

Nutrition Assistance Program Report Series
The Office of Research and Analysis

Special Nutrition Programs Report No. CN-09-DC

Direct Certification in the National School Lunch Program: State Implementation Progress

Report to Congress



October 2009

The Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

To file a complaint of discrimination, write USDA, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (800) 795-3272 or (202) 720-6382 (TDD).

USDA is an equal opportunity provider and employer.

Direct Certification in the National School Lunch Program: State Implementation Progress

Report to Congress

Authors:

Dennis Ranalli
Edward Harper
Rosemary O'Connell
Jay Hirschman
Nancy Cole
Quinn Moore
Brandon Coffee-Borden

October 2009

Suggested Citation:

Suggested Citation: Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, *Direct Certification in the National School Lunch Program: State Implementation Progress* by Dennis Ranalli, Edward Harper, Rosemary O'Connell, Jay Hirschman, Nancy Cole, Quinn Moore, and Brandon Coffee-Borden. Report CN-09-DC. Alexandria, VA: October 2009.

Acknowledgements

The authors wish to express their gratitude to those who contributed to this study and the preparation of the final report. In particular, we appreciate the advice and assistance of Cindy Long, Lynn Rodgers-Kuperman, Gary Vessels, Michelle Bucci, and Lisa Finkelstein of the Child Nutrition Division of the Food and Nutrition Service, and Steven Carlson, Robert Dalrymple, and John Endahl of the Office of Research and Analysis. Additionally, we extend our gratitude to Nancy Cole, Quinn Moore, and Brandon Coffee-Borden of Mathematica[®] Policy Research, who conducted phone interviews with best practice States and prepared the best practices section of this report. Christopher Logan of Abt Associates and Zoe Neuberger of the Center for Budget and Policy Priorities graciously served as subject matter experts for the best practices section of this report. USDA also appreciates the cooperation of State officials in Florida, Iowa, Kansas, Nevada, New Mexico, Ohio, and Pennsylvania who participated in the review of State practices. Their information was essential to the completion of this report.

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 2004 Child Nutrition and WIC Reauthorization Act requires 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 – formerly Food Stamp Program) benefits. The mandate was phased in over 3 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.

Seventy-eight percent of all LEAs directly certified some SNAP participants in SY 2008-2009. These LEAs enroll 96 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 79 percent of all students in NSLP schools, directly certified SNAP-participant students.

The percentage of SNAP-participant children who were directly certified for free school meals in SY 2008-2009 varied greatly among the States. The States with the highest rates were able to directly certify all or nearly all SNAP-participant children. The least successful States certified no more than 50 percent of those children. Half of all States were able to directly certify at least 72 percent of school-age SNAP participants. The comparable median direct certification rate for SY 2007-2008 was 69 percent.

This page left intentionally blank

Contents

Glossary of Acronyms and Abbreviations	x
Executive Summary	ES-1
I. Introduction.....	1
II. History of Direct Certification	3
III. Current Status of State Direct Certification Systems.....	4
IV. Direct Certification Performance	9
V. Direct Certification Best Practices	20
A. Description of State Practices	20
B. Recent and Planned Direct Certification Improvements	29
C. Views on Best Practices and Remaining Challenges.....	31
VI. Conclusion	32
VII. References.....	34
Appendix A – Additional Tables	36
Appendix B – Verification Summary Report	43
Appendix C – Estimation of Component Statistics	44
Appendix D – Data Limitations	47

List of Tables

Table 1: Number and Percent of LEAs Directly Certifying SNAP Participants, SY 2004-2005 through SY 2008-2009	6
Table 2: SNAP Participation, Direct Certifications, and SNAP Participant Students in Non-Base Year Provision 2 or Provision 3 Schools, SY 2008-2009.....	10
Table 3: Categorically Eligible Students, Number Directly Certified, and Number Approved by Application, SY 2008-2009	18

Table 4: Characteristics of the Direct Certification Matching Process for Public LEAs in Select States	23
Table 5: Primary Matching Criteria for States that use Centralized Matching.....	25
Table 6: Data Available for States in which Districts do the Matching	26
Table 7: Direct Certification Methods for Non-public Schools.....	29
Table A-1: Number and Percent of LEAs Directly Certifying SNAP Participants: Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts, SY 2004-2005 through SY 2008-2009	36
Table A-2: Summary State Statistics from Figures 4 and 7.....	38
Table A-3: Enrollment of NSLP-Participating LEAs, SY 2008-2009	39
Table A-4: States by FNS Administrative Region.....	42

List of Figures

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 2008-2009	5
Figure 2: Percent of LEAs Directly Certifying SNAP Participants, by LEA Size, SY 2008-2009	7
Figure 3: Students in LEAs that Directly Certified SNAP Participants, by LEA Size, SY 2008-2009	8
Figure 4: Percent of School-Age SNAP-Participant Children Directly Certified for NSLP Free School Meals - SY 2008-2009	13
Figure 5: Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals by Region in SY 2008-2009.....	14
Figure 6: Percentage Point Change in the Share of SNAP-Participant Children Directly Certified for Free School Meals, SY 2007-2008 to SY 2008-2009.....	16
Figure 7: Percent of Categorically Eligible Children Certified for Free School Meals, SY 2008-2009	19

Figure A-1: Percent of LEAs that Directly Certified SNAP Participants, by LEA Size, Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts, SY 2008-2009	37
Figure A-2: Percent of SNAP-Participant Children Directly Certified for Free School Meals, SY 2008-2009	40
Figure A-3: Percent of SNAP-Participant Children Directly Certified for Free School Meals, SY 2007-2008	40
Figure A-4: Percent of Categorically Eligible Children Certified for Free School Meals, SY 2008-2009	41
Figure A-5: Percent of Categorically Eligible Children Certified for Free School Meals, SY 2007-2008	41

Glossary of Acronyms and Abbreviations

ACS	American Community Survey (U.S. Census Bureau)
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
FY	Fiscal Year
LEA	Local Educational Agency
NSLA	Richard B. Russell National School Lunch Act
NSLP	National School Lunch Program
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 (formerly the Food Stamp Program)
SY	School Year
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture
VSR	Local Educational Agency Verification Summary Report (FNS Form 742)
WIC	Special Supplemental Nutrition Program for Women, Infants and Children

Executive Summary

Background

This report responds to a 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. The Act requires annual reports to Congress. This is the second report in the series, covering school year (SY) 2008-2009.

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. Average daily participation across 102,000 NSLP schools and institutions totaled 31 million children in fiscal year (FY) 2009.

Participating schools and institutions receive cash reimbursements and donated Department of Agriculture (USDA) foods (commodity assistance) 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 eligible children.

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. All NSLP meals are subsidized by USDA, including those served to children with household incomes above 185 percent of the 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 – formerly the Food Stamp Program), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR), confers categorical eligibility for free 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 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. 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 each State to establish a system of direct certification of school-age SNAP participants. That mandate was phased in over 3 years. The largest LEAs were required to establish direct certification systems by SY 2006-2007. The smallest LEAs (those with fewer than 10,000 students) were required to begin direct certification of SNAP-participant children by SY 2008-2009. Although the 2004 Reauthorization Act refers only to children participating in SNAP, States and LEAs may also directly certify children from TANF and FDPIR households.

State Performance Measures

This report presents information on the outcomes of direct certification for SY 2008-2009. 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 measure provides a more comprehensive assessment of State efforts to ensure that all categorically eligible children are properly certified for free school meals.

Key Findings

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 directly certified SNAP-participant children on a discretionary basis, and schools in those LEAs accounted for nearly 79 percent of all students in NSLP participating schools. The share of LEAs with direct certification systems grew to 67 percent by SY 2007-2008. By SY 2008-2009, 78 percent of LEAs directly certified SNAP-participant children. These LEAs enrolled 96 percent of all students in NSLP-participating schools. Although an estimated 22 percent of LEAs, enrolling 4 percent of students, did not directly certify any SNAP participants in SY 2008-2009, most of those were small, private LEAs that were newly subject to the direct certification mandate.

The percentage of SNAP-participant children who were directly certified for free school meals in SY 2008-2009 varied greatly among the States. States with the highest rates were able to directly certify all or nearly all SNAP-participant children. The least successful States certified no more than 50 percent of those children. Half of all States were able to directly certify at least 72 percent of school-age SNAP participants.

The overall certification rate of categorically eligible children (those participating in the SNAP, TANF, or FDPIR programs), by direct certification or by application, indicates that no State certified fewer than 55 percent of categorically eligible students in SY 2008-2009. The median certification rate was 84 percent.

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. The most successful States and LEAs design direct certification systems that make best use of their particular technological and data resources. Although all of the interviewed States rely primarily on computer matches of SNAP participant and student datasets, rather than the letter method of direct certification, they have designed match algorithms that differ in important ways. Some States and LEAs find success with algorithms that require exact name, date of birth, or Social Security Number matches. Other States and LEAs accommodate limitations in their datasets by allowing 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 are likely to find the greatest direct certification success, at least cost, using a centralized match conducted at the State level. States with relatively few, large 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 features 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.

Conclusion

This SY 2008-2009 direct certification report is the second in an annual series. It is the first that measures the effectiveness of the States' direct certification systems since LEAs of all sizes were made subject to the 2004 Reauthorization Act's direct certification mandate.

Significant progress has been made by States and LEAs in complying with the 2004 Reauthorization Act. An estimated 78 percent of LEAs, enrolling 96 percent of all children in NSLP-participating schools, directly certified SNAP participants in SY 2008-2009. Through their efforts, an estimated 71 percent of children from SNAP-participant households were certified for free school meals in SY 2008-2009 without applications. The States certified an average 85 percent of all categorically eligible students for free school meals, either by direct certification or by application.

Despite these successes, FNS estimates that a significant minority of LEAs did not directly certify any SNAP-participant children in SY 2008-2009. Almost all of these LEAs are small, and were subject to the direct certification mandate for the first time in SY 2008-2009. In addition, a majority are single-school LEAs, and about half are private. These characteristics do not exempt LEAs from their direct certification responsibilities. But, given the shared

characteristics of this group, a targeted training or technical assistance effort by State officials may be sufficient to raise this group's direct certification compliance rate.

Direct Certification in the National School Lunch Program: State Implementation Progress

I. Introduction

Direct Certification in the National School Lunch Program

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 USDA food assistance from the Department of Agriculture for each meal served. About 102,000 schools and institutions participate in the program. Average daily student participation totaled 31 million in FY 2009.

In exchange for Federal assistance, participating schools and institutions serve meals that satisfy Federal nutrition and food safety standards. In addition, they must offer school meals at no cost, or at reduced-price, to eligible children. Children from households with incomes at or below 130 percent of the poverty level (\$28,665 for a family of four during school year (SY) 2009-2010¹) are eligible for free meals. Those with incomes between 130 percent and 185 percent of the poverty level (\$40,793 for a family of four during SY 2009-2010) are eligible for reduced-price meals. Students are determined eligible for free meals through application or direct certification (described below); reduced-price eligibility is determined by application alone.

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 to 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),² Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) are “categorically eligible” for free school meals.³

Eligibility determination through direct certification

Direct certification confirms a child’s categorical eligibility for free school meals through his or her SNAP, TANF, or FDPIR participation, without the need for a household application. Direct certification typically involves matching SNAP, TANF, and FDPIR records against student

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 under “Income Eligibility” on <http://www.fns.usda.gov/cnd/lunch/>.

² Formerly the Food Stamp Program.

³ Certain children enrolled in Federally funded Head Start or Even Start programs, and certain migrant, homeless, or runaway children are also categorically eligible for free school meals.

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 to take no action for their children to be certified. In some States and school districts, direct certification does not involve computer matching. Instead, SNAP, TANF, or FDPIR agencies send letters to participant households. 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.

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 by SY 2008-2009.⁶ States may also directly certify children from TANF and FDPIR households, but are not required to do so.

Purpose of this Report

This report responds to section 4301 of the Food, Conservation, and Energy Act of 2008⁷, which calls for an assessment of the "effectiveness of each State in enrolling school-aged children in households receiving ... [Supplemental Nutrition Assistance Program] benefits" for free school meals. Specifically the law requires:

1. State-level estimates of the number of school-age children that received SNAP benefits at any time in July, August, or September (just prior to, 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, and
3. Estimates of the number of SNAP-participant students who were not candidates for direct certification because they attended Provision 2 or Provision 3 schools that were not operating in a base year in the current school year.

