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Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2011-2012

Report to Congress

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Report to Congress

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ABSTRACT

This report responds to the legislative requirement of the Food, Conservation, and Energy Act of 2008 (P.L.110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP). Direct certification is a process conducted by the States and by local educational agencies (LEAs) to certify certain children for free school meals without the need for household applications. The Child Nutrition and WIC Reauthorization Act of 2004 required all LEAs to establish, by school year (SY) 2008–2009, a system of direct certification of children from households that receive Supplemental Nutrition Assistance Program (SNAP) benefits. The mandate was phased in over three years. The largest LEAs were required to establish direct certification systems by SY 2006–2007; all were required to directly certify SNAP participants by SY 2008–2009. The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires that States meet certain direct certification performance targets. For SY 2011–2012, States that fail to achieve a direct certification rate of at least 80 percent are required to develop and implement continuous improvement plans (CIPs). The performance target increases to 90 percent for SY 2012–2013 and 95 percent for SY 2013–2014 and beyond.

Eighty-nine percent of LEAs that participate in the NSLP directly certified some SNAP participants in SY 2011–2012. These LEAs enroll 98 percent of all students in schools that participate in the NSLP. This is an increase from SY 2004–2005, when 56 percent of LEAs, enrolling 77 percent of all students in NSLP schools, directly certified some SNAP-participant students.

The number of school-age SNAP participants directly certified for free school meals was 11.6 million for SY 2011–2012, an increase of 17 percent from SY 2010–2011. Analysis in this report estimates that 86 percent of children in SNAP households were directly certified for free school meals, substantially higher than last year's rate of 77 percent. Thirty-six States achieved the HHFKA-mandated performance target of 80 percent, and 17 States achieved direct certification rates of at least 90 percent. Only one State had a direct certification rate lower than 60 percent.

CONTENTS

TABLES

FIGURES

GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey (U.S. Census Bureau)
BBCE	Broad-based categorical eligibility
CE	Categorical eligibility
CIP	Continuous improvement plan
CN	Child nutrition
CRE	Coordinated review effort
DHHS	Department of Health and Human Services
DHS	Department of Human Services
DOB	Date of birth
DPC	Delivery point code
FCEA	Food, Conservation, and Energy Act of 2008
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
FY	Fiscal year
HHFKA	Healthy, Hunger-Free Kids Act of 2010
IT	Information technology
LEA	Local educational agency
MOE	Maintenance of effort
NSLA	Richard B. Russell National School Lunch Act
NSLP	National School Lunch Program
PL	Public Law
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996
QC	Quality control data for SNAP
SBP	School Breakfast Program
SIPP	Survey of Income and Program Participation
SFA	School food authority
SNAP	Supplemental Nutrition Assistance Program
SSIS	Statewide student information system
SSN	Social Security number
SY	School year
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture
VSR	Verification summary report (FNS Form 742)
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

EXECUTIVE SUMMARY

A. Background

This report responds to a legislative requirement of the Food, Conservation, and Energy Act of 2008 (also known as the 2008 Farm Bill, Public Law [P.L].110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP). The 2008 Farm Bill requires annual Reports to Congress. This is the fifth report in the series, covering school year (SY) 2011–2012. The Food and Nutrition Service (FNS) will use results from this report in determining performance awards and identifying those States that must develop and implement direct certification improvement plans (CIPs), as required by Section 101 of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 (P.L. 111-296).

The NSLP reimburses local educational agencies (LEAs) for the cost of providing nutritious meals to children in public and private schools and residential child care institutions. Average daily participation across NSLP schools and institutions totaled approximately 32 million children in fiscal year (FY) 2011.

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

B. Eligibility for Program Benefits

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

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

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

C. Direct Certification

Student eligibility for free meals is determined by application or by direct certification. Although direct certification systems vary by State and LEA, all such systems substantially reduce the need for

household applications. Many States and LEAs certify eligible children through computer matching of SNAP, TANF, and FDPIR records against student enrollment lists. Those systems require no action by the children's parents or guardians.

States and LEAs may opt instead to send letters to SNAP, TANF, and FDPIR households with school-age children. The letters serve as proof of categorical eligibility for free meals, and must be forwarded by the households to their children's schools. By SY 2012–2013, States are required to phase out the use of the letter method as the primary means of directly certifying children receiving SNAP benefits.

The Child Nutrition and WIC Reauthorization Act of 2004 required all States to establish a system of direct certification of school-age SNAP participants by SY 2008–2009. The requirement applies only to children participating in SNAP; however, States and LEAs may also directly certify children from TANF and FDPIR households.

The HHFKA requires that States meet certain direct certification performance targets. For SY 2011–2012, States that fail to achieve a direct certification rate of at least 80 percent are required to develop and implement CIPs. The performance target increases to 90 percent for SY 2012–2013 and 95 percent for SY 2013–2014.

D. State Performance Measures

This report presents information on the outcomes of direct certification for SY 2011–2012. Mathematica Policy Research estimated the number of school-age SNAP participants and the number of children directly certified for free school meals in each State. The ratio of these figures is a measure of the success of State and local systems to directly certify SNAP-participant children.

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

E. Key Findings

States and LEAs directly certified 11.6 million children at the start of SY 2011–2012, an increase of 17 percent from one year earlier. The increase in directly certified students (1.7 million) greatly outpaced the increase in school-age SNAP participants (about 700,000) during this same time period. Therefore, most of the growth in direct certification can be attributed to improved effectiveness of direct certification systems rather than an increase in SNAP participation. The estimated percentage of SNAP-participant children certified for free school meals without application increased from 77 percent in SY 2010–2011 to 86 percent in SY 2011–2012. The overall certification rate of categorically eligible children, by direct certification or by application, increased from 86 percent in SY 2010–2011 to 92 percent in SY 2011–2012.

The number of LEAs directly certifying SNAP-participant children continues to increase. In SY 2004–2005, prior to the Congressional mandate for direct certification, 56 percent of LEAs directly certified SNAP-participant children on a discretionary basis. The share of LEAs that directly certified students grew to 67, 78, 83, and 85 percent in SYs 2007–2008, 2008–2009, 2009–2010, and 2010–2011, respectively. By SY 2011–2012, 89 percent of LEAs directly certified some SNAP children; those LEAs enrolled 98 percent of students in NSLP-participating schools.

F. State Best Practices

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

Six states with successful or improved direct certification systems were interviewed for this report. These States attributed their direct certification success to strong relationships with the departments providing program data for direct certification, an intuitive and user-friendly system, and frequent matching of program data with student enrollment data. Several States also discussed the importance of effective use of information technology (IT) resources and data matching infrastructure. For two States, SY 2011–2012 was the first full year using new central matching systems, whereas a third State made important improvements to its data matching software.

G. Conclusion

States and LEAs have made significant progress in complying with the 2004 Reauthorization Act. An estimated 89 percent of LEAs, enrolling 98 percent of all children in NSLP-participating schools, directly certified SNAP participants in SY 2011–2012. States, and LEAs directly certified 1.7 million more SNAP participants in SY 2011–2012 than they did a year earlier. Through that effort, an estimated 86 percent of children from SNAP-participant households were certified without application for free school meals in SY 2011–2012. This is nine percentage points higher than last year's direct certification rate of 77 percent. States and LEAs certified 92 percent of all categorically eligible students for free school meals, either by direct certification or by application in SY 2011–2012, six percentage points higher than the rate achieved in SY 2010–2011.

DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM: STATE IMPLEMENTATION PROGRESS, SCHOOL YEAR 2011–2012

I. INTRODUCTION

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for the cost of providing nutritious low-cost or free meals to children in public and private schools and residential child care institutions. Participating schools and institutions receive cash reimbursements and foods donated by the U.S. Department of Agriculture (USDA) for each meal served. About 101,000 schools and institutions participate in the program. Average daily student participation totaled approximately 32 million in fiscal year (FY) 2011.

In exchange for Federal assistance, participating schools and institutions serve meals that satisfy Federal nutrition and food safety standards. In addition, they must offer school meals at no cost, or at reduced price, to income-eligible children. Children from households with incomes at or below 130 percent of the Federal poverty level ($29,055 for a family of four during school year (SY) 2011–2012[1]) are eligible for free meals. Those from households with incomes between 130 and 185 percent of the Federal poverty level ($41,348 for a family of four during SY 2011–2012) are eligible for reduced-price meals. Students are determined eligible for free meals through application or direct certification (described next); reduced-price eligibility is determined by application alone.

A. Eligibility Determination Through Application

All LEAs accept applications from households to establish the eligibility of the children that reside in them for free or reduced-price school meals. Most applicants submit self-declared income and household size information, which is compared with the income thresholds for free and reduced-price benefits. Other applicants provide case numbers that demonstrate household participation in one of several other means-tested Federal assistance programs. Children in households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR) are categorically eligible for free school meals. Categorical eligibility through these assistance programs, whether determined by application or by direct certification (described next), extends to all children in the same household.[2,3]

B. Eligibility Determination Through Direct Certification

Direct certification confirms a child's categorical eligibility for free school meals without the need for a household application. Direct certification typically involves matching SNAP, TANF, and

[1] The income eligibility thresholds given here apply to households from the 48 contiguous States, the District of Columbia, Guam, and the other U.S. territories. The income thresholds are higher in Alaska and Hawaii. A table of income eligibility thresholds can be found at http://www.fns.usda.gov/cnd/Governance/notices/iegs/IEGs11-12.pdf.

[2] Foster children, certain children enrolled in Federally funded Head Start or Even Start programs; and certain homeless, runaway, and migrant children are also categorically eligible for free school meals. Their eligibility is on an individual basis and does not extend to other children in the household.

[3] See Food and Nutrition Service (FNS) school meals policy numbers 38-2009 and 25-2010 at http://www.fns.usda.gov/cnd/governance/policy.htm.

FDPIR records against student enrollment lists, either at the State or LEA level.[4] Parents or guardians of children identified through these matching systems are notified of their children's eligibility for free school meals.[5] They need not take action for their children to be certified. Under an alternate method of direct certification that does not require data set matching, 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. Under recent regulations, State agencies are required to phase out the use of the letter method as the primary method for direct certification by SY 2012–2013.

The Child Nutrition and WIC Reauthorization Act of 2004 requires each State education agency to enter into an agreement with the State agency responsible for making SNAP eligibility determinations. The agreement must establish procedures to directly certify children from SNAP households for free school meals.[6] States may also directly certify children from TANF and FDPIR households; foster children; participants in Federally-funded Head Start or Even Start programs; and certain homeless, runaway, and migrant children, but are not required to do so.

C. Purpose of this Report

This report responds to Section 4301 of the Food, Conservation, and Energy Act of 2008 (FCEA),[7] which calls for an assessment of the "effectiveness of each State in enrolling school-aged children in households receiving … [SNAP] benefits" for free school meals.[8] Specifically, the law requires the following:

1. State-level estimates of the number of school-age children that received SNAP benefits at any time in July, August, or September (just before or at the start of the current school year)
2. Estimates of the number of SNAP-participant children who were directly certified for free school meals as of October 1
3. Estimates of the number of SNAP-participant students who were not candidates for direct certification because they attended special provision schools operating in years in which applications are not collected.[9]

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

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

[6] The Child Nutrition and WIC Reauthorization Act's direct certification provision was phased in over a three-year period beginning with SY 2006–2007.

[7] Also known as the 2008 Farm Bill.

[8] This report includes analysis of the contiguous United States, Alaska, and Hawaii. The report for SY 2011–2012 includes Guam for the first time.

[9] See http://www.fns.usda.gov/CND/Governance/prov-1-2-3/Prov1_2_3_FactSheet.htm for information on Provision 2 and 3 schools.

For the first time, FNS will use these estimates in determining performance awards and identifying those States that must develop and implement direct certification continuous improvement plans (CIPs), as required by Section 101 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (Public Law [P.L.] 111-296). Specifically, for SY 2011–2012, States that fail to achieve a direct certification rate of at least 80 percent are required to develop and implement CIPs. In addition to presenting direct certification performance measures, Section 4301 of the FCEA also calls for a discussion of best practices in States with successful direct certification systems.

II. HISTORY OF DIRECT CERTIFICATION

In the mid-1980s, program managers and policymakers recognized a duplication of effort in certifying school children for free meals under the NSLP and the School Breakfast Program (SBP),[10] and certifying families for what are now the SNAP and TANF programs (formerly the Food Stamp Program and Aid to Families with Dependent Children, respectively). All of these programs have similar income-eligibility limits, and many school children participated in more than one. Further, the application processes for SNAP and TANF were, and remain, more detailed and rigorous than the certification process for free meals under the NSLP. Use of eligibility determinations for SNAP and TANF could improve the accuracy of certifications for NSLP.

Legislation taking a first step to link these programs was enacted in 1986. The Richard B. Russell National School Lunch Act (NSLA) was amended to make children who are members of a household receiving assistance under SNAP and TANF automatically eligible for free school meals. This action paved the way for more simplified application and certification procedures for these children. Initially, families could put their case number from these programs on the application in lieu of providing income information.[11] Then, in 1989, P. L. 101-147 (Child Nutrition and WIC Reauthorization Act of 1989) allowed school food authorities (SFAs) to certify children, without further application, by directly communicating with the appropriate State or local agency to obtain documentation that the children were members of a household receiving either SNAP or TANF benefits. This first statutory authorization of direct certification was made optional for SFAs.

The 2004 Reauthorization Act amended the NSLA to mandate direct certification with SNAP for all LEAs. (Before 2004, the NSLA referred only to SFAs when describing local administration of the NSLP. With the 2004 Reauthorization Act, the NSLA recognized LEAs, rather than SFAs, as the entities responsible for NSLP application and certification processes.) The 2004 act retained discretionary authority for TANF direct certification. Mandatory direct certification with SNAP was phased in over three years, beginning in SY 2006–2007. All LEAs, including private schools, were required to have direct certification systems in place for SY 2008–2009.

Because State agencies administering the NSLP and SBP recognized that direct certification would increase participation, ease the burden on families and LEAs, and result in more accurate targeting of free school meal benefits, many States chose to phase in the use of direct certification in

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

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

advance of the mandate. State education agencies worked in partnership with the agencies in their States that administered SNAP and TANF. At the outset, various methods were used, refined, and expanded. By the time direct certification with SNAP became mandatory, many State agencies had systems in place and were familiar with the process.

In the years since the statutory mandate, additional implementation requirements have been introduced with the intention of increasing the reach and effectiveness of direct certification. In August 2009, the Food and Nutrition Service (FNS) issued guidance requiring that free meal eligibility apply to all children in a family if at least one child is directly certified as categorically eligible for free school meals, beginning in SY 2009–2010. The HHFKA required State agencies to phase out the use of the letter method as their primary method for direct certification with SNAP. This act also includes a provision that expands direct certification to include Medicaid in some districts via a demonstration project. In addition, FNS published an interim rule in 2011 which requires that, starting in SY 2011–2012, direct certification matching with SNAP records occurs at least three times per school year.

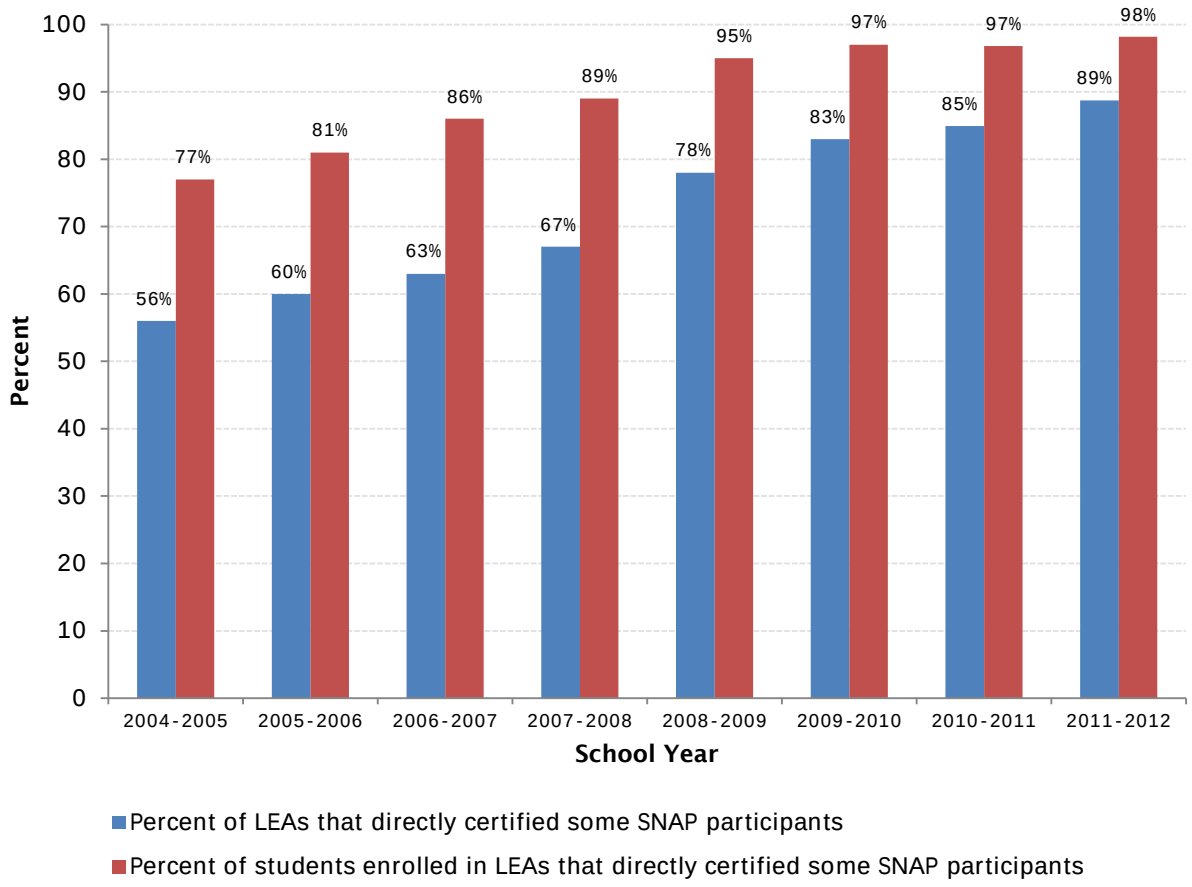
Even though all LEAs are now subject to the statutory direct certification mandate, there continues to be a need for household applications. Because children from households with incomes between 130 and 185 percent of the Federal poverty level are not eligible for SNAP, direct certification cannot be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

III. CURRENT STATUS OF DIRECT CERTIFICATION SYSTEMS

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

Figure 1 and Table 1 illustrate the increases over time in both the percent of LEAs that directly certified SNAP participants and the percent of students enrolled in those LEAs.[12] For SY 2011–2012, 89 percent of LEAs directly certified some SNAP participants[13] and those LEAs enrolled 98 percent of all students in NSLP-participating schools.

Figure 1. Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants, SY 2004–2005 through SY 2011–2012



[12] The numbers in Figure 1 and Table 1 are estimates based on figures provided by LEAs on their annual NSLP verification summary reports (VSRs). An LEA is identified as a direct certification district if the reported number of students not subject to verification exceeds the number that are categorically eligible for free meals but approved by application, or the number not subject to verification is at least five percent of all students reported certified for free meals. This methodology, previously used by Cole and Logan (2007), could misclassify a small number of LEAs. Also, as noted in the next footnote, LEAs in which all students attend nonbase year Provision 2 or Provision 3 schools may not be included in Figure 1 and Table 1 because some States do not report data for LEAs that are not required to conduct verification activities. Other States do include these LEAs.

[13] This percentage, and the corresponding Table 1 figures for all other school years, also includes the relatively small number of LEAs in which all students attend Provision 2 or Provision 3 schools that are not operating in a base year. Both Figure 1 and Table 1 attempt to measure the LEAs' progress in implementing direct certification systems. Students in Provision 2 and Provision 3 schools are not subject to either direct certification or certification by application in nonbase years. However, all children, including all SNAP participants, are eligible for free meals in Provision 2 and Provision 3 schools, which is consistent with the policy goal of direct certification. See Appendix A, Table A.2, for an alternate version of Table 1 with Provision 2 and Provision 3 LEAs excluded from both the total count of LEAs and the count of LEAs that directly certified some SNAP children.

Table 1. Number and Percent of LEAs that Directly Certified SNAP Participants, SY 2009–2010 through SY 2011–2012

	SY 2009-2010			SY 2010-2011			SY 2011-2012		
		Direct Certification or Provision 2/3 LEAs			Direct Certification or Provision 2/3 LEAs			Direct Certification or Provision 2/3 LEAs	
	Number of LEAS	Number	Percent	Number of LEAS	Number	Percent	Number of LEAS	Number	Percent
U.S. Total	**18,461**	**15,258**	**82.6**	**18,574**	**15,778**	**84.9**	**18,624**	**16,528**	**88.7**
AK	49	48	98.0	51	49	96.1	50	49	98.0
AL	151	137	90.7	151	141	93.4	156	145	92.9
AR	300	265	88.3	290	279	96.2	289	279	96.5
AZ	428	357	83.4	430	365	84.9	440	390	88.6
CA	1,057	839	79.4	1,078	806	74.8	1,094	872	79.7
CO	218	202	92.7	207	191	92.3	214	204	95.3
CT	188	174	92.6	186	176	94.6	185	183	98.9
DC	62	61	98.4	57	57	100.0	61	60	98.4
DE	34	31	91.2	34	32	94.1	42	35	83.3
FL	170	122	71.8	190	133	70.0	223	178	79.8
GA	221	199	90.0	229	207	90.4	229	219	95.6
GU	NA	NA	NA	NA	NA	NA	3	1	33.3
HI	37	26	70.3	36	26	72.2	35	25	71.4
IA	495	421	85.0	494	435	88.1	477	428	89.7
ID	142	103	72.5	144	137	95.1	148	141	95.3
IL	1,123	880	78.4	1,119	968	86.5	1,125	1,038	92.3
IN	498	405	81.3	501	424	84.6	496	429	86.5
KS	405	345	85.2	399	340	85.2	400	362	90.5
KY	197	176	89.3	189	178	94.2	189	178	94.2
LA	109	95	87.2	114	102	89.5	113	106	93.8
MA	431	303	70.3	421	311	73.9	422	355	84.1
MD	49	42	85.7	49	43	87.8	55	47	85.5
ME	194	177	91.2	192	174	90.6	187	170	90.9
MI	855	717	83.9	853	736	86.3	845	762	90.2
MN	662	457	69.0	706	471	66.7	697	472	67.7
MO	765	678	88.6	761	684	89.9	755	704	93.2
MS	177	157	88.7	176	160	90.9	175	159	90.9
MT	239	190	79.5	240	209	87.1	240	212	88.3
NC	165	151	91.5	165	154	93.3	162	152	93.8
ND	202	171	84.6	204	181	88.7	203	179	88.2
NE	383	304	79.4	379	317	83.6	374	320	85.6
NH	94	75	79.8	91	82	90.1	100	88	88.0
NJ	677	619	91.4	694	665	95.8	697	683	98.0
NM	176	132	75.0	187	134	71.7	202	147	72.8
NV	18	17	94.4	20	16	80.0	20	15	75.0
NY	1,113	989	88.9	1,106	985	89.1	1,101	1,001	90.9
OH	1,188	816	68.7	1,192	869	72.9	1,214	1,043	85.9
OK	566	458	80.9	577	496	86.0	573	545	95.1
OR	245	196	80.0	250	203	81.2	244	205	84.0
PA	851	730	85.8	853	733	85.9	853	768	90.0
RI	55	53	96.4	56	53	94.6	54	49	90.7
SC	93	85	91.4	100	85	85.0	106	84	79.2
SD	216	196	90.7	213	197	92.5	210	194	92.4
TN	165	149	90.3	175	161	92.0	181	172	95.0
TX	1,263	1,119	88.6	1,260	1,138	90.3	1,259	1,148	91.2
UT	75	72	96.0	81	75	92.6	85	81	95.3
VA	153	141	92.2	154	145	94.2	155	146	94.2
VT	225	205	91.1	238	208	87.4	218	203	93.1
WA	329	286	86.9	330	295	89.4	326	296	90.8
WI	822	584	71.0	822	650	79.1	812	698	86.0
WV	73	55	75.3	72	56	77.8	72	57	79.2
WY	58	48	82.8	58	46	79.3	58	51	87.9

Note: Figures for school years before SY 2011–2012 may differ from previous reports due to changes in data submitted by States.

NA = not available.

About two-thirds of the LEAs that did not directly certify SNAP participants in SY 2011–2012 are private, and four-fifths are single-school LEAs. These schools may be less likely to enroll eligible children or may face greater barriers to implementing direct certification. The information-sharing relationship between private school LEAs and the States' education agencies often differs from the relationship between public LEAs and the States. For this reason, private LEAs are sometimes excluded from State-level direct certification matching systems. Although small, single-school, and private LEAs might face special challenges in setting up direct certification systems, all are subject to the statutory mandate.

