

DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM: STATE PROGRESS IN IMPLEMENTATION REPORT TO CONGRESS - SUMMARY

Office of Research and Analysis

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This report responds to the legislative requirement of Public Law 110-246 to assess the effectiveness of State and local efforts to directly certify children for free school meals. Under direct certification, children are determined eligible for free school meals without the need for household applications by using data from other means-tested programs. The 2004 Child Nutrition and WIC Reauthorization Act required local educational agencies (LEAs) to establish, by School Year 2008-2009, a system of direct certification of children from households that receive Supplemental Nutrition Assistance Program (formerly Food Stamp Program) benefits. The mandate was phased in over three years; the largest LEAs were required to establish direct certification systems first, by School Year (SY) 2006-2007. As of SY 2008-2009, all LEAs are subject to the mandate. Seventy-eight percent of LEAs directly certified SNAP-participating students in SY 2008-2009. These LEAs enroll 96 percent of all students in NSLP-participating schools. The median direct certification rate was 72 percent in SY 2008-2009. This is up from 69 percent in SY 2007-2008.

Background

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for providing nutritionally balanced, low cost or free meals to children in public and private schools and residential child care institutions. Average daily participation totaled 31 million children in fiscal year 2009.

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 poverty level are eligible for reduced price meals.

Children from households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP – formerly the Food Stamp Program), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR), are deemed "categorically eligible" for free school meals.

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 eliminate the need to fill out paper applications. Most State and LEA direct certification systems rely on computer matching of SNAP, TANF, and FDPIR records against student enrollment lists. Those systems require no action by the children's parents or guardians. In other States and LEAs, letters are sent to SNAP, TANF, and FDPIR households. The letters serve as proof of categorical

eligibility for free meals, and must be forwarded by the households to their children's schools.

The Child Nutrition and WIC Reauthorization Act of 2004 requires all LEAs to begin directly certifying SNAP participant children. The mandate was phased-in over three years. The largest LEAs were required to establish direct certification systems by School Year (SY) 2006-2007. The smallest LEAs (those with fewer than 10,000 students) had to begin direct certification by SY 2008-2009.

State Performance Measures

This report presents information on the outcomes of direct certification for SY 2008-2009, the first year that all LEAs were subject to the statutory mandate.

FNS 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.

FNS also estimated the number of all SNAP, TANF, and FDPIR participants certified for free school meals, either by direct certification or by application. This provides a more comprehensive measure of State success in certifying categorically eligible children for free school meals.

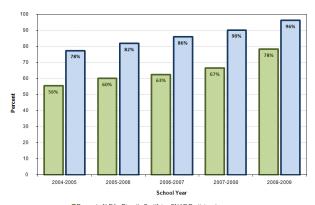
Key Findings

States and LEAs have increased their use of direct certification since enactment of the 2004 Reauthorization Act.

 In SY 2004-2005, 56 percent of LEAs operated a direct certification system on a discretionary basis; schools in those LEAs accounted for about 79 percent of all students in NSLP participating schools.

- The share of LEAs that directly certified SNAP participants grew to 67 percent by SY 2007-2008.
- By SY 2008-2009, 78 percent of LEAs directly certified some SNAP participants. These LEAs enrolled 96 percent of all students in NSLP-participating schools.

Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants SY 2004-2005 through SY 2008-2009



■ Percent of LEAs Directly Certifying SNAP Participants
■ Percent of Students in LEAs Directly Certifying SNAP Participants

An estimated 22 percent of LEAs, enrolling 4
percent of students, did not directly certify
SNAP-participant children in SY 2008-2009;
most of these were small, private LEAs that were
newly subject to the direct certification mandate.

State direct certification performance varied greatly.

- States with the most effective systems directly certify all or nearly all SNAP-participant children.
- States with the least effective systems certified no more than 50 percent of SNAP children.
- The median direct certification rate was 72 percent in SY 2008-2009, up from 69 percent in SY 2007-2008.

 The States certified an even higher 85 percent of all categorically eligible students for free school meals, either by direct certification or by application.

State Best Practices

State officials and policy experts interviewed for this report agree that no single model of direct certification will prove equally effective for all States.

All of the interviewed States rely primarily on computer matches of SNAP participant and student datasets, rather than the letter method of direct certification. Matching algorithms tend to vary according to the technological ability of the States and the quality of the data to be matched.

Some of the States and LEAs require exact matches on student name, date of birth, or Social Security Number. Other States and LEAs allow partial or close matches on some key identifiers.

One important variation in approach is dictated by differences in the centralization of the States' educational systems. States with large numbers of relatively small LEAs tend to rely on a centralized match, conducted at the State level. States with larger LEAs tend to allow the districts to design and run their own matching programs.

Interviewed officials point to some steps that would improve the effectiveness of any State or LEA direct certification system. Chief among these are periodic, rather than annual matches, and Web-based lookup systems to verify the SNAP-participant status of individual students. Both of these facilitate the timely certification of students who move during the school year, or who did not become categorically eligible for free school meals until sometime after the start of the school year. Web-based lookup systems also permit local officials to directly certify individual students known to be categorically eligible for free school meals despite not being identified through a computer match.

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