Section 4301 also calls for a discussion of best practices in States with the most successful direct certification systems, or systems that are most improved from the previous school year.

This report is the second in an annual series on the States' direct certification systems, and the first to report on these systems since the Federal requirement for States to operate such systems covering every local education agency was in full effect.

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 is phased in over a 3 year period beginning with school year 2006-2007.

⁷ Also known as the 2008 Farm Bill.

II. History of Direct Certification

In the mid-1980s, program managers and policy makers recognized a duplication of effort in certifying school children for free meals under the NSLP and the School Breakfast Program (SBP)⁸, and certifying families for what are now the SNAP and TANF programs. 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 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.⁹ Then, in 1989, Public Law 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 are members of either a household receiving SNAP or TANF benefits. This first statutory authorization of direct certification was made optional for SFAs.¹⁰

The 2004 Reauthorization Act amended the NSLA to mandate direct certification with SNAP for all LEAs; discretionary authority for TANF direct certification was retained. Mandatory direct certification with SNAP was phased in over 3 years, beginning in SY 2006-2007. All LEAs, including private schools, were required to have direct certification in place for SY 2008-2009.

Because State agencies administering the NSLP and SBP recognized that direct certification would increase participation, ease the burden on families and LEAs, and result in more accurate targeting of free school meal benefits, many States chose to phase in the use of direct certification in advance of the mandate. State 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. Therefore, by the time direct certification with SNAP was made mandatory, many State agencies had systems in place and were familiar with the process. By SY 2004-2005, 56 percent of LEAs had already adopted some form of direct certification.¹¹ Schools in those LEAs enrolled nearly 79 percent of all students in NSLP participating schools.

⁸ 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.

⁹ The option to provide a case number on the application has been retained to allow children who were not directly certified to be more easily processed by the LEA.

¹⁰ Prior to 2004, the NSLA referred only to SFAs when describing local administration of the NSLP. With the 2004 Reauthorization Act, the NSLA recognizes LEAs, rather than SFAs, as the entities responsible for NSLP application and certification processes.

¹¹ This percentage includes the small number of LEAs whose entire student populations attended Provision 2 or Provision 3 schools not operating in base years. See footnote 13 for further explanation.

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 State 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 3 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 in the number and percent of LEAs that directly certified at least some SNAP participants as the requirements of the 2004 Reauthorization Act were phased in.¹² In SY 2004-2005, 2 years before the statutory phase-in period began, 56 percent of LEAs directly certified some SNAP participants.¹³ By SY 2008-2009, an estimated 78 percent of LEAs directly certified some SNAP participants; these LEAs enroll about 96 percent of all students in NSLP-participating schools.

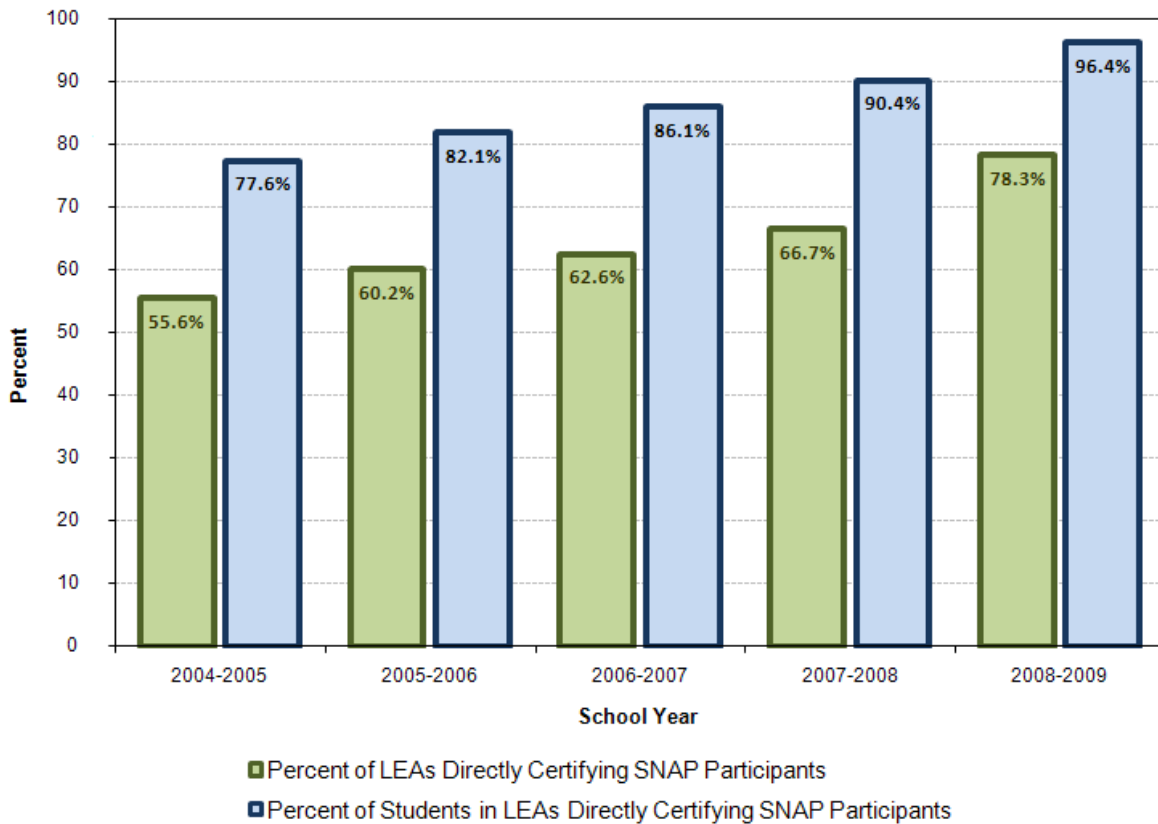
Of the 22 percent of LEAs that FNS estimates did not directly certify SNAP participants in SY 2008-2009, 99 percent enrolled fewer than 10,000 students. The 2008-2009 school year was the first that LEAs of this size were required to use direct certification.

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 who are categorically eligible for free meals but approved by application, or the number not subject to verification is at least 5 percent of all students reported certified for free meals. This methodology, previously used by Cole and Logan (2007), may misclassify a small number of LEAs. Also, as noted in the next footnote, LEAs in which all students attend non-base-year Provision 2 or Provision 3 schools are included in the direct certification counts for Figure 1 and Table 1.

¹³ This percentage, and the corresponding Table 1 figures for SY 2004-2005, 2005-2006, 2006-2007, and 2007-2008, also includes the relatively small number of LEAs where 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 non-base 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-1, 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 are directly certifying SNAP children.

More than half of the LEAs that did not directly certify SNAP participants in SY 2008-2009 are private;¹⁴ many of them are single-school LEAs. 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 school LEAs are sometimes excluded from State-level direct certification matching systems. Although small, single-school, and private LEAs may face special challenges in setting up direct certification systems, all are subject to the statutory mandate.

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 2008-2009



¹⁴ Eighty percent of non-direct certification LEAs responded to the public/private question on the SY 2008-2009 VSR. Fifty-three percent of those that did respond indicated that they were private.

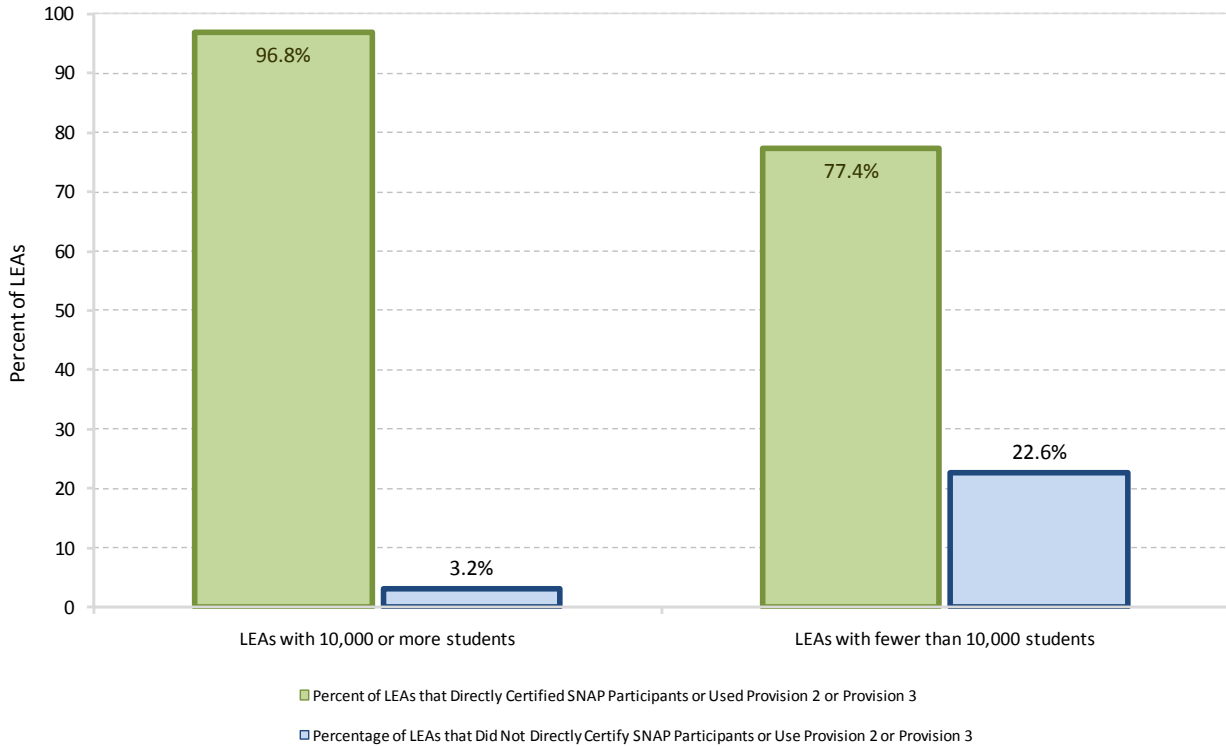
Table 1
Number and Percent of LEAs Directly Certifying SNAP Participants
SY 2004-2005 through SY 2008-2009¹⁵