The 2004 Reauthorization Act's phased implementation of mandatory direct certification recognized that the fixed costs of establishing such a system would pose the greatest challenge to small LEAs. Although SY 2011–2012 is the fourth year that the smallest LEAs were subject to the statutory mandate, these LEAs continue to lag larger LEAs in adopting direct certification, and it remains useful to track the progress of that group separately.

Figure 2 shows estimates by LEA enrollment category of the percent of LEAs that directly certified SNAP participants and the percent of students enrolled in LEAs that directly certified SNAP participants in SY 2011–2012.[14] Use of direct certification is nearly universal for larger LEAs; 99 percent of LEAs with enrollments of 5,000 or more students and 98 percent of those with enrollments of 1,000 to 4,999 directly certified some SNAP participants in SY 2011-2012.[15] Although LEAs with enrollments of at least 1,000 comprise about 40 percent of all LEAs, they enroll about 92 percent of students nationwide (Figure 3).

Direct certification is somewhat less prevalent among smaller LEAs; about 94 percent of LEAs with 500 to 999 students directly certified SNAP participants in SY 2011–2012, whereas the figure was 79 percent for LEAs with fewer than 500 students. Some of the LEAs might not have SNAP-participant children among their enrollments, although it is also possible that technical or administrative challenges are among the reasons that these LEAs did not directly certify any SNAP-participant children. The direct certification numbers for these two groups of small LEAs are a two and six percentage point improvement over the previous year. Therefore, the gap between the largest LEAs and those with fewer students is narrowing.

About 60 percent of all LEAs—approximately 11,000—enroll 1,000 or fewer students (Figure 3). In spite of their great number, these LEAs account for only eight percent of all enrolled students. Of the 3.9 million students enrolled in these LEAs, the vast majority (3.5 million or 89 percent) are enrolled in LEAs that directly certified at least some SNAP-eligible children.

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[14] LEAs made up entirely of Provision 2 and Provision 3 schools are included in the count of LEAs that directly certified SNAP participants. States were reminded in SY 2011-2012 to be sure that all LEAs report, even those that are not required to conduct verification activities (See Policy Memorandum SP 09-2012 dated January 6, 2012, at http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP09-2012os.pdf). Nevertheless, some States submitted FNS-742 datasets for SY 2011-2012 that did not include all of these LEAs. See Appendix A, Figure A.1 for the same chart with Provision 2 and Provision 3 LEAs excluded from both the total count of LEAs and the count of LEAs that directly certified SNAP participants.

[15] It is possible that some of the remaining large districts operate direct certification systems but certify no SNAP participants. It is also possible, given the limitations of the VSR data, that some of these LEAs are misclassified.

Figure 2. Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants by Enrollment Category, SY 2011–2012

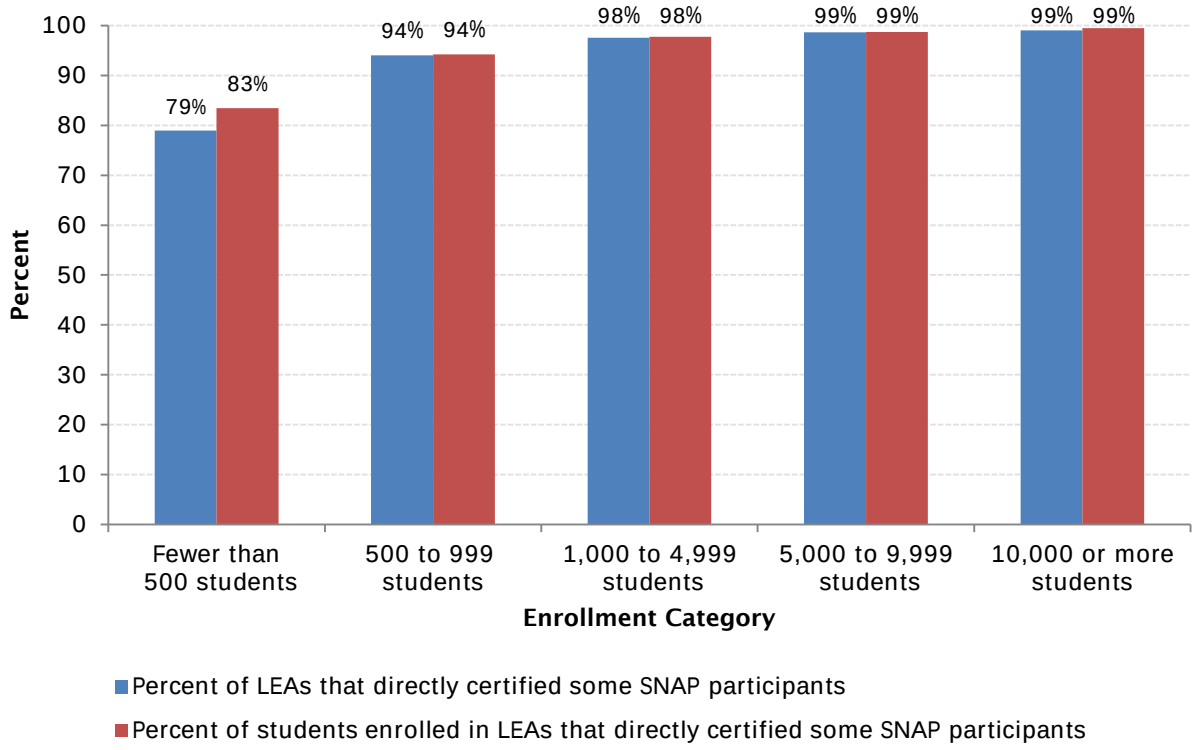
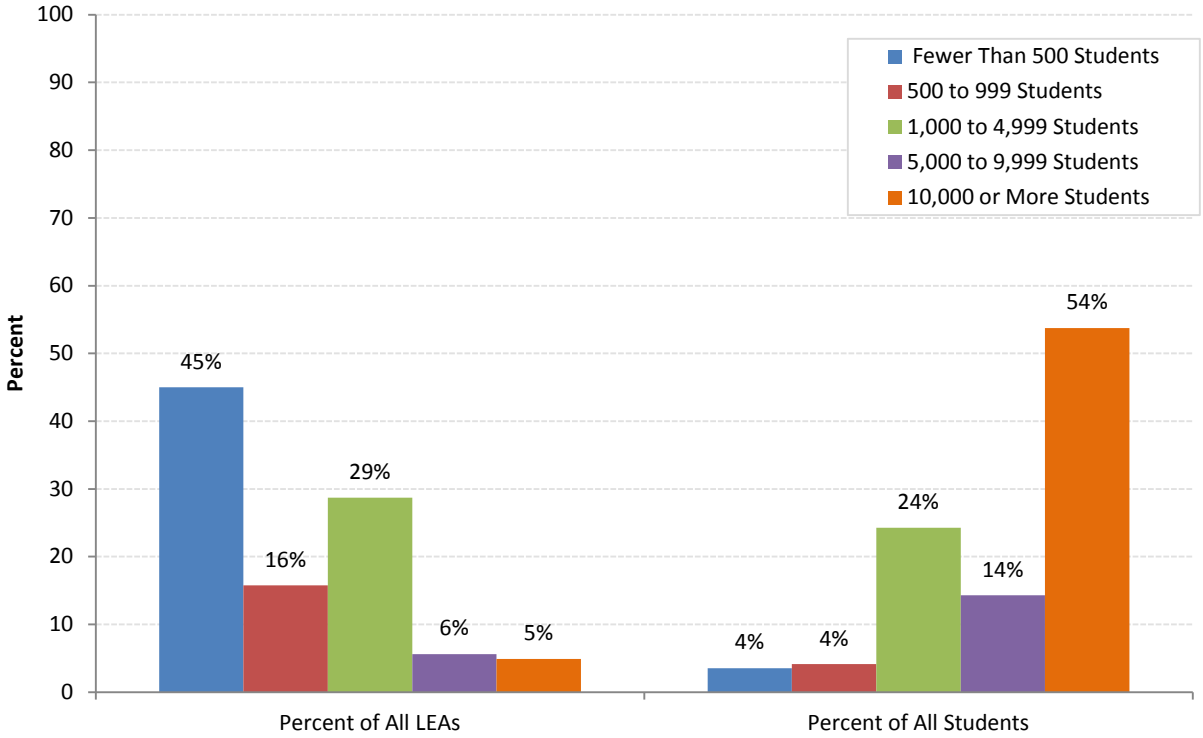


Figure 3. Percent of LEAs and Percent of Students by Enrollment Category, in SY 2011–2012



A. Characteristics of LEAs that Did Not Directly Certify Any SNAP Children

Overall, about 2,100 LEAs, about 11 percent of the total, did not directly certify SNAP-participant children in SY 2011–2012 (a decrease from about 2,800 LEAs in SY 2010–2011). Although the NSLA does not exempt small or single-school districts from the direct certification requirement, both groups are overrepresented among LEAs with no directly certified students. Because they tend to be small, the 11 percent of LEAs that did not directly certify any SNAP children enroll only two percent of students in NSLP-participating schools.

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

- About 93 percent enrolled fewer than 1,000 students; only 57 percent of LEAs that did directly certify SNAP participants enrolled fewer than 1,000 students.
- About 81 percent are single-school LEAs; only 34 percent of LEAs that did directly certify SNAP participants are single-school LEAs.
- An estimated 65 percent are private LEAs; only 14 percent of LEAs that did directly certify SNAP participants are private.
- About six percent certified no students at all for free meals, either by direct certification or by application. FNS has no reason to believe that this small group of about 136 LEAs is not in full compliance with the direct certification requirement; these LEAs might enroll very few or no children from SNAP-participant households.
- One-quarter certified some but no more than 5 percent of their enrolled students for free meals. These LEAs have an unusually low concentration of students certified for free meals. Among the 18,000 LEAs that filed VSRs for SY 2011–2012, only six percent reported having such a low concentration of low-income students. Some of these LEAs might also be in compliance with the direct certification requirement, although their systems failed to identify any SNAP participants.

IV. DIRECT CERTIFICATION PERFORMANCE

For each State, Mathematica estimates a direct certification performance measure based on three component statistics:[16]

1. The number of school-age children in the State's SNAP-participant households
2. The number of SNAP participants directly certified by the State's LEAs for free school meals[17]
3. The number of SNAP participants in the State's nonbase year Provision 2 or Provision 3 schools

[16] The derivation of each of these statistics is detailed in Appendix C.

[17] This is proxied by the number of students that LEAs report on the FNS-742 as eligible for free meals but not subject to verification. That number includes, but is not limited to, directly certified SNAP participants.

Table 2 provides the estimated values of these statistics for each State.[18]

This report's primary measure of State direct certification effectiveness is computed as follows:

$$\text{Percent of SNAP participants directly certified for free school meals} = \frac{\text{Students directly certified for free school meals}}{\text{School-age children in SNAP households} - \text{SNAP children in nonbase year Provision 2/3 schools}}$$

Figure 4 ranks the States according to this performance measure.[19] Because each of the component statistics is estimated with some error, the exact percentage values associated with the States should be viewed with caution.[20] Estimation error can result both from reporting error and limitations in the available methodology for estimating the direct certification rate. For example, if some districts provide inaccurate counts of students who are not subject to verification, State estimates of students directly certified for free school meals will be inaccurate as well. Estimates of SNAP children in nonbase year special provision schools will be inaccurate if some districts provide inaccurate information in their VSR or if some districts do not submit VSR information because all students attend nonbase year provision schools.

One methodological limitation is related to the measure's treatment of TANF recipients and other non-SNAP participant children directly certified at the option of States or LEAs.[21] TANF participation, in particular, is commonly but not universally used by States and LEAs as a second criterion in their direct certification systems. Because FNS does not know how many States, or what fraction of LEAs within States, directly certify TANF participants or these other categories of children, an adjustment for these children has not been made to the denominator of the equation presented at the top of this section. Without such an adjustment, however, Figure 4 percentages are overstated for some States. Figure 9 presents a more comprehensive measure of the States' success at certifying all categorically eligible children for free school meals. That measure includes the certification of students based on their status as SNAP, TANF, or FDPIR participants. Other limitations of the data and methodology are discussed in Appendices C and D.

Because of the potential for estimation error, this report focuses on the States' relative positions in the chart. States near the top of the chart are among the most successful at directly certifying SNAP-participant children for free school meals; relatively few SNAP households in those States are burdened with paper applications. Children from SNAP-participant households in those States are also among the least likely to be misclassified as ineligible for free school meals.

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[18] This report marks the first time estimates for Guam are included in this analysis. For ease of exposition, the report continues to refer to the units included in this analysis as "States" although it includes both Guam and the District of Columbia.

[19] See Appendix Figures A.2 through A.6 for U.S. maps providing a geographic view of these State estimates for SY 2007-2008 through SY 2011-2012.

[20] Estimation error is most obvious when State figures, computed from the component statistics in Table 2, exceed 100 percent. For purposes of display, we cap the percentages in Figure 4 at 100 percent. The paragraphs that follow discuss some of the sources of this error, and other reasons that may contribute to performance measures above 100 percent.

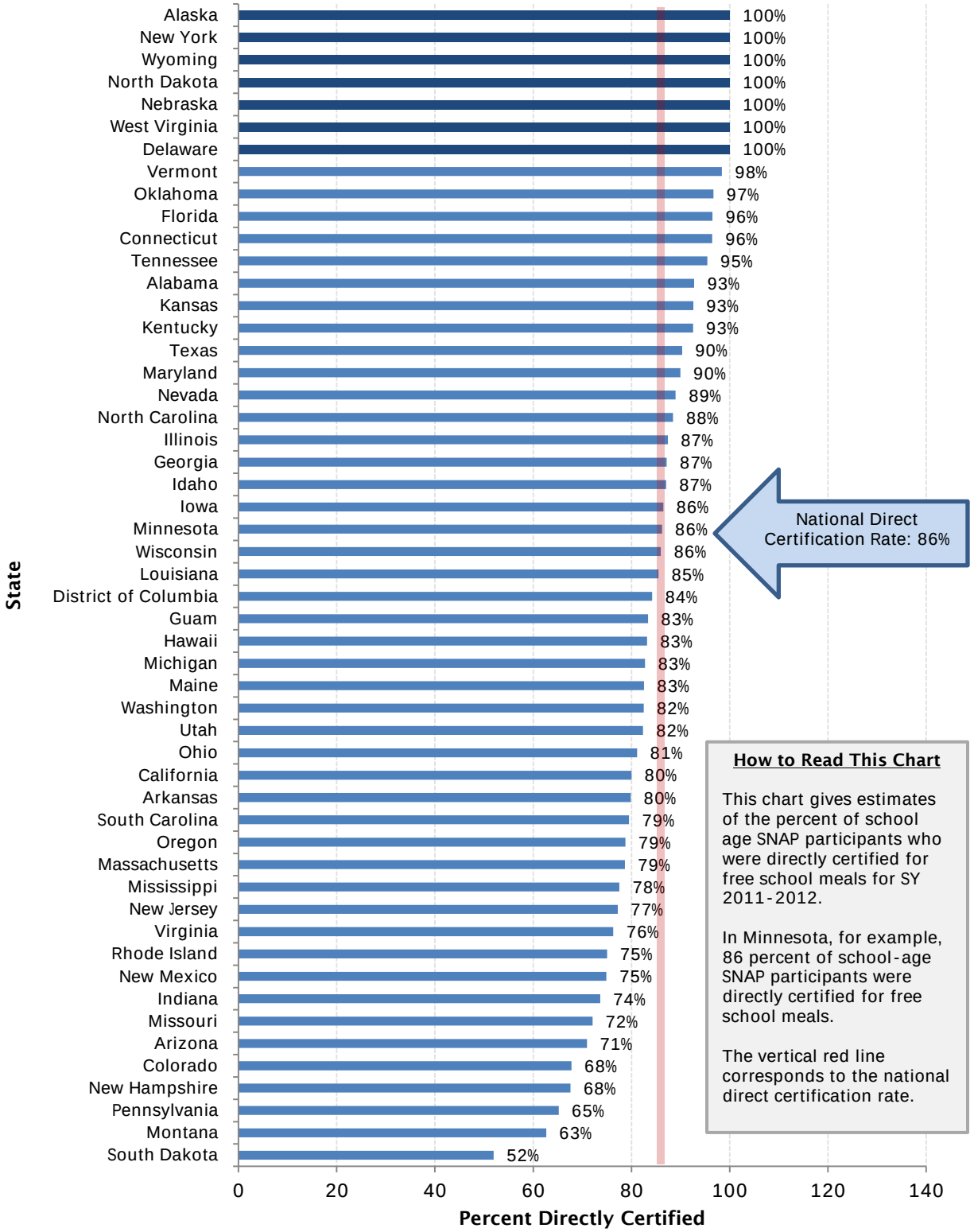
[21] These include children from FDPIR households, foster children, participants in Federally-funded Head Start or Even Start programs, and certain homeless, runaway, and migrant children.

Table 2. SNAP Participation, Direct Certifications, and SNAP-Participant Students in Non-Base-Year Provision 2 or Provision 3 Schools, SY 2011–2012 (thousands)

	School-Age SNAP Participants	NSLP Direct Certifications	SNAP Participants in Non-Base-Year NSLP Provision 2 or Provision 3 Schools
U.S. Total	**14,739.8**	**11,554.4**	**1,301.5**
Alabama	281.2	253.9	7.6
Alaska	28.8	30.2	5.3
Arizona	382.7	241.3	42.5
Arkansas	154.2	114.5	10.8
California	1,521.0	926.5	363.0
Colorado	179.5	121.1	0.9
Connecticut	98.2	65.0	30.8
Delaware	46.9	45.7	1.3
District of Columbia	36.9	17.0	16.7
Florida	912.1	868.5	12.1
Georgia	613.0	509.6	28.5
Guam	17.4	14.5	0.0
Hawaii	45.7	38.0	0.0
Idaho	77.4	66.8	0.7
Illinois	609.0	529.6	3.1
Indiana	303.1	216.1	9.6
Iowa	120.7	102.0	2.7
Kansas	97.2	90.0	0.0
Kentucky	237.1	218.7	0.8
Louisiana	301.5	257.8	0.0
Maine	63.2	52.0	0.3
Maryland	206.8	185.8	0.2
Massachusetts	242.6	183.0	9.9
Michigan	544.5	450.6	0.0
Minnesota	164.0	140.0	1.7
Mississippi	221.4	159.9	15.2
Missouri	308.3	222.1	0.0
Montana	37.3	20.0	5.3
Nebraska	55.5	58.7	0.6
Nevada	108.0	90.7	6.1
New Hampshire	35.1	23.7	0.0
New Jersey	274.2	211.5	0.2
New Mexico	148.2	60.2	67.9
New York	855.9	740.4	232.3
North Carolina	522.0	461.7	0.0
North Dakota	18.6	15.7	4.6
Ohio	538.2	398.1	47.7
Oklahoma	195.4	180.9	8.3
Oregon	212.3	163.6	4.5
Pennsylvania	461.9	290.5	16.3
Rhode Island	44.6	33.5	0.0
South Carolina	283.4	225.3	0.0
South Dakota	33.9	14.9	5.2
Tennessee	389.8	370.8	1.4
Texas	1,611.8	1,166.0	320.7
Utah	97.1	78.9	1.3
Vermont	21.5	20.6	0.6
Virginia	290.6	221.7	0.0
Washington	312.2	246.5	13.3
West Virginia	99.5	99.7	0.0
Wisconsin	268.1	229.6	1.0
Wyoming	10.1	11.1	0.8

Note: The SNAP participant count for Pennsylvania has been reduced by an estimate of SNAP-participant children who attend Philadelphia schools operating under a "Universal Feeding" pilot program. For all States, the SNAP participant figures depend on estimation of a "turnover rate" to convert monthly SNAP caseload into counts of unique individuals who received benefits for part or all of the July-to-September period of interest to this report. The SNAP participant counts are sensitive to small changes in the turnover rate. Error in estimation of the turnover rate complicates comparison of SNAP participant estimates and State direct certification effectiveness across years. See Appendix C for more detail.

Figure 4. Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals, SY 2011–2012



Note: The percentages in this figure are equal to the ratio of directly certified students, and other students eligible for free meals whose applications are not subject to verification, to all SNAP-participant school-age children. For a tabular presentation of these data, see Table A.3. Bars shaded dark blue represent estimates that were capped at 100 percent. See Appendices C and D for a discussion of data sources and data limitations. The September 2011 SNAP figures for at least two States (New Jersey and North Carolina) include a significant number of individuals who received short-term assistance following Hurricane Irene. The effect on these States' direct certification measures is unclear, and depends on when direct certification matches were conducted in those States.

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

Error in measurement and State reporting minimize the significance of small differences in the percentage point scores of States that fall near one another in Figure 4, but the wide gap between States near the bottom of the chart and those near the top makes clear that some States' direct certification systems are simply less effective than other States' systems. Among States and LEAs that rely on computer matching, variation in direct certification effectiveness might be explained in part by differences in matching algorithms, use of probabilistic matching, the nature and quality of data used as input into the matching process, procedures for handling nonmatches, access to a supplemental student-level look-up system, or other system characteristics.[22]

Figure 5 uses the same measure as Figure 4 to examine regional differences in direct certification effectiveness. The seven regions shown in Figure 5 are those defined for FNS administrative purposes.[23] States and LEAs in the Northeast, Southeast, and Southwest regions tended to outperform those in other parts of the country. Note that the regional measurements in Figure 5 are not simple averages of the State scores from Figure 4. Instead, the regional percentages reflect the relative size of the States in the regions.

Regional differences in direct certification performance can also be examined by plotting direct certification rates on a map of the United States. The top panel of Figure 6 shows the SY 2007–2008 direct certification performance measure for each State, whereas the bottom panel shows the SY 2011-2012 direct certification performance measure. This figure confirms the existence of limited regional differences in State performance, but it also highlights the fact that successful State systems are located in every part of the country. A comparison of the two panels in this figure illustrates the marked increase in direct certification performance across all States.

The pattern of improved performance is confirmed by steady increases in the national direct certification performance measure. Nationally, 86 percent of school-age SNAP participants were directly certified in SY 2011-2012, compared to 68 percent in SY 2007-2008 (Figure 7).

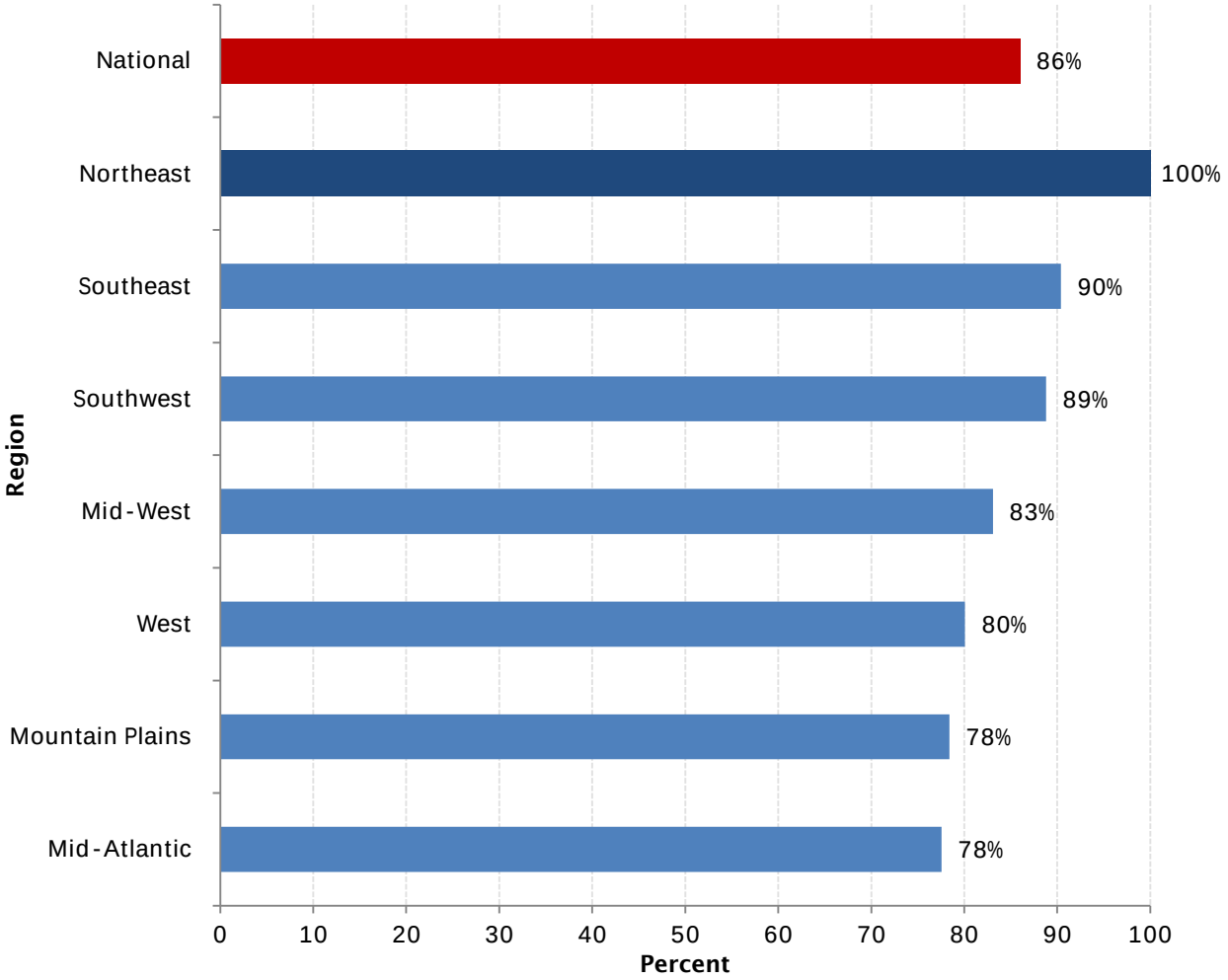
Figure 8 compares SY 2011–2012 State-level measures of direct certification effectiveness (from Figure 4) with the same measures computed with SY 2010–2011 data. Nearly all States showed improved performance. States near the top of Figure 8 achieved the largest percentage point growth in the share of SNAP-participant children who were directly certified for free school meals.[24]

[22] See Section V for a discussion of State and LEA direct certification practices.

