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**Regional Office Review of Applications (RORA)
for School Meals 2010**

Final Report



July 2011

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Regional Office Review of Applications (RORA) For School Meals 2010 Final Report

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Any opinions, findings, conclusions, and recommendations expressed in this report are those of the authors and do not necessarily reflect the views of the U.S. Department of Agriculture.

Executive Summary

This is a sixth in a series of annual reports to examine administrative errors incurred during the local educational agency's (LEA) approval process of applications for free and reduced-price meals in the National School Lunch Program (NSLP). Until 2009, the Food and Nutrition Service (FNS) staff reviewed the applications to make assessment of administrative errors; in 2010, Westat served as an independent reviewer to assess administrative errors in sampled applications.

This 2010 application review report presents administrative error estimates in certification of free and reduced price NSLP meals. Due to the unequal probability of selection of LEA and selection of an application, additional analyses were undertaken to assess the effect of applying sample weights on the error estimates. Presenting both unweighted and weighted estimates allow for direct comparison with data from the five preceding years.

A total of 2,792 applications from school year 2009/10 were selected for determination of administrative errors. In 2009/10, LEA determinations had administrative errors in 7.5 percent of applications approved or denied for free or reduced price NSLP. However, only 1 in 3 administrative errors (2.7 percent) resulted in incorrect eligibility determination for free or reduced price meals. About 97 percent of students submitting income-based applications for meal benefits in school year 2009/10 were certified for the correct level of meal benefits based on information in the application files. Household size and income were accurately calculated for 98.0 and 96.3 percent of the applications, respectively.

Adjusting for sample weights signal an upward bias in the unweighted error estimates. While unweighted estimates indicate 2.7 percent and 3.5 percent error rates in determination of certification and benefit status, the weighted estimates show 2.3 percent and 3.0 percent error rates, respectively. The difference in estimates is a direct result of unequal probability of selection of an LEA and selection of an application.

The current sampling design does not lend itself to conducting subgroup analysis; such analysis may be useful to develop policies and provide targeted regional technical assistance in the form of corrective activities. An updated sampling design which includes a greater number of LEAs from each region and possibly higher number of applications from each LEA would enable FNS to estimate region specific administrative error rates. Such data will permit the FNS to compare administrative error rates within regions over time as well as across regions. However, this would

impose additional burden on the FNS Regional Offices to gather applications from additional SFAs. Alternately, if the data sampling design is consistent across the six years, a panel data analysis approach can be used to examine pooled data from all six years.

Future analysis should continue including sampling weights to derive unbiased population estimates from the survey sample. Finally, revision of the RORA cover sheet that is completed by FNS Regional staff to include an open ended field to record relevant information in determination of eligibility as well and requiring LEAs to specify if the income verification information is included will simplify subsequent data abstraction and review efforts.

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The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) administers the National School Lunch Program (NSLP) at the federal level to provide students access to nutritious lunch at school. The individual states are required to sign agreements with the USDA to operate the program in accordance with the federal policies and regulations as well as to receive federal reimbursements for meals served. At the State level, the State education agencies, typically State departments of education operate the program through agreements with local educational agencies (LEA), mostly local school districts. State agencies set statewide policies and provide technical assistance to school districts to monitor their performance. The LEAs have the legal authority to operate the NSLP as well as to certify and verify student eligibility for NSLP. There is considerable variability across LEAs in the procedure used to certify students for NSLP benefits. More than 100,000 public and nonprofit private schools and residential child-care institutions operated the NSLP in fiscal year 2009 (USDA, 2009).

The FNS implements specific measures for improving the NSLP integrity and is required to report annually on the extent of erroneous payments in its programs under the Improper Payments Information Act of 2002 (IPIA) along with a report on the actions taken or will be taken to reduce erroneous payments. In the school meal application process, erroneous payments (both under- and over-payments) can occur mainly for two reasons; *household misreporting* and *administrative errors*.

This current report focuses on **administrative errors** incurred during eligibility determinations. FNS routinely collects data through the Regional Office Review of Applications (RORA) to track administrative errors. To date, USDA has issued five annual reports examining the administrative accuracy of LEA's approval and benefit issuance for free or reduced price meals based on household applications (USDA, 2010). In 2009, FNS issued a Task Order for an independent assessment of the nature and extent of administrative errors. This sixth report presents findings from an independent assessment of the administrative errors in a sample of LEAs during the 2009-2010 school year.

Assessment of Administrative Errors

In accordance with changes made to the Child Nutrition and WIC Reauthorization Act of 2004 and policy clarifications issued since 2001, the FNS published a revised manual, the Eligibility Manual for School Meals: Federal Policy for Determining and Verifying Eligibility, in 2008¹. The manual provides guidance to determine and verify eligibility for free and reduced price school meals (NSLP and SBP); the guidance also extends to other programs such as the Special Milk Program; the Child and Adult Care Food Program; and the Summer Food Service Program. The LEAs work with their State to identify and implement procedures and options applicable within their State.

There are three categories of eligibility for meal benefits: (1) household income, (2) categorical eligibility, and (3) direct certification. Depending on household income, students may be eligible for free meals (household income at or below 130 percent of poverty), or reduced-price meals (household income between 131 and 185 percent of poverty). Households must submit an application to the LEA in order to receive free or reduced price meals. The LEA staff review these paper applications and make determinations of eligibility by comparing household size and income information with the guidelines published by the FNS or by checking categorical program eligibility. During the eligibility determination process, administrative errors can occur in determining gross monthly income, household family size, or assignment of benefit level based on household size and income specific (or relevant) information. Per FNS guidelines, approved but incomplete applications (e.g., missing adult signature, missing social security number, etc.) also constitute administrative errors. Inaccurate certifications may result in assignment of higher or lower amount of benefits than students are entitled to receive. In some instances, administrative errors may not have any impact on the benefit decisions, and therefore do not translate into an error in benefit level.

“Categorical eligibility” refers to automatic eligibility for free meals with the submission of an application due to one of the following status:

- A member of a household is determined by the administering agency receiving assistance under the SNAP, FDPIR, or TANF;
- Enrollment in a Head Start or Even Start program; and
- A homeless, runaway or a migrant child.

¹ http://www.fns.usda.gov/cnd/guidance/eligibility_guidance.pdf.

Households receiving Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) may bypass the standard application process and be “directly certified” for benefits. With direct certification, families do not have to fill out a paper application since State agencies share information with schools to identify eligible children and automatically certify them for meal benefits. Direct certification confirms a child’s categorical eligibility for free school meals through his or her SNAP, TANF, or FDPIR participation without the need for a household application. Direct certification typically involves matching SNAP, TANF, and FDPIR records against student enrollment lists, either at the State or LEA level. Parents or guardians of children identified through these matching systems are notified of their children’s eligibility for free school meals. They need to take no action for their children to be certified.

Current program rules provide for an alternate method of direct certification that does not require dataset matching. Under that option, SNAP, TANF, or FDPIR agencies send letters to participant households with school-age children. Those letters, which serve as proof of categorical eligibility for free meals, must be forwarded by the households to their children’s schools. This “letter method” of direct certification requires households to take some positive action (forwarding the letter) before their children are certified for free meals.

Just because a household participates in SNAP, TANF or FDPIR doesn’t necessarily mean that they will be directly certified. States are required to directly certify children from SNAP households for free school meals. States may also directly certify children from TANF and FDPIR households, but are not required to do so. Also, based on the algorithms used in the matching process, it is possible that some households will not be “directly certified” necessitating them to submit an application with their case number to indicate they are “categorically eligible”

Administrative Errors in Review of Household Income. Common administrative errors in determining gross monthly income may involve computation errors. Such errors include:

- Not converting multiple income sources to annual income;
- Incorrectly determining the frequency of receipt of household income, and/or
- Incorrect addition or multiplication.

Administrative Errors in Review of Household Size. In determining household size, common errors include:

- Not counting the student in the list of all household members, or
- Double counting the student as an adult when the application asks only for the list of adult members of the household.

Administrative Errors Resulting Due to Certification of Incomplete Applications. These involve:

- Missing signatures;
- Missing social security numbers;
- Other missing information; or
- Issues related to the proof of income documents reported by household during verification.

In the 2009 RORA report, FNS noted that based on the information in the application, about 98 percent of households who submitted applications for meal benefits in school year 2008/09 were certified for the correct level of meal benefits. The 2009 report also noted that the percent of all applications with administrative errors resulting in changes in eligibility status dropped in school year 2008/09 compared to the previous 4-year period, when administrative errors ranged between 3 and 4 percent.

Research Questions

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Data abstracted from the review of applications will enable FNS to answer the following questions about administrative errors made by LEAs:

- To what extent did LEAs make the correct meal price status determination during certification?
- What types of administrative errors were made? What was the prevalence of each type of administrative error?
- What percent of applications received the correct meal benefit status? What percent of applications received the incorrect meal benefits at each combination of error (free, reduced price, paid)?
- Has the accuracy of LEA certification and benefit status determinations changed compared with previous years?

The FNS regional staff selected the free- and reduced-price meal applications for independent review, using a randomized sampling procedure. Photocopies of the selected applications were forwarded to Westat for an independent assessment of eligibility and document errors in household size, income, and eligibility determinations. This is the first time FNS has sought independent assessment – and to ensure consistency in review with previous studies, Westat reviewed and submitted 500 applications to FNS for verification of the Westat process, and then continued with the review of the remaining applications.

Sampling Design

FNS uses a stratified two-stage cluster sample design to select applications for review. The first stage selects a sample of districts using 28 strata defined by the seven FNS regions and four size categories within each region. This database includes more than 95 percent of all public and private schools participating in the NSLP. Two LEAs are selected from each stratum using probabilities proportional to size (PPS) methods with replacement (eight LEAs are selected from each of the seven FNS regions). The measure of size for each LEA is the number of students approved for free or reduced-price meals obtained from FNS's School Food Authority Verification Summary Report (FNS-742). This selection process is accomplished in the following steps:

1. Sort the LEAs in each region by the number of students approved for free/reduced price meals, from the smallest to the largest;
2. In each region, calculate the cumulative number of students approved for free/reduced price meals for the LEA sorted in (1);
3. Determine the cutoff values to be $\frac{1}{4}$, $\frac{1}{2}$, and $\frac{3}{4}$ of the total number of students approved for free/reduced price meals in each region;

4. Examine the cumulative frequencies in each region and use the cutoff values to divide the LEAs into four strata (“small”, “medium”, “large” and “very large” school districts, number of schools for each region by strata is included in **Appendix A**); and
5. Randomly select 2 LEAs within each stratum, using probability proportionate to size sampling with replacement with the number of students approved for free/reduced price meals as the measure of size.

In stage two, FNS regional staff is asked to select students who had applied for meal benefits from the administrative files of the 56 LEAs selected in the first stage using systematic (randomized) sampling. In each of the 56 selected LEAs, applications from about 50 students were selected for review. If a LEA was selected twice (sampling was done with replacement), applications from about 100 students were sampled, so that the sample size in each stratum remained about 100 in all cases. Both approved and denied applications were included in the sample; students directly certified or students in provision 2 or 3 SFAs were not included. **Appendix B** includes strata totals of the number of free and reduced price students and direct certifications in each stratum.