	SY 2004 2005			SY 2005 2006			SY 2006 2007			SY 2007 2008			SY 2008 2009		
	Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs	
		Number	Percent		Number	Percent		Number	Percent		Number	Percent		Number	Percent
US Total	16,612	9,239	55.6%	17,397	10,467	60.2%	17,748	11,113	62.6%	18,141	12,097	66.7%	18,253	14,301	78.3%
AK	54	43	79.6%	35	34	97.1%	47	43	91.5%	50	46	92.0%	48	47	97.9%
AL	163	62	38.0%	148	87	58.8%	145	93	64.1%	147	110	74.8%	150	134	89.3%
AR	251	247	98.4%	258	12	4.7%	281	256	91.1%	286	252	88.1%	295	280	94.9%
AZ	302	251	83.1%	333	243	73.0%	334	256	76.7%	372	307	82.5%	388	327	84.3%
CA	1,004	399	39.7%	1,033	469	45.4%	1,024	518	50.6%	1,028	555	54.0%	1,029	676	65.7%
CO	178	44	24.7%	168	68	40.5%	205	78	38.1%	175	81	46.3%	205	181	88.3%
CT	185	146	78.9%	187	148	79.1%	193	161	83.4%	192	161	83.9%	191	169	88.5%
DC	47	1	2.1%	51	4	7.8%	52	2	3.9%	58	2	3.5%	61	2	3.3%
DE	27	22	81.5%	34	28	82.4%	32	28	87.5%	29	27	93.1%	35	30	85.7%
FL	145	74	51.0%	96	62	64.6%	145	88	60.7%	159	98	61.6%	164	107	65.2%
GA	171	155	90.6%	175	158	90.3%	183	166	90.7%	216	187	86.6%	215	190	88.4%
HI	N/A	N/A	N/A	32	18	56.3%	38	20	52.6%	36	22	61.1%	40	26	65.0%
IA	496	339	68.4%	508	372	73.2%	507	383	75.5%	499	393	78.8%	494	424	85.8%
ID	125	97	77.6%	266	218	82.0%	133	106	79.7%	121	106	87.6%	139	121	87.1%
IL	1,036	749	72.3%	1,113	835	75.0%	1,075	839	78.1%	1,115	904	81.1%	1,114	928	83.3%
IN	407	73	17.9%	468	106	22.7%	478	143	29.9%	482	184	38.2%	487	341	70.0%
KS	403	314	77.9%	404	333	82.4%	403	335	83.1%	403	327	81.1%	407	348	85.5%
KY	197	128	65.0%	192	145	75.5%	189	154	81.5%	193	171	88.6%	190	170	89.5%
LA	98	57	58.2%	36	34	94.4%	107	92	86.0%	112	95	84.8%	117	105	89.7%
MA	N/A	N/A	N/A	357	216	60.5%	370	232	62.7%	357	245	68.6%	423	305	72.1%
MD	47	29	61.7%	47	29	61.7%	46	31	67.4%	48	40	83.3%	47	39	83.0%
ME	245	199	81.2%	228	194	85.1%	233	201	86.3%	246	223	90.7%	235	213	90.6%
MI	741	331	44.7%	698	349	50.0%	803	449	55.9%	836	570	68.2%	846	693	81.9%
MN	610	392	64.3%	620	387	62.4%	630	413	65.6%	650	433	66.6%	663	448	67.6%
MO	762	453	59.5%	711	476	67.0%	749	490	65.4%	756	510	67.5%	744	615	82.7%
MS	183	93	50.8%	72	47	65.3%	184	134	72.8%	179	144	80.5%	179	151	84.4%
MT	236	130	55.1%	233	159	68.2%	234	177	75.6%	244	188	77.1%	241	182	75.5%
NC	N/A	N/A	N/A	172	117	68.0%	178	133	74.7%	170	141	82.9%	169	144	85.2%
ND	160	126	78.8%	216	170	78.7%	193	142	73.6%	223	170	76.2%	217	158	72.8%
NE	407	241	59.2%	433	313	72.3%	381	290	76.1%	381	297	78.0%	382	285	74.6%
NH	82	57	69.5%	88	65	73.9%	89	60	67.4%	92	65	70.7%	95	64	67.4%
NJ	661	159	24.1%	661	185	28.0%	663	206	31.1%	660	247	37.4%	662	551	83.2%
NM	142	98	69.0%	150	118	78.7%	167	119	71.3%	189	135	71.4%	171	166	97.1%
NV	40	35	87.5%	39	34	87.2%	19	15	79.0%	20	16	80.0%	19	16	84.2%
NY	1,096	797	72.7%	1,054	889	84.4%	1,042	857	82.3%	1,083	951	87.8%	1,072	935	87.2%
OH	1,093	178	16.3%	1,196	302	25.3%	1,129	223	19.8%	1,166	258	22.1%	1,172	745	63.6%
OK	533	248	46.5%	613	322	52.5%	573	333	58.1%	568	373	65.7%	565	429	75.9%
OR	205	166	81.0%	227	178	78.4%	232	185	79.7%	235	183	77.9%	237	188	79.3%
PA	724	368	50.8%	776	458	59.0%	826	501	60.7%	837	523	62.5%	855	623	72.9%
RI	N/A	N/A	N/A	55	47	85.5%	55	50	90.9%	53	50	94.3%	32	31	96.9%
SC	86	85	98.8%	85	83	97.7%	88	84	95.5%	87	84	96.6%	96	85	88.5%
SD	223	119	53.4%	227	127	56.0%	221	127	57.5%	222	128	57.7%	215	145	67.4%
TN	169	132	78.1%	175	154	88.0%	171	144	84.2%	168	142	84.5%	167	153	91.6%
TX	1,202	741	61.7%	1,026	797	77.7%	1,189	839	70.6%	1,264	989	78.2%	1,264	1,110	87.8%
UT	51	45	88.2%	53	50	94.3%	49	45	91.8%	55	51	92.7%	64	56	87.5%
VA	160	136	85.0%	141	138	97.9%	152	139	91.5%	151	139	92.1%	150	138	92.0%
VT	204	186	91.2%	217	200	92.2%	215	201	93.5%	219	194	88.6%	214	189	88.3%
WA	292	215	73.6%	345	260	75.4%	330	260	78.8%	325	266	81.9%	314	272	86.6%
WI	842	177	21.0%	823	138	16.8%	840	180	21.4%	853	218	25.6%	847	474	56.0%
WV	73	54	74.0%	68	54	79.4%	73	55	75.3%	75	55	73.3%	74	55	74.3%
WY	54	48	88.9%	54	37	68.5%	53	37	69.8%	56	41	73.2%	53	37	69.8%

¹⁵ Data for Hawaii, North Carolina, Massachusetts, Rhode Island, and one of two State agencies in both Oklahoma and Arkansas are omitted from the school year 2004-2005 totals; these agencies either did not submit school verification data, or submitted unusable data.

Figure 2 compares the relative fraction of larger and smaller LEAs that directly certified SNAP participants in SY 2008-2009.¹⁶

Figure 2
Percent of LEAs Directly Certifying SNAP Participants, by LEA Size
SY 2008-2009



Nearly 97 percent of LEAs with enrollments of 10,000 or more students directly certified SNAP participants in SY 2008-2009.¹⁷ This is up from 95 percent in SY 2007-2008. Seventy-seven percent of LEAs with fewer than 10,000 enrolled students directly certified SNAP participants in SY 2008-2009. This is a 12 percentage point improvement over the previous year, when LEAs with enrollments under 10,000 were not yet subject to the statutory direct certification requirement.

The number of students enrolled in LEAs that directly certified SNAP participants in SY 2008-2009 is presented in Figure 3.¹⁸ As in Figure 2, LEAs are separated by size. The area of each circle in the figure is proportional to the total number of students in NSLP-participating LEAs. While 23 percent of LEAs with enrollments below 10,000 did not directly certify any

¹⁶ LEAs made up entirely of Provision 2 and Provision 3 schools are included in the count of LEAs that directly certified SNAP participants. 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.

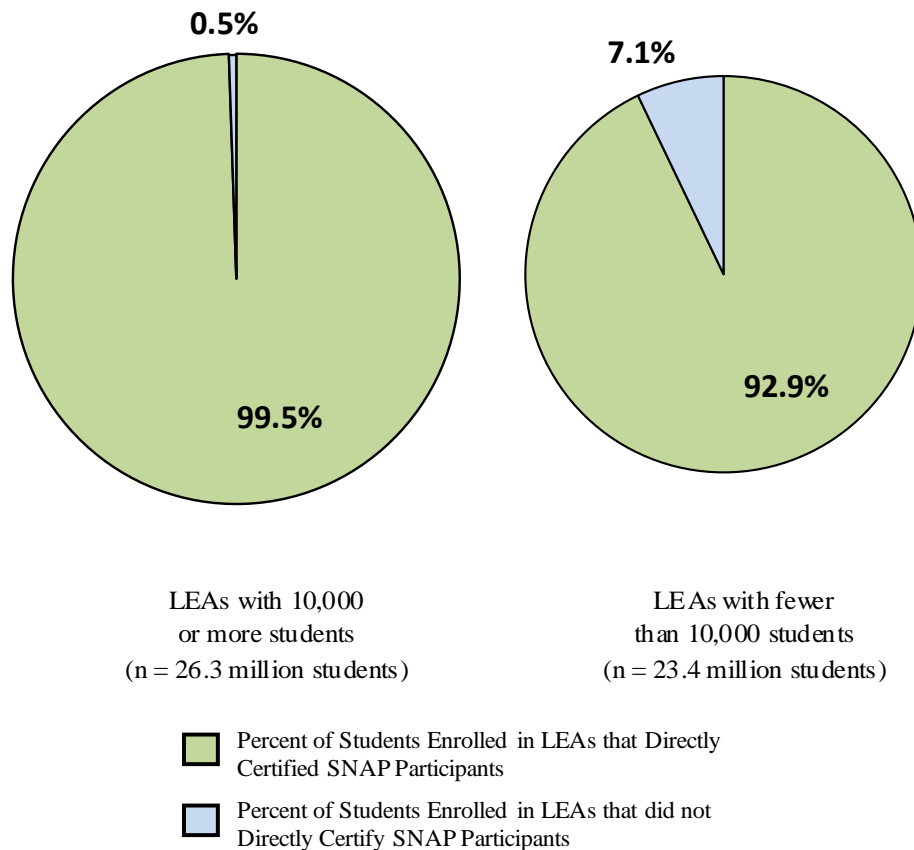
¹⁷ It is possible that some of the remaining 3 percent of large districts operate direct certification systems, but certify no SNAP participants. It is also possible, given the limitations of the VSR data, that some of these LEAs are misclassified.

¹⁸ As in Figure 1, Figure 2, and Table 1, LEAs in which all students attend non-base-year Provision 2 or Provision 3 schools are also included in Figure 3's direct certification count.

SNAP participants in SY 2008-2009 (from Figure 2), they accounted for just 7 percent of the students in LEAs with enrollments below 10,000.

Overall, LEAs enrolling 96 percent of students in NSLP-participating schools were directly certifying SNAP participants in SY 2008-2009.

Figure 3
Students in LEAs that Directly Certified SNAP Participants, by LEA Size
(Pies are Proportional in Size to the Number of Students Enrolled)
SY 2008-2009



Characteristics of LEAs that directly certified no SNAP children

As discussed above, nearly 4,000 LEAs, about 22 percent of the total, are estimated by FNS to have directly certified no SNAP-participant children in SY 2008-2009. Although the NSLA does not exempt small or single-school districts from the direct certification requirement, both groups are overrepresented among non-direct certification LEAs. Because they tend to be small, the 22 percent of LEAs that did not directly certify any SNAP children enroll just 4 percent of students in NSLP-participating schools.

Some additional detail on this group is given below:

- Three percent of LEAs that directly certified no SNAP students in SY 2008-2009 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 130 LEAs is not in full compliance with the direct certification requirement; these LEAs enroll very few or no children from SNAP-participant households.
- An additional 20 percent report that no more than 5 percent of their enrolled students are certified for free meals. These LEAs have an unusually low concentration of students certified for free meals. Among all 18,000 LEAs that filed VSR reports for SY 2008-2009, just 8 percent reported having as low a concentration of low-income students. Some of these LEAs may also be in compliance with the direct certification requirement, although their systems failed to identify any SNAP participants.
- Ninety-nine percent of LEAs that directly certified no SNAP participants enrolled fewer than 10,000 students. Seventy-three percent are single-school LEAs.
- SY 2008-2009 was the first year that these small LEAs were required to directly certify students in SNAP-participant households. Note, however, that more than 77 percent of LEAs with fewer than 10,000 students did meet the SY 2008-2009 direct certification deadline.
- An estimated 53 percent are private LEAs.

IV. Direct Certification Performance

For each State, FNS estimates a direct certification performance measure based on three component statistics¹⁹:

- a. the number of school-age children in the State's SNAP-participant households;
- b. the number of SNAP participants directly certified by the State's LEAs for free school meals²⁰; and
- c. the number of SNAP participants in the State's non-base-year Provision 2 or Provision 3 schools.

The estimated values of these statistics for each State are given in Table 2.

¹⁹ The derivation of each of these statistics is detailed in Appendix C.

²⁰ This is proxied by the number of students that LEAs report on the FNS-742 as free eligible but not subject to verification. That number includes, but is not limited to, directly certified SNAP participants.