[23] See Table A.5 for a listing of States by FNS administrative region.

[24] Some of the percentages in Figure 7, particularly those near the top and bottom of the chart, are due, at least in part, to factors unrelated to the States' direct certification performance. These factors include corrections to prior year VSR reporting, possible errors in current year reporting, and the technical characteristics of the performance estimate itself.

Figure 5. Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals by Region, SY 2011–2012



Note: The percentages in this figure are equal to the ratio of directly certified students, and other students eligible for free meals whose applications are not subject to verification, to all SNAP-participant school-age children in the region. The performance measure for the Northeast region has been capped at 100 percent. See Appendices C and D for a discussion of data sources and data limitations.

Figure 6. Percent of SNAP-Participant Children Directly Certified for Free School Meals, by State

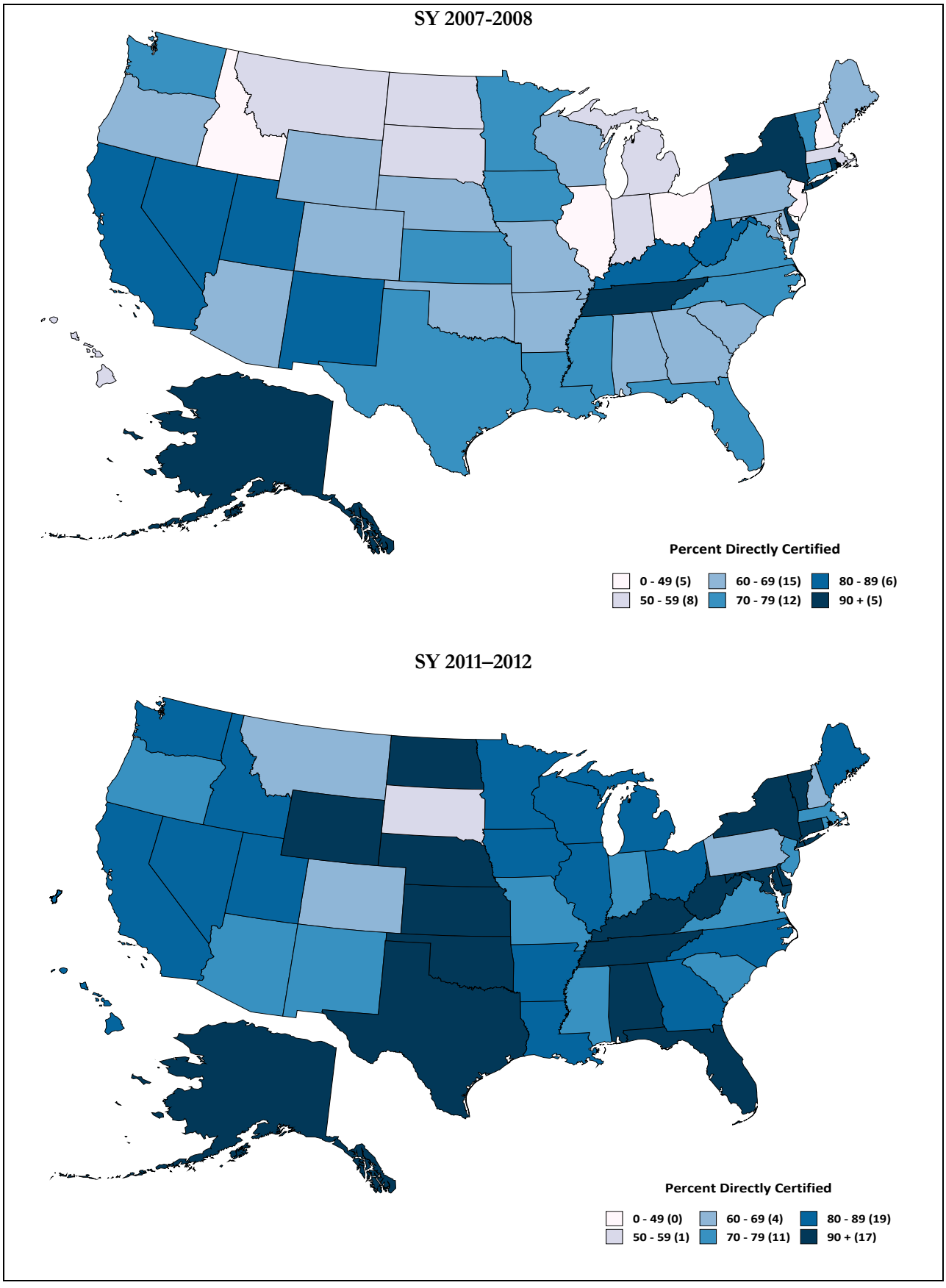


Figure 7. Percent of SNAP-Participant Children Directly Certified for Free School Meals Nationally, SY 2007-2008 to SY 2011-2012

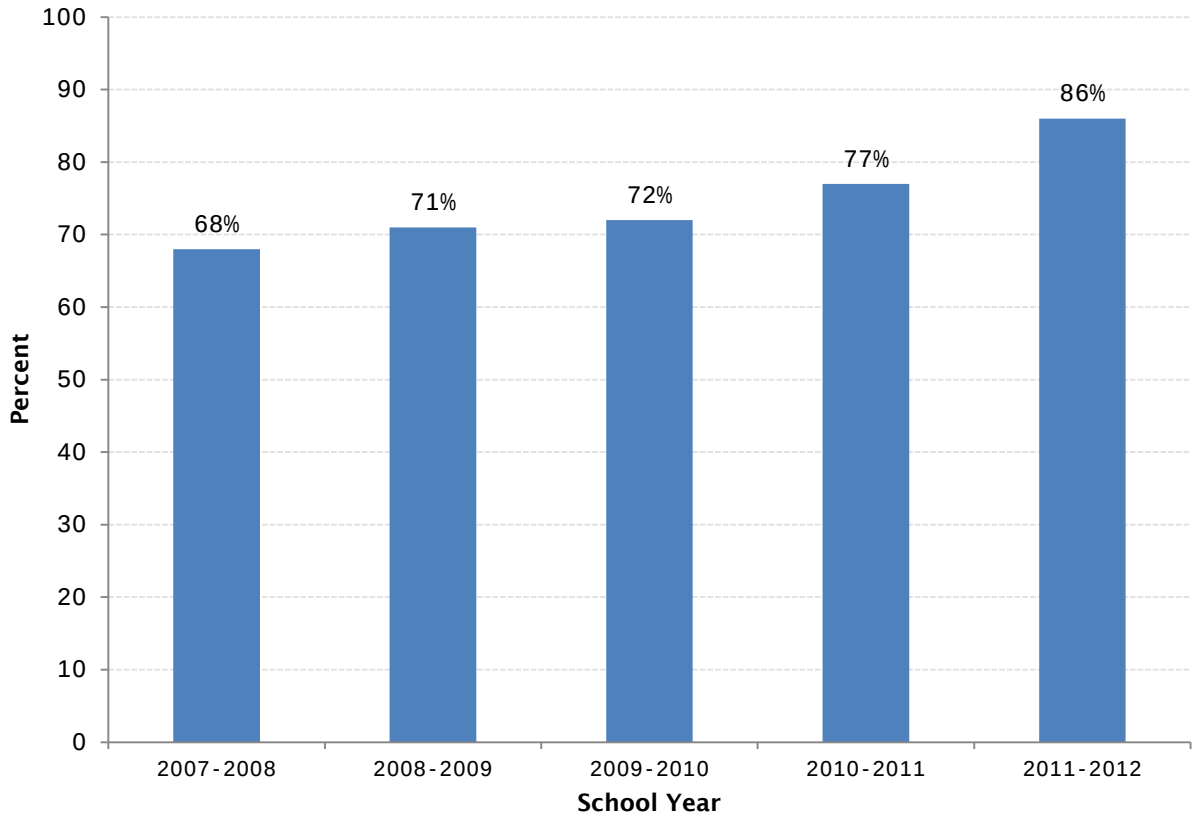
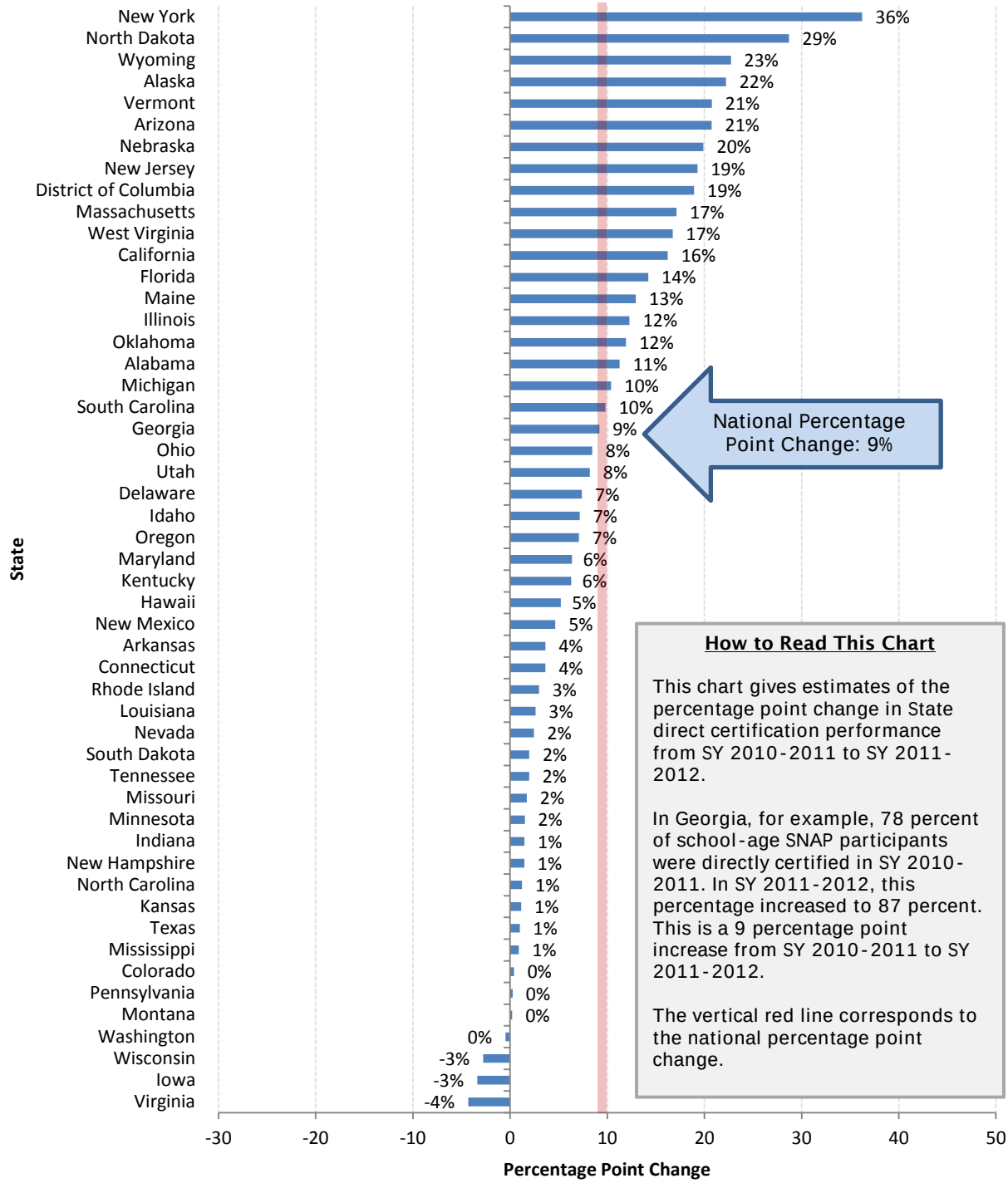


Figure 8. Percentage Point Change in the Share of SNAP-Participant Children Directly Certified for Free School Meals, SY 2010–2011 to SY 2011–2012



Note: For a tabular presentation of these data, see Table A.3. Some year-to-year changes in the share of SNAP-participant children directly certified for free school meals, particularly the extreme changes at the top and bottom of this figure, can be attributed to factors other than direct certification performance, such as State reporting error and methodological limitations of the performance measure. See footnote 24 for specific examples of these issues. The percentages in Figure 8 are based on the performance measures computed from the component figures in Table 2, not the figures in Figure 4 that are capped at 100 percent for several States.

Like the numeric values in Figure 4, it is useful to view the values in Figure 8 as relative measures between States rather than absolute measures of improved direct certification performance across years.[25]

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

The measure starts with the number of students whose eligibility for free school meals is not subject to verification. This is the same proxy measure of directly certified SNAP participants used earlier. Added to this are the students whose approval for free school meals is based on the household's submission of a SNAP, TANF, or FDPIR case number on an NSLP application. The sum of these two numbers, the numerator in the equation on the following page, is the total number of students that are certified by LEAs based on categorical eligibility for free school meals.[26]

This count of children identified as categorically eligible for free meals is divided by an estimate of the combined SNAP, TANF, and FDPIR populations. The SNAP population estimate used here is the same one used in the performance measure developed earlier. The number of children in households that receive TANF but not SNAP benefits is estimated from data found in the U.S. Census Bureau's American Community Survey (ACS).[27] The number of children who receive FDPIR benefits is estimated from FNS program and survey data.[28]

[25] See Appendix C for a discussion of the uncertainty surrounding this report's estimates of SNAP-participant counts at the start of the school year.

[26] Some children might not be identified as categorically eligible even if they are current recipients of SNAP, TANF, or FDPIR benefits. These students might be missed by the States' direct certification systems. Others might fail to submit SNAP, TANF, or FDPIR case numbers on paper applications for free meals. Some of these children are nevertheless certified for free meals based on income information submitted by application. Others are misclassified as ineligible for free meals.

[27] See Appendix D for a discussion of data limitations. ACS data are not available for Guam. Therefore, Guam is not included in the analysis of the more comprehensive categorical eligibility certification measure. No adjustment is made for TANF (or FDPIR) participants who are not SNAP participants and who attend nonbase year Provision 2 or Provision 3 schools.

[28] The FDPIR population survey is discussed in Usher et al. (1990). See Appendix D for a discussion of data limitations. Note that FDPIR households may not simultaneously participate in SNAP. No adjustment is made for FDPIR (or TANF) participants who attend nonbase year Provision 2 or Provision 3 schools.

Details of this computation are summarized in the following equation. The two statistics in the numerator and the sum of the values in the denominator are given for each State in Table 3. Figure 9 displays the same data graphically.

$$\text{Percent of SNAP, TANF, and FDPIR participants certified (directly or by application) for free school meals} = \frac{\text{SNAP, TANF and FDPIR applicants identified as categorically eligible on applications for free meals (Table 3, column 3)} + \text{Directly certified students (Table 3, column 2)}}{\text{School-age children in SNAP households} - \text{SNAP children in nonbase year Provision 2/3 schools} + \text{School-age children in TANF households that do not participate in SNAP} + \text{School-age children in FDPIR households}}$$

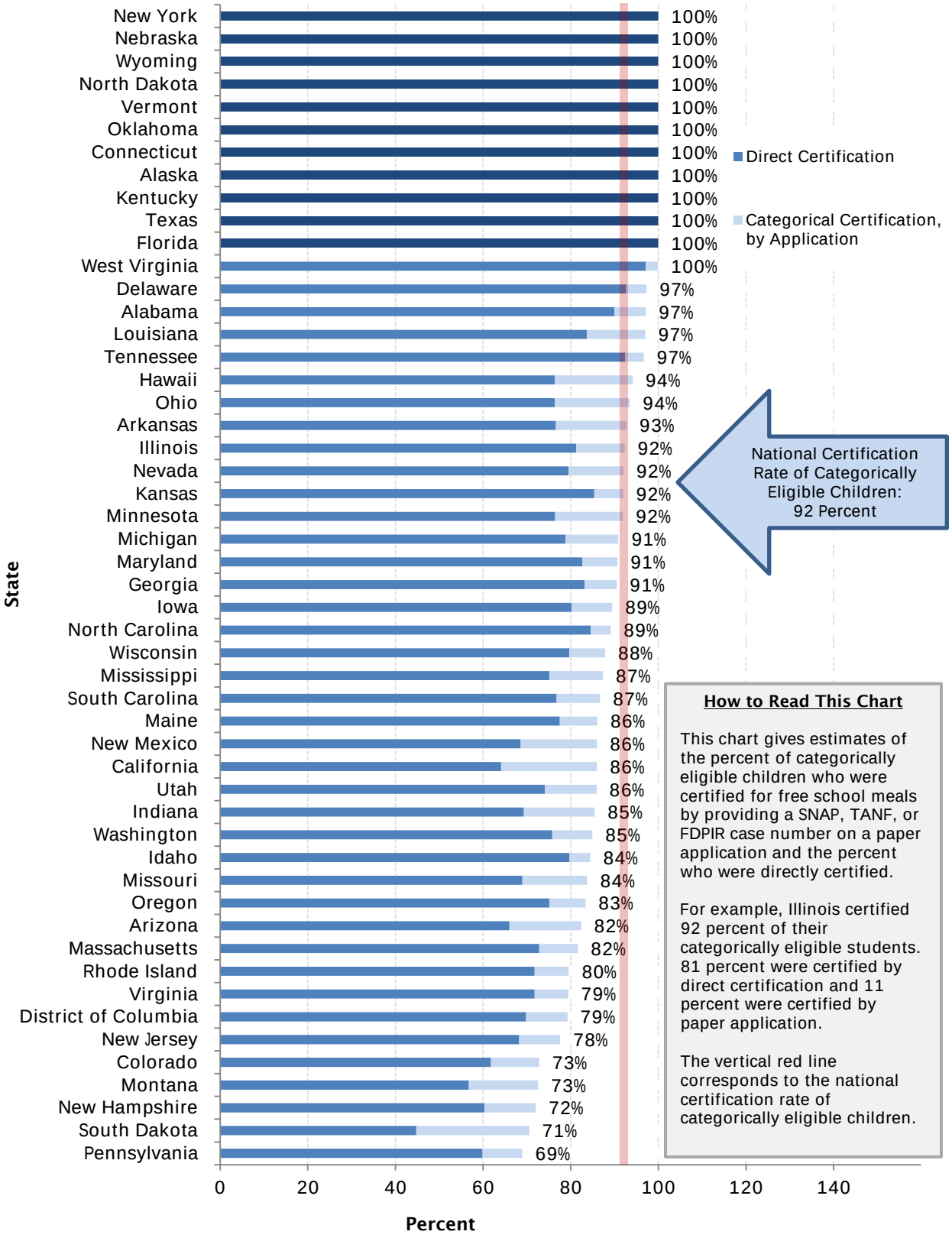
The 26 States—up from 17 States last year—at the top of Figure 9 certified at least 90 percent of students who were categorically eligible for free meals based on their participation in SNAP, TANF, or FDPIR. States at the bottom of Figure 9 are the least successful at identifying and certifying these children.[29]

[29] See Appendix Figures A.7 through A.11 for U.S. maps providing a geographic view of these State estimates.

Table 3. Categorically Eligible Students: Number Directly Certified and Number Approved by Application, SY 2011–2012 (thousands)

	Number of Children Identified as Categorically Eligible	Directly Certified	Categorically Eligible, Approved by Application
U.S. Total	**14,504.5**	**11,554.4**	**1,741.7**
Alabama	282.1	253.9	20.2
Alaska	31.0	30.2	1.2
Arizona	365.7	241.3	60.0
Arkansas	149.5	114.5	24.2
California	1,444.8	926.5	315.8
Colorado	196.1	121.1	21.7
Connecticut	74.9	65.0	12.4
Delaware	49.4	45.7	2.3
District of Columbia	24.4	17.0	2.3
Florida	950.6	868.5	83.8
Georgia	613.2	509.6	45.7
Hawaii	49.8	38.0	8.8
Idaho	83.7	66.8	4.0
Illinois	651.6	529.6	72.0
Indiana	311.8	216.1	50.4
Iowa	127.2	102.0	11.8
Kansas	105.4	90.0	7.0
Kentucky	244.3	218.7	28.0
Louisiana	308.0	257.8	41.1
Maine	67.1	52.0	5.8
Maryland	224.7	185.8	18.1
Massachusetts	251.3	183.0	22.2
Michigan	571.7	450.6	69.2
Minnesota	183.1	140.0	28.3
Mississippi	212.9	159.9	26.0
Missouri	322.0	222.1	47.6
Montana	35.3	20.0	5.6
Nebraska	58.3	58.7	5.5
Nevada	114.1	90.7	14.3
New Hampshire	39.3	23.7	4.6
New Jersey	310.0	211.5	29.1
New Mexico	87.7	60.2	15.3
New York	676.5	740.4	63.0
North Carolina	546.3	461.7	25.3
North Dakota	16.3	15.7	2.1
Ohio	521.0	398.1	89.2
Oklahoma	206.1	180.9	36.6
Oregon	217.8	163.6	18.0
Pennsylvania	485.2	290.5	44.3
Rhode Island	46.6	33.5	3.6
South Carolina	293.5	225.3	29.2
South Dakota	33.4	14.9	8.6
Tennessee	401.0	370.8	17.0
Texas	1,355.1	1,166.0	202.3
Utah	106.5	78.9	12.6
Vermont	22.3	20.6	3.1
Virginia	308.9	221.7	23.7
Washington	325.4	246.5	30.0
West Virginia	102.7	99.7	2.9
Wisconsin	288.1	229.6	23.5
Wyoming	10.7	11.1	0.7

Figure 9. Percent of Categorically Eligible Children Certified for Free School Meals, SY 2011–2012



Note: The percentages in this figure are equal to the ratio of categorically eligible students certified for free meals by application, directly certified students, and other students eligible for free meals whose applications are not subject to verification, to all SNAP-, TANF-, and FDPIR-participant school-age children. For a tabular presentation of these data, see Table A.3. Bars shaded dark blue represent estimates capped at 100 percent. See Appendices C and D for a discussion of data sources and data limitations.

V. DIRECT CERTIFICATION BEST PRACTICES

The Food, Conservation, and Energy Act of 2008 (P.L. 110-234) requires a discussion of best practices with States with successful direct certification programs. To fulfill this requirement, FNS contracted with Mathematica Policy Research to conduct interviews with child nutrition (CN) administrators and direct certification experts and to host a roundtable discussion among FNS, Mathematica, and CN officials from several States with successful or improved direct certification programs.

Several criteria were used in the selection of the States for the best practices portion of the study. States were selected to participate primarily on the basis of direct certification performance during SY 2011–2012, or positive change in the percentage of eligible children directly certified compared with the previous school year. In addition, States were selected to reflect the diverse perspectives of States in different parts of the country with different types of matching systems, and to include States that have not been highlighted in previous years' reports.

Six States participated in interviews for this review: California, Nebraska, Oklahoma, Tennessee, Vermont, and West Virginia. The selected States met the performance criteria while also representing different regions of the country. Three of these States (Nebraska, Oklahoma, and Vermont) have never been featured in recent direct certification best practices reports, and California and West Virginia substantially changed their direct certification systems and processes since they were last interviewed in 2008. Tennessee provided the perspective of a local matching State. Representatives from five of these States, plus the District of Columbia and Ohio, participated in the roundtable discussion. Two experts on direct certification IT and processes were consulted and provided their perspectives on best practices, performance, and the role of technology. One expert works for a third-party software vendor that has provided districts with CN data management software systems for the past 10 years and has recently partnered with West Virginia in enhancing its central matching direct certification system. The other expert works for the Nebraska State office of data, research, evaluation and information technology and helps integrate internal and external IT resources in developing Nebraska's direct certification system.

The remainder of this chapter includes a description of State practices (Section A); recent and planned strategies for improving direct certification (Section B); best practices in implementing direct certification systems (Section C); and challenges States face in meeting direct certification rate targets required by the HHFKA (Section D).