Development of Sampling Weights

Sampling weights are required to produce substantially unbiased estimates from the administrative records data by compensating for the unequal probabilities of application selection. The initial component of the sampling weight, called the *base weight*, corrects for the unequal probabilities of selection and is typically the reciprocal of each unit’s probability of selection into the sample. In mathematical notation, if ‘n’ LEAs are sampled with replacement, with probability p_i , on each draw then the base weight, denoted by w_i , is given by

$$w_i = 1/np_i.$$

This approach to weighting for sampling with replacement and with unequal probabilities has been widely recognized for some time (Hansen and Hurwitz, 1943; Cochran, 1977, pp. 250-255). In this application, $n=2$, and p_i for each LEA is the ratio of the number of students approved for free/reduced price meals in the school LEA to the total number of such students in the stratum. Hypothetically, if all students in a sampled LEA were reviewed by Westat, then the LEA base weight could be applied to the student data as well. But in the next stage, about 50 students were selected from the LEA for review, thereby requiring another weighting component.

For multi-stage designs, the base weights must reflect the probabilities of selection or base weights at each stage. For instance, in the case of a two-stage design in which the base weight for the i -th LEA is $w_i = 1/(2 p_i)$, and the j -th student is selected within a selected LEA with probability $p_j(i)$ at the second stage, then an appropriate weight for each student $j(i)$ in the sample is given by

$$w_{ij} = w_i/p_j(i)$$

The estimates presented in this report are reported in three different ways:²

1. Consistent with the earlier reports prepared by FNS, using no weight adjustment. We note that unweighted estimates are biased since applications were not sampled with equal probabilities. Unweighted estimates describe only the characteristics of the sampled applications.
2. Applying a weight for each application using the same formula that FNS used in earlier years (i.e., LEA base weight/probability of student). The following formula was used to compute this sampling weight (*weight as usual*):

$$\text{Weight as usual} = \frac{\text{Region size}}{2 \times \text{LEA size}} \div \frac{50}{\text{LEA size}}$$

3. After discussions with FNS, we were informed that in the past, while directly certified students were excluded in the selection of students at the sample LEAs, the weighting used for the estimates assumed that the selected applications were randomly selected from all free/reduced-price students including those directly certified. However, the weight formula discussed above does not take this information into account. Thus, we compute weights accounting for the exclusion of directly certified students in the LEA listing and prepare estimates using these revised weights (*revised weights*).

$$\text{Revised weight} = \frac{\text{Region size}}{2 \times \text{LEA size}} \div \frac{50}{(\text{LEA size} - \text{LEA direct certification size})}$$

Training, and Data File

To be consistent with earlier RORA reviews, three Westat staff attended one-half day training at FNS offices. Under direction from FNS staff, an EXCEL spreadsheet was created with appropriate

² For comparison purposes, we report estimates on all four types of errors among income based applications and the weight computation does not reflect the process of removing categorically eligible's. This would provide good estimates only if the distribution of the categorically eligible's did not affect weights.

data fields (Table 1). Each application was input into the spreadsheet along with the reviewer comments.

Table 1. List of variables obtained during application review

| Variable name | Variable description | Value labels |
|---------------|--|--|
| Distnum | LEA Number (Region, Strata, LEA) | |
| LEA | LEA Name | |
| State | State Abbreviation | |
| Student | Student Number within LEA (1-50) | |
| CBIS | Current Benefit Issuance Status | (1) Free (2) Reduced Price (3) Paid |
| Napps | Number of Benefit Applications on File | |
| Verify | Was the Student Application Selected for Income Document Verification? | (1) Yes (2) No |
| VerDoc | Was Documentation Provided for Verification Request? | (1) Yes (2) No |
| CatElig | Application Categorically Eligible? | (1) Yes (2) No (3) Foster Child |
| HHSize | Household Size as Determined by Reviewer | |
| HHIncome | Monthly Household Income as Determined by Reviewer | |
| SSN | Was Parent's Social Security Number provided on Application? | (1) Yes (2) Don't Have SSN (3) No |
| Signature | Was Adult Signature Provided on Application? | (1) Yes (2) No |
| SFAHSize | Household Size as Determined by SFA | |
| SFAHHInc | Monthly Household Income as Determined by SFA | |
| SFAElig | Eligibility Status as Determined by SFA | (1) Free (2) Reduced Price (3) Paid- Income too High (4) Paid-Incomplete Application |
| FNSElig | Eligibility Status as Determined by Reviewer | (1) Free (2) Reduced Price (3) Paid- Income too High (4) Paid-Incomplete Application |
| SFAVer | Eligibility Status by SFA after Verification | (1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request |
| FNSVer | Eligibility Status by Reviewer after Verification | (1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request |
| ProcErr | Was Processing Error Made in Certification Process? | (1) Yes (2) No |

Application Review Process

Data Abstraction. The first stage of data abstraction included data entry onto hard copy spreadsheets. Any inconsistencies or inquiries were discussed at internal weekly meetings and documented on problem sheets. Issues that were not resolved internally were submitted to FNS for final resolution. All internal and FNS inquiries were recorded in a Data Decision Log and serve as historical record keeping for future data abstraction and analysis (**Appendix D**). The second stage of data entry was data transfer from hard copy spreadsheet to an electronic database.

Quality Control. A rigorous quality control effort was employed at each stage of data abstraction and entry. Hard copy data abstraction received 100 percent review from a separate abstractor with an additional review of a 10 percent sample performed by project management staff. Electronic data entry also received 100 percent review from alternate data entry staff and a 10 percent sample by project management staff. Each case that was categorically eligible or selected for verification also received 100 percent review from project management staff. Lastly, any application that was considered to be an anomaly or raised any questions was discussed thoroughly among all data abstraction staff and documented accordingly.

Eligibility Determinations

Following the definitions used in the previous FNS reviews, certification status was considered in error in the following situations:

1. If the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig).
2. For applications selected for verification (e.g., pay stub verification for reported income), if SFA certification determination after verification (SFAVer) was different than independent certification determination after verification (FNSTVer).
3. In certain LEAs, application forms lack space on the application for LEA staff to note their computation of household size and income and certification decision. However, regional FNS staff completed a cover page - including information on current benefit issuance status (CBIS) - to each application selected for this study. In applications with no information on initial certification decision, certification status was considered in error if LEA certification determination was different than the current benefit issuance status (CBIS).³

³ In some instances, the applications were scanned and the certification process was completed using computer software. In some cases the FNS Regional staff failed to collect the information from the data files, so we could only assume that the initial certification status matched the current benefit issuance status. To that end, SFAElig should equal CBIS.

In addition, benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or if the application was selected for verification the CBIS was different than the eligibility status by the reviewer after verification (FNSVer).

Various types of administrative errors can be made by the LEAs in calculating household size and income. Common errors in calculation of household size include:

1. Not counting the student if the applicant inadvertently omitted the child's name in the list of all household members; and
2. Double-counting the student if the application called for a list of all adult household members and the student was included in the list as an adult⁴.

Common errors in the calculation of gross monthly income include:

1. Incorrect determination of the frequency for receiving income (e.g., biweekly instead of monthly);
2. Not using a standard frequency (i.e., monthly) when there are multiple income sources with different frequency; and
3. Incorrect addition or multiplication. In addition, there can be issues related to inconsistent treatment of income received from child support alimony payments and income from irregular employment (e.g., substitute teacher). While income from such sources should be most often correctly computed and included in the gross household income, there may be cases where such income may be inadvertently excluded from the household income computation.

Data Security

In agreement with the Federal Privacy Act and other regulations to protect individual data, hard copy applications were stored in a locked file cabinet secured with a lock bar in a limited access field room controlled by an alarm locked key pad door lock and security cameras. All electronic data files were encrypted and password-protected; only staff working on the project had access to these files. All staff signed a confidentiality agreement, in compliance with Westat's *Electronic Data Storage*,

⁴ Some applications have a separate place for the list all adult members of the household. Sometimes, households include the children in that list due to misunderstanding and this may cause the reviewer to double count the number of children.

Transport, and Security Acceptable Use Policy and Guidelines and Electronic Mail and Internet Acceptable Use Policy and Guidelines in addition to the required USDA confidentiality agreement.

A total of 2,792 applications were selected for review. Of these 2,792 applications, 423 (15.1%) were categorically eligible applications and 2,345 (84.0%) were income-based applications. The remaining 24 applications (0.9%) could not be located (i.e., no application submitted) and only cover pages were submitted by the LEA.

LEAs must have documentation that a student receiving benefits has submitted an application or was directly certified for free meals. There are 24 cases with missing application forms (only had a cover page). Of the 24 applications, 5 had a current benefit issuance status of free or reduced price. With input from FNS, it was decided that an administrative error occurred for these 5 cases since they were receiving some benefits and had no indication that an application was submitted. Out of the remaining 19 applications, 9 had a current benefit issuance status of “paid” and 10 had no information about current benefit issuance status. We were not able to assess eligibility status for these 19 applications and they were not included in the analysis.

Categorically eligible students are eligible for free meals. In order to process the application, a household must provide the name of the child, a SNAP, TANF, or the FDPIR case number, and a signature of an adult household member on the application.

In the following section, we first present error estimates and then examine the effect of applying sample weights on the error estimates. The samples under examination include (1) categorically eligible applications (n=423), (2) income based applications (n=2,345), and (3) all approved/denied applications (sample 1+ sample 2+5 missing applications with a free/reduced price benefit issuance (n=2,773)).

On categorically eligible applications, the prevalence of certification error during processing ranged from 0 percent to 2.1 percent. All applications were considered categorically eligible if a number was provided in the space for SNAP, TANF, or FDPIR number. The accuracy of the SNAP, TANF, or FDPIR number listed on the application was not verified for this study. Nine of the 423 categorically eligible applications had resulted in an eligibility determination of reduced-price or paid status rather than free status which indicates a certification error. Thus the certification error rate was 2.1 percent (9/423). The remaining applications included a case number,

an adult signature, and were processed correctly. All of the certification errors resulted from LEA proceeding to make an income based assessment of an application when a SNAP, TANF, or FDPIR number was included on the application. If LEA staff determined that these students were no longer on such public subsidy program and/or that the beneficiary number was no longer valid, then, all 9 administrative errors may be justified. Moreover, effective with the start of SY 2009-10, if one child in a household is directly certified or is determined categorically eligible, SNAP, TANF, FDPIR for free school meals by application, then all children in that household are categorically eligible for free meals. However, LEA staff may not be knowledgeable about the new policy and may be implementing an income based assessment for a student without a SNAP/TANF/FDPIR case number while there are other students on the application with such case numbers.

On income-based applications, LEAs made more errors in determining gross monthly income than in determining household size. Similar to earlier reports, about one-fourth (27.6 percent) of the applications had no indication of what household size or income levels the LEA staff had used in making its eligibility determination. Majority of such applications did not have the information, most likely because the applications were scanned and computer software was used to make the eligibility determinations or possibly the application lacked space on the application form for LEA staff to enter their computation of household size and income. Among other applications with appropriate space for LEA to note their computation of household size and income, 31 applications with missing information on household size (FNShhsize and hhsize were missing) and 67 applications with missing information on income (FNShhinc and hhincome were missing) were excluded from the analysis since administrative error could not be assessed. Thus, the sample size is 2,314 (2,345 minus 31) for the household size computations and 2,278 (2,345 minus 67) for the household income computations.