Table 2
SNAP Participation, Direct Certifications, and SNAP-Participant Students
in Non-Base Year Provision 2 or Provision 3 Schools, SY 2008-2009²¹ (thousands)

State	School Age SNAP Participants	NSLP Direct Certifications	SNAP Participants in non-Base-Year NSLP Provision 2 or Provision 3 Schools
Alabama	229.1	146.7	0.0
Alaska	20.1	18.2	6.3
Arizona	254.4	152.8	23.4
Arkansas	130.4	82.9	13.3
California	1,061.3	574.8	182.9
Colorado	93.7	69.1	7.9
Connecticut	61.9	35.5	13.8
Delaware	25.4	24.2	0.1
District of Columbia	26.8	13.3	0.0
Florida	479.8	390.9	0.5
Georgia	400.2	238.7	25.2
Hawaii	27.8	22.0	0.0
Idaho	35.9	17.5	0.5
Illinois	431.0	245.5	0.2
Indiana	225.0	143.2	8.6
Iowa	81.5	68.9	0.0
Kansas	60.8	50.1	0.2
Kentucky	193.1	147.8	4.3
Louisiana	231.4	202.0	0.0
Maine	48.0	35.4	0.2
Maryland	115.0	86.0	0.0
Massachusetts	164.3	91.1	17.5
Michigan	387.2	247.3	0.0
Minnesota	101.7	78.1	1.3
Mississippi	160.9	111.6	9.8
Missouri	334.8	149.6	0.0
Montana	22.8	11.1	3.8
Nebraska	37.7	28.5	0.1
Nevada	50.3	41.0	3.5
New Hampshire	18.0	5.5	0.0
New Jersey	152.7	85.5	0.0
New Mexico	91.4	33.1	52.2
New York	594.9	406.5	169.8
North Carolina	335.7	271.9	0.0
North Dakota	15.0	8.3	0.0
Ohio	382.4	237.0	30.8
Oklahoma	134.0	100.3	5.6
Oregon	137.1	93.9	3.2
Pennsylvania	278.1	187.6	0.8
Rhode Island	28.2	15.3	0.0
South Carolina	202.9	125.5	0.0
South Dakota	20.1	7.3	6.2
Tennessee	293.3	270.8	1.3
Texas	1,022.4	596.2	220.5
Utah	51.2	37.8	1.3
Vermont	14.4	9.8	0.0
Virginia	181.2	141.3	0.0
Washington	178.0	119.3	2.4
West Virginia	81.1	68.7	0.0
Wisconsin	154.5	111.1	1.2
Wyoming	7.3	4.5	0.0
US Total	9,866.2	6,461.2	818.8

²¹ The number of school-age SNAP-participant children in Pennsylvania is greater than the number reflected in Table 2. 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.

The number of SNAP-participant children in Louisiana excludes those who received temporary (hurricane-related) disaster assistance in September 2008. Although these children were eligible for free school meals as temporary SNAP participants, this report only examines direct certifications through October 1. The timing of these students’ SNAP eligibility makes it unlikely that many of them could have been captured in the direct certification process conducted at the start of the SY 2008-09 school year. However, some probably were directly certified, and excluding them from the count of SNAP-participants overstates Louisiana’s direct certification rate, which would affect Figures 4 and 7. The Louisiana estimate in Figure 7 would be further overstated to the extent that some of these students were identified as categorically eligible by application before October 1.

This report’s initial measure of State direct certification effectiveness is computed as follows:

$$\begin{array}{l} \text{percent of SNAP} \\ \text{participants} \\ \text{directly certified} \\ \text{for free school} \\ \text{meals} \end{array} = \frac{\text{SNAP participants directly} \\ \text{certified for free school meals}}{\text{school-age children in} \\ \text{SNAP households} - \text{SNAP children in non-base} \\ \text{year Provision 2/3 schools}}$$

Figure 4 ranks the States according to this performance measure.²² Because each of the component statistics is estimated with some error, the exact percentage values associated with the States should be viewed with caution.²³ For this same reason, 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.

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 may 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.

Measurement error and State reporting error minimize the significance of small differences in the percentage point scores of States that fall near each other in Figure 4. But the wide gap between States near the bottom of the graph, and those near the top, makes clear that some States’ direct certification systems are simply less effective than other States’ systems. Among the factors that may contribute to a system’s effectiveness is the use of computer matching rather than reliance on the “letter method.” The important difference between these two approaches is that a child cannot be directly certified through a hard-copy letter system without some action on the part of his or her parent or guardian. A computer match system requires no action by the parent or guardian. According to a 2005 survey on State direct certification practices,²⁴ 11 States relied

²² See Appendix Figures A-2 and A-3 for U.S. maps providing a geographic view of these State estimates.

²³ Estimation error is most obvious where State figures exceed 100 percent. However, the same methodology that overstates the performance of these States likely overstates the performance of other States near the top of the chart. Figures above 100 percent can be explained, at least in part, by the fact that TANF participation is commonly used by States and LEAs as a second criterion in their direct certification systems. TANF participation is not an element of all direct certification systems. Because FNS does not know how many States, or what fraction of LEAs within States, directly certify TANF participants, an adjustment for TANF participants 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 6 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, and FDPIR participants.

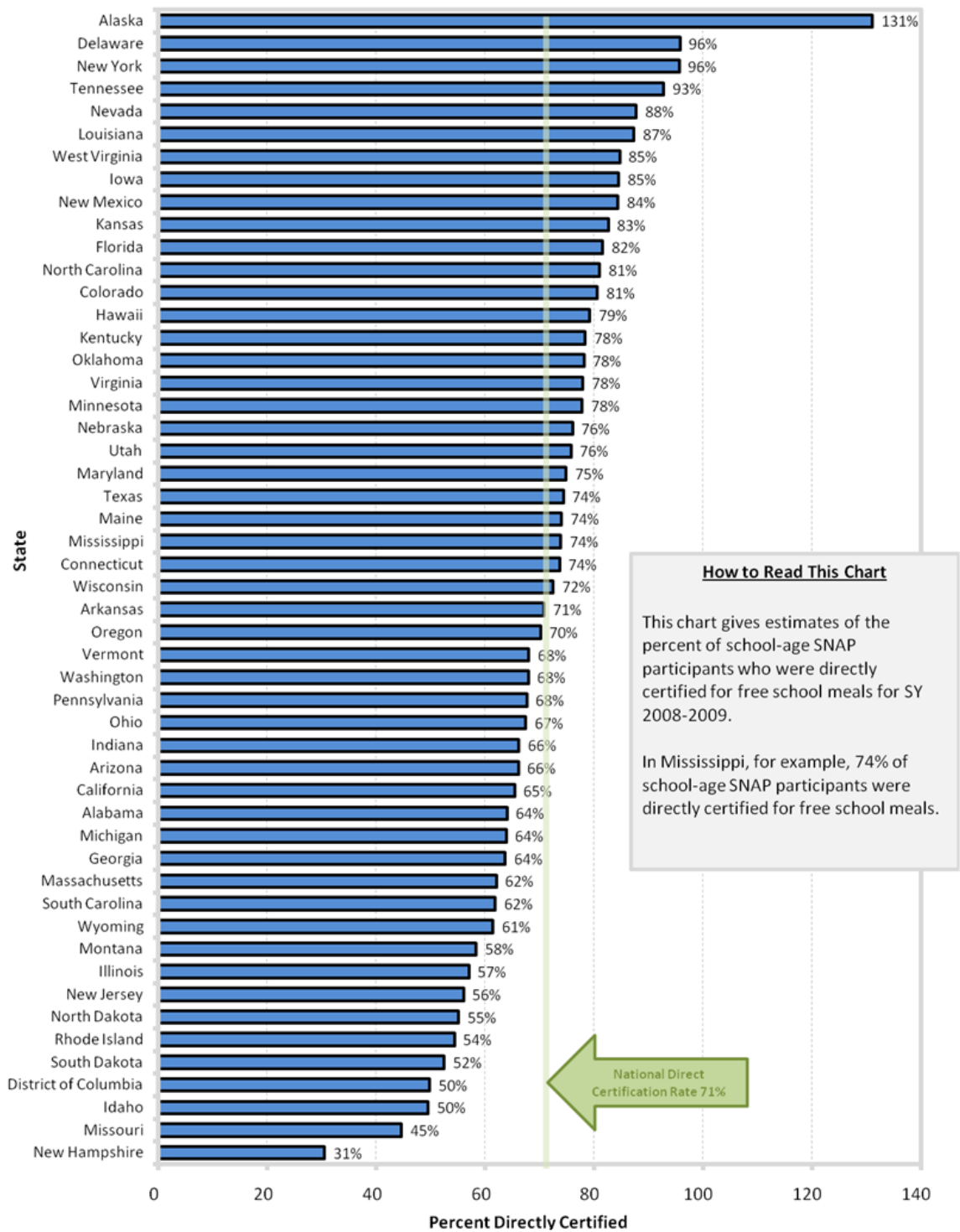
²⁴ FNS did not survey all of the States for this report; the most recent FNS survey of State direct certification practices was conducted in 2005. See Cole and Logan (2007).

solely on the letter method of direct certification.²⁵ Eight of those States are among the bottom 11 in directly certifying SNAP participants for free school meals in SY 2008-2009.

Some of the States that relied exclusively on a letter system of direct certification in 2005 may have since supplemented or replaced their letter systems with computer matching systems. Nevertheless, the 2005 survey and the direct certification percentages in Figure 4 suggest a strong relationship between current or recent reliance on the letter method, and the effectiveness of a State's direct certification system.

²⁵ Cole and Logan (2007), Exhibit 2-5.

Figure 4
Percent of School-Age SNAP-Participant Children Directly Certified for NSLP Free School Meals - SY 2008-2009

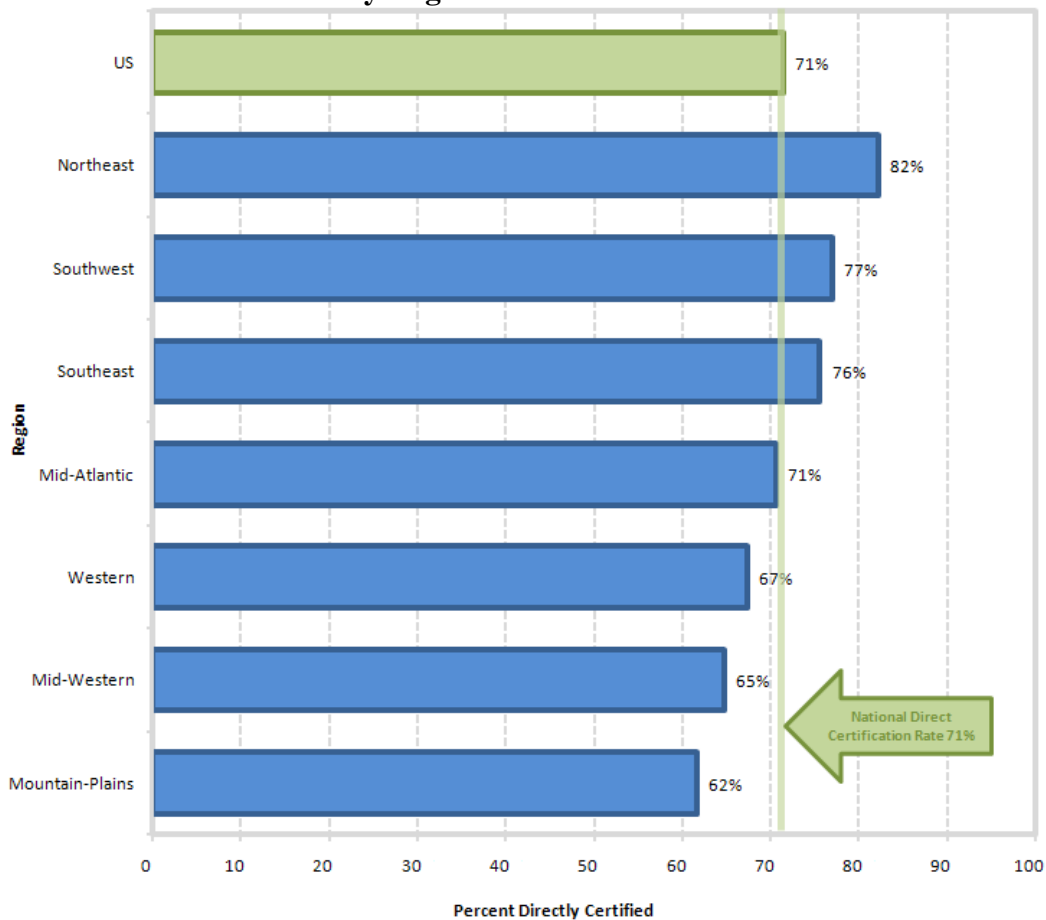


Note:
 See Appendix C and Appendix D for a discussion of the data sources used to develop these State figures, and the limitations of those sources. These percentages represent the ratio of all directly certified students, plus other free-eligible students whose applications are not subject to verification, to all SNAP participant school-age children. Direct certification percentages above 100 percent can be explained, in part, by the fact that many LEAs use TANF and FDIPIR participation databases, in addition to SNAP databases, in their direct certification systems. These directly certified students are included in the numerator of this computation, although the denominator includes only SNAP participants.