A. Description of State Practices

The primary goal of direct certification is to identify children in SNAP-participant households and certify them as eligible for free school meals without application. States may also use information about children enrolled in qualifying programs, such as TANF, foster care, and FDPIR.[30] Methods for direct certification have evolved over time. Currently, there are two main

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

methods for conducting direct certification: (1) using a central matching system, whereby a State agency uses computer matching to link SNAP records with student enrollment records and distributes match results to LEAs; and (2) using a local matching system, whereby a State agency distributes SNAP data to LEAs and LEAs match these data with their student enrollment lists.[31] Another approach to direct certification is the letter method, whereby a State agency or LEA sends letters to SNAP-participant households, which then take the letter to their schools in lieu of a school meal benefit application. HHFKA disallows the letter method as a means of direct certification. By regulation, States will no longer be allowed to use the letter method for direct certification with SNAP in SY 2012-2013.

Although there are only two primary matching methods, actual processes and procedures for direct certification vary considerably, even among States with successful programs. Our review of State systems is similar to the reviews conducted in previous years, focusing on five key questions about direct certification:

1. Which administrative entity is responsible for matching SNAP/TANF records with student records (that is, is it a central matching or a local-level process)?
2. How is a match made? What identifiers and matching rules are used to form the match?
3. Is any attempt made to directly certify initially unmatched or partially matched SNAP/TANF children?
4. When and how often are records matched?
5. What direct certification methods are available to nonpublic schools?

This year, we also asked States about several additional issues: (1) any recent or planned technological changes or innovations to their direct certification systems; (2) challenges in meeting the direct certification performance rate targets required by HHFKA; and (3) recommendations for low-performing States in developing continuous improvement plans (CIPs) to help them make improvements to their direct certification rates.

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

[31] These methods are often referred to as State-level matching and district-level matching. However, districts typically play critical roles in direct certification systems that are developed and maintained by a central authority, with responsibilities such as uploading enrollment data, reconciling lists of potential matches, and conducting secondary matching processes. The terms used in this report refer to the entity responsible for developing and maintaining the matching system.

Table 4. Characteristics of the Direct Certification Matching Process for Public LEAs in Select States, SY 2011–2012

State	Type of Matching System	How Does Direct Certification Work?	Approach for Unmatched Students?	Frequency of Direct Certification
California	Central	System matches public K-12 and charter school student enrollment data with SNAP and TANF data. Results are filtered by zip codes and districts log in to the Statewide student information data management system for download. Districts notify households of definite matches and perform secondary processes for partial matches.	No formal approach	Monthly
Nebraska	Central	System performs nightly matches of updated daily program and student enrollment data. The matching algorithm includes four elements. If all four elements match, it is considered a definite match. Partial matches are identified and scored. Districts download a partial match list and perform secondary matches at their discretion using individual look-up and additional fields.	Districts have access to individual student look-up	Daily
Oklahoma	Central	State switched to a central matching system in SY 2011-2012. This system utilizes updated monthly SNAP and TANF program data and matches with student enrollment data (including charter schools) that are updated daily. Districts are notified when the partial and matched lists are available for download and for finalizing certification.	Districts are provided a list of unmatched students to review manually	Monthly
Tennessee	Local	A Statewide SNAP and TANF program data file is provided to districts' food service coordinators via a secure web portal. Subsequent program data include only those new to program benefits. Most districts perform electronic matching of the program data to their student enrollment files, mainly through their point of sale or student enrollment systems. Those districts not using electronic matching typically have small enrollments.	District discretion	Monthly
Vermont	Central	The system matches TANF and SNAP program data with a student census. The program data are updated monthly and the student census is updated twice per year. Districts are informed of matches via email and have to finalize the match for direct certification by comparing matched students with a current enrollment roster.	State IT staff reviews unmatched list manually	Monthly
West Virginia	Central	West Virginia uses third-party software to perform matches of SNAP and TANF program data with student data from its Statewide student information system. Enrollment data are continuously updated, whereas the program data are updated quarterly. Matching is conducted nightly. Because certification is tied to the SSIS system directly, direct certification does not require active steps by the district and eligibility status follows students who transfer between districts.	Districts are provided a list of unmatched students filtered by county to review manually	Daily

Central or Local Matching

Five States included in this review use central matching systems for direct certification: California, Nebraska, Oklahoma, Vermont, and West Virginia. Tennessee uses a local-level matching system. The key distinctions between central and local matching include the following:

- **Central matching system.** With central matching, a State agency (usually the CN agency) is responsible for a system that matches a list of children attending schools participating in the NSLP with a list of children in SNAP households using a common identifier or identifiers. This system can be set up in a variety of ways. Some examples include:
  - A State agency matches State enrollment information with a State list of children in SNAP households. A list of students directly certified on the basis of this match is forwarded to districts, which then notify the households.
  - The State agency conducts an initial match. A list of matched students is sent to districts, which then verify the matches, obtain further information on students who are potential matches, or conduct other types of secondary matching.
  - Districts upload enrollment information into a State-maintained computer or web-based system that conducts a match against a list of children in SNAP households. Students are directly certified on the basis of this match.
- **Local matching system.** With local matching, LEAs have primary responsibility for matching a list of children enrolled in their schools with a list of children in SNAP households using a common identifier or identifiers. Some States using local matching provide districts with a list limited to children in SNAP households living in the district's geographic area; others provide a full Statewide list. Districts may use manual methods or their own computer systems to conduct matching.

The five States that use central matching have each developed relatively new, comprehensive matching systems and attribute their success to the gains in efficiency and accuracy that come with centralized systems. Tennessee, which uses local matching, cites the stability of the process, coupled with more frequent matching and district familiarity with its students, as key features of its methods and processes.

California introduced a central matching system in August 2010; SY 2011–2012 was the first full year it used that system. The new system conducts an automated matching process monthly and delivers the results to districts via a secure web portal. Nebraska's central matching system has been upgraded gradually each year to include features such as unique student ID, individual student look-up, updated probabilistic matching software, and increasing the frequency of data updating and matching. Oklahoma moved to a central matching system from a local matching system for SY 2011–2012. Key features of this new system include automatic updates to enrollment data, daily matching, and a system for reconciling unmatched children from the program data. Vermont has used a central matching system for five years, with a recent change to monthly matching and development of a web-based tool to improve the accuracy of verification reporting. West Virginia uses a centralized matching system that allows for continuous, automated direct certification of students and does not require any additional steps from districts to finalize certification status.

Tennessee has used local matching for direct certification since the 1990s and was one of the first States to use electronic files in direct certification matching. Each month, starting in July, public

and private districts can download a Statewide SNAP and TANF program data file from their password protected internet sites. Districts use their own processes to match SNAP/TANF data with enrollment data.

Overview of the Matching Process in Six States

In SY 2011–2012, all six States in this review used electronic matching algorithms. In Tennessee, where the districts do the matching, the vast majority of the districts employ some form of computer matching either through their point-of-sale or student enrollment systems. There is some commonality among the interviewed States in the elements they use (or provide) for their matching algorithms. All six States used students' names (first and/or last) and dates of birth (DOB) in the direct certification matching process. Three of the six States reported using Social Security numbers (SSNs), when available. In the remainder of this section we describe, separately for central and local-level approaches, the matching process, identifiers, and program data used to form direct certification matches.

a. Matching Process for States Using Central Matching Systems

All five central matching States used a program data file with information on both SNAP and TANF receipt. In addition, these State agencies all have access to a Statewide student enrollment system that provides the student records for matching with program data. Although all of these States rely on a centrally developed system for conducting the primary direct certification matching, local districts play a large role in finalizing matches and conducting secondary matches or reviews of students identified as potential matches by the central matching system.

States vary in how program data are received and incorporated into the matching process. In West Virginia, the Department of Human Services (DHS) uploads SNAP/TANF program data directly into its Statewide student information system (SSIS). In Oklahoma and Vermont, CN officials receive SNAP and TANF program data files from the DHS and Department of Children and Families, respectively, and then import those data into their matching system. Student privacy concerns led California to develop a system in which the three State agencies responsible for SNAP, TANF and enrollment data respectively send files to an independent State data center. Nebraska's system receives an updated data file of SNAP and TANF recipients and foster care participants nightly from its Department of Health and Human Services (DHHS).

There is some commonality in the criteria used in assigning matches (see Table 5). All States distinguish between definite matches (which are directly certified automatically) and potential matches (which can be directly certified based on further investigation). Additionally, all States require exact matches on the primary identifiers to determine a definite match.

California's direct certification system imports the program data each month and performs an automated match against all K–12 public school students, public charter school students, and county Department of Education students. Students who match on first name, last name, DOB, and address are considered exact matches and a list is produced for download. For the purposes of this match, California codes all addresses to U.S. Postal Service delivery point codes (DPCs). Because every address is associated with a unique DPC, the DPC provides a single unique number to use in the matching process. Administrators in each district log on to the system and extract the matched direct certification list by zip code.

Table 5. Primary Matching Criteria for States that Use Central Matching Systems

	California	Nebraska	Oklahoma	Vermont	West Virginia
First Name	●	○	●	●	○
Last Name	●	○	●	●	○
Middle Name/Initial			○	●	
Date of Birth	●	○	●	●	○
Social Security Number			○		●
Address	●		○	●	
Gender		○		○	
Zip Code			○		
Parents' Names			○		

Notes: ○ Exact match can be used in identifying a definite match; inexact match can be used to identify a potential match.
● An exact match is required for the given field.
No symbol indicates that the criterion is not used or not available.

For SY 2011–2012, Nebraska was the only State interviewed that used a probabilistic matching algorithm that provided a score indicating the likelihood of a match. The automated system matches updated student enrollment data to program data using first name, last name, DOB, and gender. If there is an exact match on all four elements, the match gets a score of 100 and the student is directly certified. In cases in which there is an exact match on some but not all data elements or an inexact match due to variation in name spelling or a transposed date, the student gets a score of less than 100. Scores from 62 to 99 are deemed as possible matches and can be directly certified subject to further review by the districts. Nebraska's program data file includes a larger number of data elements than are available in the enrollment system. To take advantage of all available information, the State has developed an interface that enables districts to reconcile potential matches by entering additional student characteristics to be matched with the full set of data elements available in the program data.

In Oklahoma, DHS sends SNAP and TANF data monthly beginning in August. In making its matches, Oklahoma uses several algorithms. Students are directly certified based on an exact match of first name, last name, and DOB. Additional matches are based on combinations of parent name, SSN (if available), zip code, address, and middle name. For some of these elements, the matching algorithm can use substrings or inexact matches to make a match. Children from the program data who are not matched go to a file that districts can review using their own local methods.

Vermont bases its matching algorithm on first name, last name, middle initial or name, gender, DOB, and address. If all identifiers match exactly, the student is deemed a definite match and directly certified. Students are considered partial matches when there is an exact match on some but not all data elements or an inexact match on some data elements. Food service directors in each district receive an email when the matches are ready for download. Districts log in to the system to compare the matched list with their student roster.

West Virginia's completely automated system receives program data quarterly but conducts nightly matches using current enrollment data (which are updated continuously by districts). When the program data are imported into the SSIS, the system performs edits on the data, such as removing special characters. Direct certification matching is conducted in two stages. First, if there is a match against SSN, then the student is determined to be an exact match and is directly certified

with no further action required from the district. Second, if there is no match on SSN (or SSN is not available), students with exact matches on first name, last name, and DOB are automatically directly certified.

b. Matching Process for State Using Local Matching System

Tennessee uses an approach to matching that parallels the central matching States in terms of the data elements used for matching (Table 6). SNAP or TANF program data are available to districts for download from Tennessee's secure web portal on a monthly basis starting July 1. The July 1 files contain the full set of school-age program beneficiaries. Each successive month, only newly certified program beneficiaries are included in the file. The SNAP/TANF files include last, first, and middle names; SSN; DOB; TANF/SNAP program ID number; parent name; and address. Tennessee provides minimal guidance to districts with regard to matching criteria because district student enrollment data can vary in content and quality across districts, and districts are in the best position to leverage the strengths of their data systems. Thus districts have been responsible for developing and performing the matching algorithms. Public and private districts download the SNAP/TANF data files and edit and load the data into their point-of-sale or student enrollment systems to perform the matches.[32]

Table 6. Characteristics of Data Provided to Districts in Tennessee, a State with a Local Matching System

Key Characteristics	File allows for computerized matching
	Includes information for children receiving SNAP and TANF benefits
	In coming years, will include information on foster care children
Data Elements Provided	Social Security number
	First name
	Last name
	Date of birth
	Address
	Parents' names

Frequency of Match

Each State performs its first direct certification match before the start of school. As shown in Table 7, all States supplement that first match with additional direct certification efforts during the school year. Additional efforts identify students who are newly receiving SNAP or TANF benefits or newly enrolled as a result of out-of-State or within-State transfers.

A direct certification match before the beginning of a new school year directly certifies only children who are enrolled in SNAP or TANF at that time. By obtaining updates of newly enrolled SNAP or TANF recipients, States can identify and directly certify students who become eligible at other points during the school year, making direct certification a more continuous and dynamic process.

In States with central matching, there were commonalities in the frequency of data matching and the timing in which they received the program data. California, Oklahoma, and Vermont receive

[32] Not all LEAs in Tennessee have point-of-sale or enrollment systems to perform computer matching. Districts that do not have such systems perform the matches manually.

updated SNAP/TANF data each month. Direct certification matching algorithms in those States are programmed to coincide with the receipt of the updated program data and thus occur monthly.

Table 7. Approach to Children with Potential Matches and to Children Not Matched in the Primary Process

State	Approach for Partial Matches	Approach for Unmatched Children
California	Districts are provided a list of partial matches with indicators for what elements do not match.	Districts review monthly lists of children from the program data who were neither definite nor partial matches.
Nebraska	The system uses probabilistic matching to assign a match score. Districts review cases with scores from 62 to 99. The review tool is an individual student look-up interface that enables districts to enter student characteristics that are available in program data but not in the enrollment data used in the primary match.	Districts do not review unmatched children directly, but these children can be matched by districts through the individual student look-up interface.
Oklahoma	The system does not provide lists of partial matches.	Districts review monthly lists of children from the program data who were not matched.
Tennessee	The matching approach is at district discretion.	The matching approach is at district discretion.
Vermont	The system does not provide lists of partial matches.	Unmatched children are reviewed by State IT officials, who conduct direct certification matching.
West Virginia	The system does not identify partial matches.	Districts are sent a list of unmatched students filtered by county. The list does not include children who were previously matched. State officials felt that a new list feature that indicates the number of students remaining for review helped motivate system users.

Each of these three States has an SSIS. California and Oklahoma enrollment data are constantly updated after an initial load of enrollment data for the school year in July. Vermont enrollment data are uploaded directly to the SSIS via a student census that districts send twice a year. West Virginia enrollment data are updated continuously, but the program data for matching was received four times a year in SY 2011–2012. Matches are made nightly and automatically loaded into its SSIS. Nebraska was the sole State that had synchronized the timing of both enrollment and program data to its direct certification processes. Enrollment data are updated by the districts directly into their SSIS and DHHS provides a nightly updated file on SNAP, TANF, and foster care recipients. Data are updated daily thereafter and districts can access the system daily to show a list of matched and potentially matched students.

Methods to Directly Certify Unmatched SNAP/TANF Children

Most of the States interviewed for this review have methods (formal and informal) to directly certify children enrolled in SNAP or TANF who are not matched to student enrollment records through the initial match procedure (Table 4). The burden is generally on districts to review these unmatched records and States generally do not provide much formal guidance or requirements for these secondary match methods. California and Nebraska have system features that enable districts to investigate children who matched on some—but not all—data elements. In California, Oklahoma, and West Virginia, districts investigate lists of children who were not matched in the primary central process. In Vermont, State IT officials conduct this investigation. Tennessee uses a local matching system, so treatment of unmatched children is at districts' discretion.

Extending Categorical Eligibility to Additional Children in a Household

In August 2010, FNS implemented a policy to extend categorical eligibility for free meals to all children in households receiving assistance from SNAP, TANF, or FDPIR. Among States included in this review, the most common response was to notify districts of the policy change and provide districts with technical assistance in interpreting the policy.

West Virginia implemented a comprehensive multistep process to review potential sibling matches. This process takes a two-pronged approach with an automated component and a manual match routine. The automated system approach has three components: (1) identify students listed on a single NSLP application in the previous year, (2) identify students' program data case number (supplied in the SNAP/TANF files), and (3) identify students with the same addresses. Districts can review students identified through this process and directly certify those they verify to be members of the same household. In addition to this process, West Virginia implements the policy to extend benefits through the notification letters sent to households, which ask parents/guardians to contact CN administrators if they have other children in the household. Finally, districts are instructed to extend benefits automatically if they receive applications that include students directly certified for free meals.

Direct Certification Process for Nonpublic and Charter Schools

Nonpublic and charter schools present special challenges for the direct certification process. Both nonpublic and charter schools are schools of choice, often without defined enrollment areas for prospective students. They are also generally smaller entities, compared with public school districts. In addition, nonpublic schools do not receive public funding and therefore are not governed by the same regulations and reporting requirements present in public schools. Charter schools may either establish themselves as independent reporting agencies or affiliate with an LEA, which acts as an authorizing agency for reporting purposes.

In Nebraska, West Virginia, and Vermont, nonpublic school students are included in the direct certification match in the same way as public school students[33] (Table 8). Nebraska applied for a performance improvement grant to work with nonpublic schools to ensure they access the match reports regularly. West Virginia utilizes the same matching process for public and nonpublic schools; however, nonpublic school enrollment information is uploaded through a separate third-party software product. Additionally, nonpublic schools do not perform any secondary matches of unmatched children. In Vermont, nonpublic schools can opt to use the student census and thus can participate in the direct certification process as public schools. Otherwise they can contact the State CN office to perform a separate match. Vermont has independent schools, which are similar to charter schools. These schools participate in the direct certification system as public schools.

[33] Neither Nebraska nor West Virginia has charter schools.

Table 8. Direct Certification Methods for Nonpublic Schools

State	Direct Certification Process for Nonpublic Schools
California	Private schools gather program data from their local county welfare departments and perform their own matching processes. On California's direct certification web page, information is provided to private schools on policy, county contacts, and required matching elements.
Nebraska	Same process as public schools.
Oklahoma	Slightly different process than public/charter schools. Private schools' enrollment data are updated only quarterly. New students are looked up by the State official in charge of private school direct certification, only by request of the private school.
Tennessee	Same process as public schools. Private schools are more likely than public schools to use manual matching methods.
Vermont	Private schools have the option of using the same process as public schools. Alternatively, they can send a list of students to the CN office for matching.
West Virginia	Private schools use the same matching system as public schools, but enrollment data are not kept in the SSIS. Private schools do not perform secondary matching on partial or unmatched students.

There are large differences in the treatment of public and nonpublic schools in Oklahoma and California. Oklahoma has many charter schools, which are processed as part of the Statewide match. However, the process for nonpublic schools is different. Direct certification matching was not conducted using the same system used for public schools, and enrollment information was updated only four times a year, as opposed to the continuously updated enrollment information for public schools. New students who enter nonpublic schools during the year can be matched by request. California nonpublic and charter schools that participate in the NSLP employ their own local matching process because student information is not included in the SSIS.

In Tennessee, nonpublic schools have access to the same program data each month as public schools and perform direct certification matching similarly. Because most of the nonpublic schools have small enrollments and might not have sufficient technology infrastructure, most of these schools perform a manual match.

B. Recent and Planned Innovations for Improving Direct Certification

Effective and/or improved direct certification systems characterize the States selected for this review. These States cited changes in the direct certification process that can be linked to performance improvements, as summarized in Table 9. In addition to these recent improvements, most States included in this review have made, or plan to make, changes to the direct certification systems used in SY 2012–2013 (Table 8). As a result, they anticipate additional improvement in direct certification rates documented in this report.

Table 9. Recent and Planned Innovations for Improving Direct Certification

State	Recent Changes	Planned Changes
California	SY 2011-2012 was the first full year of using the central matching system. The State increased the frequency of matching to monthly.	Focus on standardizing data entry into SSIS and following up with districts more frequently
Nebraska	The State switched to a faster and more accurate probabilistic matching software (Microsoft fuzzy match) from internally developed software. This allows more frequent matching and faster individual student look-up.	Increase frequency of receipt of program data; improve nonpublic schools use of the matching system
Oklahoma	The State switched to a central matching system. State officials feel the new system is more consistent and accurate than local matching had been.	Improve ease of use, such as identifying newly certified children on unmatched lists provided to districts
Tennessee	Tennessee instituted student "passport" that includes a unique student identifier and student information.	Incorporate foster care data
Vermont	Vermont increased the frequency of matching and receipt of program data to monthly. It also developed an online tool to improve accuracy of FNS-742 reporting.	Increase frequency of enrollment data updates
West Virginia	The State enhanced its current system's user-friendliness and automation.	Increase frequency of receipt of program data from quarterly to monthly; institute probabilistic matching; and more search options for unmatched list, such as guardian's name

C. Best Practices in Implementation of Direct Certification Systems

Each of the States selected for this review has currently implemented a successful direct certification system or has made significant improvements to its system. Although earlier sections of the review described key features of these systems, it is also instructive to examine some of the factors that the States view as being critical to their success.

Teamwork among program data partners, IT, strong leadership, and user-friendliness were cited by the States as important factors in direct certification performance. Because direct certification cannot be done without timely and workable program data from multiple State agencies, relationships have to be forged to have an effective direct certification system. All of the States interviewed noted the importance of these relationships. Central matching States emphasized the importance of cooperation between program offices and internal IT departments. Tennessee strongly believes that fostering relationships with program data partners and frequent in-person communication are paramount to the success of a direct certification program.

Leadership within the State CN office and in other levels of State government was also seen as an important element to successful implementation of direct certification. In Oklahoma, for example, leadership at the highest levels of State government facilitated the change from a local matching system to a central matching system. Nebraska cited leadership within CN as being key to coordinating program office interaction, IT resources, and internal department resources. California mentioned leadership at the superintendent level as important in focusing schools on the reporting requirements and the importance of meeting performance rate targets.

An IT expert interviewed for this report focused on the "user experience" of direct certification systems. He considered efficient, user-friendly tools as a key factor in removing barriers to direct certification. If the system is intuitive and well organized, users are more likely to access the system frequently and use it appropriately. Several States echoed this sentiment. Some relatively simple features that make systems easier for users to operate and manage were believed to improve the frequency and accuracy of direct certification. For example, several States discussed simple changes to the way they provide information to districts (changing the sort order) to make it easier for large districts to process the files. West Virginia's unmatched student list included a new feature that indicates the number of students remaining for review, which officials believe helped motivate system users. Oklahoma, as mentioned earlier, plans to identify newly certified children in the unmatched program data files provided to districts. Vermont hopes to provide match reports to districts organized by name or by the date of certification.

Another feature cited as key to effective direct certification is a unique student identifier that follows each student throughout his or her school career. Four of five States with central matching systems had SSIS with permanent student IDs, and the fifth (Vermont) is in the process of upgrading its SSIS to include this feature. As noted earlier, Tennessee implemented a new SSIS for SY 2011–2012.

Technical Assistance, Training, and Monitoring LEA Compliance

Several States indicated that technical assistance to and training of LEAs was an important part of coordination and compliance efforts. Technical assistance can take the form of working with LEAs on their reporting of verification results on Form FNS-742, advising LEAs on the importance of direct certification and the value of accurate reporting, and assisting LEAs in uploading or downloading match lists and program data. Tennessee encourages the districts to talk and share experiences among themselves and the State organizes regional meetings to facilitate district interaction. Vermont cited the need to train local staff on the importance of direct certification, training on the direct certification process, and maintaining constant communication with local coordinators. Vermont staff train schools on the value of matching and participating fully in the direct certification process.

States were also asked about their methods or approaches to tracking and monitoring LEAs' receipt of information, processing, and subsequent reporting of direct certification on the FNS-742 Verification Summary Reports (VSRs). In interacting with districts, most States stress the importance of the reporting requirements and direct certification targets. However, States tend to conduct limited monitoring of whether districts perform their role in direct certification on a timely basis. In West Virginia, students are directly certified automatically without an active step from districts. As a result, monitoring or tracking district receipt of information is not regarded as necessary. Nebraska has system features that enable tracking direct certification data, but it uses these to track system performance overall rather than to monitor LEA use (although the State believes it is well used). In other States, most monitoring of compliance occurs through the States Coordinated Review Effort (CRE). Oklahoma and Vermont mentioned the CRE as their main monitoring tool. Oklahoma supplements this effort by checking its system periodically for whether the direct certification status of matched students has been finalized. Tennessee also uses the CRE as its main monitoring tool, but it has developed a more comprehensive, State-specific form that enables it to review more than what is Federally required. Tennessee also assesses reasonableness of FNS-742 reporting by comparing values with the previous year.

D. Challenges in Meeting Future Performance Rate Targets

HHFKA mandated that States meet certain direct certification performance targets. Starting in SY 2011–2012, States must have an 80 percent direct certification rate, followed by a 90 percent rate in SY 2012–2013 and 95 percent in SY 2013–2014 and beyond. This means that, in SY 2011–2012, 80 percent of children enrolled in SNAP must be directly certified for free school meals (80 percent of program records must be matched to student enrollment records). As a part of this review, States were asked about the challenges they have experienced or believe they might experience, in meeting these performance rate targets.