Table 2 details the accuracy of household income and household size from income-eligible applications. In school year 2009-2010, household size and household income were accurately calculated for 98.0 and 96.3 percent of the applications, respectively. In terms of household size determination, there were an equal number of under-counts and over-counts. In calculating household income, there were more undercounts than overcounts. While 2.3 percent of applications had gross income undercounted, only 1.4 percent of applications had income overcounted.

Table 2. Accuracy of LEA Determination of household income and household size from income-eligible applications, (Unweighted data for SY 2004/05 to 2009/10)

| | 2004/05 Percent | 2005/06 Percent | 2006/07 Percent | 2007/08 Percent | 2008/09 Percent | 2009/10 Percent |
|-------------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| Household size | | | | | | |
| Correct | 97.9 | 97.1 | 96.5 | 98.1 | 97.8 | 98.0 |
| Not correct | 2.1 | 2.9 | 3.5 | 1.9 | 2.2 | 2.0 |
| Under-count | 0.9 | 1.9 | 2.1 | 0.8 | 1.1 | 1.0 |
| Over-count | 1.2 | 1.0 | 1.4 | 1.1 | 1.0 | 1.0 |
| Number of applications | 2,222 | 2,293 | 2,252 | 2,315 | 2,118 | 2,314 |
| Household income | | | | | | |
| Correct | 91.9 | 92.1 | 94.0 | 90.1 | 96.2 | 96.3 |
| Not correct | 8.1 | 7.9 | 6.0 | 9.9 | 3.8 | 3.7 |
| Under-count | 4.4 | 3.5 | 3.5 | 7.6 | 2.4 | 2.3 |
| Over-count | 3.7 | 4.4 | 2.5 | 2.3 | 1.4 | 1.4 |
| Number of applications | 2,222 | 2,293 | 2,252 | 2,315 | 2,118 | 2,278 |

Note: Table presents unweighted percent of cases with information recorded on the application. Household size and household income are considered incorrect **only if** the household size and income recorded on the application by the LEA are not equal to the value calculated by the independent reviewer from the data provided on the application.

LEA determinations had administrative errors in 7.5 percent of applications *approved or denied on the basis of an application*. However, approximately 1 in 3 administrative errors (2.7 percent) resulted in incorrect eligibility determination. Administrative errors do not always result in incorrect eligibility determination. For example, a household size may be incorrectly assessed as five and the student may qualify for free meal. If the correct household size was four, this would indicate an administrative error, but if the student still qualifies for free meal, it does not affect the eligibility determination. Some applications were approved for meal benefits although the application was incomplete. Nineteen income-based applications were approved for free or reduced-price meals even though they did not have the required Social Security number or an indication that the adult signing the application had no Social Security number. As seen in Table 3, there were 76 administrative errors that resulted in incorrect eligibility determination (9 in categorically eligible⁵, 5 in missing applications, and 62 in income based applications). There were 50 applications with more benefits and 26 applications with fewer benefits than were justified.

⁵ These nine applications had “reduced price” or “paid” status instead of “free” status.

Table 3. Administrative errors and incorrect certification determinations on the basis of an approved/denied application (n=2,773), (Unweighted data for SY 2009/10)

| Administrative errors | N | Percent |
|--|----------|----------------|
| All administrative errors | 209 | 7.5 |
| Administrative errors that resulted in incorrect determination | 76 | 2.7 |
| More benefits | 50 | 1.8 |
| Fewer benefits | 26 | 0.9 |

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer).

The percentage of eligibility determinations in error was 2.6 percent for students approved or denied *on the basis of income based assessment*. As seen in Table 4, there were 62 applications (2.6 percent) with incorrect certification out of 2,345 income-based applications. Of these 62 applications with certification error, almost three-fourths (73 percent or 45 applications), were certified for more benefits, and about one-fourth (27 percent or 17 applications), were certified for fewer benefits than justified based on the documentation available.

Table 4. Certification status determination for income-based applications (n=2,345), (Unweighted data for SY 2009/10)

| Certification status determination | N | Percent |
|---|----------|----------------|
| Correct determination | 2,283 | 97.4 |
| Incorrect determination | 62 | 2.6 |
| More benefits | 45 | 1.9 |
| Fewer benefits | 17 | 0.7 |

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer).

Accuracy of benefit issuance status was a little lower compared with the accuracy of certification determination. Meal benefits issuance status was correct for about 96.5 percent of the applications approved or denied *on the basis of income based assessment*. As seen in Table 5, there were 82 students (3.5 percent) out of 2,345 income-based applications with incorrect level of benefits. Of the 82 students with benefit determination error, 59 percent (48 students) were certified for more benefits, and 41 percent (34 students) were certified for fewer benefits than justified based on the documentation available.

Table 5. Benefit issuance status determination for income-based applications (n=2,345), (Unweighted data for SY 2009/10)

| Benefit issuance determination | N | Percent |
|--------------------------------|-------|---------|
| Correct determination | 2,263 | 96.5 |
| Incorrect determination | 82 | 3.5 |
| More benefits | 48 | 2.1 |
| Fewer benefits | 34 | 1.5 |

Note: Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer). Numbers may not exactly sum to total due to rounding.

The percentage of applications incorrectly approved or denied for NLSP free or reduced-price meal benefits was comparable to the previous years among all applications *approved or denied on the basis of an application*. Data from school year 2009/10 compared to data from school years 2004/05 through 2008/09 show no major change in overall certification error due to administrative errors. All the series compared in the table are weighted using FNS's current weighting method. The percentage of students applying for meal benefits who were incorrectly certified due to administrative errors varied from 2 to 4 percent during the previous 5-year span. As seen in Table 6, in school year 2009/10 administrative error in certification status determination was at 2.3 percent. The percentage of over-certified was 1.5 percent and the percentage of under-certified was 0.9 percent.

Table 6. Comparison of Certification and Benefit Status Determinations for all applications approved or denied on the basis of an application, (Weighted data for SY 2004/05-SY 2009/10, n=2,773)

| | 2004/05 Percent | 2005/06 Percent | 2006/07 Percent | 2007/08 Percent | 2008/09 Percent | 2009/10 Percent |
|---|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| Certification status determination | | | | | | |
| Correct determination | 96.5 | 97.0 | 96.1 | 96.1 | 98.0 | 97.7 |
| Incorrect determination | 3.5 | 3.0 | 3.9 | 3.9 | 2.0 | 2.3 |
| More benefits | 2.9 | 2.5 | 3.0 | 3.2 | 1.3 | 1.5 |
| Fewer benefits | 0.6 | 0.5 | 0.9 | 0.7 | 0.7 | 0.9 |
| Benefit status determination | | | | | | |
| Correct determination | 95.7 | 96.2 | 95.8 | 95.4 | 97.0 | 97.0 |
| Incorrect determination | 4.3 | 3.8 | 4.2 | 4.6 | 3.0 | 3.0 |
| More benefits | 3.4 | 2.8 | 3.3 | 3.5 | 1.9 | 1.5 |
| Fewer benefits | 0.9 | 1.0 | 0.9 | 1.1 | 1.1 | 1.5 |

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer). Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer). Numbers may not exactly sum to total due to rounding.

The overall percentage of students with incorrect meal benefits issuance status was also comparable with the reports from previous 5 years. The benefit status determination error varied from 3.0 to 4.6 percent during the previous 5-year span. In school year 2009/10, among the 2,773 applications, 3.0 percent had incorrect benefit status determination. The percent of students receiving more benefits than they were entitled decreased to 1.5 percent and the percentage of students receiving fewer benefits due to benefit issuance error has increased to 1.5 percent.

In both variations, adjusting for sample weights indicate an upward bias in the unweighted error estimates for determination of household size and income. We first compute estimates adjusted for the sampling weights that have been used by FNS in earlier years (*weighted as usual*). In addition, we compute revised weights to account for directly certified students who are excluded in the LEA listing and present estimates using the revised weights (*revised weights*)⁶. Both variants of sample weights produced very similar results. Unweighted estimates for household size and income are both higher than any of the weighted estimates. As seen in Table 7, while unweighted estimates indicate 2.03 percent and 3.69 percent errors, “weighted as usual” estimates show a 1.83 percent and 3.28 percent errors and “revised weights” estimates show a 1.75 percent and 3.03 percent errors in determination of household size and income, respectively.

Table 7. Comparison of weighted and unweighted estimates: accuracy of LEA determination of household size (n=2,314) and income (n=2,278) from income-eligible applications, SY 2009/10

| | Incorrect determination | | Under-count | | Over-count | |
|-------------------------|-------------------------|---------|-------------|---------|------------|---------|
| | N | Percent | N | Percent | N | Percent |
| Household size | | | | | | |
| Unweighted | 47.0 | 2.03 | 23.0 | 0.99 | 24.0 | 1.04 |
| Weighted as usual | 42.3 | 1.83 | 20.8 | 0.90 | 21.5 | 0.93 |
| Revised weights | 40.5 | 1.75 | 20.6 | 0.89 | 19.9 | 0.86 |
| Household income | | | | | | |
| Unweighted | 84.0 | 3.69 | 53.0 | 2.33 | 31.0 | 1.36 |
| Weighted as usual | 74.7 | 3.28 | 51.3 | 2.25 | 23.5 | 1.03 |
| Revised weights | 69.0 | 3.03 | 47.6 | 2.09 | 21.4 | 0.94 |

⁶ See sampling weights section for descriptions of both weights.

The difference in estimates is a direct result of unequal probability of selection of LEA and selection of an application. Thus, as discussed earlier, sampling weights are needed to derive unbiased population estimates from the survey sample.

In both variations, adjusting for sample weights indicate an upward bias in the unweighted error estimates for determination of certification and benefit status. As seen in Table 8, unweighted estimates for certification and benefit status determination are both higher than any of the weighted estimates. While unweighted estimates indicate 2.74 percent and 3.50 percent errors, “weighted as usual” estimates show a 2.31 percent and 3.02 percent and “revised weight” estimates indicate 2.35 percent and 3.11 percent error rates in determination of certification and benefit status, respectively.

Table 8. Comparison of weighted and unweighted estimates: administrative errors in determination of certification and benefit status among all applications approved or denied on the basis of an application (n=2,773), SY 2009/10

| | Incorrect determination | | Fewer-Benefits | | More-Benefits | |
|---|-------------------------|---------|----------------|---------|---------------|---------|
| | N | Percent | N | Percent | N | Percent |
| Certification status determination | | | | | | |
| Unweighted | 76.0 | 2.74 | 26.0 | 0.94 | 50.0 | 1.80 |
| Weighted as usual | 64.1 | 2.31 | 24.1 | 0.87 | 40.2 | 1.45 |
| Revised weights | 65.2 | 2.35 | 24.1 | 0.87 | 40.8 | 1.47 |
| Benefit status determination | | | | | | |
| Unweighted | 97.0 | 3.50 | 44.0 | 1.59 | 53.0 | 1.91 |
| Weighted as usual | 83.7 | 3.02 | 41.0 | 1.48 | 42.4 | 1.53 |
| Revised weights | 86.2 | 3.11 | 43.0 | 1.55 | 43.3 | 1.56 |

The difference in estimates is a direct result of the variable weights resulting from the unequal probability of selection of a LEA and selection of a fixed number of applications per LEA. If the measure of size used to select the LEAs had been perfectly correlated with the actual counts of eligible applications from which the sample was drawn, the resulting sample would have been self-weighting (i.e., an equal weighted sample), in which case the weighted and unweighted results would be identical. The fact that the weighted and unweighted estimates differ indicates there is a negative correlation between sampling weight and probability of error (i.e., an application with a large weight corresponding to lower probability of selection tends to have a lower error rate, or, vice versa). Thus, as discussed earlier, sampling weights are needed to derive substantially unbiased population estimates from the survey sample.