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.²⁶ States and LEAs on or near the East coast, or in the Southwest, tend to outperform those in other parts of the country. Note, however, 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. The strong performance by the Northeast region, for example, is driven largely by the very high direct certification percentage estimated for New York. The low percentage estimated for New Hampshire makes a relatively modest contribution to the Northeast regional score.

A different presentation of regional differences in direct certification performance is given in Appendix A, Figure A-2. Figure A-2 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.

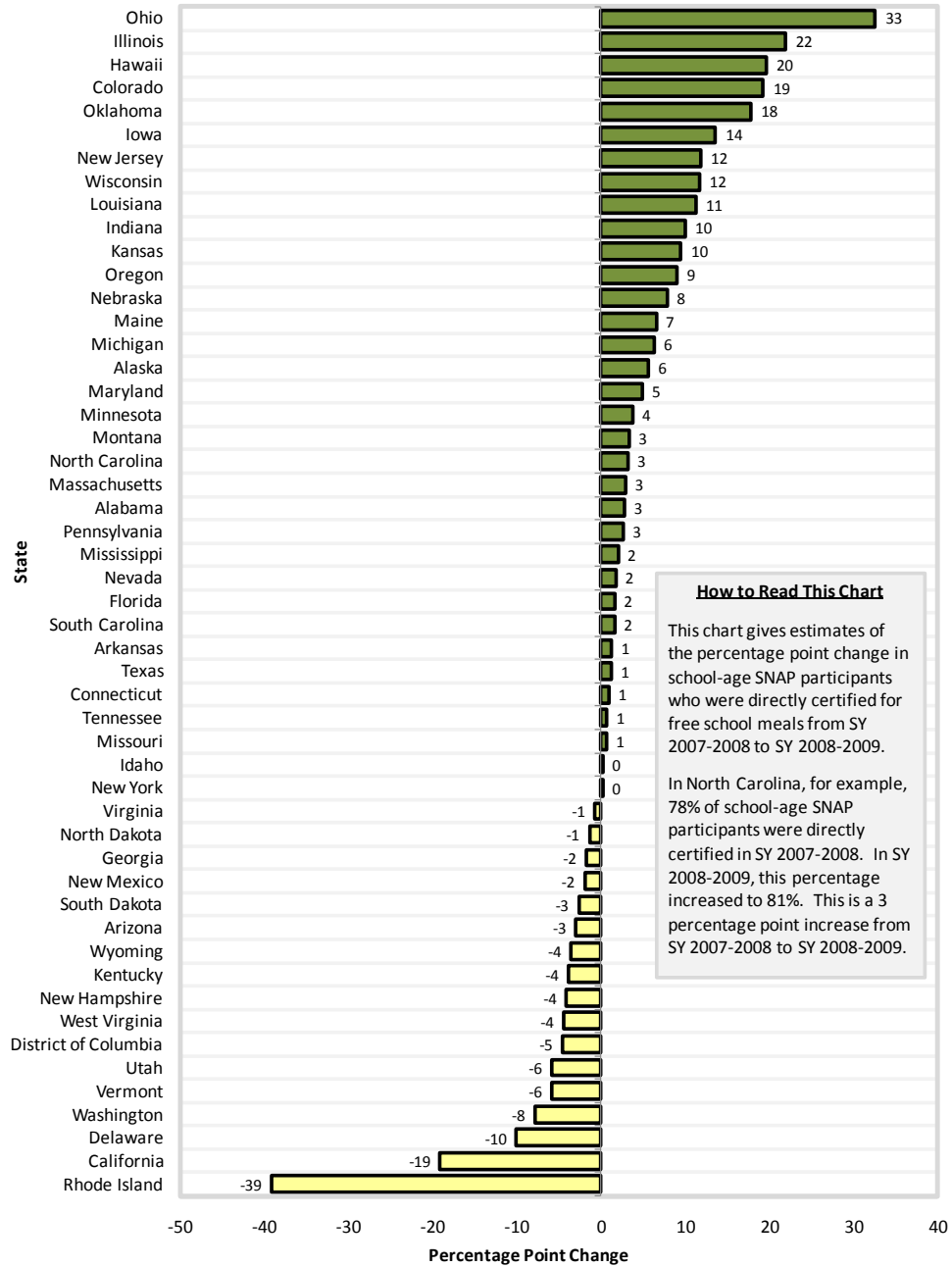
Figure 5
Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals by Region in SY 2008-2009



²⁶ See table A-4 for a listing of States by FNS administrative region.

Figure 6 compares SY 2008-2009 State-level measures of direct certification effectiveness (from Figure 4) to the same measures computed with SY 2007-2008 data. States near the top of Figure 6 achieved the largest percentage point growth in the share of SNAP-participant children who were directly certified for free school meals. Growth in the share of SNAP participants who are directly certified is affected by State and LEA policy, but also by the number of LEAs with fewer than 10,000 students who may not have directly certified any SNAP participants prior to SY 2008-2009.

Figure 6
Percentage Point Change in the Share of SNAP-Participant Children Directly Certified for Free School Meals
SY 2007-2008 to SY 2008-2009²⁷



²⁷ Some of the State figures, particularly those at the bottom of Figure 6, are affected by LEA and State reporting error. LEAs with fewer than 10,000 students were not required to directly certify SNAP-participant children until SY 2008-2009. In some States, especially those with centralized direct certification matching systems, small LEAs may have directly certified students well ahead of that deadline. In those States, there may have been little growth from SY 2007-2008 to SY 2008-2009 in the number of LEAs using direct certification, and in the percent of SNAP eligible children who were directly certified. Nevertheless, few States, if any, should have directly certified a smaller share of SNAP participants in SY 2008-2009 than in SY 2007-2008.

A more comprehensive measure of the States’ success in certifying all categorically eligible children for free school meals is developed below. 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 above. Added to this are the students whose approval for free school meals is based on the households’ submission of a SNAP, TANF, or FDPIR case number on an NSLP application.²⁸ The sum of these two numbers is the population of students who are recognized by LEAs as categorically eligible for free school meals.²⁹ This number excludes children who are not identified as categorically eligible, but may nevertheless be found income eligible by application.

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 above. 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.³⁰ The number of children who receive FDPIR benefits is estimated from FNS program and survey data.³¹

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 7 displays the same data graphically.

$$\begin{array}{r}
 \text{percent of SNAP, TANF, and FDPIR participants certified (directly or by application) for free school meals} \\
 = \\
 \frac{\text{SNAP, TANF and FDPIR applicants identified as categorically eligible on applications for free meals} + \text{directly certified SNAP participants}}{\text{school-age children in SNAP households} - \text{SNAP children in non-base year Provision 2/3 schools} + \text{school-age children in TANF households that do not participate in SNAP} + \text{school-age children in FDPIR households}}
 \end{array}$$

²⁸ All of this information is taken, as above, from LEA VSRs.

²⁹ Some children may not be identified as categorically eligible even if they are current recipients of SNAP, TANF, or FDPIR benefits. These students may be missed by the States’ direct certification systems. Others may 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.

³⁰ U.S. Census Bureau. See Appendix D for a discussion of data limitations. No adjustment is made for TANF (or FDPIR) participants who are not SNAP participants and who attend non-base year Provision 2 or Provision 3 schools.

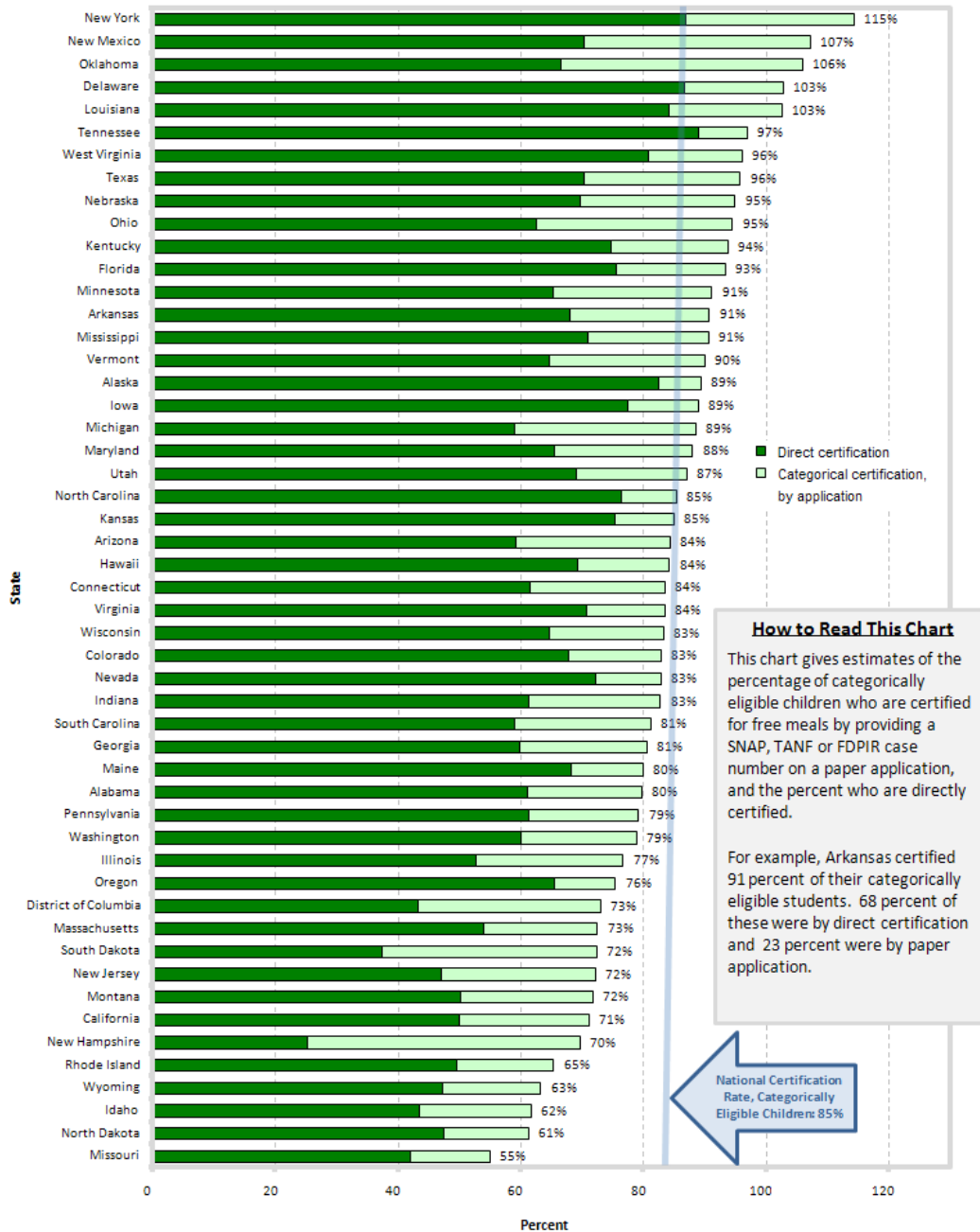
³¹ The FDPIR population survey is discussed in Usher, et. al. (1990). See Appendix D for a discussion of data limitations. Note that FDPIR households may not simultaneously participate in SNAP. No adjustment is made for FDPIR (or TANF) participants who attend non-base year Provision 2 or Provision 3 schools.