The most frequently cited challenge is related to children who receive SNAP benefits but who are not enrolled in schools that participate in the NSLP. Examples of these populations include home-schooled children, school dropouts, homeless and migrant children, and students in nonpublic schools not participating in the NSLP. Ideally, the direct certification performance measure would account for these populations by removing them from the performance rate denominator, which is intended to represent the set of children eligible for direct certification. However, this is not possible because data that identify the number of children in these populations are not available for all States. This limitation of the performance measure represents a challenge for States in which these populations are relatively prevalent, particularly as the target performance rate moves toward 95 percent. All interviewed States discussed this challenge.

Another commonly cited challenge is reconciling the number of students matched by a central matching process with the number of students reported as directly certified by districts as a part of the VSRs collected with form FNS-742. For example, Nebraska and Vermont noticed that sometimes there is a significant difference between the number of students identified in the central system and the number reported on the VSR. One potential source for differences in these values is that in all States with central matching systems except West Virginia, districts must take an extra step to directly certify students after matching has been conducted. If districts do not execute this step properly, there might be fewer students directly certified than were matched. Another more commonly cited source of this problem is inaccurate reporting of information from the VSR. In response to this possibility, Vermont developed an online tool for collecting VSRs that it feels has substantially improved reporting accuracy.

Resource constraints present an additional challenge to meeting performance rate targets, particularly in completing work that is not automated. For example, West Virginia mentioned limited labor time and resources as a potential barrier for districts in fully investigating children listed on the unmatched list. Nebraska also noted problems with infrastructure in nonpublic schools as a challenge; due to a lack of resources it is difficult to provide assistance to those smaller districts.

Advice for Low-Performing States in Meeting Performance Targets

HHFKA requires States that do not meet the direct certification performance rate benchmarks to develop CIPs. The CIPs must include a step-by-step plan for implementing changes that will improve direct certification rates. In the best practice interviews, States were asked what advice or suggestion they would offer to a low-performing State to incorporate into its CIP. Experts in direct certification were also consulted on this topic. State suggestions, which are summarized in Table 10, can be categorized into three main points of emphasis: (1) develop a strong matching system and IT support team, (2) develop and foster strong relationships with data partners, and (3) communicate regularly with users.

Table 10. Suggestions for Improving Direct Certification Rates

State	Suggestions for Improving Direct Certification Rates
California	• Include more identifiers in the matching process, especially SSN. • Develop a strong SSIS with good matching software. • Foster flexibility in meeting appropriate program staff and selling benefits of collaboration. • Apply for direct certification grants to improve IT infrastructure.
Nebraska	• Conduct formal project planning and set attainable/measurable milestones. Have regular status meetings. • Consult with users on a regular basis.
Oklahoma	• Use a central matching process. • Gather additional IT resources (external and/or internal) in the development of software. • Foster good relationships with program data partners.
Tennessee	• Develop relationships with key players to know of changes and how they affect direct certification. • Meet regularly with districts and program data partners.
Vermont	• Establish a cooperative relationship with SNAP staff. • Pull in strong IT staff to obtain relevant information. • Train districts on the value of matching and participating fully in the direct certification process.
West Virginia	• Develop strong data systems, specifically a data warehouse for efficient processing. • Use a unique centralized student ID if feasible for the State. • Partner with companies that specialize in direct certification. • Train users on systems features and the benefits of direct certification.

All five of the central matching States have sophisticated SSIS to take in the program data, merge and match with student enrollment data, and deliver matched lists to districts for further action. West Virginia believes that well-developed, comprehensive data systems are crucial for direct certification success and that its system benefits from automatically directly certifying students without district action. West Virginia, California, and Oklahoma also recommend developing a unique, centralized student ID to track student eligibility status and follow the child throughout his or her school career anywhere in the State regardless of mobility. The interviewed experts further supported the importance of data systems.

One expert who works with a number of different State and district direct certification systems stressed the importance of centralized enrollment and program data and believes that it is much more difficult to work with localized data than with centralized data. Oklahoma concurs with this opinion and believes that having a central matching system is the primary reason for its improved direct certification performance. However, Oklahoma officials acknowledged that switching to a central matching system can be difficult politically.

California, Nebraska, Tennessee, and Vermont emphasized strengthening relationships with program data counterparts and regularly meeting with and assisting users as two key elements to include in a CIP. States indicated that strong relationships with program data counterparts enable strong performance within a given direct certification system and help with identifying ways to

improve the system. California suggested that State CN officials be flexible in meeting with appropriate social services data partners and try to gain buy-in by showcasing the benefits of the partnership. Nebraska thinks having a formal project planning phase, setting obtainable and measureable goals, and holding regular status meeting are essential in developing an improved direct certification system. As discussed earlier, Tennessee sees developing relationships with key players, especially DHS, as essential to a successful local matching system.

VI. CONCLUSION

States and LEAs directly certified 1.7 million more children at the start of SY 2011–2012 than they did a year earlier, an increase of 17 percent. The increase in directly certified students (1.7 million) greatly outpaced the increase in school-age SNAP participants (about 700,000) during this same time period. Therefore, most of the growth in direct certification can be attributed to improved effectiveness of direct certification systems rather than an increase in SNAP participation.

States and LEAs directly certified an estimated 86 percent of school-age children from SNAP-participant households in SY 2011–2012, a figure substantially higher than the estimated 77 percent for the previous year. Seventeen States achieved direct certification rates of at least 90 percent, whereas only one had a direct certification rate lower than 60 percent. With both direct certification and paper applications, States and LEAs certified 92 percent of all categorically eligible SNAP, TANF, and FDPIR children for free school meals in SY 2011–2012; this is up from the 86 percent computed for SY 2010–2011.

States and LEAs continue to find success with different direct certification models. States and LEAs are making investments in their direct certification systems that promise improved performance in the coming years. These include more frequent matching, improved user friendliness, and enhanced computer matching procedures. Changes such as these might affect direct certification and free certification rates in coming years.

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APPENDIX A

ADDITIONAL TABLES AND FIGURES

Table A.1. Number and Percent of LEAs that Directly Certified SNAP Participants, SY 2004–2005 through SY 2011–2012

	SY 2004-2005			SY 2005-2006		
		Direct Certification or Provision 2/3 LEAs			Direct Certification or Provision 2/3 LEAs	
	Number of LEAS	Number	Percent	Number of LEAS	Number	Percent
U.S. Total	**16,612**	**9,239**	**55.6**	**17,397**	**10,467**	**60.2**
AK	54	43	79.6	35	34	97.1
AL	163	62	38.0	148	87	58.8
AR	251	247	98.4	258	12	4.6
AZ	302	251	83.1	333	243	73.0
CA	1,004	399	39.7	1,033	469	45.4
CO	178	44	24.7	168	68	40.5
CT	185	146	78.9	187	148	79.1
DC	47	1	2.1	51	4	7.8
DE	27	22	81.5	34	28	82.4
FL	145	74	51.0	96	62	64.6
GA	171	155	90.6	175	158	90.3
HI	NA	NA	NA	32	18	56.2
IA	496	339	68.4	508	372	73.2
ID	125	97	77.6	266	218	82.0
IL	1,036	749	72.3	1,113	835	75.0
IN	407	73	17.9	468	106	22.6
KS	403	314	77.9	404	333	82.4
KY	197	128	65.0	192	145	75.5
LA	98	57	58.2	36	34	94.4
MA	NA	NA	NA	357	216	60.5
MD	47	29	61.7	47	29	61.7
ME	245	199	81.2	228	194	85.1
MI	741	331	44.7	698	349	50.0
MN	610	392	64.3	620	387	62.4
MO	762	453	59.4	711	476	67.0
MS	183	93	50.8	72	47	65.3
MT	236	130	55.1	233	159	68.2
NC	NA	NA	NA	172	117	68.0
ND	160	126	78.8	216	170	78.7
NE	407	241	59.2	433	313	72.3
NH	82	57	69.5	88	65	73.9
NJ	661	159	24.0	661	185	28.0
NM	142	98	69.0	150	118	78.7
NV	40	35	87.5	39	34	87.2
NY	1,096	797	72.7	1,054	889	84.4
OH	1,093	178	16.3	1,196	302	25.2
OK	533	248	46.5	613	322	52.5
OR	205	166	81.0	227	178	78.4
PA	724	368	50.8	776	458	59.0
RI	NA	NA	NA	55	47	85.4
SC	86	85	98.8	85	83	97.6
SD	223	119	53.4	227	127	56.0
TN	169	132	78.1	175	154	88.0
TX	1,202	741	61.6	1,026	797	77.7
UT	51	45	88.2	53	50	94.3
VA	160	136	85.0	141	138	97.9
VT	204	186	91.2	217	200	92.2
WA	292	215	73.6	345	260	75.4
WI	842	177	21.0	823	138	16.8
WV	73	54	74.0	68	54	79.4
WY	54	48	88.9	54	37	68.5

	SY 2006-2007			SY 2007-2008		
		Direct Certification or Provision 2/3 LEAs			Direct Certification or Provision 2/3 LEAs	
	Number of LEAS	Number	Percent	Number of LEAS	Number	Percent
U.S. Total	**17,748**	**11,113**	**62.6**	**18,141**	**12,097**	**66.7**
AK	47	43	91.5	50	46	92.0
AL	145	93	64.1	147	110	74.8
AR	281	256	91.1	286	252	88.1
AZ	334	256	76.6	372	307	82.5
CA	1,024	518	50.6	1,028	555	54.0
CO	205	78	38.0	175	81	46.3
CT	193	161	83.4	192	161	83.8
DC	52	2	3.8	58	2	3.4
DE	32	28	87.5	29	27	93.1
FL	145	88	60.7	159	98	61.6
GA	183	166	90.7	216	187	86.6
HI	38	20	52.6	36	22	61.1
IA	507	383	75.5	499	393	78.8
ID	133	106	79.7	121	106	87.6
IL	1,075	839	78.0	1,115	904	81.1
IN	478	143	29.9	482	184	38.2
KS	403	335	83.1	403	327	81.1
KY	189	154	81.5	193	171	88.6
LA	107	92	86.0	112	95	84.8
MA	370	232	62.7	357	245	68.6
MD	46	31	67.4	48	40	83.3
ME	233	201	86.3	246	223	90.6
MI	803	449	55.9	836	570	68.2
MN	630	413	65.6	650	433	66.6
MO	749	490	65.4	756	510	67.5
MS	184	134	72.8	179	144	80.4
MT	234	177	75.6	244	188	77.0
NC	178	133	74.7	170	141	82.9
ND	193	142	73.6	223	170	76.2
NE	381	290	76.1	381	297	78.0
NH	89	60	67.4	92	65	70.6
NJ	663	206	31.1	660	247	37.4
NM	167	119	71.3	189	135	71.4
NV	19	15	79.0	20	16	80.0
NY	1,042	857	82.2	1,083	951	87.8
OH	1,129	223	19.8	1,166	258	22.1
OK	573	333	58.1	568	373	65.7
OR	232	185	79.7	235	183	77.9
PA	826	501	60.6	837	523	62.5
RI	55	50	90.9	53	50	94.3
SC	88	84	95.4	87	84	96.6
SD	221	127	57.5	222	128	57.7
TN	171	144	84.2	168	142	84.5
TX	1,189	839	70.6	1,264	989	78.2
UT	49	45	91.8	55	51	92.7
VA	152	139	91.4	151	139	92.0
VT	215	201	93.5	219	194	88.6
WA	330	260	78.8	325	266	81.8
WI	840	180	21.4	853	218	25.6
WV	73	55	75.3	75	55	73.3
WY	53	37	69.8	56	41	73.2

	SY 2008-2009			SY 2009-2010		
		Direct Certification or Provision 2/3 LEAs			Direct Certification or Provision 2/3 LEAs	
	Number of LEAS	Number	Percent	Number of LEAS	Number	Percent
U.S. Total	**18,253**	**14,301**	**78.3**	**18,461**	**15,258**	**82.6**
AK	48	47	97.9	49	48	98.0
AL	150	134	89.3	151	137	90.7
AR	295	280	94.9	300	265	88.3
AZ	388	327	84.3	428	357	83.4
CA	1,029	676	65.7	1,057	839	79.4
CO	205	181	88.3	218	202	92.7
CT	191	169	88.5	188	174	92.6
DC	61	2	3.3	62	61	98.4
DE	35	30	85.7	34	31	91.2
FL	164	107	65.2	170	122	71.8
GA	215	190	88.4	221	199	90.0
HI	40	26	65.0	37	26	70.3
IA	494	424	85.8	495	421	85.0
ID	139	121	87.0	142	103	72.5
IL	1,114	928	83.3	1,123	880	78.4
IN	487	341	70.0	498	405	81.3
KS	407	348	85.5	405	345	85.2
KY	190	170	89.5	197	176	89.3
LA	117	105	89.7	109	95	87.2
MA	423	305	72.1	431	303	70.3
MD	47	39	83.0	49	42	85.7
ME	235	213	90.6	194	177	91.2
MI	846	693	81.9	855	717	83.9
MN	663	448	67.6	662	457	69.0
MO	744	615	82.7	765	678	88.6
MS	179	151	84.4	177	157	88.7
MT	241	182	75.5	239	190	79.5
NC	169	144	85.2	165	151	91.5
ND	217	158	72.8	202	171	84.6
NE	382	285	74.6	383	304	79.4
NH	95	64	67.4	94	75	79.8
NJ	662	551	83.2	677	619	91.4
NM	171	166	97.1	176	132	75.0
NV	19	16	84.2	18	17	94.4
NY	1,072	935	87.2	1,113	989	88.9
OH	1,172	745	63.6	1,188	816	68.7
OK	565	429	75.9	566	458	80.9
OR	237	188	79.3	245	196	80.0
PA	855	623	72.9	851	730	85.8
RI	32	31	96.9	55	53	96.4
SC	96	85	88.5	93	85	91.4
SD	215	145	67.4	216	196	90.7
TN	167	153	91.6	165	149	90.3
TX	1,264	1,110	87.8	1,263	1,119	88.6
UT	64	56	87.5	75	72	96.0
VA	150	138	92.0	153	141	92.2
VT	214	189	88.3	225	205	91.1
WA	314	272	86.6	329	286	86.9
WI	847	474	56.0	822	584	71.0
WV	74	55	74.3	73	55	75.3
WY	53	37	69.8	58	48	82.8

	SY 2010-2011			SY 2011-2012		
		Direct Certification or Provision 2/3 LEAs			Direct Certification or Provision 2/3 LEAs	
	Number of LEAS	Number	Percent	Number of LEAS	Number	Percent
U.S. Total	**18,574**	**15,778**	**84.9**	**18,624**	**16,528**	**88.7**
AK	51	49	96.1	50	49	98.0
AL	151	141	93.4	156	145	92.9
AR	290	279	96.2	289	279	96.5
AZ	430	365	84.9	440	390	88.6
CA	1,078	806	74.8	1,094	872	79.7
CO	207	191	92.3	214	204	95.3
CT	186	176	94.6	185	183	98.9
DC	57	57	100.0	61	60	98.4
DE	34	32	94.1	42	35	83.3
FL	190	133	70.0	223	178	79.8
GA	229	207	90.4	229	219	95.6
GU	NA	NA	NA	3	1	33.3
HI	36	26	72.2	35	25	71.4
IA	494	435	88.1	477	428	89.7
ID	144	137	95.1	148	141	95.3
IL	1,119	968	86.5	1,125	1,038	92.3
IN	501	424	84.6	496	429	86.5
KS	399	340	85.2	400	362	90.5
KY	189	178	94.2	189	178	94.2
LA	114	102	89.5	113	106	93.8
MA	421	311	73.9	422	355	84.1
MD	49	43	87.8	55	47	85.5
ME	192	174	90.6	187	170	90.9
MI	853	736	86.3	845	762	90.2
MN	706	471	66.7	697	472	67.7
MO	761	684	89.9	755	704	93.2
MS	176	160	90.9	175	159	90.9
MT	240	209	87.1	240	212	88.3
NC	165	154	93.3	162	152	93.8
ND	204	181	88.7	203	179	88.2
NE	379	317	83.6	374	320	85.6
NH	91	82	90.1	100	88	88.0
NJ	694	665	95.8	697	683	98.0
NM	187	134	71.7	202	147	72.8
NV	20	16	80.0	20	15	75.0
NY	1,106	985	89.1	1,101	1,001	90.9
OH	1,192	869	72.9	1,214	1,043	85.9
OK	577	496	86.0	573	545	95.1
OR	250	203	81.2	244	205	84.0
PA	853	733	85.9	853	768	90.0
RI	56	53	94.6	54	49	90.7
SC	100	85	85.0	106	84	79.2
SD	213	197	92.5	210	194	92.4
TN	175	161	92.0	181	172	95.0
TX	1,260	1,138	90.3	1,259	1,148	91.2
UT	81	75	92.6	85	81	95.3
VA	154	145	94.2	155	146	94.2
VT	238	208	87.4	218	203	93.1
WA	330	295	89.4	326	296	90.8
WI	822	650	79.1	812	698	86.0
WV	72	56	77.8	72	57	79.2
WY	58	46	79.3	58	51	87.9

Note: Figures for SYs before SY 2011–2012 may differ from previous reports due to changes in data submitted by States. Data for Hawaii, Massachusetts, North Carolina, Rhode Island, and one of two State agencies in both Oklahoma and Arkansas are omitted from the SY 2004–2005 totals; these agencies either did not submit school verification data or submitted unusable data.

NA. = not available.

Table A.2. Number and Percent of LEAs that Directly Certified SNAP Participants Excluding Provision 2 and Provision 3 LEAs, SY 2004–2005 through SY 2011–2012

	SY 2004-2005			SY 2005-2006		
		Direct Certification LEAs			Direct Certification LEAs	
	Number of Non-Provision 2/3 LEAS	Number	Percent	Number of Non-Provision 2/3 LEAS	Number	Percent
U.S. Total	**16,389**	**9,016**	**55.0**	**17,048**	**10,118**	**59.4**
AL	44	33	75.0	35	34	97.1
AK	163	62	38.0	148	87	58.8
AR	242	238	98.4	247	1	0.4
AZ	302	251	83.1	333	243	73.0
CA	991	386	39.0	1,005	441	43.9
CO	173	39	22.5	168	68	40.5
CT	185	146	78.9	187	148	79.1
DC	47	1	2.1	51	4	7.8
DE	27	22	81.5	34	28	82.4
FL	145	74	51.0	96	62	64.6
GA	170	154	90.6	174	157	90.2
HI	NA	NA	NA	32	18	56.3
IA	495	338	68.3	507	371	73.2
ID	125	97	77.6	266	218	82.0
IL	1,035	748	72.3	1,112	834	75.0
IN	407	73	17.9	467	105	22.5
KS	403	314	77.9	404	333	82.4
KY	194	125	64.4	188	141	75.0
LA	97	56	57.7	36	34	94.4
MA	NA	NA	NA	357	216	60.5
MD	47	29	61.7	47	29	61.7
ME	239	193	80.8	228	194	85.1
MI	741	331	44.7	698	349	50.0
MN	610	392	64.3	620	387	62.4
MO	759	450	59.3	711	476	67.0
MS	163	73	44.8	60	35	58.3
MT	236	130	55.1	233	159	68.2
NC	NA	NA	NA	172	117	68.0
ND	160	126	78.8	199	153	76.9
NE	405	239	59.0	433	313	72.3
NH	82	57	69.5	88	65	73.9
NJ	653	151	23.1	654	178	27.2
NM	93	49	52.7	88	56	63.6
NV	39	34	87.2	39	34	87.2
NY	1,090	791	72.6	945	780	82.5
OH	1,090	175	16.1	1,189	295	24.8
OK	499	214	42.9	579	288	49.7
OR	203	164	80.8	217	168	77.4
PA	723	367	50.8	773	455	58.9
RI	NA	NA	NA	55	47	85.5
SC	86	85	98.8	85	83	97.7
SD	194	90	46.4	188	88	46.8
TN	169	132	78.1	175	154	88.0
TX	1,198	737	61.5	1,026	797	77.7
UT	50	44	88.0	51	48	94.1
VA	160	136	85.0	141	138	97.9
VT	204	186	91.2	217	200	92.2
WA	291	214	73.5	345	260	75.4
WI	833	168	20.2	823	138	16.8
WV	73	54	74.0	68	54	79.4
WY	54	48	88.9	54	37	68.5

	SY 2006-2007			SY 2007-2008		
		Direct Certification LEAs			Direct Certification LEAs	
	Number of Non-Provision 2/3 LEAS	Number	Percent	Number of Non-Provision 2/3 LEAS	Number	Percent
U.S. Total	**17,382**	**10,747**	**61.8**	**17,560**	**11,516**	**65.6**
AK	44	40	90.9	43	39	90.7
AL	145	93	64.1	142	105	73.9
AR	270	245	90.7	271	237	87.5
AZ	334	256	76.7	338	273	80.8
CA	976	470	48.2	980	507	51.7
CO	205	78	38.1	175	81	46.3
CT	193	161	83.4	192	161	83.9
DC	52	2	3.9	58	2	3.5
DE	32	28	87.5	29	27	93.1
FL	145	88	60.7	159	98	61.6
GA	181	164	90.6	189	160	84.7
HI	38	20	52.6	36	22	61.1
IA	506	382	75.5	499	393	78.8
ID	133	106	79.7	120	105	87.5
IL	1,074	838	78.0	1,114	903	81.1
IN	478	143	29.9	482	184	38.2
KS	403	335	83.1	403	327	81.1
KY	183	148	80.9	190	168	88.4
LA	107	92	86.0	111	94	84.7
MA	370	232	62.7	356	244	68.5
MD	45	30	66.7	47	39	83.0
ME	233	201	86.3	239	216	90.4
MI	803	449	55.9	836	570	68.2
MN	630	413	65.6	642	425	66.2
MO	749	490	65.4	756	510	67.5
MS	168	118	70.2	167	132	79.0
MT	234	177	75.6	227	171	75.3
NC	178	133	74.7	170	141	82.9
ND	193	142	73.6	202	149	73.8
NE	381	290	76.1	381	297	78.0
NH	89	60	67.4	92	65	70.7
NJ	656	199	30.3	658	245	37.2
NM	104	56	53.9	106	52	49.1
NV	19	15	79.0	20	16	80.0
NY	937	752	80.3	963	831	86.3
OH	1,125	219	19.5	1,161	253	21.8
OK	539	299	55.5	540	345	63.9
OR	222	175	78.8	232	180	77.6
PA	823	498	60.5	834	520	62.4
RI	55	50	90.9	53	50	94.3
SC	88	84	95.5	87	84	96.6
SD	187	93	49.7	184	90	48.9
TN	171	144	84.2	168	142	84.5
TX	1,189	839	70.6	1,184	909	76.8
UT	49	45	91.8	55	51	92.7
VA	151	138	91.4	151	139	92.1
VT	215	201	93.5	219	194	88.6
WA	322	252	78.3	323	264	81.7
WI	832	172	20.7	845	210	24.9
WV	73	55	75.3	75	55	73.3
WY	53	37	69.8	56	41	73.2

	SY 2008-2009			SY 2009-2010		
		Direct Certification LEAs			Direct Certification LEAs	
	Number of Non-Provision 2/3 LEAS	Number	Percent	Number of Non-Provision 2/3 LEAS	Number	Percent
U.S. Total	**17,644**	**13,692**	**77.6**	**17,886**	**14,667**	**82.0**
AK	38	37	97.4	41	40	97.6
AL	145	129	89.0	148	134	90.5
AR	279	264	94.6	284	249	87.7
AZ	359	298	83.0	406	335	82.5
CA	982	629	64.1	1,004	786	78.3
CO	204	180	88.2	208	192	92.3
CT	191	169	88.5	188	174	92.6
DC	61	2	3.3	62	61	98.4
DE	35	30	85.7	33	30	90.9
FL	164	107	65.2	170	122	71.8
GA	191	166	86.9	200	178	89.0
HI	40	26	65.0	37	26	70.3
IA	493	423	85.8	495	421	85.1
ID	135	117	86.7	138	99	71.7
IL	1,112	926	83.3	1,121	878	78.3
IN	487	341	70.0	498	405	81.3
KS	407	348	85.5	405	345	85.2
KY	186	166	89.3	194	173	89.2
LA	117	105	89.7	109	95	87.2
MA	423	305	72.1	431	303	70.3
MD	47	39	83.0	49	42	85.7
ME	229	207	90.4	188	172	91.5
MI	846	693	81.9	855	717	83.9
MN	653	438	67.1	656	451	68.8
MO	744	615	82.7	765	678	88.6
MS	167	139	83.2	164	144	87.8
MT	223	164	73.5	220	171	77.7
NC	169	144	85.2	165	151	91.5
ND	196	137	69.9	196	150	76.5
NE	382	285	74.6	381	302	79.3
NH	95	64	67.4	94	75	79.8
NJ	661	550	83.2	677	619	91.4
NM	67	62	92.5	104	60	57.7
NV	19	16	84.2	18	17	94.4
NY	950	813	85.6	987	863	87.4
OH	1,166	739	63.4	1,181	809	68.5
OK	530	394	74.3	538	430	79.9
OR	229	180	78.6	238	189	79.4
PA	852	620	72.8	850	729	85.8
RI	32	31	96.9	54	52	96.3
SC	96	85	88.5	93	85	91.4
SD	179	109	60.9	173	153	88.4
TN	167	153	91.6	165	149	90.3
TX	1,194	1,040	87.1	1,187	1,043	87.9
UT	64	56	87.5	75	72	96.0
VA	150	138	92.0	153	141	92.2
VT	214	189	88.3	227	206	90.8
WA	309	267	86.4	323	280	86.7
WI	838	465	55.5	809	571	70.6
WV	74	55	74.3	73	55	75.3
WY	53	37	69.8	56	45	80.4

