications changed to REDUCED PRICE based on sufficient documentation provided by the household and the number of students on the applications.
C2: Number of applications changed to FREE based on sufficient documentation provided by the household and the number of students on the applications.
A3, B3, & C3: Number of applications for which the eligibility was changed to PAID based on sufficient documentation by the household and the number of students on the applications.
A4, B4, & C4: Number of applications for which the eligibility was changed to PAID because documentation necessary to complete the verification process was NOT provided and the number of students on the applications.

The number of applications reported in 5-8 should include both the results of verification from verification process and the results from any applications verified for cause reported in VC-1.

VC-1: If applicable in at least one school and/or RCCI, report all applications verified for cause outside of the verification process (7 CFR 245.6a) as of November 15th. Applications verified for cause are NOT considered part of the required sample size.
Include the results of verification for cause by original benefit type in the appropriate category in 5-8.

OMB APPROVED NO. 0584-0577
Expiration Date: 04/30/2016

U.S. DEPARTMENT OF AGRICULTURE

FOOD AND NUTRITION SERVICE

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

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).

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:

- the SNAP State agency, providing Data Element #2 below; and
- each State agency that administers the NSLP, providing Data Element #3 below.

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

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.

State	
School Year	20 _ _ - 20 _ _

State Agency Name and Address:	
Contact Information: (Name, Title, Email, Phone)	

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.

SNAP State agency completes this section

Data Element #2 – The number of school-aged children in SNAP households during the months of July, August, and September.

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.

Data Element #2

NSLP State agency completes this section

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

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.

Data Element #3

Optional - The NSLP or SNAP State agency may complete this section, if applicable

Special Circumstances

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.

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:

$$\text{Percent of SNAP children directly certified for free school meals} = \frac{\text{SNAP children directly certified for free school meals} + \text{SNAP children in special provision schools operating in a non-base years}}{\text{School-age children in SNAP households during themonths of July, August, and September}} = \textbf{\#1 + \#3}$$

Data Element	Instructions and additional information
# 1	**SNAP CHILDREN DIRECTLY CERTIFIED FOR FREE SCHOOL MEALS:** This is the number of children directly certified with SNAP for free school meals as of the last operating day in October. **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.**
# 2	**SCHOOL-AGED CHILDREN IN SNAP HOUSEHOLDS:** 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. **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.** 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.
# 3	**SNAP CHILDREN IN SPECIAL PROVISION SCHOOLS OPERATING IN A NON-BASE YEAR -** 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.) **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.** [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.]
Special Circumstances (Optional)	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.

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.

APPENDIX C

DESCRIPTION AND LIMITATIONS OF DATA SOURCES USED FOR DIRECT CERTIFICATION PERFORMANCE MEASURE CALCULATIONS

This report presents two measures of State success in certifying categorically eligible children for free school meals:

1. The direct certification performance rate measures the percentage of school-age Supplemental Nutrition Assistance Program (SNAP) participants each State directly certifies for free school meals.
2. The broader measure of certification estimates the percentage of all categorically eligible students each State certifies directly, by application, or by letter method, based on their participation in or association with any of the programs or institutions that confer categorical eligibility for free school meals.

Both measures use State-reported counts for component statistics where possible, using the Food and Nutrition Service (FNS) data collection forms first available in school year (SY) 2013–2014. The broader measure supplements these State-reported numbers with data from the U.S. Census Bureau's American Community Survey (ACS), a survey of Food Distribution Program on Indian Reservations (FDPIR) participants, and FDPIR administrative data. This appendix contains descriptions of these data sources and their limitations.

A. Direct certification performance rate

The main direct certification performance rate described in this report is calculated using State counts of three data elements from two FNS data reports: the Verification Collection Report (FNS-742) and the Direct Certification Rate Data Element Report (FNS-834).

1. Verification Collection Report

The primary purpose of the FNS-742 is to enable States to report statistics pertaining to school meal certification verification. FNS used FNS-742 data to calculate direct certification performance rates from SY 2007–2008 to SY 2013–2014. However, the form was not designed for this purpose and did not contain a field for the number of SNAP participants who were directly certified, the primary data element used to calculate State performance. This statistic, therefore, had to be approximated based on other fields. The FNS-742 was revised for SY 2013–2014 to retain the fields necessary for program verification while offering the specific data elements needed to calculate direct certification performance.