FNS has been implementing regional office review of applications since 2005. In 2010, Westat served as an independent reviewer to examine administrative errors incurred by the Local Educational Agencies in their approval process of applications for free and reduced price meals in the NSLP during the 2009/10 school year.

The percentage of students who apply for NSLP free or reduced-price meal benefits and are incorrectly approved or denied due to administrative errors was slightly higher than in SY 2008/09 (certification error of 2.3 percent in SY 2009/10 compared with 2.0 percent in SY 2008/09). However, it was still lower than the previous 4-year period. Using FNS's current weighting method, we found that for all applications approved or denied on the basis of application, 1.5 percent received more benefits and 0.9 percent received fewer benefits than justified. Errors in household size and income determination were similar to estimates from SY 2008/09.

The process of obtaining applications for this study does not ensure equal probability of selection, mainly, in order to expand the number of cases available with less effort. However, the fact that the weighted and unweighted estimates differ suggests that sampling weights are needed to derive substantially unbiased population estimates from the survey sample. As shown in tables 7 and 8, unweighted statistics may have an upward bias. Thus, sampling weights need to be applied when tabulations are made of statistics (i.e., percentages, means, medians) to produce the proper representation.

In 2008, FNS issued a new version of the *Eligibility Manual for School Meals* in an attempt to reduce the number of administrative errors. The earlier reports prepared by FNS indicate that issuance of the manual was followed by a significant decrease in certification status determinations. This year, the 2.3 percent certification error is still lower than the previous 4-year span.

FNS has been encouraging LEAs to make reasonable efforts to contact households to obtain and clarify required information before they make an eligibility determination. In 2010, lower errors rates were found in determining household size and income compared to the error rates published in the initial RORA reports.

Recommendations for Future Studies

6

This report presents findings of the sixth annual RORA review. Westat reviewed the applications selected by FNS, entered data, implemented quality control procedures, and conducted data analyses. We recommend that future RORA studies will benefit from two revisions including a change in sampling design to permit expanded analysis and a change in the RORA cover sheet to permit documentation of additional relevant information.

Sampling Design and Expanding Analyses

The current sampling design is sufficient to determine annual rates of administrative errors and track changes overtime. However, as indicated in this report, sampling weight adjustment is needed to develop population level unbiased estimates. In order to examine trend in population level error estimates, data for earlier years has to be reexamined by using respective sampling weights. In addition, the current sampling design does not enable researchers to make subgroup analysis. For example, FNS may be interested in examining regional differences in administrative errors to provide tailored technical assistance for corrective activities.

A new sampling design to include more LEAs from each region and possibly higher number of applications from each LEA would permit examination of administrative error rate within and across regions. In general, increasing the number of LEAs in the sample along with a corresponding reduction in the number of sampled applications per LEA will improve sampling precision (i.e., reduce the standard errors of estimates) for overall and subgroup estimates. The extent of the improvement will depend on the degree of the within-LEA intraclass correlation of the characteristics being measured. For example, if application errors tend to be clustered in certain LEAs, the intraclass correlation will be relatively high. If application errors tend to be more or less uniformly distributed across all LEAs, the intraclass correlation will be relatively low. Even where the intraclass correlation is fairly small, there will be benefits to increasing the number of sampled LEAs and reducing the within-LEA sample size. For example, with an intraclass correlation of 0.05 or higher, the standard error of an estimate based on 8 LEAs per stratum and 25 applications per LEA will be reduced by 20-25 percent compared with the current design.

It may also be possible to examine and compare estimates across regions if analysis can be implemented by using the RORA data from all six years. If data sampling designs across years are comparable and allow for such pooling, data for each region will be increased to 6 X 8 data points instead of only 8. Initial analysis can be implemented on the pooled data to assess and control for any time trends in the data. Panel data analysis can produce more precise and efficient estimates in terms of the rate and nature of region level administrative errors. This would enable FNS to provide broader policy guidance at the national level but targeted technical assistance at the regional level.

The RORA Cover Sheet

When the FNS regional staff submits applications to FNS, each application includes a cover sheet that provides summary information about LEA review. The RORA Cover Sheet currently includes the following data fields: (1) LEA, (2) school name, (3) roster position of selected student, (4) FNS reviewer, (5) Current Benefit Issuance Status, (6) Number of applications submitted, (7) if the child's application was selected for verification, and (8) if so, if SFA was able to obtain all documents associated with verification. An open ended field is provided to allow the reviewer to record other information perceived to be beneficial in explaining/interpreting the eligibility determination of the selected student.

We recommend that the RORA Cover Sheet should include information on whether the selected application is for a foster child and/or if the student is categorically eligible. A tag to identify if the student is considered categorically eligible before review will greatly improve the reviewers' ability to determine processing errors. An additional line to indicate the position of the student in the sample rather than roster position would also help with data abstraction efforts.

In addition, item number 8 on the Cover Sheet currently reads "If this application was selected for verification, were you able to identify and photocopy all documents associated with verification?" Regional office staff completes this question on the cover sheet and check "yes" to indicate that *the attempts made* to obtain what they requested were identified and photocopied. The documentation can include letters sent to the household requesting the verification information as well as an indication that the household failed to respond to the verification request. Perhaps the wording could be changed to differentiate between the types of documentation: "Is the LEA providing FNS with documents to illustrate verification attempts or the actual documents necessary for verification?". Such a change would help reviewers to better understand the results of the verification process.

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Appendix A

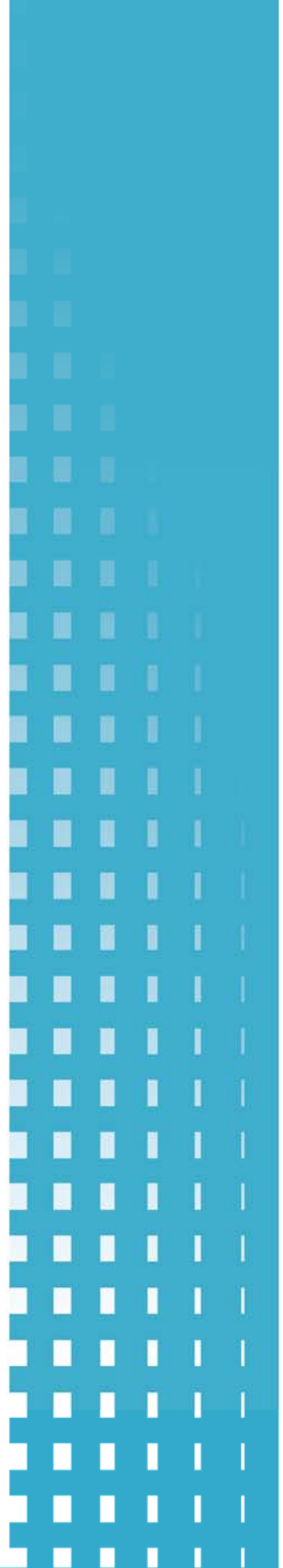
The Strata Totals of the Number of Free and Reduced Price Students and Direct Certifications in Each Stratum

| LEA number | LEA size | LEA direct certification size | Region size that the LEA is selected from |
|------------|----------|-------------------------------|---|
| 111 | 158 | 75 | 502,381 |
| 112 | 141 | 78 | 502,381 |
| 121 | 1,524 | 211 | 497,570 |
| 122 | 1,251 | 284 | 497,570 |
| 131 | 16,655 | 7,906 | 335,508 |
| 132 | 128,581 | 45,646 | 335,508 |
| 141 | 199,104 | 66,384 | 677,122 |
| 142 | 269,795 | 89,309 | 677,122 |
| 211 | 99 | 2 | 448,110 |
| 212 | 588 | 300 | 448,110 |
| 221 | 1,181 | 504 | 445,695 |
| 222 | 1,255 | 189 | 445,695 |
| 231 | 4,536 | 2,446 | 438,964 |
| 232 | 7,252 | 3,124 | 438,964 |
| 241 | 31,022 | 6,945 | 461,170 |
| 242 | 61,548 | 18,034 | 461,170 |
| 311 | 1,422 | 800 | 1,185,798 |
| 312 | 1,858 | 510 | 1,185,798 |
| 321 | 6,085 | 2,264 | 1,186,867 |
| 322 | 5,534 | 2,190 | 1,186,867 |
| 331 | 10,890 | 5,502 | 1,176,358 |
| 332 | 9,662 | 2,531 | 1,176,358 |
| 341 | 74,252 | 17,911 | 1,196,586 |
| 342 | 87,696 | 58,267 | 1,196,586 |
| 411 | 481 | 154 | 833,507 |
| 412 | 506 | 36 | 833,507 |
| 421 | 1,364 | 556 | 832,425 |
| 422 | 2,263 | 132 | 832,425 |
| 431 | 3,419 | 2,028 | 829,348 |
| 432 | 4,178 | 1,001 | 829,348 |
| 441 | 23,701 | 12,195 | 840,352 |
| 442 | 23,417 | 10,350 | 840,352 |
| 511 | 395 | 79 | 935,267 |
| 512 | 838 | 309 | 935,267 |
| 521 | 6,610 | 2,520 | 935,374 |
| 522 | 2,930 | 1,209 | 935,374 |
| 531 | 11,758 | 5,181 | 918,684 |
| 532 | 13,739 | 3,415 | 918,684 |

| LEA number | LEA size | LEA direct certification size | Region size that the LEA is selected from |
|------------|----------|-------------------------------|---|
| 541 | 33,122 | 8,370 | 957,309 |
| 542 | 29,518 | 6,807 | 957,309 |
| 611 | 91 | 18 | 369,182 |
| 612 | 279 | 43 | 369,182 |
| 621 | 1,497 | 495 | 369,216 |
| 622 | 881 | 263 | 369,216 |
| 631 | 6,277 | 3,021 | 366,427 |
| 632 | 6,998 | 1,826 | 366,427 |
| 641 | 10,215 | 2,840 | 372,307 |
| 642 | 14,879 | 7,355 | 372,307 |
| 711 | 2,666 | 1,167 | 1,166,159 |
| 712 | 2,099 | 888 | 1,166,159 |
| 721 | 7,736 | 1,043 | 1,170,959 |
| 722 | 6,997 | 1,625 | 1,170,959 |
| 731 | 21,017 | 8,769 | 1,168,319 |
| 732 | 20,839 | 5,579 | 1,168,319 |
| 741 | 27,907 | 7,798 | 1,172,207 |
| 742 | 31,087 | 5,419 | 1,172,207 |