Table 3
Categorically Eligible Students, Number Directly Certified,
and Number Approved by Application
SY 2008-2009 (thousands)

State	Categorically Eligible Students	Directly Certified	Approved by Application
Alabama	240.3	146.7	45.1
Alaska	22.0	18.2	1.5
Arizona	257.8	152.8	64.9
Arkansas	121.9	82.9	27.9
California	1,149.1	574.8	243.8
Colorado	101.9	69.1	15.4
Connecticut	57.6	35.5	12.7
Delaware	27.9	24.2	4.5
District of Columbia	30.8	13.3	9.1
Florida	516.4	390.9	91.6
Georgia	398.3	238.7	82.5
Hawaii	31.7	22.0	4.8
Idaho	40.2	17.5	7.4
Illinois	465.9	245.5	112.1
Indiana	233.5	143.2	50.2
Iowa	88.8	68.9	10.2
Kansas	66.5	50.1	6.5
Kentucky	197.9	147.8	38.0
Louisiana	239.7	202.0	44.1
Maine	51.9	35.4	6.1
Maryland	131.4	86.0	29.7
Massachusetts	168.4	91.1	31.2
Michigan	418.1	247.3	123.3
Minnesota	119.7	78.1	31.0
Mississippi	157.0	111.6	30.9
Missouri	355.1	149.6	45.9
Montana	22.0	11.1	4.7
Nebraska	40.9	28.5	10.3
Nevada	56.8	41.0	6.1
New Hampshire	21.7	5.5	9.6
New Jersey	181.4	85.5	45.5
New Mexico	46.9	33.1	17.2
New York	467.7	406.5	129.1
North Carolina	355.8	271.9	32.1
North Dakota	17.4	8.3	2.4
Ohio	379.1	237.0	121.4
Oklahoma	150.6	100.3	59.3
Oregon	143.3	93.9	14.2
Pennsylvania	306.3	187.6	55.2
Rhode Island	30.8	15.3	4.9
South Carolina	212.4	125.5	47.1
South Dakota	19.6	7.3	6.9
Tennessee	303.9	270.8	23.8
Texas	846.9	596.2	215.4
Utah	54.8	37.8	9.9
Vermont	15.1	9.8	3.8
Virginia	199.5	141.3	25.4
Washington	198.4	119.3	37.4
West Virginia	85.0	68.7	13.0
Wisconsin	171.9	111.1	32.1
Wyoming	9.5	4.5	1.5
U.S. Total	10,027.3	6,461.2	2,098.6

Sixteen States, at the top of Figure 7, certify at least 90 percent of students who are categorically eligible for free school meals based on their participation in SNAP, TANF, or FDPIR. States at the bottom of Figure 7 are the least successful at identifying and certifying these children.³²

Figure 7
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2008-2009



Note:
See Appendix C, Appendix D, and the text preceding Figure 6 for a discussion of the data sources used to develop these State figures, and limitations of those sources. Percentages above 100 percent may be explained by these limitations and data estimation error.

³² See Appendix Figures A-2 through A-5 for U.S. maps providing a geographic view of these State estimates.

V. Direct Certification Best Practices

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

Successful direct certification programs were identified as those with either (1) the highest percentage of eligible children directly certified during SY 2008-2009, or (2) the largest improvement in the percentage of eligible children directly certified as compared with the previous school year. Rates of direct certification were based on data from Verification Summary Reports, which contain information on enrollment, application, and eligibility, as well as the results of the verification process. FNS used the number of children approved as “free eligibles” who are not subject to verification as a proxy for the number of students directly certified. From among the States with successful direct certification programs, those selected for this review met two additional criteria: they were not included in the review published last year and they provided geographic variation.

Seven States participated in this review. Six States participated in interviews: Florida, Iowa, Kansas, New Mexico, Ohio, and Pennsylvania. Five of these States, plus Nevada, participated in the roundtable discussion. Florida, Nevada, and New Mexico are among the top States in direct certification effectiveness; Iowa and Kansas are among the top ten States and also among the most improved for SY 2008-2009; Ohio showed the greatest improvement in direct certification effectiveness in SY 2008-2009 compared to the prior school year, though Ohio is still slightly below the national average in percentage of eligible children directly certified.

Two experts on direct certification provided their perspectives on best practices: Christopher Logan and Zoe Neuberger. Mr. Logan is a researcher at Abt Associates and co-author of a recent report on approaches to direct certification conducted for FNS. Ms. Neuberger is a researcher at the Center on Budget and Policy Priorities and author of several policy briefs on direct certification.

The remainder of this chapter includes: Section A, Description of State Practices, Section B, State Plans for Improving Direct Certification, and Section C, State and Expert Views on Best Practices and Remaining Challenges.

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 the Temporary Assistance for Needy Families (TANF) program, where available. Methods for direct certification have evolved over time. Prior research has documented the prevalence of three main methods for direct certification:

(1) State-level matching, whereby a State agency uses computer matching to link SNAP records with student enrollment records, and distributes match results to local education agencies (LEAs); (2) district-level matching, whereby a State agency distributes SNAP data to LEAs, and LEAs match these data with student enrollment; and (3) letter method, whereby a State agency sends letters to SNAP-participant households, and households take the letter to their school in lieu of a school meals application.³³

There is considerable variation in methods of direct certification, even among States with successful programs. Our review of State systems focused on six key questions about direct certification:

1. Which administrative entity is responsible for matching SNAP/TANF records with student records (that is, is it a centralized process or a district-level process)?
2. How is a match made? (and what identifiers and geographic level of data are used to form the match?)
3. Is any attempt made to directly certify initially unmatched SNAP/TANF children?
4. What is the frequency in which records are matched?
5. Does the system include an individual student look-up capability?
6. What direct certification methods are available to non-public schools?

State approaches for implementing direct certification for public LEAs are summarized in Table 4.

Centralized or District-Level Matching

Three of the States included in this review use a centralized matching process: Iowa, Kansas, and Ohio. The remaining four States use district-level matching: Florida, Nevada, New Mexico, and Pennsylvania. The key distinctions between centralized and district-level matching are:

- **Centralized matching.** The statewide list of SNAP/TANF children is matched with student enrollment records. Match results are distributed to LEAs according to the LEA identifier on the matched student record. Matched records include a student ID number to facilitate LEAs' use of the data.
- **District-level matching.** The statewide list of SNAP/TANF children is typically divided into separate county or school district files and distributed to LEAs, who are responsible for matching these data with student records.

One important difference between these methods is that a centralized match uses statewide SNAP/TANF data, whereas a district-level match is limited to SNAP/TANF data for a single county or district. A drawback with the latter is that LEAs cannot directly certify children who recently moved into their county if the recent change in county of residence is not reflected in the

³³ Cole and Logan. (2007).

SNAP/TANF records. District-level matching is more limiting in a State with small school districts where student mobility is more likely to be across rather than within district boundaries.

The three States that use centralized matching each have numerous, relatively small school districts that do not coincide with county boundaries. Iowa has over 300 public LEAs, Kansas has nearly 300, and Ohio has 800. In these States, it would be difficult to divide the statewide file of SNAP/TANF children into files that correspond to individual LEAs. It would also be burdensome for all LEAs to develop and implement a matching process due to staffing or other resource constraints. These States cited the efficiency of a centralized match and their concern about student mobility across districts as prime motivators for a centralized system. The Iowa and Kansas systems are 3 years and 1 year old, respectively, while the Ohio system has been in place since the 1990s, with some changes over time.

Among the four States using district-level matching, Florida and Nevada have large countywide school districts (70 public LEAs in Florida and 17 in Nevada) and divide the SNAP/TANF records into individual county files for distribution to LEAs. The large LEAs have the technological capabilities to implement data matching. New Mexico has 89 public LEAs spread across 33 counties. The State uses ZIP code information to divide the SNAP/TANF file into lists that are distributed to LEAs; LEAs manually match these lists to student enrollment. Pennsylvania has approximately 800 school districts, which do not coincide with county boundaries, but the State is able to provide each LEA with a file of SNAP/TANF records for children in their district because households report their school district to the SNAP/TANF agency when applying for benefits from those programs. Nonetheless, Pennsylvania is concerned that their match rates are limited by the quality of the school district information in the SNAP/TANF file.

Table 4
Characteristics of the Direct Certification Matching Process for Public LEAs in Select States

State	Who Performs the Direct Certification Match?	How Does Direct Certification Work?	Approach for Unmatched Students?	Frequency of Direct Certification	Web-based Look-up?
Florida	Districts	LEAs obtain SNAP/TANF data for their county from the State Web site, and match these data to their enrollment database.	No	Quarterly	No
Iowa	State	The State matches the statewide SNAP/TANF data to the State student enrollment database, and distributes match results to LEAs via their Web site.	Yes	Biannually with monthly updates of newly certified students.	Yes
Kansas	State	The State matches the statewide SNAP/TANF data to the State student enrollment database, and distributes match results to LEAs via their Web site.	Yes	Annually with monthly updates of newly certified students.	Yes
Ohio	Regional Information Technology Centers (ITCs)	ITCs match students to statewide SNAP/TANF data using district enrollment files. Matches are distributed to LEAs, The method of distribution varies by ITC.	No	Biannually with monthly updates of newly certified students.	No
Nevada	Districts	LEAs receive SNAP/TANF data for their county and match to their student enrollment database.	No	Annually with monthly updates of newly certified students.	No
New Mexico	Districts	LEAs receive SNAP data for students in their ZIP codes and manually match to their enrollment database.	No	Biannually	No
Pennsylvania	Districts	LEAs receive SNAP/TANF data for students who report being in their district and match using enrollment database. Data are distributed on disk.	No	Annually	Yes

LEA = local education agencies; SNAP = Supplemental Nutrition Assistance Program; TANF = Temporary Assistance to Needy Families

The Matching Process: Algorithms and Identifiers

All seven States in this review use students' names (first and last) and dates of birth as identifiers in the direct certification matching process. Five of the seven States reported that social security numbers (SSNs) are used for matching when available on student records. In the remainder of this section we describe, separately for State- and district-level approaches, the matching process and identifiers and geographic level of data used to form the match.

a. Matching Process for States with Centralized Matching

In Iowa and Kansas, the centralized match of SNAP/TANF data to student records is conducted by the respective State departments of education using software developed with internal department resources. In Ohio, matching is conducted by regional information technology centers (ITCs), which provide services to LEAs.³⁴ The Ohio Department of Education provides the ITCs with statewide data on SNAP and TANF receipt as well as matching software developed by the department. All three States emphasized the importance of strong, in-house programming and information technology resources in developing their matching systems.

There is considerable variation among these States in the criteria used in assigning matches, as shown in Table 5. Ohio requires an exact match on student's first name, last name, date of birth (DOB), and either parent's name or zip code. Ohio LEAs do not report students' SSNs, so the SSN is not used in the matching algorithm. In Kansas, the primary match is an exact match on student's first name, last name, DOB, SSN, and school district.³⁵ However, after applying this primary set of criteria, Kansas sequentially applies six additional sets of criteria to the remaining unmatched records (see footnote "b," Table 5). Most matches are formed based on the primary criteria, but the additional criteria reduce the number of students who are eligible for but do not receive school benefits through direct certification.

Iowa bases its matches on first name, last name, DOB, and SSN. However, the matching process does not rely on exact matches for first name, last name, and DOB. The Soundex algorithm is used to generate phonetic representations of each name, which are then used in the matching procedure. The matching process also allows month or year of the DOB to vary by up to 2 months or years, respectively, and allows for the day and month to be transposed. State administrators estimate that they match less than 40 percent of TANF and SNAP recipients when requiring exact matches, compared to 92 percent using the system they have in place.

³⁴ The Ohio Education Computer Network (OECN) was established in 1979 to provide information technology services to school districts, career centers, community schools, and educational service centers in the State. Currently, the OECN is comprised of 23 regional ITCs which operate as data centers and information technology providers. The ITCs receive State and local funding, with the majority of funding from local sources paid in the form of membership dues or fees for a la carte services.

³⁵ In Kansas, as in Pennsylvania, the SNAP/TANF application collects information about the school district for children listed on the application.

Table 5
Primary Matching Criteria for States that use Centralized Matching

	Iowa ^a	Kansas ^b	Ohio ^c
First name	○	●	●
Last name	○	●	●
Middle initial		●	
Date of birth	○	●	●
Social security number	●	●	
Address			
Zip code			●
Parents' names			●
Claiming district ^d		●	
Residence district ^d		●	

Notes: ○Indicates an exact match is not required for the given field.

●Indicates an exact match is required for the given field.

^a Soundex is used for first and last names to produce a phonetic match. The matching process allows for +/-2 months, +/-2 years, and transposed day and month for DOB.

^b The State uses a seven iteration procedure to produce a match with the majority of matches occurring on the first iteration: (1) First name, last name, DOB, SSN and claiming district; (2) First name, last name, DOB, SSN; (3) First name, last name, SSN; (4) First name, last name, middle initial, DOB, and claiming district; (5) First name, last name, middle initial, DOB, and residence district; (6) First name, last name, DOB, and claiming district; (7) First name, last name, DOB, and residence district.

^c First name, last name, and social security number are used to produce an exact match. Zip code and parent's names are used subsequently to confirm matches.