Mathematica worked with FNS to implement two types of FNS-742 data quality checks: (1) examining changes over time at the State level, and (2) checking for internal consistency within each district's data. To analyze changes over time, Mathematica compared the current SY 2014–2015 FNS-742 data against the SY 2013–2014 FNS-742 data, as well as examined large value changes in each data element at the State level. To check for internal consistency within each district's data, FNS looked for impossible relationships between the data elements for all districts present in the SY 2014–2015 FNS-742 data by conducting 18 internal consistency checks, identifying districts reporting mutually exclusive subtotals of schools or students that exceed overall totals. Six of these internal consistency checks are potentially related to the direct certification performance rates. Of these six, errors were found to be uncommon: for two internal consistency checks, no districts were found to be in error; and for two other checks, less than one half of a percent of districts were found to be in error. The remaining two errors affect less than

1.5 percent of districts each. The first identified districts with only special provision schools in non-base years that listed students as directly certified. This indicates a reporting problem as these schools should not have any directly certified students. The second identifies districts that list mutually exclusive subtotals of students that sum to a number greater than the total number of students listed on the FNS-742. Both of these errors likely indicate double-counting on the report and may inflate State direct certification performance.

The data reported on the FNS-742 suffer from two limitations. The first is that they do not capture school-age SNAP participants who do not attend National School Lunch Program (NSLP)-participating schools. Table C.1 presents the types of children in these circumstances States reported to FNS, including the number of States that provided estimates of the number of children in each category based on valid individual-level data. Other types of children that appear in State SNAP data but might not attend schools participating in the NSLP include school-age children who graduate early as well as some homeless or migrant children. Children who appear on State lists of school-age SNAP participants but do not attend schools participating in the NSLP are included in the denominator of the direct certification performance rate calculation but not the numerator. This reduces State performance rates and might limit some States' ability to meet the performance rate target. The performance rate target of 95 percent accounts for this by allowing States to meet the standard while leaving up to 5 percent of the school-age SNAP population uncertified. The estimates some States provided for the number of children in these categories provides a useful first step in gauging the scope of this problem. However, firm, consistent numbers do not currently exist and the size of these groups likely varies considerably across States.

Table C.1. State-reported special circumstances affecting direct certification performance rate calculations

Circumstance	Number of States citing it	Number of States attempting to quantify it	Comments
School drop-outs	1	1	This circumstance likely applies to all States.
Five-year-olds below mandatory school age	4	1	The extent of this circumstance depends on State-specific school enrollment policies. This circumstance includes students old enough to be eligible, but not required, to enroll in school. In some States it also includes students too young to enroll in school.[a]
Home-schooled students	2	2	This circumstance likely applies to all States. An estimated 1.5 million students were home-schooled nationwide in 2007.[b]
Virtual students	2	0	The extent of this circumstance likely varies by State.
Students attending schools not participating in the NSLP	8	8	The extent of this circumstance likely varies by State.

[a]State SNAP lists used for direct certification include children residing in households receiving SNAP benefits who turn five years old in September. In some States, children must be at least five years old on September 1 to enroll in school. Children in these States who turn five during the month of September appear on the State SNAP list but not in the school enrollment data.

[b]U.S. Department of Education 2008.

SNAP = Supplemental Nutrition Assistance Program.

The second limitation of the FNS-742 is the inability of three States[35]—California, New York, and Rhode Island—to distinguish all or some students directly certified based on SNAP participation from those directly certified based on participation in other programs in SY 2014–2015. The performance rate calculation for these States includes all directly certified students, not just those who were directly certified based on SNAP.[36] The performance rate, therefore, overstates the percentage of school-age SNAP recipients who were directly certified in those States, as well as for the nation.

2. Direct Certification Rate Data Element Report

FNS introduced the FNS-834 in SY 2013–2014 in order to simplify and improve two data elements used in the direct certification performance rate calculation. States use the FNS-834 to submit counts of the number of school-age children in SNAP households during July, August, or September and the number of SNAP children in special provision schools operating in non-base years.[37]

Direct State reports of counts of SNAP children and SNAP children in non-base-year special provision schools likely improve performance rate accuracy compared with methods used in previous years. Nonetheless, some States might have difficulty providing accurate counts for one or both of these data elements—responses State staff provided in the best practices interviews confirmed that some States found this challenging. Comparisons between State-reported and estimated counts revealed large differences in some States and it is not always clear which count might be more accurate. These differences underscore the importance of refraining from comparing State performance across years using performance rates calculated using different methodologies.