	SY 2010-2011			SY 2011-2012		
		Direct Certification LEAs			Direct Certification LEAs	
	Number of Non-Provision 2/3 LEAS	Number	Percent	Number of Non-Provision 2/3 LEAS	Number	Percent
U.S. Total	**17,964**	**15,168**	**84.4**	**18,019**	**15,923**	**88.4**
AK	41	39	95.1	44	43	97.7
AL	147	137	93.2	151	140	92.7
AR	273	262	96.0	273	263	96.3
AZ	400	335	83.8	404	354	87.6
CA	1,025	753	73.5	1,027	805	78.4
CO	205	189	92.2	205	195	95.1
CT	186	176	94.6	184	182	98.9
DC	57	57	100.0	61	60	98.4
DE	34	32	94.1	42	35	83.3
FL	190	133	70.0	223	178	79.8
GA	209	187	89.5	208	198	95.2
GU	NA	NA	NA	3	1	33.3
HI	36	26	72.2	35	25	71.4
IA	494	435	88.1	477	428	89.7
ID	141	134	95.0	145	138	95.2
IL	1,115	964	86.5	1,123	1,036	92.3
IN	501	424	84.6	496	429	86.5
KS	399	340	85.2	400	362	90.5
KY	188	177	94.1	189	178	94.2
LA	114	102	89.5	113	106	93.8
MA	420	310	73.8	419	352	84.0
MD	48	42	87.5	54	46	85.2
ME	186	168	90.3	181	164	90.6
MI	853	736	86.3	845	762	90.2
MN	697	462	66.3	686	461	67.2
MO	758	681	89.8	753	702	93.2
MS	162	146	90.1	160	144	90.0
MT	221	190	86.0	219	191	87.2
NC	165	154	93.3	162	152	93.8
ND	183	160	87.4	181	157	86.7
NE	377	315	83.6	372	318	85.5
NH	91	82	90.1	100	88	88.0
NJ	694	665	95.8	697	683	98.0
NM	115	62	53.9	135	80	59.3
NV	20	16	80.0	20	15	75.0
NY	992	871	87.8	1,003	903	90.0
OH	1,182	859	72.7	1,199	1,028	85.7
OK	546	465	85.2	544	516	94.9
OR	246	199	80.9	236	197	83.5
PA	850	730	85.9	850	765	90.0
RI	55	52	94.5	54	49	90.7
SC	100	85	85.0	106	84	79.2
SD	169	153	90.5	186	170	91.4
TN	175	161	92.0	181	172	95.0
TX	1,178	1,056	89.6	1,175	1,064	90.6
UT	81	75	92.6	85	81	95.3
VA	154	145	94.2	155	146	94.2
VT	237	207	87.3	217	202	93.1
WA	316	281	88.9	309	279	90.3
WI	811	639	78.8	806	692	85.9
WV	72	56	77.8	72	57	79.2
WY	55	43	78.2	54	47	87.0

Note: Figures for SYs before SY 2011–2012 may differ from previous reports due to changes in data submitted by States. Data for Hawaii, Massachusetts, North Carolina, Rhode Island, and one of two State agencies in both Oklahoma and Arkansas are omitted from the SY 2004–2005 totals; these agencies either did not submit school verification data or submitted unusable data.

NA. = not available.

Table A.3. Percent of SNAP Children Directly Certified for Free School Meals and Percent of All Categorically Eligible Children Certified for Free School Meals, SY 2010–2011 and SY 2011–2012

	Percent of School-Age SNAP Participants Directly Certified for Free School Meals, SY 2011-2012	Change in Percent of School-Age SNAP Participants Directly Certified, SY 2010-2011 to SY 2011-2012	Percent of Categorically Eligible Children Certified for Free School Meals, SY 2011-2012
U.S. Total	**86**	**9**	**92**
Alabama	93	11	97
Alaska	100	22	100
Arizona	71	21	82
Arkansas	80	4	93
California	80	16	86
Colorado	68	0	73
Connecticut	96	4	100
Delaware	100	7	97
District of Columbia	84	19	79
Florida	96	14	100
Georgia	87	9	91
Guam	83	NA	NA
Hawaii	83	5	94
Idaho	87	7	84
Illinois	87	12	92
Indiana	74	1	85
Iowa	86	-3	89
Kansas	93	1	92
Kentucky	93	6	100
Louisiana	85	3	97
Maine	83	13	86
Maryland	90	6	91
Massachusetts	79	17	82
Michigan	83	10	91
Minnesota	86	2	92
Mississippi	78	1	87
Missouri	72	2	84
Montana	63	0	73
Nebraska	100	20	100
Nevada	89	2	92
New Hampshire	68	1	72
New Jersey	77	19	78
New Mexico	75	5	86
New York	100	36	100
North Carolina	88	1	89
North Dakota	100	29	100
Ohio	81	8	94
Oklahoma	97	12	100
Oregon	79	7	83
Pennsylvania	65	0	69
Rhode Island	75	3	80
South Carolina	79	10	87
South Dakota	52	2	71
Tennessee	95	2	97
Texas	90	1	100
Utah	82	8	86
Vermont	98	21	100
Virginia	76	-4	79
Washington	82	0	85
West Virginia	100	17	100
Wisconsin	86	-3	88
Wyoming	100	23	100

Note: For a graphical presentation of these data, please see Figures 4, 8, and 9. The figures in the first and third columns are capped at 100 percent. The percentage point changes in the middle column are equal to the difference in non-capped direct certification rates from SY 2010-2011 to 2011-2012.

NA. = not available.

Table A.4 Enrollment of NSLP-Participating LEAs, SY 2011–2012 (millions of students)

	LEAs that Directly Certified SNAP Participants or in which all Schools are Non-Base Year Provisions 2 or 3	All Other LEAs	All NSLP-Participating LEAs
All LEAs	49.9	0.9	50.9
LEA Size			
10,000 students or more	27.2	0.1	27.4
5,000 to 9,999 students	7.2	0.1	7.3
1,000 to 4,999 students	12.1	0.3	12.3
500 to 999 students	2.0	0.1	2.1
Fewer than 500 students	1.5	0.3	1.8

Note: Values in the "All NSLP-Participating LEAs" column may not equal the sum of values in the other two columns due to rounding.

Table A.5. States by FNS Administrative Region

FNS Region	State	FNS Region	State
Mid-Atlantic	DC	Northeast	CT
	DE		MA
	MD		ME
	NJ		NH
	PA		NY
	VA		RI
	WV		VT
Mid-West	IL	Southeast	AL
	IN		FL
	MI		GA
	MN		KY
	OH		MS
	WI		NC
Mountain-Plains	CO		SC
	IA		TN
	KS	Southwest	AR
	MO		LA
	MT		NM
	ND		OK
	NE		TX
	SD	West	AK
	UT		AZ
	WY		CA
			GU
			HI
			ID
			NV
			OR
			WA

Figure A.1 Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants by Enrollment Category Size: Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts, SY 2011–2012

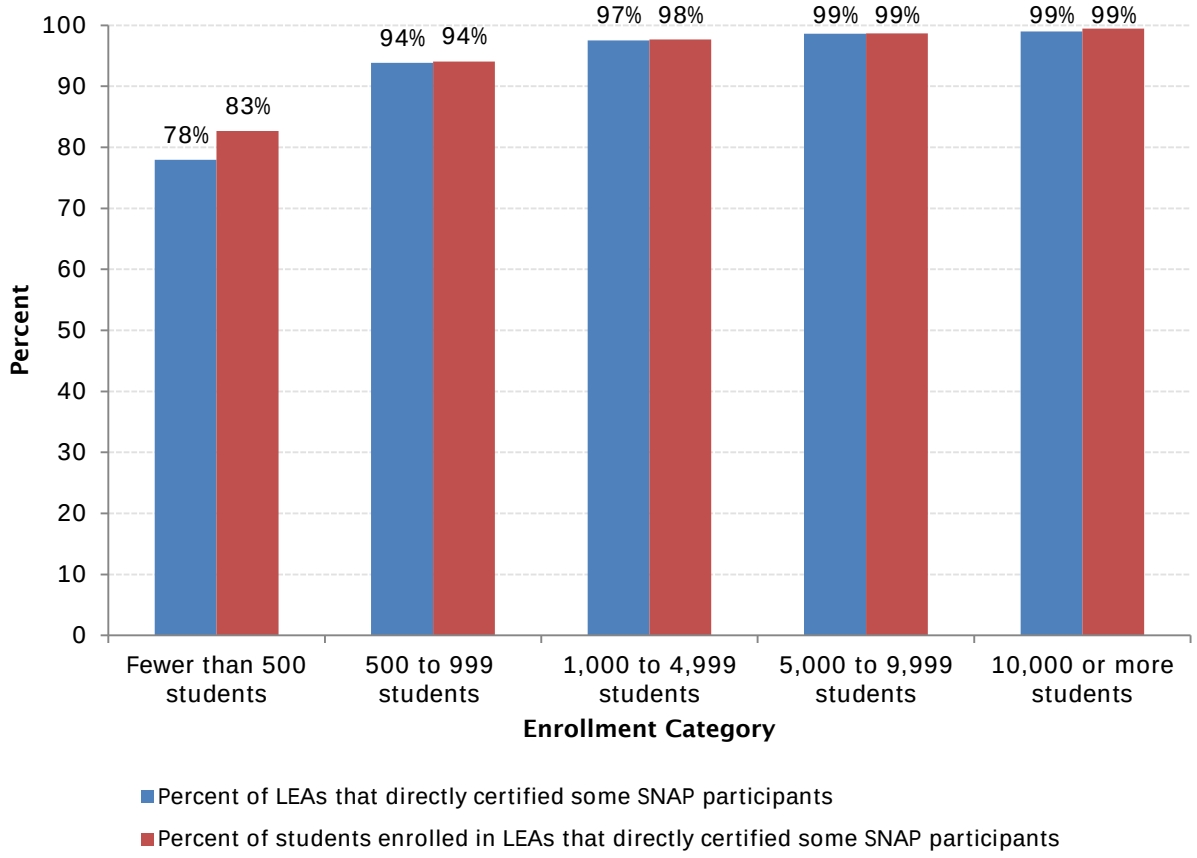
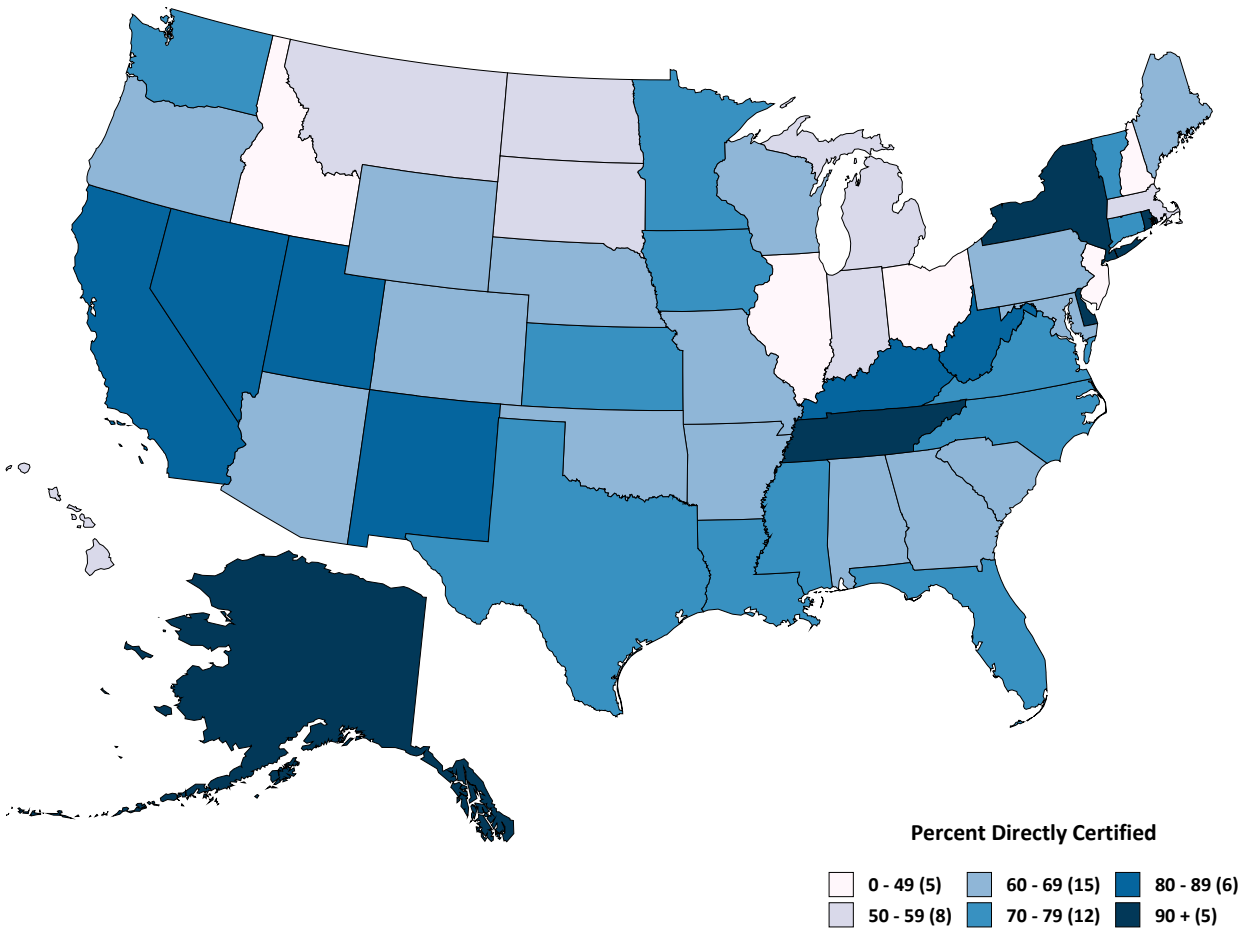
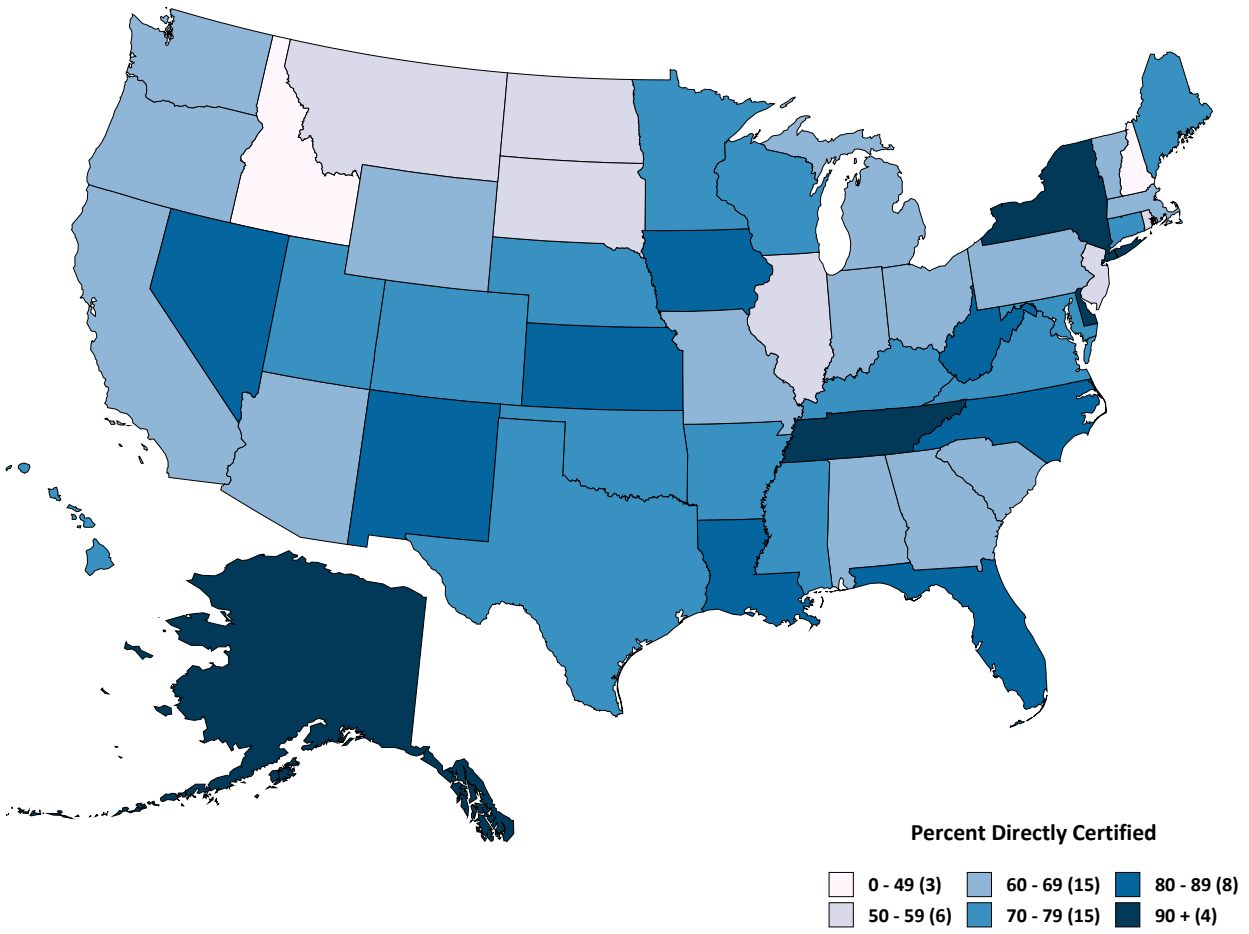


Figure A.2. Percent of SNAP-Participant Children Directly Certified for Free School Meals, SY 2007–2008



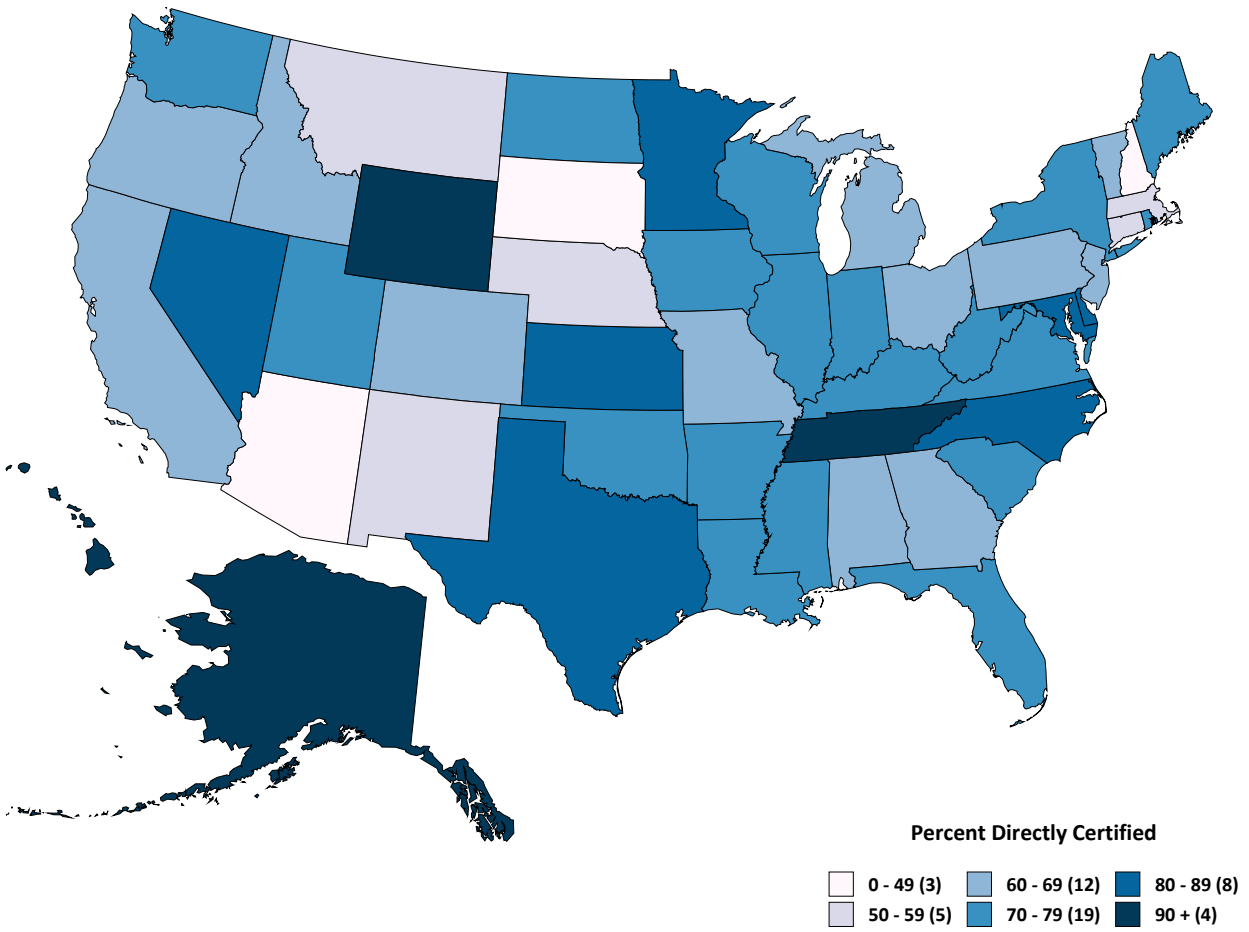
Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.3. Percent of SNAP-Participant Children Directly Certified for Free School Meals, SY 2008–2009



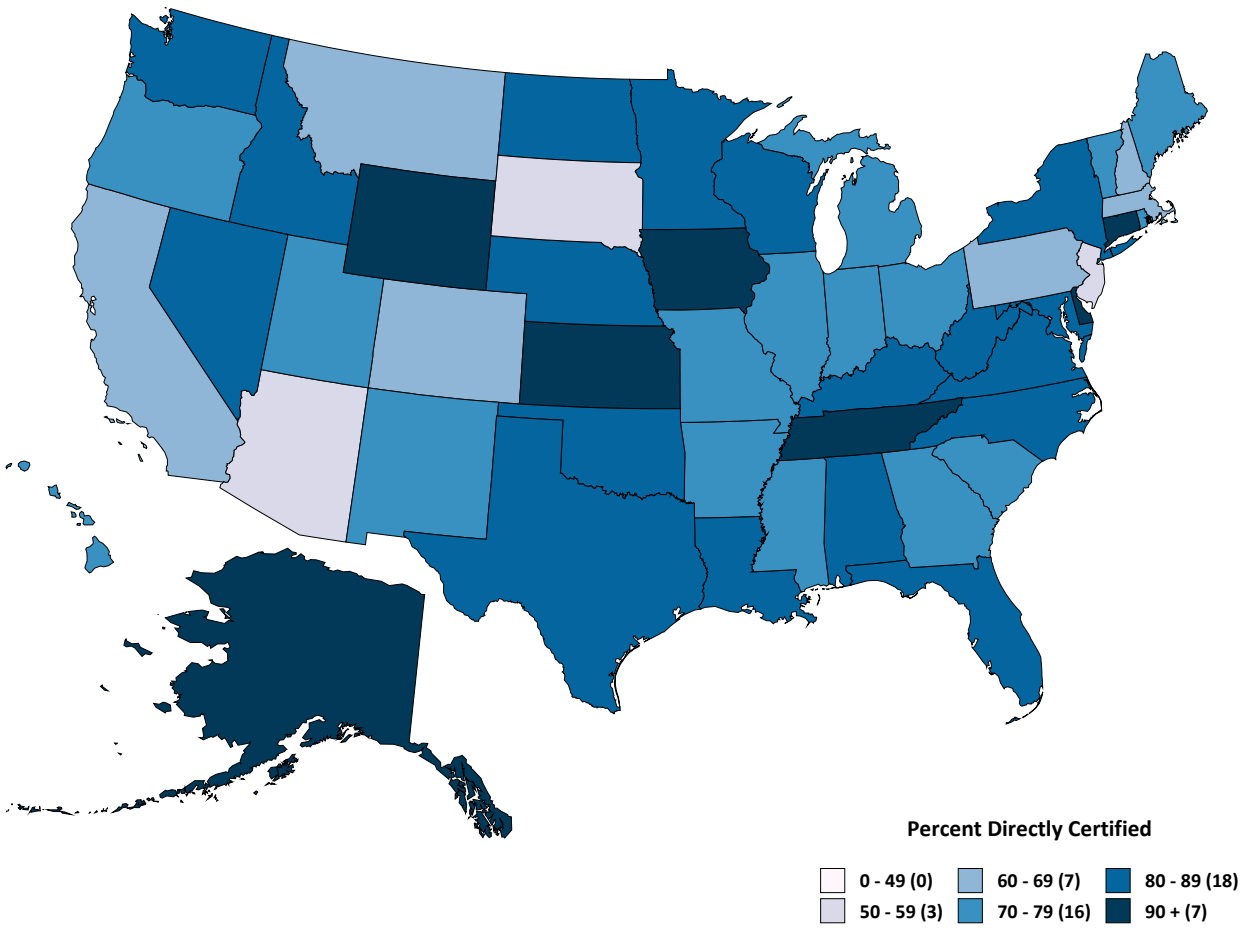
Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.4. Percent of SNAP-Participant Children Directly Certified for Free School Meals, SY 2009–2010



Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.5. Percent of SNAP-Participant Children Directly Certified for Free School Meals, SY 2010–2011



Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.6. Percent of SNAP-Participant Children Directly Certified for Free School Meals, SY 2011–2012

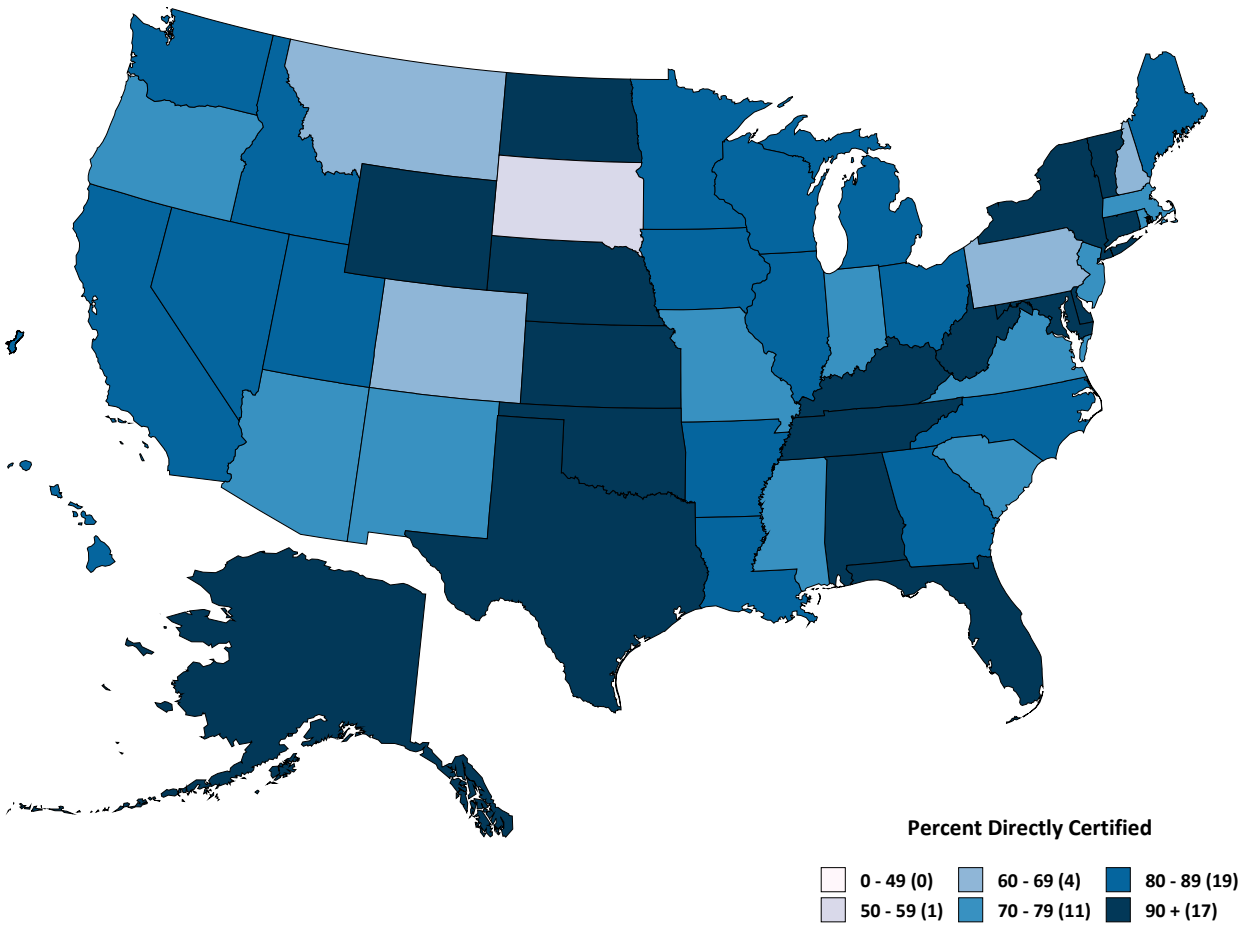
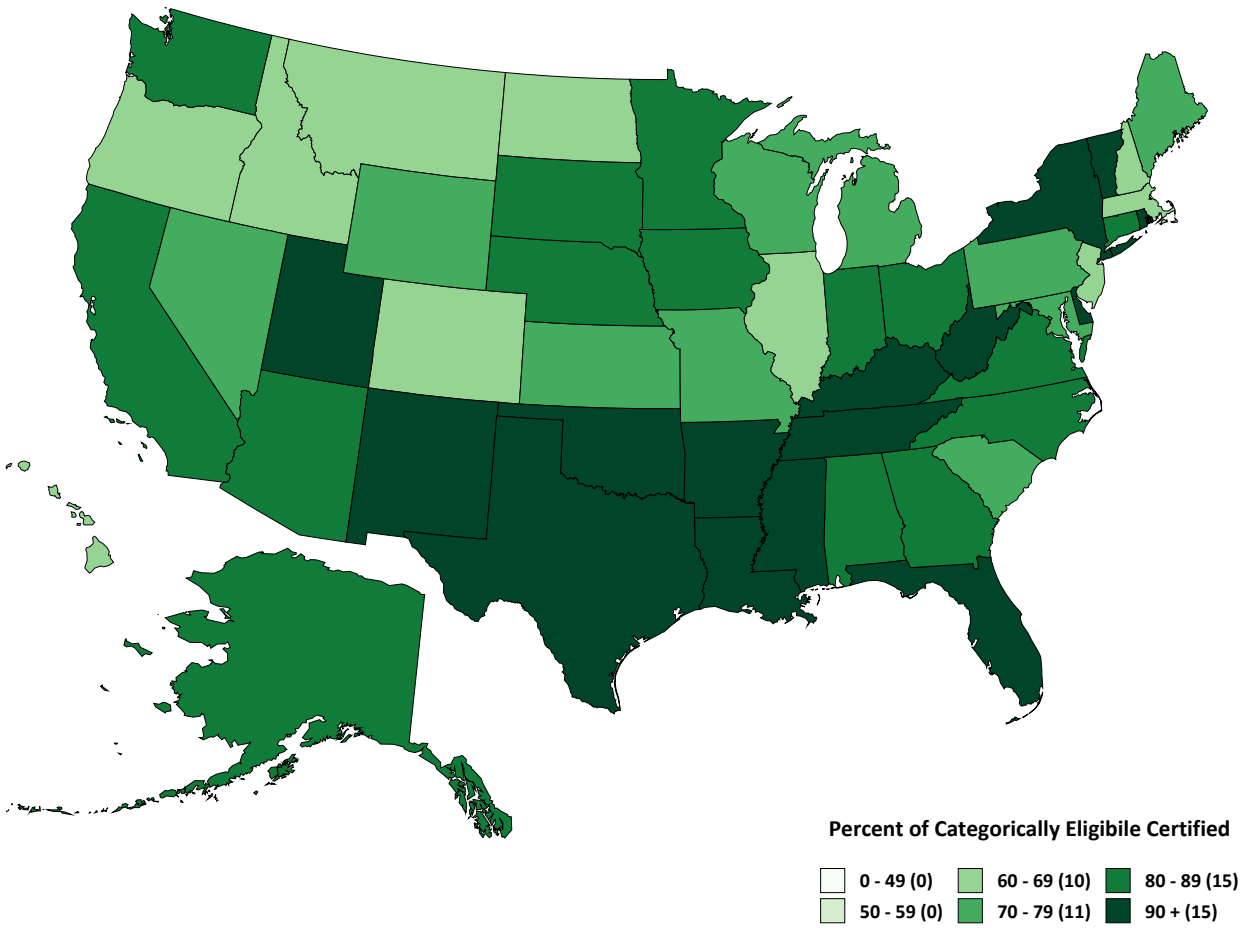
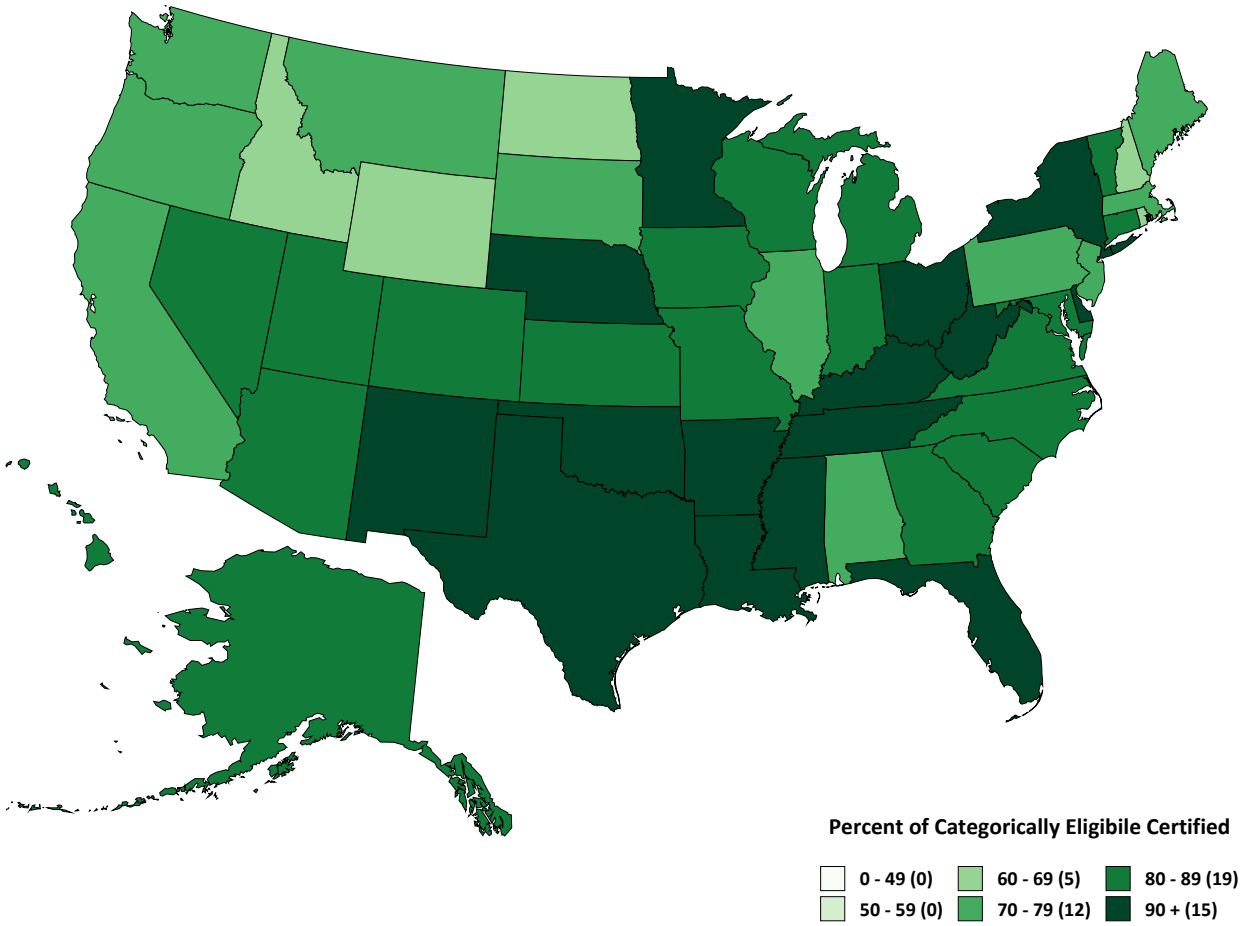


Figure A.7. Percent of Categorically Eligible Children Certified for Free School Meals, SY 2007–2008



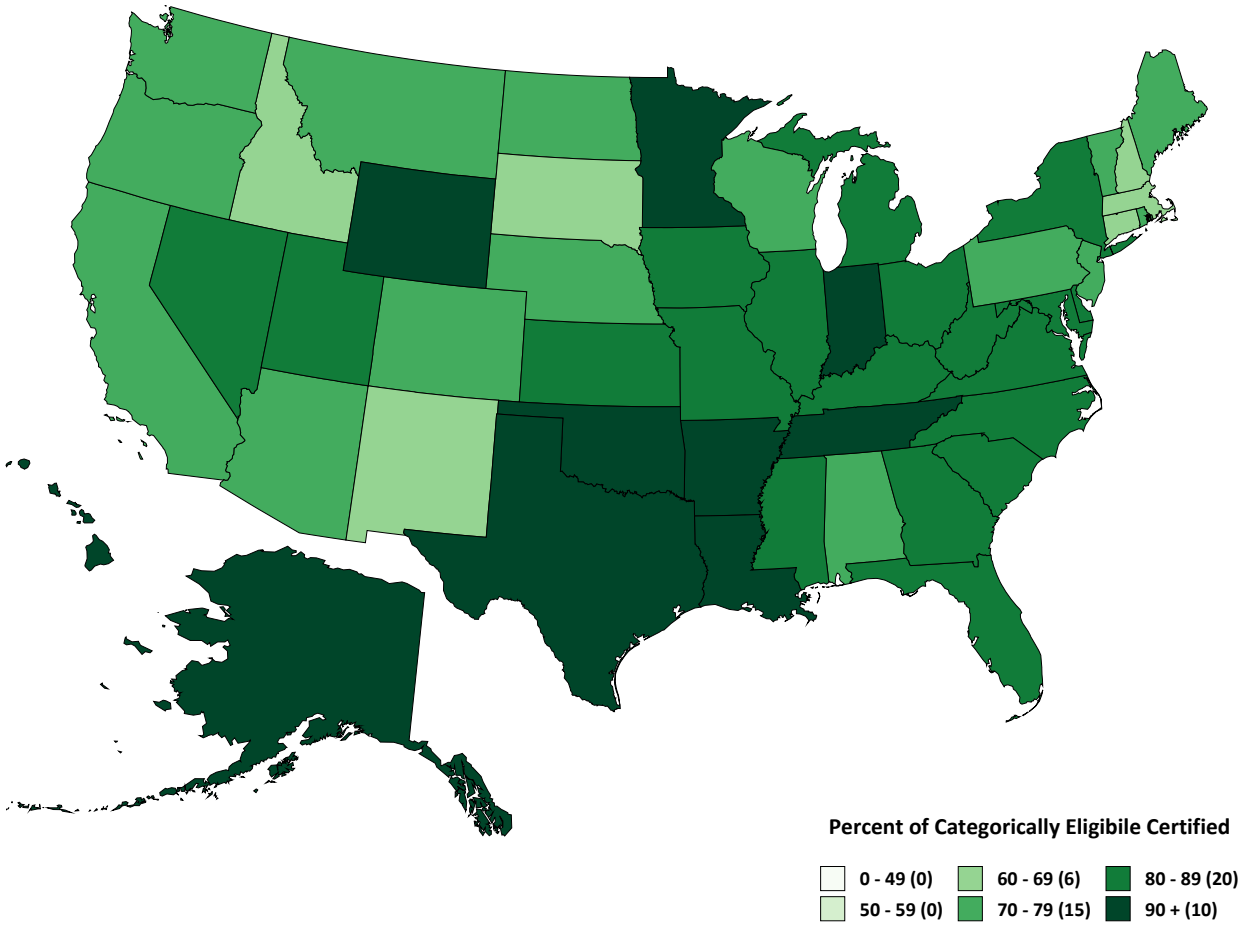
Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.8. Percent of Categorically Eligible Children Certified for Free School Meals, SY 2008–2009



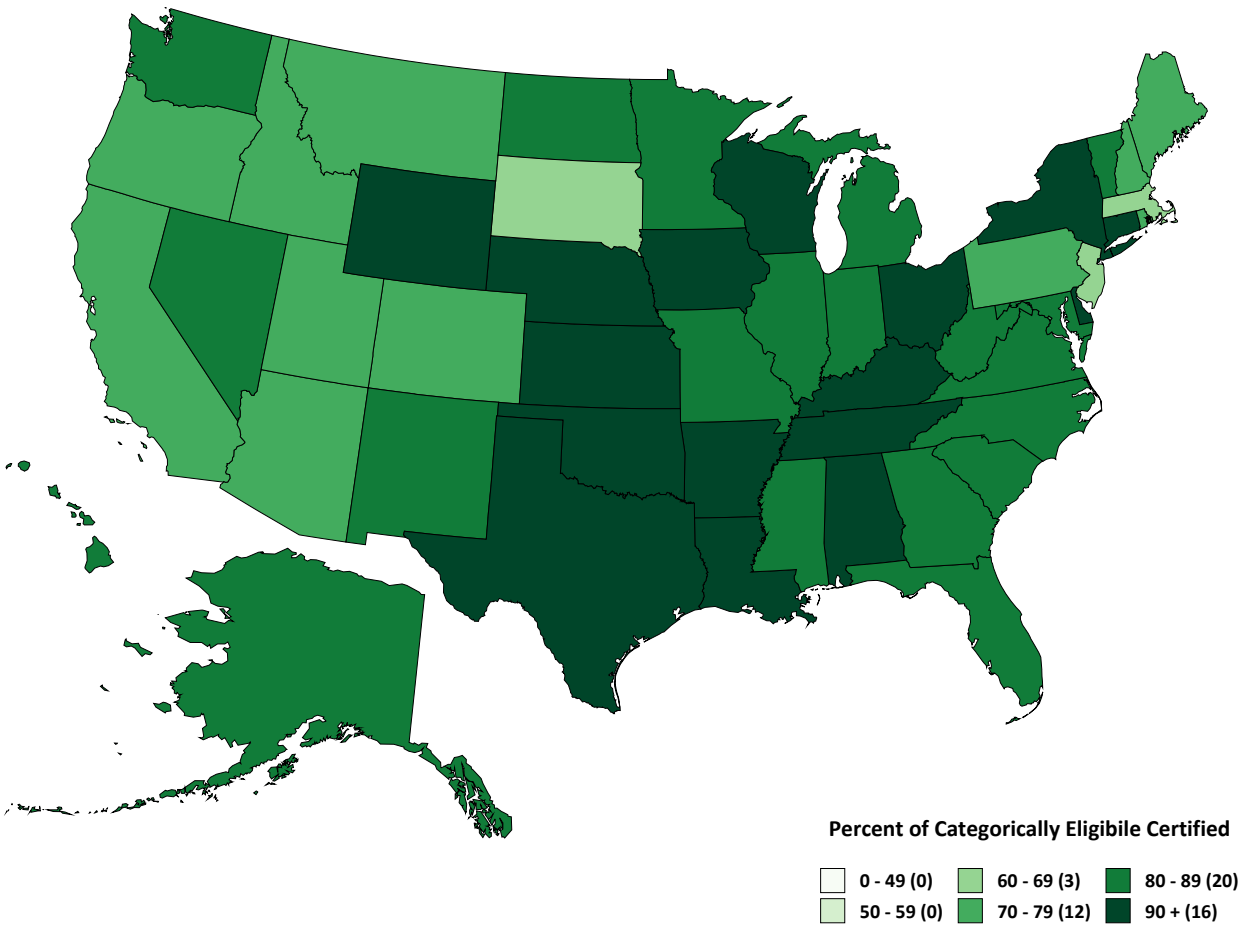
Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.9. Percent of Categorically Eligible Children Certified for Free School Meals, SY 2009–2010



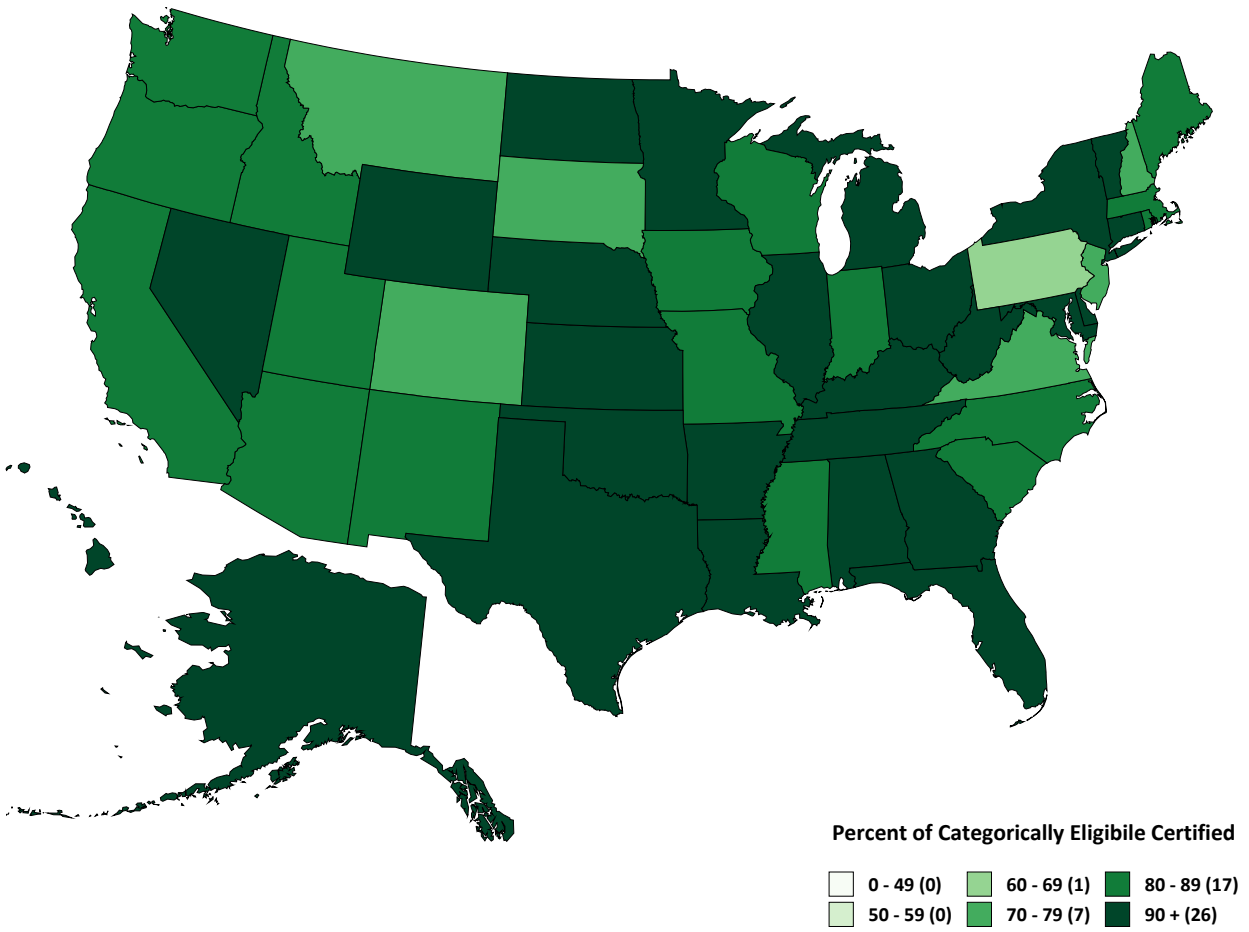
Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.10. Percent of Categorically Eligible Children Certified for Free School Meals, SY 2010–2011



Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

Figure A.11. Percent of Categorically Eligible Children Certified for Free School Meals, SY 2011–2012



Note: The map has been revised slightly from previously published versions. The legend has been updated to avoid overlap between categories. In addition, the map uses the direct certification rates rounded to the nearest integer to assign States to categories, which is consistent with how rates are shown in the body of the report. The revisions have resulted in minor changes for the same year in previous reports to Congress.

APPENDIX B

VERIFICATION SUMMARY REPORT

FORM APPROVED OMB #0584-0026
Expiration Date 03/31/2013

[INSERT STATE AGENCY NAME]	SFA ID#	
SCHOOL FOOD AUTHORITY VERIFICATION SUMMARY REPORT	SFA NAME	
	TYPE OF SFA	☐ Public ☐ Private
	SCHOOL YEAR	–

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB number for this collection is 0584-0026. The time required to complete this information collection is 30 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.