^d The claiming district is the district reported by the household to the SNAP agency; the residence district is determined by household address. The claiming and residence district will differ for private school students.

b. Matching Process for States with District-level Matching

Four States included in the review that match at the district level —Florida, Nevada, New Mexico, and Pennsylvania—send information on benefit receipt to LEAs, who are then responsible for conducting the matching process. The direct certification data available to LEAs in these States is summarized in Table 6. Florida, Nevada, and Pennsylvania provide LEAs with an electronic file of children enrolled in both SNAP and TANF. New Mexico provides LEAs with lists of children enrolled in SNAP and the Food Distribution Program on Indian Reservations (FDPIR).

Florida, Nevada, and Pennsylvania each provide LEAs with a data file containing the following identifiers for SNAP/TANF children: first and last name, DOB, and SSN. Florida requires an exact match on at least two of name, DOB, or SSN. Nevada and Pennsylvania require an exact match on name and DOB, and SSN if available. Pennsylvania also provides parent name and

address, which may be used to confirm uncertain or duplicate matches. In New Mexico, LEAs have leeway with the specific criteria used in identifying matches and in whether they require exact or close matches on those criteria.

Table 6
Data Available for States in which Districts do the Matching

	Florida	Nevada	New Mexico	Pennsylvania
File allows for computerized matching?	√	√	—	√
TANF participation provided?	√	√	—	√
Social security number	√	√	√	√
First name	√	√	√	√
Last name	√	√	√	√
Date of birth	√	√	√	√
Address	√	√	√	√
Parent name	—	—	√	√

TANF = Temporary Assistance for Needy Families; √ = yes; — = no.

Methods to Directly Certify Unmatched SNAP/TANF Children

Iowa and Kansas have procedures aimed at improving direct certification rates above their initial match rates by distributing information about unmatched SNAP/TANF children to LEAs.

- **Iowa.** In addition to exact matches, LEAs receive records of children enrolled in SNAP/TANF who are siblings of students who were successfully matched in the primary match process. Because these “potential matches” are not matched to a student enrollment record, they do not include a student ID number for easy integration in the district information system. LEAs are encouraged to look up potential matches in their enrollment records and directly certify them if found.
- **Kansas.** In addition to exact matches, LEAs receive a list of children enrolled in SNAP/TANF in their district, according to the household report of school district to the SNAP/TANF agency. LEAs are encouraged to verify whether the child is enrolled in their district and to directly certify the student.

In addition, both Iowa and Kansas used the letter method for direct certification prior to developing State-level matching. With the letter method, the State Child Nutrition agency sends a letter to households with children who are enrolled in SNAP and/or TANF. Households are instructed to take the letter to their school district as documentation of eligibility for free school meals. The “direct certification letter” was used in lieu of a school meals application, saving time and effort for both the household and the LEA relative to completing a school meals application. These States continued the letter method through SY 2008-2009 as a backup to their electronic data match processes. Both States plan to discontinue the letter method because of the

high cost of the letter method and the success of their data matching processes in identifying children eligible for free meals without requiring any action from households.

Frequency of Match

The frequency with which direct certification is performed has implications for a State's ability to identify children eligible for free school meals. In all States, direct certification is conducted before the start of the school year to identify students eligible for free meals. As shown in Table 4, the match at the beginning of the school year is supplemented by additional direct certification data and matching efforts in all States except Pennsylvania.

In States with district-level matching, SNAP/TANF data are provided to districts biannually in New Mexico, quarterly in Florida, monthly in Nevada, and annually in Pennsylvania. The biannual distribution of data in New Mexico includes the full caseload of SNAP/TANF children at those two points in time. In Florida and Nevada, following the initial distribution, the quarterly and monthly distributions include only newly enrolled SNAP/TANF children who were not in the initial files distributed before the school year.

In Iowa, Kansas, and Ohio—which have centralized matching—direct certification match results are provided to LEAs monthly. After the first match before the start of the school year, newly enrolled SNAP/TANF children are matched with records of students who were not directly certified in the initial annual match. Thus, LEAs receive a monthly update that includes only new direct certifications. (Iowa also does a full match of SNAP/TANF to student records biannually, using updated student records submitted by schools.)

A single direct certification match performed near the beginning of a new school year only allows States to directly certify children who are eligible prior to the beginning of the school year. By providing updates of new 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 continuous, dynamic process.

Individual Student Look-Up

The centralized and district-level matching described in this review are file-based methods of direct certification. LEAs receive and process data files containing records of children enrolled in SNAP/TANF (Florida, Nevada, and Pennsylvania), results of a match of SNAP/TANF records with student enrollment records (Ohio), or a mix of match results and unmatched data (Iowa and Kansas).

Three States (Iowa, Kansas, and Pennsylvania) also developed a centralized Web-based direct certification look-up tool to complement their file-based direct certification procedures. The look-up tool allows LEAs to search for a single student (or several students) in the SNAP/TANF data file by entering the student's name and other identifiers in a Web-based form. All three States developed the look-up tool primarily for private and charter schools, but the tool may also

be used by public LEAs to directly certify transfer students or to obtain information on children who could not initially be matched.³⁶

States without a Web-based look-up system recognized the advantages of this application. One State wants to build a Web-based look-up system but cannot find time to secure grant funding. Other States mentioned technological limitations either in their departments or differences between their information systems and those of their partner human services agency. Two States remarked that there were more pressing concerns and priorities and that their current system seemed to function well.

Direct Certification Process for Non-Public and Charter Schools

Non-public and charter schools present special challenges for the direct certification process.³⁷ These schools are alike in that they are schools of choice without defined enrollment areas. They are also generally smaller entities, as compared with public school districts.

Non-public schools do not receive public funding and therefore are not governed by the same regulations and reporting requirements governing public schools. In the States interviewed for this report, non-public schools do not submit student records to the State department of education. Charter schools receive public funding and report student enrollment data to the State. In many States, charter schools may establish themselves as an independent reporting agency, or they may be affiliated with an LEA which acts as an authorizing agency for reporting purposes.

In States with centralized matching systems (Iowa, Kansas, and Ohio), charter school students are included in the match, but private school students are not. In Iowa and Kansas, all charter schools operate within school districts; in Ohio, charter schools may operate independently. Ohio indicated some problems with charter schools that did not understand the direct certification process.

In Iowa, Kansas, and Ohio, non-public school students are not included in the centralized match because the State does not have those student records. These States have developed alternative methods of direct certification for non-public schools (Table 7). As described above, Iowa and Kansas provide a Web-based look-up system that non-public schools can use to search the statewide SNAP/TANF database. In addition to the look-up, Kansas also provides non-public schools with access to download a file of SNAP/TANF children in the counties they serve, although the State indicated that no schools use this download method. Ohio provides non-public schools, upon request, with a CD-ROM containing a file of SNAP/TANF children in their county.

³⁶ Iowa's look-up system has a unique feature to prevent misuse of the data. When an LEA submits a look-up, they receive potential matches and are prompted to check the SNAP/TANF record that is determined to match their student. This SNAP/TANF record is then tagged in the database and other LEAs that look at the record are alerted that the child has already been directly certified by another LEA.

³⁷ Charter schools are schools of choice that receive public funding but are freed from many of the regulations faced by other public schools in exchange for a charter, or agreement, to meet certain performance targets.

States using district-level matching (Florida, Nevada, New Mexico, and Pennsylvania) vary in their approach to non-public and charter schools. New Mexico uses the same procedure to provide county lists of SNAP/TANF children to public school districts, charter schools, private schools, and Bureau of Indian Affairs schools. Florida provides direct certification data to private and charter schools, but must manually email the data to these entities because they do not have access to download the data from the State Web site using the methods used by public LEAs. Nevada indicated that only one private school in the State has approved children for free meals; direct certification data are currently not provided to this school. Pennsylvania offers private and charter schools two methods for direct certification: (1) a Web-based look-up system is available to search for one or more students in the SNAP/TANF data, or (2) the school may enter enrollment data in a template and upload the file to be matched with SNAP/TANF data. Pennsylvania indicated that non-public schools are not using the enrollment upload option because of the work involved in compiling the file for upload.

Table 7
Direct Certification Methods for Non-public Schools

State	Direct Certification Process for Non-Public Schools (NPS)
Florida	NPS receive a county SNAP/TANF list and match using their enrollment records.
Iowa	NPS can use Web-based look-up system to search the statewide SNAP/TANF database.
Kansas	NPS can use Web-based look-up system to search the statewide SNAP/TANF database, or download a file of SNAP/TANF children in the counties they serve.
New Mexico	Like public schools, NPS receive SNAP data for students in their zip code and match using their enrollment records
Ohio	NPS receive a county SNAP/TANF list and match using their student enrollment records.
Pennsylvania	NPS can use Web-based look-up system, or can upload enrollment data to be matched with SNAP/TANF data.

SNAP = Supplemental Nutrition Assistance Program; TANF = Temporary Assistance to Needy Families.

B. Recent and Planned Direct Certification Improvements

The States selected for this review are characterized by effective and/or improved direct certification systems. The three States with large improvements in the percentages of children directly certified indicated that improvements can be linked to the following changes in the direct certification process:

- Ohio is characterized as having the most improved direct certification rates in SY 2008-2009. The State attributes its improved match rate to a change in procedure from a regional to a statewide match. Prior to SY 2008-2009, regional ITCs received SNAP/TANF data for children residing in their region (according to information in the SNAP/TANF file). Beginning in SY 2008-2009, Ohio provided regional ITCs with a statewide SNAP/TANF file because it was concerned that students who move and have outdated addresses in the SNAP/TANF file were not being matched.³⁸
- Iowa is among the top ten States in terms of direct certification effectiveness and also among the most improved in SY 2008-2009. Iowa's centralized matching system has been in place for three years, but the State indicated that LEA participation increased in the past year as the direct certification mandate included all LEAs and the State provided additional training. Iowa officials cited the importance of performing their monthly direct certification updates and estimated that during the course of the school year one in four directly certified students are certified through the monthly updates that follow the initial annual match.
- Kansas is also among the top ten States in terms of direct certification effectiveness and among the most improved in SY 2008-2009. Direct certification improved in Kansas because the State implemented its centralized match in SY 2008-2009.

In addition, States indicated that moving beyond an annual procedure toward increased frequency of direct certification is important in maximizing the percentage of eligible children directly certified. During SY 2008-2009, New Mexico moved from annual direct certification to a biannual process. State officials felt that while this would create a slightly greater workload they would benefit from an increased likelihood of identifying students who could be directly certified.

Future Improvements

Three of the seven States included in this review are planning changes to their direct certification systems that they anticipate will improve the results of direct certification process:

- Florida plans to implement monthly updates.
- Ohio plans to implement a Web-based system for distributing direct certification match results to LEAs in January 2010.
- Pennsylvania submitted a grant application to FNS to fund several improvements including increasing the frequency of direct certification; providing proactive notification of newly enrolled SNAP/TANF children to the relevant LEA; incorporating Soundex in the individual look-up matches; and leveraging geographic

³⁸ Most States recorded some improvement in direct certification performance from SY 2007-2008 to SY 2008-2009. And in most States, some of that improvement can be attributed to the fact that LEAs with enrollments under 10,000 students were not required to directly certify SNAP participants until SY 2008-2009. Ohio is among the States with the highest percent of students in LEAs with enrollments under 10,000. See: Ranalli, et. al. (2008), Figure 5.

information systems (GIS) to automatically determine a household's school district when the household applies for SNAP or TANF.

These planned changes indicate the fluid nature of direct certification processes and the ability of States to iteratively improve processes.

C. Views on Best Practices and Remaining Challenges

The experts interviewed for this review commented on several aspects of the direct certification process and emphasized that there is no “one size fits all” solution to direct certification. One expert noted that centralized matching works well if the conditions are right—specifically, if the State maintains up-to-date student enrollment data and can route match results to the correct LEA. On the other hand, district-level matching works best when districts are large, technologically capable, and have more up-to-date student records. Likewise, matching algorithms naturally vary among States according to the data available in student records and the quality of the data.

One expert suggested that an ongoing review of performance (and better measures of performance) is needed in order to diagnose problems and develop solutions. FNS measures the percentage of children enrolled in SNAP who are directly certified (as included in this report). It is not clear how many States monitor this measure, diagnose problems with their direct certification systems, and work toward solutions.