Mathematica worked with FNS to analyze the special circumstances States cited that affect their direct certification performance rates, as well as to implement data quality checks on the FNS-834 data itself as compared to estimates based on extant data and to the data used in the SY 2013–2014 report. Included in these data quality checks is one where FNS derived an estimate of the minimum number of school-age SNAP participants by taking the total number of reported Community Eligibility Provision (CEP) students in each State from the FNS-742 data and multiplying by 40 percent, which is the federally allowed minimum identified student percentage for districts participating in CEP. If a State-reported value for FNS-834 data element 3 is less than the estimated minimum, than there very likely is a data error (the reported value almost certainly should be higher). Overall, errors were again found to be uncommon, as only three states were flagged regarding this potential underreporting.

[35] This is a decrease from seven States in SY 2013–2014.

[36] This is similar to the count of directly certified students used in the direct certification performance rates presented reports to Congress prior to SY 2013–2014.

[37] Before SY 2013–2014, the performance rate relied on estimates derived from SNAP program operations data, SNAP quality control data, and the U.S. Census Bureau's Survey of Income Program Participation, as discussed later in this appendix.

B. Broader certification rate

The broader direct certification rate estimates the percentage of all categorically eligible students who are directly certified for free school meals. This measure uses the same data sources as the performance rate and adds data for other categorically eligible students, such as Temporary Assistance for Needy Families (TANF) or FDPIR participants. Variables for these data components remain the same as in previous years and do not rely on direct State reports of counts of students. Instead, they use national survey and Federal administrative program data, as described below.

1. American Community Survey

The U.S. Census Bureau's American Community Survey (ACS) offers estimates of households that receive SNAP benefits and households that receive both SNAP benefits and public assistance, which ACS documentation defines as "general assistance and Temporary Assistance to Needy Families."[38] For this report, we use the ACS count of households that receive public assistance as a proxy for households that receive TANF benefits. This proxy will overstate the TANF population by an unknown amount that varies according to the size of the States' general assistance programs.

A second problem with the ACS data is the tendency of households to underreport receipt of public assistance benefits—SNAP benefits in particular. In this report, FNS uses ACS estimates of households that receive either public assistance or SNAP benefits and households that receive SNAP benefits. These two data elements are used here to estimate the ratio of TANF-only households to all SNAP households. Underreporting of either benefit, especially differences in underreporting, reduces the reliability of the ratio constructed from the two ACS variables.

Finally, ACS data are not available for Guam. Therefore, Guam is not included in the analysis of the more comprehensive categorical eligibility certification measure.

2. Survey of FDPIR participants

The estimated count of school-age FDPIR participants used to develop the broader certification measure presented in Figure 10 is based in part on a survey conducted for a 1990 study (Usher et al. 1990). The study found that 37 percent of FDPIR participants were younger than 18. FNS multiplied this figure by a factor of 13/18 (the expected number of children ages 5 to 17 among those ages 0 to 17) and applied it to the average monthly FDPIR caseload,[39] by State, for fiscal year (FY) 2008. The primary weakness of this estimate is clear: the share of children in households that currently receive FDPIR benefits likely has changed, significantly in some States, since 1990.

[38] See U.S. Census Bureau 2012, p.80.

[39] FNS FDPIR program data.