Appendix B

The Number of School Districts Within Each Region by the Four Strata



The Number Of School Districts Within Each Region By The Four Strata

| Strata | FNS REGION | | | | | | |
|--------|------------|-------|-------|-------|-------|-------|-------|
| | NERO | MARO | SERO | MWRO | SWRO | MPRO | WRO |
| 1 | 2,100 | 1,606 | 1,036 | 4,249 | 2,115 | 2,652 | 1,969 |
| 2 | 167 | 223 | 220 | 680 | 218 | 298 | 195 |
| 3 | 10 | 70 | 64 | 192 | 61 | 73 | 77 |
| 4 | 3 | 18 | 17 | 21 | 21 | 20 | 17 |
| Total | 2,280 | 1,917 | 1,337 | 5,142 | 2,415 | 3,043 | 2,258 |

Appendix C

Mean and Standard Errors Estimates for Certification and Benefit Issuance Errors for All Applications Approved or Denied on the Basis of an Application

Mean and Standard Errors Estimates for Certification and Benefit Issuance Errors for all applications approved or denied on the basis of an application

Unweighted statistics, n=2,773

| Variable | Label | Mean | Standard Error |
|-----------|---|-----------|----------------|
| CERTERROR | Is there a certification error? | 0.0274071 | 0.0031010 |
| CERTMOREB | Certification error – receiving more benefits? | 0.0180310 | 0.0025273 |
| CERTLESSB | Certification error – receiving less benefits? | 0.0093761 | 0.0018305 |
| | | | |
| BENERROR | Is there a benefit issuance error? | 0.0349802 | 0.0034897 |
| BENMOREB | Benefit issuance error – receiving more benefits? | 0.0191129 | 0.0026006 |
| BENLESSB | Benefit issuance error – receiving less benefits? | 0.0158673 | 0.0023735 |

Statistics using weights as usual, n=2,773

| Variable | Label | Mean | Standard Error |
|-----------|---|-----------|----------------|
| CERTERROR | Is there a certification error? | 0.0231089 | 0.0028538 |
| CERTMOREB | Certification error – receiving more benefits? | 0.0144507 | 0.0022667 |
| CERTLESSB | Certification error – receiving less benefits? | 0.0086582 | 0.0017597 |
| BENERROR | Is there a benefit issuance error? | 0.0301896 | 0.0032499 |
| BENMOREB | Benefit issuance error – receiving more benefits? | 0.0153496 | 0.0023350 |
| BENLESSB | Benefit issuance error – receiving less benefits? | 0.0148400 | 0.0022965 |

Statistics using adjusted weights, n=2,773

| Variable | Label | Mean | Standard Error |
|-----------|---|-----------|----------------|
| CERTERROR | Is there a certification error? | 0.0234539 | 0.0028745 |
| CERTMOREB | Certification error – receiving more benefits? | 0.0147095 | 0.0022866 |
| CERTLESSB | Certification error – receiving less benefits? | 0.0087444 | 0.0017683 |
| BENERROR | Is there a benefit issuance error? | 0.0310949 | 0.0032968 |
| BENMOREB | Benefit issuance error – receiving more benefits? | 0.0156350 | 0.0023563 |
| BENLESSB | Benefit issuance error – receiving less benefits? | 0.0154598 | 0.0023433 |

Appendix D

Data Management Decision Log



| | | | |
|----------------|--|---|---|
| 1 App # | TOPIC: Student number | PROBLEM: From where should we obtain the "student number" to identify each application? We assumed that each district would have assigned student numbers of 1 to 50. | RESOLUTION: Student number is not pulled from any place. The numbering system should simply go from 1 to 50. There may be some SFA samples with fewer than 50 students. SFAs typically include the random number associated with the selected student; however it would be nice to record 1 - 50 on the applications to match up with the database in case one wants to go back and locate a specific application for a given SFA. We will add 1-50 on the upper right hand corner of the application. |
| | DATE INITIATED: 08/24/2010 | | |
| | DATE DECIDED: 08/24/2010 | | |
| | REFERENCE: Dist 111 and 112 All applications | | |
| | Resolution 1 Decided by: John Endahl Resolution 2 Decided by: Westat team | | |

| | | | |
|---|---|--|---|
| <p>2</p> <p>Duplicate Applications</p> | <p>TOPIC:</p> <p>Duplicate application</p> | <p>PROBLEM:</p> <p>In instances where the same application (with sibling students) will include a cover sheet for each individual student, should we review a single application twice and document each under a separate student number?</p> | <p>RESOLUTION:</p> <p>Because students and not applications are selected at random, it is entirely possible that two students from the same household may be selected into the sample. The application should be reviewed as many times as necessary to match the selected students.</p> |
| <p>DATE INITIATED:</p> <p>08/24/2010</p> | | | |
| <p>DATE DECIDED:</p> <p>08/24/2010</p> | | | |
| <p>REFERENCE:</p> <p>Multiple cases</p> | | | |
| <p>DECIDED BY:</p> <p>John Endahl</p> | | | |

| | | | |
|---|--|---|---|
| 3 Single coversheet for 2 students | TOPIC: 2 Students represented on 1 Cover sheet | PROBLEM: A few districts have provided one application which includes two students/siblings. The district has then counted each sibling as a separate application (towards the total of 50) with only one coversheet (i.e., roster position of selected students on coversheet will say Student #14 and #15). For our analysis, does it present an issue that only one coversheet represents two students? Prior districts that have included one application for multiple siblings have copied the same application and attached a coversheet to each. | RESOLUTION: The district should have had a separate coversheet for each student selected. However, since the eligibility is determined for the household, all students on the application should have the same current benefit status. If the household was selected for verification, the eligibility status each child on that application should reflect the determination of that verification process. For your analysis you should assume that the coversheet is the same for each student on that application. Remember, the random selection process was used to select students not applications, so it is entirely possible that more than one student on an application is selected for the RORA sample. |
| | DATE INITIATED: 10/20/2010 | | |
| | DATE DECIDED 10/20/2010 | | |
| | REFERENCE: Multiple cases | | |
| | DECIDED BY: John Endahl | | |

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| 4 No Application | TOPIC: No application submitted NAPPS =0 | PROBLEM: There have been several cases where there is a cover sheet indicating the Current Benefits Issuance is "paid" without submission of an application. Is this included in the total number of reviewed applications? In Problem 1, CBIS=3. Does ProcErr = X or 2? | RESOLUTION: When CBIS indicates paid, indicate in the Notes section "No application submitted" and do not include these in the analysis of certification error. We will give the student ID and code CBIS=3 and NAPPS = 0, X's in the remaining fields and a note indicating " no application submitted." These are not included in the analysis for certification error so, X not 2. 2 would indicate that no mistake was made when in actuality we can't make an assessment. If a student has a current benefit issuance of free or reduced price and there is no indication that an application was submitted or no application could be found, then this is a certification error because the SFA must have documentation that a student receiving benefits submitted an application or was directly certified for free meals So this is if CBIS=1 or 2 and NAPPS =0 then ProcErr=1. These would be included in the analysis for certification error. |
| | DATE INITIATED: 08/24/2010 Question 2: MP 09/15/2010 | | |
| | DATE DECIDED: 08/24/2010 Resolution 1: 08/25/2010 Resolution 2: 09/15/2010 | | |
| | REFERENCE: Dist 112 ST 6, 10, 16 - 18 | | |
| | DECIDED BY: John Endahl Resolution 1: Westat team Resolution 2: Westat team | | |

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| <p>5</p> <p>Applicant declines benefits</p> | <p>TOPIC:</p> <p>Indication that applicant doesn't qualify for benefits</p> | <p>PROBLEM:</p> <p>Some applications have a box that the applicant checks stating that "I don't qualify for benefits."</p> <p>ADDENDUM: Later applications in the same district (without HHSize or HHIncome)SFA categorized as SFAElig =3.</p> | <p>RESOLUTION:</p> <p>Populate variables CBIS, Napps, Verify, CatElig, SSN, Signature, SFAElig =3, FNSElig=3 ProcErr =2 rest of variables X's. Comment variable (after deliverable) "Applicant indicated they do not qualify for benefits."</p> |
| | <p>DATE INITIATED:</p> <p>9/2/2010</p> | | |
| | <p>DATE DECIDED:</p> <p>09/02/2010</p> <p>ADDENDUM:</p> <p>Within 1 week.</p> | | |
| | <p>REFERENCE:</p> <p>Dist 132 ST 1, 11, 15, 17. 18 Multiple cases</p> | | |
| | <p>DECIDED BY:</p> <p>Westat team</p> | | |

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| <p>6</p> <p>Applicant declines benefits</p> | <p>TOPIC:</p> <p>Indication that applicant doesn't qualify for benefits</p> | <p>PROBLEM:</p> <p>The FNS reviewer Rick Hargreaves has stated that an application with N/A meant the applicant was not interested (assuming in benefits). Some other comments are "Application shows 'NA'" and "Household not applying". All of these have a CBIS of 3 and there is no HHInc or HHSIZE information on the application. Most have no SSN, and one has no SSN or signature. Can we assume that N/A will equate to the district where we had a check box for "I don't qualify for benefits"?</p> <p>If yes, I would like to use "Household not applying" comment unless you think we should use whatever the comment was for the other district.</p> | <p>RESOLUTION:</p> <p>We have decided to use the same variable we did with the first 500: "Applicant indicated they do not qualify for benefits."</p> |
| | <p>DATE INITIATED:</p> <p>09/27/2010 meeting</p> | | |
| | <p>DATE DECIDED:</p> <p>09/29/2010</p> | | |
| | <p>REFERENCE:</p> <p>Dist 322 ST 05,06, 07; Multiple cases</p> | | |
| | <p>DECIDED BY:</p> <p>Westat team</p> | | |

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| 7 Applicant check box | TOPIC: SFA makes income calculations when an applicant indicates he or she does not qualify for benefits | PROBLEM: If the applicant indicates that they do not qualify for benefits but filled out the income and household information, and the SFA continues with their assessment and there are HHSsize or HHInc errors (which may or may not affect the benefit decision), is this considered a processing error? | RESOLUTION: Yes, this too would be considered a processing error, but not necessarily be a certification error. |
| | DATE INITIATED: 11/04/2010 | | |
| | DATE DECIDED: 11/10/2010 | | |
| | REFERENCE: Multiple cases | | |
| | DECIDED BY: John Endahl | | |

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| 8 HHInc | TOPIC: No frequency for income | PROBLEM: If the family does not give a unit for their income (i.e., weekly, monthly, etc.) do we assume the calculation by the SFA is correct? | RESOLUTION: If the family does not give a frequency of receipted income, try to get a feel for the typical income levels of other households. If the application asks for monthly income then assume that it is monthly income. If the application doesn't ask for monthly income and no frequency is identified, assume that it is the most frequent occurrence (weekly). |
| | DATE INITIATED: 08/24/2010 | | |
| | DATE DECIDED: 08/24/2010 | | |
| | REFERENCE: Dist 111 ST 50 | | |
| | DECIDED BY: John Endahl | | |