I. Enrollment, Application and Eligibility Information (Pre Verification)

1. Type of Free/Reduced Price Application Used

☐ Individual Student ☐ Household ☐ Both

Report items 2 through 5 as of the last operating day in October	A. All Schools	B. Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR
2. Number of schools and RCCIs operating the NSLP and/or SBP		
3. Number of enrolled students with access to the NSLP (or SBP for SBP only schools)		
	A. # of Students	B. # of Approved Applications
4. Total FREE ELIGIBLE reported		
4-1. # approved as FREE ELIGIBLE who are not subject to verification (directly certified, homeless liaison list, income-eligible Head start, pre-K Even start, residential students in RCCIs, non-applicants approved by local officials)		
4-2. #approved as FREE ELIGIBLE based on FS/ TANF/FDPIR case number submitted on an application (Categorically Eligible)		
4-3. # approved as FREE ELIGIBLE based on income/household size information submitted on an application		
4-4. # FREE ELIGIBLES reported for Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR		
5. Total REDUCED PRICE ELIGIBLE reported		
5-1. # reduced price eligibles reported for Provision 2/3 schools WHICH ARE NOT OPERATING A BASE YEAR		

II. Results of Verification, by Application Type

6. Type of Verification Used

☐ Basic ☐ Alternate-Random ☐ Alternate-Focused ☐ No Verifications Performed

Items 7 through 11 are required and are reported as of the date of completion of the verification process (see instructions). Item 12 is optional and is reported as of February 15.		A. FREE ELIGIBLE based on FS/TANF/ FDPIR Application (Categorically Eligible)	B. FREE ELIGIBLE based on Income/ Household Size Application (Income Eligible)	C. REDUCED PRICE ELIGIBLE
7. No Change	# applications			
	# students			
8. Responded, Changed to Free	# applications			
	# students			
9. Responded, Changed to Reduced Price	# applications			
	# students			
10. Responded, Changed to Paid	# applications			
	# students			
11. Did Not Respond	# applications			
	# students			
12. Reapplied and Reapproved on or Before Feb.15	# applications			
	# students			

FORM FNS-742 (2/04)

SBU

Electronic Form Version Designed in Adobe 7.1 Version

This form, and the accompanying instructions for completion, is available for download at http://www.fns.usda.gov/cnd/Governance/Forms/.

APPENDIX C

ESTIMATION OF COMPONENT STATISTICS

The direct certification performance measures presented here are based on State-level estimates of (1) the number of school-age children that received SNAP benefits at any time in July, August, or September of 2011; (2) the number of SNAP-participant children that were directly certified for free school meals as of October 1, 2011; and (3) the number of SNAP-participant students that were not candidates for direct certification because they attended Provision 2 or Provision 3 schools that were not operating in a base year in SY 2011–2012. The methods and sources used for these estimates are described next.[34]

A. Estimate of School-Age Population in SNAP-Participant Households

The report uses two primary sources to estimate the number of school-age SNAP participants at the State level. The first is SNAP data reported to the FNS by State SNAP agencies each month. SNAP data include State agency counts of the number of individual participants in households that are issued SNAP benefits. The figures used in this report are the final participant counts for July through September 2011. Although these are the best available monthly estimates of SNAP participation, the data do not separate school-age children from other members of the SNAP household.

The school-age SNAP subpopulations are estimated from the SNAP quality control (QC) data set, which is based on statistically representative samples drawn by the States from participating SNAP households (U.S. Department of Agriculture 2008). The number of school-age children in SNAP households can be estimated for each State from the QC data. However, given the size of the State samples, monthly estimates of participation by State and age group are not sufficiently reliable and State estimates of the average monthly school-age population for the entire fiscal year are used instead.

With these two inputs, FNS is able to estimate the number of school-age SNAP participants by State for the target months of July through September. From official SNAP data, FNS computes average monthly participation from July through September as a percentage of average monthly participation for the entire fiscal year. This is multiplied by QC estimates of average monthly school-age SNAP participation for the year. The result is a set of State estimates of average school-age SNAP participation for the months of July through September 2011.

A final adjustment is needed to convert this average monthly figure into an estimate of school-age children who received SNAP benefits at any time in those three months. Across any period, the total number of individuals served by the SNAP program is higher than the average monthly caseload over the same period. The participant turnover rate is defined as the total number of SNAP participants over a given period divided by the period's average monthly caseload. FNS estimates that the turnover rate across an entire year is about 1.4 (Mabli et al. 2011). That is, if the average monthly caseload for the year is 100, the unduplicated number of individuals who participated for any part of the year is 140.

The turnover rate applied here is a national estimate. The estimate is based on the Survey of Income and Program Participation (SIPP), a U.S. Census Bureau data set that contains information on a representative panel of households over time. The longitudinal nature of the data set allows for

[34] See Appendix D for a discussion of data limitations.

estimation of the SNAP turnover rate over the July-through-September period of concern to this report. However, SIPP data are not designed for State-level analysis. Use of a national turnover rate introduces some uncertainty into the estimates of SNAP participation developed here.

In the first two reports in this series, we used single-year point estimates of the turnover rate for July through September based on the most current SIPP data available. That approach generated estimates that varied significantly from year to year. Given the error inherent in a turnover rate estimated over such a short (three-month) period, we were concerned that much of the variation observed over time could be largely random. Beginning with the Report to Congress for SY 2009–2010, we compensated for the uncertainty in single-year point estimates by applying a three-year moving average of estimated turnover rates to the SNAP participant counts for each of the years examined in the report.[35] We continue to use the three-year moving average for this year's report. The three-year moving average of the estimated turnover rate is 1.10, which is the same as that which was estimated in last year's report.

$$\text{Unduplicated count of school-age SNAP-participant population, July–September 2011} = \frac{\text{Average monthly SNAP participation, FNS program data, July–September 2011}}{\text{Average monthly SNAP participation, FNS program data, FY 2011}} \times \text{Average monthly school-age SNAP-participant population, QC estimate, FY 2011} \times \text{Estimated SNAP-participant turnover rate, July–September 2011}$$

FY = fiscal year.

B. Estimate of SNAP Participants Directly Certified for Free School Meals

This report uses data collected by FNS from the States and LEAs to estimate the number of children in SNAP-participant households that are directly certified for free school meals. These data are generated and reported by LEAs as part of the annual process of verifying student eligibility for free and reduced-price school meal benefits. Although these data were not designed specifically to support the requirements of this report, they remain the most current and best available State estimates of directly certified SNAP participants.

All household applications approved for free and reduced-price benefits are subject to annual verification by local LEAs. LEAs are required to draw a sample from approved applications and review applicant documentation. LEAs report the results of the verification process to FNS through their State education agencies. These VSRs include the number of applications and students initially certified for free or reduced-price benefits and the corresponding number of applications and students whose status was confirmed or changed as a result of the verification review.[36]

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[35] As described in the Report to Congress for SY 2009–2010, when the move to a three-year rolling average was applied to SY 2007–2008, the national direct certification rate was revised downward from 69 to 68 percent. For SY 2008–2009, the national rate was unchanged at 71 percent.

[36] The annual NSLP eligibility verification and reporting process is described in 7 CFR 245.6a. The verification summary report, FNS form 742, is reprinted as Appendix B.

The VSRs are intended primarily to document the results of the verification process. For this reason, most of the information contained in the reports concerns the verification outcomes of applications initially approved for free or reduced-price meals. However, the reports also contain counts of students whose eligibility for free or reduced-price meals was not determined by application and whose certifications are therefore not subject to verification. These counts include, but are not limited to, directly certified SNAP participants. This report uses LEA counts of students certified for free school meals, but not subject to verification, as a proxy for directly certified SNAP participants.[37]

C. Estimate of SNAP Participants in Provision 2 and Provision 3 Schools

The population of SNAP-participant children who are candidates for direct certification does not include children who attend Provision 2 or Provision 3 schools that are not operating in a base year. These schools directly certify (and accept applications from) SNAP-participant children only in base years when they establish the percentage of meals served free, at reduced-price, and at the paid rate for NSLP reimbursement. In nonbase years, the schools are reimbursed at these previously determined percentages; individual children are not subject to certification or recertification in nonbase years.[38]

In order to remove these children from the estimated population of SNAP participants, FNS used data reported by LEAs on their SY 2011–2012 VSRs. LEAs for which all schools use Provisions 2 or 3 and are not operating in a base year are required to submit VSRs, although compliance with that requirement is imperfect. These LEAs, and LEAs with both Provision 2 or Provision 3 and non-provision schools, report the number of students eligible for free (and reduced-price) meals in their Provision 2 and Provision 3 schools that are not operating in base years. The information provided by the LEAs does not distinguish SNAP-participant children from other income-eligible or categorically eligible children in Provision 2 or Provision 3 schools.

Children in Provision 2 or Provision 3 schools who were determined eligible for free meals in the schools' base years must have met the income or categorical requirements of the NSLP in those years. Virtually all of those children were also income-eligible for SNAP benefits. However, not all households that are income-eligible for SNAP benefits are SNAP participants. Some fraction of income-eligible households do not meet SNAP's asset test. An additional fraction of income- and asset-eligible households do not participate in SNAP for other reasons.[39]

FNS applied two factors to the count of children from nonbase year Provision 2 or Provision 3 schools who were determined income-eligible for free meals in the schools' most recent base years:

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[37] Some limitations of this measure are discussed in Appendix D.

[38] Provision 2 and Provision 3 schools operating in nonbase years serve all meals at no charge, although they are reimbursed by USDA at rates consistent with their free, reduced-price, and paid claiming percentages. Provision 2 and Provision 3 are offered to schools as administrative cost-saving options. In exchange for a much-reduced meal counting and claiming burden and no certification costs in nonbase years, Provision 2 and Provision 3 schools absorb any difference between their Federal reimbursement and the cost of meals served.

[39] Reasons for nonparticipation in SNAP by fully eligible households include real or perceived access barriers and personal preference. For additional discussion of reasons for SNAP nonparticipation, see Bartlett and Burstein (2004).

1. An estimate of the percentage of the population that is income-eligible for SNAP benefits but not asset-eligible
2. A national estimate of the participation rate of school-age children from households that meet both the SNAP income and asset tests[40]

A recent trend has been for States to adopt noncash categorical eligibility (CE) for SNAP benefits. Under CE, households that receive a noncash benefit from a means-tested cash assistance program (such as TANF) may be held categorically eligible for SNAP benefits. States may choose to maintain a traditional asset test for eligibility or they may adopt broad-based or narrow categorical eligibility requirements. Under broad-based CE (BBCE), if a household receives a noncash TANF or State maintenance of effort (MOE) benefit (for example, information on a service), then the household is considered categorically eligible for SNAP benefits. Under narrow CE, households become categorically eligible for SNAP benefits if they receive a noncash TANF-/MOE-funded service, such as child care or employment assistance, for which a small subset of the SNAP population is eligible.[41]

The policy that provides for CE has been in use since 2001, when eight States used broad-based criteria for determining eligibility. Its use has grown considerably, with large numbers of States adopting CE in FY 2008 through FY 2011. The majority of States have now adopted BBCE and eliminated traditional SNAP asset tests, which negates the need to adjust the estimated population of SNAP participants. During SY 2011–2012, 40 States plus the District of Columbia and Guam had adopted BBCE policies. For these States, we apply an asset adjustment factor of 1.0 and a national participation adjustment of 0.918 (Eslami et al. forthcoming). For the remaining 10 non-BBCE States[42]—Alaska, Arkansas, Indiana, Kansas, Missouri, South Dakota, Tennessee, Utah, Virginia, and Wyoming—we apply an asset adjustment factor of 0.824[43] and the national participation adjustment of 0.918.

[40] The national estimate of the participation rate of school-age children used in last year's Report to Congress was taken from the report *Trends in Supplemental Nutrition Assistance Program Participation Rates: 2000 to* 2009 (Leftin 2010). That report has since been updated and includes methodological improvements that make use of more recent data and of methodologies developed for the SIPP-based microsimulation model. See Eslami et al. (2012) for details regarding the methodological changes. The methodology changes revised the participation rate used last year downward from 0.902 to 0.827. We include the revised participation rate when presenting the corrected direct certification estimates for SY 2010–2011 shown in Appendix E.

[41] See Trippe and Gilloly (2010) for more details regarding noncash CE.

[42] In last year's Report to Congress, 13 States were identified as not having adopted BBCE policies (down from 27 States the previous year).

[43] Before last year's Report to Congress, the asset adjustment for States that retained a traditional asset test (non-BBCE) was based on a national estimate, which included BBCE States and those that have narrow or no categorical eligibility. However, this served to overestimate the percentage of the population that was income-eligible but not asset-eligible in States that have narrow or no categorical eligibility. Last year, we improved the adjustment by reestimating the values in Table A.1 of the report, *Assets of Low-Income Households by SNAP Eligibility and Participation in 2010* (Trippe and Schechter 2010) for households residing only in states that have *not* implemented BBCE policies. We continue to use this revised methodology for this year's Report to Congress to determine the asset adjustment factor for the remaining 10 non-BBCE States.

APPENDIX D

DATA LIMITATIONS

A. Local Educational Agency Verification Summary Reports

Each school year, LEAs that participate in the NSLP are required to review a sample of applications that were approved for free or reduced-price benefits. LEAs record the results of this review on VSRs that they submit through State education agencies to the FNS. The VSRs are the source for two key data elements used in this report.

1. Students Certified for Free Meals and Not Subject to Verification

This data element is used as a proxy for directly certified children from households that participate in the SNAP. In many States, however, students eligible for free meals whose status is not subject to verification also include directly certified TANF or FDPIR participants; children who are categorically eligible based on their status as a migrant or homeless child, or their enrollment in Federally funded Head Start or Even Start; and children in certain residential child care institutions.

A 2005 survey found that 15 of the 18 States that conducted State-level direct certification matches included both SNAP and TANF databases in their matching systems. In 18 of the 22 States that employed a local matching system, or district-level matching, at that time, the States provided both SNAP and TANF databases to the LEAs for use in the matching process.[44] Since SY 2004–2005, the percentage of LEAs that directly certify children from SNAP-participant households has increased from 55.6 to 88.7 percent in SY 2011–2012.[45] To the extent that those LEAs adopted already-established central- or local-matching system procedures for their new direct certification systems, it is likely that they too are certifying both TANF and SNAP participants.

For these reasons, the number of students eligible for free meals not subject to verification is an imperfect proxy for directly certified SNAP participants. Specifically the proxy will overstate the number of directly certified SNAP participants because it includes students who were not SNAP participants but who were directly certified on the basis of TANF participation. Although this population of TANF participants is likely to be small, this overstatement is not constant across States or LEAs. The proxy count tends to be smallest for States and LEAs that include only SNAP-participant databases in their direct certification systems, even though those States and LEAs might be in full compliance with the statutory direct certification mandate. As a result, the estimates of direct certification performance developed in this report could exaggerate the differences between the States.

Separately, State counts of children in SNAP households include home-schooled students,[46] students in schools that do not participate in the NSLP, and school-age dropouts. These school-age SNAP participants are categorically eligible for free school meals, however, the NSLP cannot reach these students and they are not counted in the VSR data. Therefore, the existence of home-schooled students, students in schools that do not participate in the NSLP, and school dropouts will reduce the direct certification performance measure. Moreover, the number of these students varies across States.

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[44] LEAs in the remaining States relied solely on the letter method of direct certification. See Cole and Logan (2007), pp. ix, 34–36.

[45] See Table 1.

[46] An estimated 1.5 million students were home-schooled in 2007 (U.S. Department of Education 2008).

Finally, Section 4301 of the 2008 Farm Bill specifies that State measures of direct certification effectiveness shall use estimates of the number of SNAP-participant children directly certified as of October 1. Our estimates of directly certified children are taken from the VSR, which contains data through the last reporting day of October.

2. Students Eligible for Free Meals, Based on Claiming Percentages Reported by Provision 2 and Provision 3 Schools that Are Not Operating in a Base Year

The performance measure includes this data element to reduce the number of SNAP-participant children that are candidates for direct certification. The problem with this variable, for purposes of this report, is that children in Provision 2 and Provision 3 schools receive free meals based on their income or SNAP-participant status in some previous year. If the number of SNAP-participant children has changed significantly in a particular State since a school's most recent base year, then an estimate of SNAP participants who attend Provision 2 or Provision 3 schools based on this data element will be inaccurate.

B. SNAP Quality Control System Data Set

This data set contains the data necessary to estimate the school-age participant share of each States' SNAP population. The QC data element used here is the number of children between the ages of 5 and 17. A more appropriate variable would be one that identifies children by their educational status rather than their ages. In States or districts with widespread or mandatory pre-kindergarten programs or all-day kindergarten, this QC variable will understate the SNAP population eligible for free school meals. In States with kindergarten age cutoffs that do not require many 5-year old children to be in school, this variable will overstate the relevant population. Similarly, this variable will overstate the relevant population in States with high drop-out rates.

C. American Community Survey

This report's alternate measure of the States' success at certifying categorically eligible children for free school meals relies in part on a factor developed with ACS data from the U.S. Census Bureau. The ACS offers estimates of households that receive SNAP benefits and households that receive both SNAP benefits and public assistance, which ACS documentation defines as "general assistance and Temporary Assistance to Needy Families."[47] For this report, we use the ACS count of households that receive public assistance as a proxy for households that receive TANF benefits. This proxy will overstate the TANF population by an unknown amount that varies according to the size of the States' general assistance programs.

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

[47] See U.S. Census Bureau 2009.

Finally, ACS data are not available for Guam, which is included in the Report to Congress this year for the first time. Therefore, Guam is not included in the analysis of the more comprehensive categorical eligibility certification measure.

D. Survey of FDPIR Participants

The estimated count of school-age FDPIR participants used to develop the performance measure presented in Figure 7 is based in part on a survey conducted for a 1990 study (Usher et al. 1990). The study found that 37 percent of FDPIR participants were younger than 18. FNS multiplied this figure by a factor of 13/18 (the expected number of children ages 5 to 17 among those ages 0 to 17) and applied it to the average monthly FDPIR caseload,[48] by State, for fiscal year 2008. The primary weakness of this estimate is clear: the share of children in households that currently receive FDPIR benefits likely has changed, significantly in some States, since 1990.

E. Survey of Income and Program Participation

Another methodological limitation is related to the use of a national parameter in generating State-level estimates for the number of school-age SNAP participants. Although monthly State-level estimates of the number of school-age SNAP participants are available, these estimates do not indicate how many of these children received SNAP in previous months and how many are new cases. The performance measure uses an estimate of the SNAP turnover rate to calculate the number of unduplicated school-age SNAP children. However, the turnover rate estimate is based on data from the SIPP, which is not intended for State-level analysis. Therefore, State-specific estimates of the SNAP turnover rate are not available. The State direct certification performance measure must use the national estimate for SNAP turnover rate in its estimate of the number of unduplicated school-age SNAP children. This procedure will overstate the number of SNAP participants in States with lower than average SNAP turnover rates and will understate the number of SNAP participants in States with higher than average SNAP turnover rates.

[48] FNS FDPIR program data.

APPENDIX E

DATA UPDATES FOR SCHOOL YEAR 2010–2011

For this year's direct certification report, we have updated last year's table showing the percentage of directly certified school-age SNAP participants.

Updates to the estimate inputs since the previous report include the following:

1. Revised SY 2010–2011 FNS-742 data from 13 states
2. Updated SY 2010–2011 SNAP school-age participation rate from a newly released report (as discussed in Appendix C, the participation rate revised downward from 0.902 to 0.827)

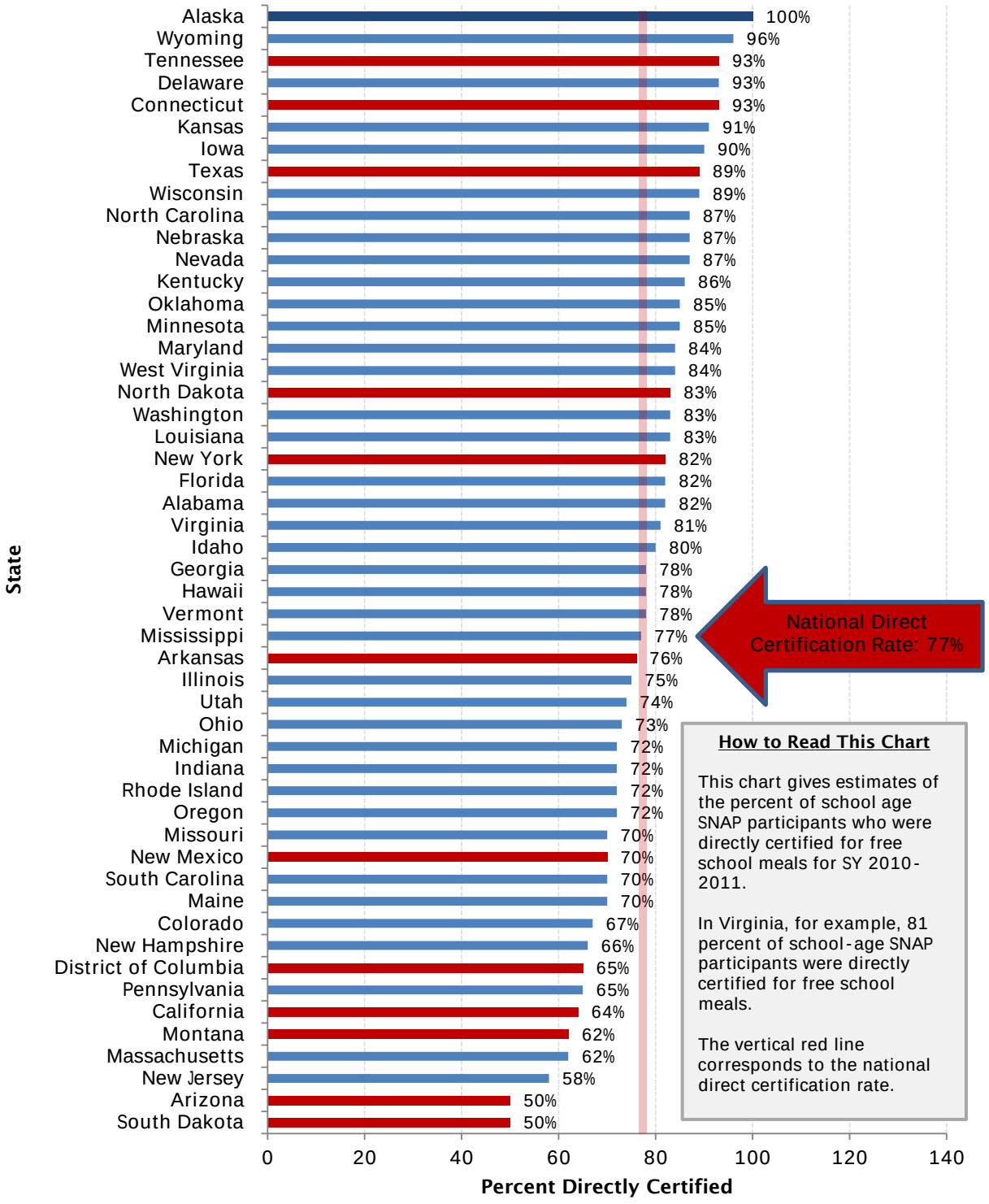
The updated estimates are reflected in the amended version of Figure 4 from the October 2011 Report to Congress. Changes related to these data updates were typically small. The national direct certification rate decreased by 0.64 percentage points from 77.79 to 77.15 percent. When rounded to the nearest percentage point, 38 States have the same direct certification rate under both the previously published and the updated data. Of the 13 States that show changes to their direct certification rates, seven had changes of two percentage points or less (Alaska, Arizona, California, District of Columbia, Montana, North Dakota, South Dakota, Tennessee, and Texas).

The largest changes related to the data updates were for New Mexico (updated from 78 to 70 percent), the District of Columbia (updated from 71 to 65 percent), Connecticut (updated from 97 to 93 percent), and New York (updated from 86 to 82 percent). Changes in these four States are driven entirely by the update to the SNAP participation rate.

The reduction in the SNAP participation rate reduces the estimated count of SNAP participants attending non-base year Provision 2 or Provision 3 schools (see Appendix C). Reducing the estimate of SNAP participants in non-base year Provision 2 or Provision 3 schools reduces the direct certification rate estimate because it leads to a larger denominator for the direct certification rate.

The update to the participation rate estimate affects the direct certification rate more for States in which SNAP participants attending non-base year Provision 2 or Provision 3 schools represent a larger proportion of all school-age SNAP participants. Nationally, the estimated share of school-age SNAP participants attending non-base year Provision 2 or Provision 3 schools (after updating with the revised participation rate) was about eight percent. The four States with the largest shares were New Mexico (51 percent), the District of Columbia (45 percent), Connecticut (29 percent), and New York (29 percent). Therefore, these four States had the largest changes to their direct certification rates in response to the updated SNAP participation rate.

Amended Figure 4. Revised Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals, SY 2010–2011



Note: This figure has been revised to account for changes in State verification summary report information for SY 2010–2011 and for revisions to the methodology for calculating the SNAP participation rate. Revised values are indicated with red shading. The percentages in this figure are equal to the ratio of directly certified students, and other students eligible for free meals whose applications are not subject to verification, to all SNAP-participant school-age children. Bars shaded dark blue represent estimates that were capped at 100 percent. See Appendices C and D for a discussion of data sources and data limitations.

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