APPENDIX D

DATA UPDATES FOR SCHOOL YEAR 2013–2014

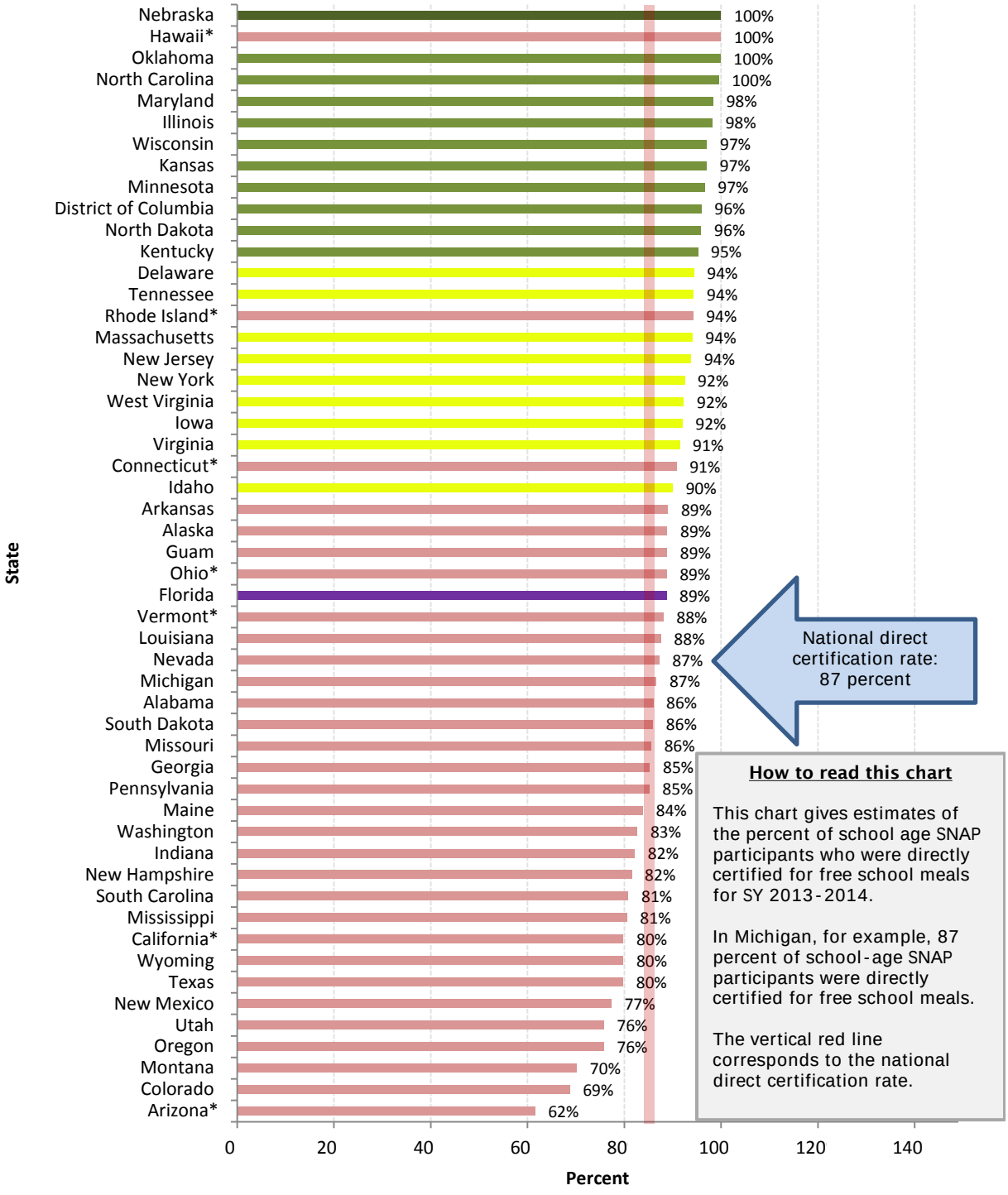
Following publication of the Report to Congress on direct certification in the National School Lunch Program for school year (SY) 2013–2014, some States submitted updated Verification Collection Report (FNS-742) data or Direct Certification Data Element Report (FNS-834) data for SY 2013–2014. As discussed in the body of this report, the FNS-742 and FNS-834 are the sources for the components used to calculate the percentage of directly certified school-age Supplemental Nutrition Assistance Program (SNAP) participants. More specifically, five States submitted updated component data that could have an impact on the direct certification performance rate:

1. Four States submitted updated FNS-742 data for SY 2013–2014. Three States—Oregon, Pennsylvania, and Wisconsin—revised the count of direct certifications based on SNAP participation upward. One State, Connecticut, revised the count of SNAP direct certifications downward.
2. One State submitted updated FNS-834 data for SY 2013–2014. Florida revised its count of school-age SNAP participants upward by more than 91,000.

The updated estimates are reflected in the amended version of Figure 4 from the SY 2013–2014 Report to Congress, shown below. The national direct certification rate decreased by 0.50 percentage points, from 87.07 to 86.57 percent. The reported national direct certification rate remains unchanged at 87 percent when rounded to the nearest percentage point, as is done in Amended Figure 4.

When rounded to the nearest percentage point, all but one State have the same direct certification rate under both the previously published and the updated data. Only Florida has a different direct certification rate, decreasing 8 percentage points from 97 percent to 89 percent. In SY 2013–2014, the direct certification performance target established by the Healthy, Hunger-Free Kids Act of 2010 was 95 percent. With its revised data, Florida went from having met the performance target to not meeting the target for SY 2013–2014.

Amended Figure 4. Revised percentage of school-age SNAP-participant children directly certified for free school meals, SY 2013–2014



Note: This figure has been revised to account for updates to the FNS-742 and FNS-834 submitted by four States. These changes only impact the reported direct certification rates of one State (shown with purple shading). Dark green shading indicates calculations that were greater than 100 percent. Light green shading indicates rates of at least 95 percent and less than or equal to 100 percent. Yellow shading indicates rates of at least 90 percent and less than 95 percent. Red shading indicates estimates less than 90 percent. Asterisks indicate that State was unable to distinguish direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP. Performance rate calculations for these States are overstated because they include all direct certifications reported by these States. All seven of these States are shaded red.

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