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| <p>9</p> <p>HHInc & HSize</p> | <p>TOPIC:</p> <p>Error in HHInc or HSize</p> | <p>PROBLEM:</p> <p>If there is an error in the income amount or number of household members, but the eligibility is the same, this discrepancy is still documented as an error, correct?</p> | <p>RESOLUTION:</p> <p>If there is an error in the calculation of household income or household size, but the eligibility status is unaffected, you should still indicate that a processing error occurred. This is an administrative error that did not lead to a certification error.</p> |
| | <p>DATE INITIATED:</p> <p>08/24/2010</p> | | |
| | <p>DATE DECIDED:</p> <p>08/24/2010</p> | | |
| | <p>REFERENCE:</p> <p>Dist 111 ST20 Dist 112ST 1. 2 23</p> | | |
| | <p>DECIDED BY:</p> <p>John Endahl</p> | | |

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| 10 HHInc & HHSIZE & SFAInc | TOPIC: No SFA variables available | PROBLEM: For districts not providing an SFA worksheet, we have been pulling the SFA information from the "For School Use Only" at the bottom of the application. Sometimes this section does not include total number in household. Should SFA HHSIZE be left blank on the spreadsheet? How is eligibility verified? In one instance, the income was not provided by the family but the SFA listed a total monthly income amount. Similarly, one district didn't seem to ever answer yes or no to if the household was categorically eligible (in some instances they were). Would you like us to note that the SFA portion of the application was not answered in full? | RESOLUTION: (Questions 1 & 3) For instances where there is no information indicating how SFA calculated household size or income leave the SFAHHInc and SFAHHSIZE variables blank (X) and assume that the current benefit status from the cover sheet reflects the SFAs determination of eligibility at the time of certification (SFAElig). For the instance that no household income was reported on the application but in the section reserved for the SFA there is a household income amount, this probably suggests that the SFA contacted the household and obtained additional information. The SFA should have noted on the application that such a contact was made, but often times this is not noted on the application. I would assume that the SFA has the correct household income in that case. |
| | DATE INITIATED: 08/24/2010 | | |
| | DATE DECIDED: 08/24/2010 ADDENDUM: 08/24/2010 meeting | | |
| | REFERENCE: Dist 111 ST 25for #3. Dist 111 ST 4 Dist 112 ST 28,2, 23 | | |
| | DECIDED BY: John Endahl | | |

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| 11 HHSize | TOPIC: Which number is used for HHSize | PROBLEM: When an applicant reports a total household number that is different from the number of people listed on the application which number is used for FNSHHSize? | RESOLUTION: You should use the count of the number of people listed on the application and not the total number of household members reported on the application to make your eligibility assessment. |
| | DATE INITIATED: 10/12/2010 | | |
| | DATE DECIDED: 10/13/2010 | | |
| | REFERENCE: Multiple cases | | |
| | DECIDED BY: John Endahl | | |

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| 12 HHInc | TOPIC: Child's earned income | PROBLEM: Does a Child's earned income have to be included in HHInc? | RESOLUTION: Yes. |
| | DATE INITIATED: 09/02/2010 meeting | | |
| | DATE DECIDED: 09/02/2010 meeting | | |
| | REFERENCE: Multiple Cases | | |
| | DECIDED BY: Westat team | | |

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| 13 CatElig & HHSIZE & HHInc | TOPIC: HHSIZE & HHInc on applications with instructions to skip section 4 (household section) | PROBLEM: In most districts section 4 is where the applicant is asked to indicate their household members and any income that these members may have. Often a district instructs the applicant to skip this section if they have categorically eligible students and go straight to the section where they sign the application. If the applicant leaves section 4 blank, do we use other parts of the application to produce a household size number? If not, is using an "X" for "SFAHHSIZE" sufficient? | RESOLUTION: If Section 4 is left blank, simply indicate that the HHSIZE and HHInc could not be calculated. If information does exist in Section 4 even though the household is categorically eligible, record the information on the application for HHSIZE and HHInc but do not use this information to determine eligibility. There may be instances where a household provides a valid TANF or SNAP case number and is categorically eligible for free meals and also provided information on the application in terms of household size and household income that make them ineligible for these benefits. This information should be ignored and the household should be deemed eligible for free meals. |
| | DATE INITIATED: 10/12/2010 | | |
| | DATE DECIDED 10/13/2010 | | |
| | REFERENCE: Multiple Cases | | |
| | DECIDED BY: John Endahl | | |

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| 14 C CatElig | TOPIC: Categorically eligible variables | PROBLEM: What variables are required for categorically eligible students? If the Social Security number is missing, is this an error? | RESOLUTION: Including the cover sheet variables, the required variables are CATElig = 1, Signature = 1, SFAELIG and FNSELIG both = 1 and ProcErr = 2. No. On page 16 of the Eligibility Manual for School Meals, for categorically eligible students only the names of the children, a Food stamp, FDPIR, or TANF case number or other FDPIR identifier and the signature of an adult household member are required for a complete application. |
| | DATE INITIATED: 08/23/2010 meeting | | |
| | DATE DECIDED: 08/30/2010 | | |
| | REFERENCE: Eligibility Manual Pg 16 | | |
| | DECIDED BY: Westat team | | |

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| 15 CatElig | TOPIC: Categorically eligible variables | PROBLEM: When an applicant is categorically eligible, which variables should we populate? Sometimes the applicant will also provide income information; however, it will take us time to do the calculations if we want to include this additional information. Apart from income, should we also be documenting HHSIZE, etc? | RESOLUTION: Populate all variables for which we have data. This will include income information. |
| | DATE INITIATED: 08/30/2010 | | |
| | DATE DECIDED: 09/10/2010 | | |
| | REFERENCE: None. | | |
| | DECIDED BY: John Endahl | | |

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| 16 CatElig | TOPIC: Comments for categorically eligible students | PROBLEM: When an applicant is categorically eligible, would you like to indicate which type of category has made them eligible in the notes section (e.g., TANF, runaway, etc.)? | RESOLUTION: No. |
| | DATE INITIATED: 09/08/2010 | | |
| | DATE DECIDED: 09/10/2010 | | |
| | REFERENCE: Multiple case | | |
| | DECIDED BY: Westat team | | |

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| <p>17</p> <p>CatElig</p> | <p>TOPIC:</p> <p>Errors in variables not required for categorically eligible students</p> | <p>PROBLEM:</p> <p>For income-based eligibility decisions if HHSIZE or HHINC is different from SFAHHSIZE or SFAHHINC then ProcErr=1?</p> <p>If CatElig=1 and HHSIZE is different from SFAHHSIZE or if HHIncome is different for SFAHHINC is this ProcErr=1 or ProcErr=2?</p> | <p>RESOLUTION:</p> <p>ProcErr=1 but it does not affect the benefit amount.</p> |
| | <p>DATE INITIATED:</p> <p>09/27/2010 meeting</p> | | |
| | <p>DATE DECIDED:</p> <p>09/27/2010</p> | | |
| | <p>REFERENCE:</p> <p>Multiple cases</p> | | |
| | <p>DECIDED BY:</p> <p>Westat team</p> | | |

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| 18 CatElig | TOPIC: Direct certification with no application and an SFA computer print out | PROBLEM: When screen printouts are attached for students that were approved for free meals by "direct certification" and there is no application is included how do we proceed? | RESOLUTION: We will we write in the notes section: "direct certification through computer matching." FNS eligibility will match SFA eligibility and there is no error because the SFA representative didn't actually process any of the application when matching occurs through computer/TANF records. This situation of the computer print screen is different from only a coversheet indicating CBIS 1 or 2 with no application or anything indicating direct certification. |
| | DATE INITIATED: 09/27/2010 | | |
| | DATE DECIDED: 09/29/2010 | | |
| | REFERENCE: Multiple cases | | |
| | DECIDED BY: Westat team | | |

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| <p>19</p> <p>CatElig</p> | <p>TOPIC: Acceptable indication of categorically eligible for food stamps, SNAP etc.</p> | <p>PROBLEM:</p> <p>If there is no TANF number and no food stamp number and there is "food stamps" written in that section and SFA writes FS in its space on the form, should we count the applicant as categorically eligible?</p> <p>Should we evaluate a legitimate TANF or SNAP number? Do we make an assessment based on the absence or presence of any number or the length of a number?</p> | <p>RESOLUTION:</p> <p>No, the application must have a legitimate TANF or SNAP (food stamp) number. Simply indicated that the household received these benefits is not sufficient to be considered as categorically eligible.</p> <p>Assume that if there is number in the location for TANF or SNAP case numbers that the number is legitimate. As independent reviewers, we have no knowledge of what the format of a legitimate case number might look like for a specific locale. To that end, we assume that SFA has done due diligence and made sure that the number conforms to the format of a legitimate case number.</p> |
| | <p>DATE INITIATED: 10/12/2010 Resolution 1: MK to JE 10/20/2010</p> | | |
| | <p>DATE DECIDED: 10/12/2010 Resolution 2 10/20/2010</p> | | |
| | <p>REFERENCE: Multiple cases</p> | | |
| | <p>DECIDED BY: John Endahl</p> | | |

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| <p>20</p> <p>CatElig Homeless, Migrant</p> | <p>TOPIC:</p> <p>Application with “migrant” or “homeless” checked</p> | <p>PROBLEM:</p> <p>An application indicates that the child is a migrant. Page 17 of the Eligibility Manual explains that while this child would be categorically eligible, they first need to be directly certified. Instead, the SFA used income eligibility to determine benefit status.</p> <p>Is using income instead of categorical eligibility considered a processing error?</p> <p>How do we confirm if the child has been directly certified and therefore categorically eligible?</p> | <p>RESOLUTION:</p> <p>The LEA must contact the household and then, if needed, contact the Migrant Education Program liaison to confirm enrollment in the program. If the household is not on such a list, the LEA should process the application based on income.</p> <p>This is not a processing error because they processed it based on income.</p> <p>Students directly certified should have been removed from the sample frame.</p> |
| <p>DATE INITIATED:</p> <p>10/26/2010</p> | | | |
| <p>DATE DECIDED:</p> <p>10/27/2010</p> | | | |
| <p>REFERENCE:</p> <p>Dist 321 ST 34</p> | | | |
| <p>DECIDED BY:</p> <p>John Endahl</p> | | | |

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| 21 CatElig | TOPIC: Direct certification indicators | PROBLEM: An application has "DC" next to the child's name. Is that an adequate indication of direct certification? | RESOLUTION: <p>Given the new policy in effect beginning in SY 2009/10 categorical eligibility for free meals is extended to all children in a household with any household member receiving SNAP or TANF benefits.</p> <p>Some districts, when approving applications, check the direct certification listings, and note on applications if students are directly certified. One could assume that this notation on the application reflects an accurate assessment of the direct certification listing. If such a review was conducted on site, the reviewer would have access to the direct certification listing to confirm.</p> <p>While this appears to be the case for Application 22, it also appears that the district based the eligibility determination on household income, not categorical eligibility.</p> |
| | DATE INITIATED: 10/26/2010 | | |
| | DATE DECIDED 10/27/2010 | | |
| | REFERENCE: DistST 22 | | |
| | DECIDED BY: John Endahl | | |

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| <p>22</p> <p>CatElig</p> | <p>TOPIC:</p> <p>SFA makes income calculations on categorically eligible applications including errors in non required variables</p> <hr/> <p>DATE INITIATED:</p> <p>11/04/2010</p> <hr/> <p>DATE DECIDED</p> <p>11/10/2010</p> <hr/> <p>REFERENCE:</p> <p>Multiple cases</p> <hr/> <p>DECIDED BY:</p> <p>John Endahl</p> | <p>PROBLEM:</p> <p>If the applicant is categorically eligible (i.e., application includes a SNAP or TANF number, or a check for homeless, runaway, migrant, or Head Start) and the SFA continues to make an income and HHSize assessment but the computations are incorrect, is this considered a processing error?</p> | <p>RESOLUTION:</p> <p>Yes this would be considered a processing error whether the computations are correct or incorrect, <i>but</i> not necessarily be a certification error.</p> |
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| <p>23</p> <p>CatElig</p> | <p>TOPIC:</p> <p>SFA makes income calculations on categorically eligible applications</p> | <p>PROBLEM:</p> <p>An application has a number provided in the TANF/SNAP section but the assessment was made based on income. In situations where a number is provided in the TANF section, and the SFA makes an assessment based on income, is it accurate to assume that the SFA agent has done some prior work to determine whether the TANF/SNAP number is accurate? Without extra information, from Westat's perspective, it seems like there is a categorical eligibility. Is this a processing error on behalf of the SFA for moving forward with an income based assessment though information for categorical eligibility seems to have been provided?</p> | <p>RESOLUTION:</p> <p>I would agree that this is a processing error. Policy Memo SP 39-2009 (Extending Categorical Eligibility to Additional Children in a Household) specifically states that "for households submitting applications with case numbers for some, but not all, of their children, the LEA must certify all children as categorically eligible for free meals or milk. Any income information on the application is disregarded.</p> |
| | <p>DATE INITIATED:</p> <p>11/04/2010</p> | | |
| | <p>DATE DECIDED</p> <p>11/10/2010</p> | | |
| | <p>REFERENCE:</p> <p>DL #43 Dist#52</p> | | |
| | <p>DECIDED BY:</p> <p>John Endahl</p> | | |

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| <p>24</p> <p>CatElig</p> | <p>TOPIC:</p> <p>SFA makes income calculations on categorically eligible applications</p> | <p>PROBLEM:</p> <p>Application #10 provides a number in the TANF/SNAP section but the SFA ignores categorical eligibility information and continues with income based assessment. Without extra information, from Westat's perspective, it seems like there is a categorical eligibility. Is this a processing error on behalf of the SFA for moving forward with an income based assessment though information for categorical eligibility seems to have been provided?</p> | <p>RESOLUTION:</p> <p>Similar to Question (in DL#43), regardless if calculations are made correctly or incorrectly, by processing a categorically eligible household based on income it is a processing error. In this case, I would assume that the numbers that appear in the TANF/SNAP section are Ohio Works First (TANF) numbers since they don't appear to be a 10-digit SNAP number.</p> |
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| <p>25</p> <p>C SSN & CatElig</p> | <p>TOPIC:</p> <p>SSN variable for categorically eligible students</p> | <p>PROBLEM:</p> <p>Currently, the value labels for the SSN variable are 1) Yes 2) Don't have SSN and 3) No. One district seems to require a social security number only if the household income portion of the application was completed (i.e., not categorically eligible, income eligible only). Therefore SSN may not be provided and using "3"(No) may not be appropriate by our current definition.</p> | <p>RESOLUTION:</p> <p>For the categorically eligible ones, you do not need SSN for any of the districts. All you need is an adult signature.</p> <ol style="list-style-type: none"> 1. For applications that are categorically eligible, using "3" (No) when the applicant does not provide an SSN number is sufficient. We may also have "1" (Yes) because some may still provide it. 2. A "3" (No) can then either indicate <i>not applicable</i> in situations of categorical eligibility or an <i>incomplete application</i> in cases of income eligibility. |
| <p>DATE INITIATED:</p> <p>08/30/2010</p> | | | |
| <p>DATE DECIDED:</p> <p>08/30/2010</p> | | | |
| <p>REFERENCE:</p> <p>Decision 14 Question 2</p> | | | |
| <p>DECIDED BY:</p> <p>Westat team</p> | | | |

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| <p>26</p> <p>SSN</p> | <p>TOPIC: Missing SSN or signature on application</p> <p>DATE INITIATED: 09/08/2010</p> <p>DATE DECIDED: 09/14/2010</p> <p>REFERENCE: Dist 112 ST 3</p> <p>DECIDED BY: John Endahl</p> | <p>PROBLEM:</p> <p>If an applicant has received a current benefit issuance of "paid" based on income being too high (correct decision), and the SSN was not provided, would that be considered an error since the application should have not been reviewed due to missing SSN?</p> | <p>RESOLUTION:</p> <p>If the SFA has determined that the household is not eligible for free or reduced price meal benefits based on income, then not providing a social security number should not be considered an error. Not including a SSN should only be considered an administrative error if the household has been approved for free or reduced-price meal benefits based on income. A household approved for free meals based on categorical eligibility need not have a SSN on the application. Similarly, if the application is not signed by an adult, this would only be considered an administrative error if the household was approved for free or reduced-price meals.</p> |
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| <p>27</p> <p>SSN</p> | <p>TOPIC: Acceptable indication of "no SSN"</p> <p>DATE INITIATED: 09/08/2010</p> <p>DATE DECIDED: 09/14/2010</p> <p>REFERENCE: Dist 112 ST 3</p> <p>DECIDED BY: John Endahl</p> | <p>PROBLEM: When the applicant doesn't have a SSN and there is no box to check or instructions to write "none", would either a dash or "N/A" in the SSN section be interpreted as "don't have" or "no" (meaning it would not be considered an incomplete application)?</p> | <p>RESOLUTION: If there is no place to check or instructions to write "none", I would consider a dash or N/A as an adequate indication that the individual did not have a social security number and therefore the application should not be considered incomplete.</p> |
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| 28 SSN | TOPIC: Partial SSN | PROBLEM: Some applicants only provided the last four numbers of their SSN - is this considered complete? | RESOLUTION: The entire social security number, not just the last four digits, need to be included on the application in order to be considered complete |
| | DATE INITIATED: 09/08/2010 | | |
| | DATE DECIDED: 09/14/2010 | | |
| | REFERENCE: Multiple cases | | |
| | DECIDED BY: John Endahl | | |

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| 29 SSN | TOPIC: Acceptable indication of "no SSN" when applicant does not follow instructions | PROBLEM: It was previously decided when the applicant doesn't have a SSN and there is no box to check or instructions to write "none", a dash or an "N/A" in the SSN section serves as an adequate indication that the individual does not have a social security number. However, if the application instructions state (Write "NONE" if N/A). And the translated Spanish instructions say (Write "None if you don't have one") is a dash or N/A still adequate or is this a processing error? | RESOLUTION: Not all applicants follow directions. If they have place a dash or N/A in the SSN they are making an effort to indicate that such a number is not available. To this end, I would not consider this a processing error. |
| | DATE INITIATED: 10/26/2010 | | |
| | DATE DECIDED: 10/27/2010 | | |
| | REFERENCE: Multiple cases | | |
| | DECIDED BY: John Endahl | | |

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| <p>30</p> <p>SFA</p> | <p>TOPIC: Blank or missing SFA data</p> <p>DATE INITIATED: 09/02/2010 Meeting Question 1: 11/05/2010</p> <p>DATE DECIDED: 09/02/2010 Resolution 1: 11/05/2010</p> <p>REFERENCE: General and Dist 722 , 741, 742 ALL</p> <p>DECIDED BY: Resolution 1: Westat team Resolution 2: Westat team</p> | <p>PROBLEM:</p> <ol style="list-style-type: none"> 1. Are SFA Blank areas processing errors? 2. For applications where no SFA documentation is available, either on the application or in the form of computer documentation, how should we handle missing data? | <p>RESOLUTION:</p> <ol style="list-style-type: none"> 1. No. We will put Xs in all fields SFA left blank. 2. If a district uses an application that does not have a section for SFA to mark their income, SFAHHSIZE, or eligibility assessment (or they do not attach a computer printout with the same information), we will continue to use an "X" for the SFAHHInc and SFAHHSIZE but will use "99" for the SFAElig. |
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| 31 SFA | TOPIC: SFAInc calculation error. | PROBLEM: SFA recalculates monthly income to a weekly figure by dividing by 4, then recalculated annual incomes an error in the SFA income. | RESOLUTION: Documented monthly income should not be recalculated, just add it to the recalculated weekly, bi-weekly, annual etc. incomes. This is an SFAInc error and ProcErr = 1. |
| | DATE INITIATED: 09/02/2010 Meeting | | |
| | DATE DECIDED: 09/02/2010 Add to Log | | |
| | REFERENCE: Multiple cases | | |
| | DECIDED BY: Westat team | | |

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| 32 SFA | TOPIC: Status on SFA computer sheets incorrect | PROBLEM: All the computer related documentation from SFA has erroneous status codes. Even when there is written information such as "changed benefits from free to reduced" their code is a 3. All of the status indications seem to be 1 above the correct status (2 for 1, 3 for 2, and 4 for 3). I have chosen to use the FNS reviewer's CBIS code as the SFAElig variable. Since all of the SFA information related to SFAElig status seems to be incorrect, can we assume the current benefits status is correct and use that for SFAElig? | RESOLUTION: Yes, we have agreed to use the CBIS for SFAElig. However, if the SFA has filled something out directly on the application, I would first defer to that decision (i.e., some applications have the bottom portion filled out just by the SFA reviewer, etc.). |
| | DATE INITIATED: 09/27/2010 meeting | | |
| | DATE DECIDED 09/29/2010 | | |
| | REFERENCE: Dist 322 Entire group | | |
| | DECIDED BY: Westat team | | |

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| <p>33</p> <p>SFAHHSize</p> | <p>TOPIC:</p> <p>SFA differences in household size</p> | <p>PROBLEM:</p> <p>Where there are discrepancies either on the SFA reporting of household size on the application or the print out where SFA populates part of the application and a print out is submitted, which do we defer to for household size and income?</p> | <p>RESOLUTION:</p> <p>Assuming that the information that appears in the computer system is what is used to make the final determination of meal eligibility equates to the current benefit issuance status use the information in the computer file as the "SFA determination of household size, income and eligibility status." One could argue these cases both ways; however, information in the computer system more often reflects what the benefit issuance status of the student is and should be used as the "official SFA determination."</p> |
| | <p>DATE INITIATED:</p> <p>10/12/2010</p> | | |
| | <p>DATE DECIDED</p> <p>10/13/2010</p> | | |
| | <p>REFERENCE:</p> <p>Multiple cases</p> | | |
| | <p>DECIDED BY:</p> <p>John Endahl</p> | | |

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| <p>34</p> <p>SFAInc</p> | <p>TOPIC:</p> <p>Irregular income calculation</p> | <p>PROBLEM:</p> <p>When an applicant lists income that is irregular, is the SFA supposed to include the given figure in their monthly/yearly calculations? For example, we have an applicant who has listed income (2 days/week) from being a substitute teacher though did not include this amount in her total monthly income. She does not work 2 days a week for the whole year, she only works when there is a need. SFA included this income in the total by multiplying the given amount by 52. Is this correct?</p> | <p>RESOLUTION:</p> <p>When the income of an applicant is irregular, the household has the option of providing annual household income information. In this case the substitute teacher, the SFA could have contacted the household to get clarification on the typical annual income received from substitute teaching. Without this information, if the SFA knows that the school district operates on a 9-month school year rather than year-round, instead of multiplying by 52 weeks, I would probably multiply by 39 weeks (3/4 of a year).</p> |
| | <p>DATE INITIATED:</p> <p>09/10/2010</p> | | |
| | <p>DATE DECIDED</p> <p>09/10/2010</p> | | |
| | <p>REFERENCE:</p> <p>Dist 212 ST 28</p> | | |
| | <p>DECIDED BY:</p> <p>John Endahl</p> | | |

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| <p>35</p> <p>SFAInc</p> | <p>TOPIC:</p> <p>Irregular income inclusion (child support)</p> | <p>PROBLEM:</p> <p>Page 35 of the Eligibility Manual states that income exclusions include “occasional earnings received on an irregular basis, e.g., not recurring, such as payment for occasional baby-sitting or mowing lawns.” Does this also include irregular child support payments?</p> | <p>RESOLUTION:</p> <p>Yes, as long as it is clearly stated that the income is “irregular” in nature, exclude it.</p> |
| | <p>DATE INITIATED:</p> <p>09/27/2010 meeting</p> | | |
| | <p>DATE DECIDED</p> <p>09/28/2010</p> | | |
| | <p>REFERENCE:</p> <p>Multiple cases</p> | | |
| | <p>DECIDED BY:</p> <p>Westat team</p> | | |

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| 36 Verification variables & SFAInc | TOPIC: Income calculation on verified applications and variables from verified applications | PROBLEM: Should the new income listed on the verification sheet be used for both HHIncome and SFAHHInc? What about variables for verified applications? | RESOLUTION: Use income from verification sheet for determination of agreement between SFAVer and FNSVer variables only. All variables up to SFAVer are to be pulled from the original application. For example HHIncome comes from the original application, not the amount you might find on one of the paystubs that are submitted as part of the verification process. SFAElig and FNSElig are from the original application also. Also see #42 ADDENDUM: The SFAVer and FNSVer (in addition to the Verify and VerDoc) columns are those that we populate based on the verification process. If those don't match the SFA determination after the verification process, any type of error would be documented through these two variables. |
| | DATE INITIATED: 9/3/2010 Addendum: 10/11/2010 | | |
| | DATE DECIDED Resolution: 09/08/2010 Addendum: 11/05/2010 | | |
| | REFERENCE: Dist 122 ST 16 Addendum:: Dist 511 ST 48 through 50 | | |
| | DECIDED BY: Resolution: Westat team Addendum: Westat team | | |

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| <p>37</p> <p>Verification Variables</p> | <p>TOPIC:</p> <p>Instructions for variables on applications selected for verification</p> | <p>PROBLEM:</p> <p>Clarification of variable information on applications selected for verification.</p> | <p>RESOLUTION:</p> <p>On applications selected for verification, all of the variable columns up to “SFAVer” and “FNSVer” are to be pulled from the original application. For example, HHIncome comes from the original application and not the amount that you might find on the pay stubs that are submitted as part of the verification process. SFAElig and FNSElig are from the original application also.</p> <p>The SFAVer and FNSVer (in addition to the Verify and VerDoc) columns are those that we populate based on the verification process. If those don’t match the SFA determination after the verification process, any type of error would be documented through these two variables.</p> |
| | <p>DATE INITIATED:</p> <p>11/05/2010</p> | | |
| | <p>DATE DECIDED:</p> <p>11/05/2010</p> | | |
| | <p>REFERENCE:</p> <p>All selected applications</p> | | |
| | <p>DECIDED BY:</p> <p>Westat team</p> | | |

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| 38 ADULTS | TOPIC: Calculation of adults in household | PROBLEM: How do we reliably calculate adults in household? | RESOLUTION: Eliminate the “adult” variable. It has been confusing and not necessary for analysis. The reviewers will not enter any data related to number of adults on the application. |
| | DATE INITIATED: 09/08/2010 Meeting | | |
| | DATE DECIDED: 09/14/2010 | | |
| | REFERENCE: All | | |
| | DECIDED BY: John Endahl | | |

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| <p>39</p> <p>VerDoc</p> | <p>TOPIC:</p> <p>Cover sheet variable meaning</p> | <p>PROBLEM:</p> <p>Does the VerDoc variable refer to whether the school has simply asked for verification or if the family provided the documentation in full?</p> <p>CLARIFICATION to JE:</p> <p>The VerDoc variable is (1) if the family submitted all the requested documentation, (2) if the family did not submit all the requested documentation, correct?</p> | <p>RESOLUTION:</p> <p>VerDoc variable refers to whether or not the family has provided all documents associated with the verification process.</p> <p>ADDENDUM/CORRECTION:</p> <p>In past years I have been using this variable to indicate if the household file contains sufficient information to make a decision about the appropriateness of the SFA's determination as a result of verification. If the household failed to respond to the verification request and the file provides documentation to this effect, I would code this variable as a "1" indicating that the information was there to make an appropriate decision. It does not mean that the household had necessarily responded to the verification request and provided all the information requested.</p> |
| | <p>DATE INITIATED:</p> <p>09/06/2010 meeting</p> <p>ADDENDUM:</p> <p>Mustafa Karakus to John Endahl</p> <p>09/14/2010</p> | | |
| | <p>DATE DECIDED</p> <p>09/08/2010</p> <p>ADDENDUM:</p> <p>09/14/2010</p> | | |
| | <p>REFERENCE:</p> <p>All verified applications</p> | | |
| | <p>DECIDED BY:</p> <p>Mustafa Karakus & Allison Roeser</p> <p>ADDENDUM/CORRECTION</p> <p>John Endahl</p> | | |

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| <p>40</p> <p>CBIS</p> | <p>TOPIC:</p> <p>CBIS value different from SFAElig or FNSElig</p> <hr/> <p>DATE INITIATED: 08/31/2010 Blue sheet.</p> <p>ADDENDUM: 10/12/2010 Mustafa Karakus to John Endahl</p> <hr/> <p>DATE DECIDED 09/13/2010 ADDENDUM : 10/12/2010</p> <hr/> <p>REFERENCE: Dist 131 : ST15</p> <hr/> <p>DECIDED BY: Westat team ADDENDUM: John Endahl</p> | <p>PROBLEM:</p> <p>If the CBIS listed on the coversheet is different from SFA eligibility and FNS eligibility determination should we record this as an error or simply record the discrepancy in the "notes" section of the spreadsheet?</p> | <p>RESOLUTION:</p> <p>Record this as a processing error (ProcErr=1) if current benefit issuance status was different from the eligibility determination made by the independent reviewer and note in the notes section that "CBIS different from FNSElig."</p> |
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| <p>41</p> <p>Foster Child Income</p> | <p>TOPIC:</p> <p>Difference between a foster child's personal income and income received for care of a foster child</p> | <p>PROBLEM:</p> <p>Should HHSIZE for a household with a foster child be a "1"? We have been abstracting the household size from the sections where we can obtain this actual data. The reference for this question is The Eligibility Handbook, page 9.</p> | <p>RESOLUTION:</p> <p>As noted in Decision Log #31...HHSIZE = 1 for a foster child.</p> |
| | <p>DATE INITIATED:</p> <p>10/12/2010</p> | | |
| | <p>DATE DECIDED</p> <p>10/13/2010</p> | | |
| | <p>REFERENCE:</p> <p>General question</p> | | |
| | <p>DECIDED BY:</p> <p>John Endahl</p> | | |

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| <p>42</p> <p>Foster Child</p> | <p>TOPIC:</p> <p>Application with a foster child HHSIZE</p> | <p>PROBLEM:</p> <p>Should HHSIZE for a household with a foster child be a "1"? We have been abstracting the household size from the sections where we can obtain this actual data. The reference for this question is The Eligibility Handbook, page 9.</p> | <p>RESOLUTION:</p> <p>As noted in Decision Log #31...HHSIZE = 1 for a foster child.</p> |
| | <p>DATE INITIATED:</p> <p>10/12/2010</p> | | |
| | <p>DATE DECIDED:</p> <p>10/12/2010</p> | | |
| | <p>REFERENCE:</p> <p>Decision Log 31</p> | | |
| | <p>DECIDED BY:</p> <p>John Endahl</p> | | |

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| <p>43</p> <p>Foster Child</p> | <p>TOPIC:</p> <p>Foster child indicators</p> | <p>PROBLEM:</p> <p>Part 3 includes a check box as well as a space for child's personal use monthly income. When an amount is listed or a "0" is recorded and the box is not checked, is it accurate to assume the child is a foster child?</p> | <p>RESOLUTION:</p> <p>If the application has only one child on the application and the total household gross income section is left blank, I would assume that this is a foster child with no personal monthly income even though the box was not checked indicating this child was a foster child.</p> <p>It is quite possible that "Student A" is a foster child living with a SNAP household and thus the DC next to "Student B" and not next to "Student A; however, if "Student B" was directly certified there would have been no need to submit an application for her, and a separate application should have been submitted for "Student A" (foster child household of 1).</p> <p>It is interesting that neither application has a valid SNAP case number next to "Student B's" name. It is possible that at the time of the initial submission of the application, the mother was unemployed and had applied for SNAP benefits but hadn't been approved yet and that by the time the second application was submitted 2 ½ months later, the mother was employed and no longer on SNAP. Regardless, the eligibility determination (free) is correct any way you look at the application.</p> |
| <p>DATE INITIATED:</p> <p>10/26/2010</p> | | | |
| <p>DATE DECIDED</p> <p>10/27/2010</p> | | | |
| <p>REFERENCE:</p> <p>DistST 22</p> | | | |
| <p>DECIDED BY:</p> <p>John Endahl</p> | | | |

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| <p>44</p> <p>SAMPLE DATA</p> | <p>TOPIC:</p> <p>Exclusion for Analysis</p> | <p>PROBLEM:</p> <p>There are several districts that require all households to return applications. As a result, there are applicants that have either indicated they do not qualify for benefits or are not interested, and the SFA does not make an assessment. We suggest that these applications be removed from the sample that we are reviewing to most accurately assess error rates. Please let us know if you are in agreement.</p> | <p>RESOLUTION:</p> <p>I would disagree. The sample frame from which these applications were selected reflects households that have submitted applications for benefits. In districts that have encouraged all students to submit applications (typically for purposes other than receiving meal benefits), the district still must make an assessment of the student's eligibility. Often households simply leave the income portion blank or do not provide a SSN or signature on the form. The district simply records this as an incomplete application and places them in the paid category. If the application has a box to check indicating that they do not qualify for benefits or are not interested then regardless of what is on the rest of the application, the district will place them in the paid category. If a household completes the application and is eligible for free or reduced-price meals, but indicates on the application that they are not interested in these benefits, the school district should honor those wishes. In processing the application, the school district should correctly reflect that the child is eligible for free or reduced price meals. However, the school district should note on the application that the family has elected not to receive these benefits and the meals served to this child must be claimed as paid meals. (p.29)</p> |
| | <p>DATE INITIATED:</p> <p>10/26/2010</p> | | |
| | <p>DATE DECIDED:</p> <p>10/27/2010</p> | | |
| | <p>REFERENCE:</p> <p>General</p> | | |
| | <p>DECIDED BY:</p> <p>John Endahl</p> | | |