Both the States and experts commented on the importance of conducting direct certification more often than annually. Iowa found that monthly direct certification updates during SY 2008-2009 accounted for 1/4 of total direct certifications for the school year. Other States, however, commented that they make the data available more often than annually but are unable to say how many LEAs use monthly updates. One expert commented that an ideal direct certification system would provide an LEA with access to direct certification whenever a new child enrolls in the LEA, and would also notify the LEA every time one of its students enrolls in SNAP or TANF, with a process that is invisible to the household.³⁹

Remaining challenges for the States center on improving match rates. States cited two problems with the matching process:

1. **Student mobility.** Student mobility poses a problem if the household address in the SNAP file is not up to date. When students move to a new school district, direct certification data may be sent to the wrong LEA. This is a larger problem in States with geographically small school districts (where moves are more likely to be across rather than within districts). States that previously used the letter method cited the high percentage of undeliverable letters as evidence that SNAP/TANF addresses are often inaccurate.

³⁹ Pennsylvania has proposed an update to its direct certification system to provide proactive notification of newly enrolled SNAP/TANF children to the relevant LEA.

2. **Some but not all students in a household are directly certified.** States recognize this as a limitation of matching algorithms, especially when an exact match is required on name. Several States cited the difficulty in matching records by name because of spelling variations, use of nicknames, or variations in the use or specification of hyphenated last names.⁴⁰

The quality of addresses and names was the most-cited problem with the data matching process. At least one State indicated that direct certification has led LEAs to improve the quality of their student records, ensuring that legal names are entered and dates of birth are accurate, to improve direct certification match rates. One expert suggested that probabilistic matching is underutilized, but this expert was not sure if federal policy would allow it. Probabilistic matching is a method of matching records from two files based on comparison of multiple data fields and allowing for matches that are not exact. Matches are determined based on the statistical probability of a match, which relies in part on the uniqueness of the data in the records being matched. This expert suggested that probabilistic matching might be used as a benchmark for evaluating matching algorithms, but the variation in data quality and available identifiers across States makes it difficult to prescribe a matching strategy that could be used universally.

VI. Conclusion

This SY 2008-2009 direct certification report is the second in an annual series. It is the first that measures the effectiveness of the States' direct certification systems since LEAs of all size were made subject to the 2004 Reauthorization Act's direct certification mandate.

An estimated 56 percent of LEAs directly certified some children from SNAP-participant households in SY 2004-2005, 2 years before the first LEAs were required to establish direct certification systems. States and LEAs have made significant progress since that time. In SY 2008-2009 the share of all districts that directly certified some SNAP-participant children had grown to 78 percent. Although a significant minority of LEAs did not directly certify any SNAP-participant children in SY 2008-2009, those LEAs tend to be small. LEAs that directly certified SNAP-participant children enroll an estimated 96 percent of all students in schools that participate in the NSLP.

The most successful States directly certified all or nearly all SNAP-participant children. States with the least effective direct certification systems directly certified fewer than half of eligible SNAP children. Nationwide, 71 percent of children from SNAP-participant households were certified for free school meals in SY 2008-2009 without applications. The States certified an even higher 85 percent of all categorically eligible students for free school meals, either by direct certification or by application.

⁴⁰ On August 27, 2009 FNS released policy guidance, "Extending Categorical Eligibility to Additional Children in a Household," SP-38-2009. This policy says that "for direct certification with SNAP, FDPIR, or TANF and applications with case numbers for these programs, all children in the family, as defined by 7 CFR 245.2, are categorically eligible for free meals." This policy was released after we completed interviews with States for this report, and we were unable to collect information about possible strategies for incorporating this policy in direct certification processes.

Despite these successes, a significant minority of LEAs did not directly certify any SNAP-participant children in SY 2008-2009. Almost all of these LEAs are small, however, and were subject to the direct certification mandate for the first time in SY 2008-2009. In addition, a majority are single-school LEAs. About half are private. These characteristics do not exempt LEAs from their direct certification responsibilities. Given the shared characteristics of this group, a targeted assistance effort by State officials may be sufficient to raise this group's direct certification compliance rate.

State officials and policy experts interviewed for this report emphasize that no single direct certification approach will prove effective for all States and LEAs. The most successful States and LEAs design their systems to take advantage of their particular technological and data resource strengths. All agree, however, that periodic matching of SNAP databases against student enrollment lists throughout the school year is necessary to maximize the States' direct certification rates. Interviewed officials also point to the potential of Web-based lookup systems to fill in gaps left by imperfect match algorithms and matching programs that are run just once or just a few times per year.

VII. References

Bartlett, Susan, and Nancy Burstein (December 2003). *Food Stamp Program Access Study: Eligible Nonparticipants*. Abt Associates, Inc.

<http://www.ers.usda.gov/publications/efan03013/efan03013-2/efan03013-2.pdf>

Cody, Scott, Laura Castner, James Mabli, Julie Sykes (November 2007). *Dynamics of Food Stamp Program Participation, 2001-2003*. Mathematica Policy Research, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service.

<http://www.fns.usda.gov/ora/MENU/Published/SNAP/FILES/Participation/Dynamics2001-2003.pdf>

Cole, Nancy and Christopher Logan (February 2007). *Data Matching in the National School Lunch Program: 2005 Volume 1: Final Report*. Abt Associates, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service.

<http://www.fns.usda.gov/ora/menu/Published/CNP/FILES/DataMatching-V1.pdf>

Gothro, Andrew (August 2009). *FSP Three-Month Turnover Rate for School-Age Children*. Mathematica Policy Research, Inc. Memorandum to U.S. Department of Agriculture, Food and Nutrition Service.

Leftin, Joshua and Kari Wolkwitz, (June 2009). Trends in Food Stamp Program Participation Rates: 2000 to 2007, Table A-1. Mathematica Policy Research, Inc. for the Department of Agriculture, Food and Nutrition Service,

<http://www.fns.usda.gov/ora/menu/Published/SNAP/FILES/Participation/Trends2000-2007.pdf>

Neuberger, Zoe, (August 2006). *Implementing Direct Certification: States and School Districts Can Help Low Income Children Get the Free School Meals for Which They Are Eligible*. Center for Budget and Policy Priorities. <http://www.cbpp.org/8-11-06fa.htm>

Ponza, Michael, Philip Gleason, Lara Hulsey, Quinn Moore, (November 2007). *NSLP/SBP Access, Participation, Eligibility, and Certification Study, Erroneous Payments in the NSLP and SBP, Volume I: Study Findings*. Mathematica Policy Research, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service.

<http://www.fns.usda.gov/ORA/MENU/published/CNP/FILES/apecvol1.pdf>

Ranalli, Dennis, Edward Harper, Rosemary O'Connell, and Jay Hirschman, (December 2008). *Direct Certification in the National School Lunch Program: State Implementation Progress*. U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis.

<http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert08.pdf>

Trippe, Carole and Bruce Schechter, (May 2007). *Tables Describing the Asset and Vehicle Holdings of Low-Income Households in 2002*. Mathematica Policy Research, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service.

<http://www.fns.usda.gov/ora/menu/Published/snap/FILES/ProgramDesign/AssetVehicle2002.pdf>

U.S. Census Bureau, *American Community Survey, Puerto Rico Community Survey, 2007 Subject Definitions*. <http://www.census.gov/acs/www/UseData/Def.htm>

U.S. Department of Agriculture, Food and Nutrition Service, (October 2003). *FNS Handbook 310: Food Stamp Program Quality Control Review Handbook*.
http://www.fns.usda.gov/snap/qc/pdfs/310_Handbook_2004.pdf

Usher, Charles L., David S. Shanklin, and Judith B. Wildfire, (June 1990). *Evaluation of the Food Distribution Program on Indian Reservations*. U.S. Department of Agriculture, Food and Nutrition Service.

Executive Summary and Chapter 1:

<http://www.fns.usda.gov/ora/menu/Published/CNP/FILES/FDPIREval-1.pdf>

Chapter 2: <http://www.fns.usda.gov/ora/menu/Published/CNP/FILES/FDPIREval-2.pdf>

Chapter 3: <http://www.fns.usda.gov/ora/menu/Published/CNP/FILES/FDPIREval-3.pdf>

Chapter 4: <http://www.fns.usda.gov/ora/menu/Published/CNP/FILES/FDPIREval-4.pdf>

Wolkwitz, Kari, (September 2007). *Characteristics of Food Stamp Households: Fiscal Year 2006*. Mathematica Policy Research, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service,
<http://www.fns.usda.gov/ora/MENU/Published/snap/FILES/Participation/2006Characteristics.pdf>

Wolkwitz, Kari and Daisy Ewell (September 2007). *Technical Documentation for the Fiscal Year 2006 FSPQC Database and QC Minimodel*. Mathematica Policy Research, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service, <http://hostm142.mathematica-mpr.com/fns/2006/qcfy2006.pdf>

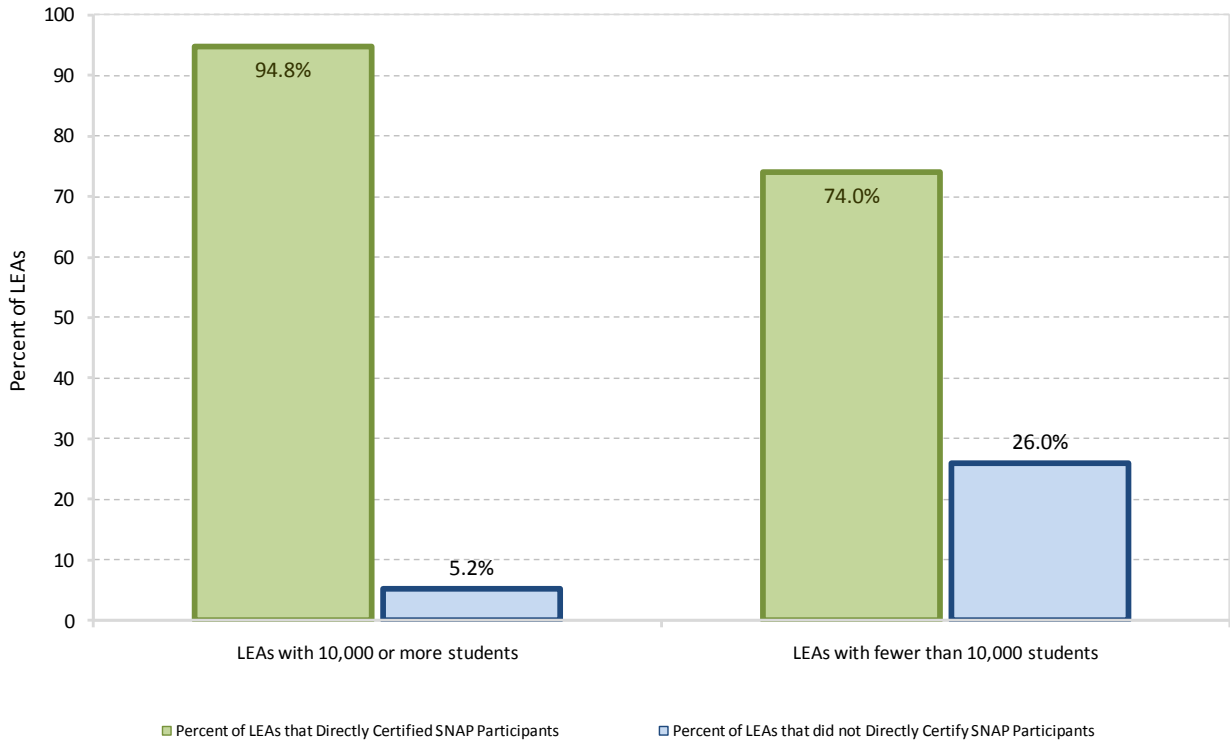
Appendix A – Additional Tables

Table A-1
Number and Percent of LEAs Directly Certifying SNAP Participants:
Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts⁴¹
SY 2004-2005 through SY 2008-2009

	SY 2004 2005			SY 2005 2006			SY 2006 2007			SY 2007 2008			SY 2008 2009		
	Number of non-Provision 2/3 LEAs	Direct Certification LEAs Number	Percent	Number of non-Provision 2/3 LEAs	Direct Certification LEAs Number	Percent	Number of non-Provision 2/3 LEAs	Direct Certification LEAs Number	Percent	Number of non-Provision 2/3 LEAs	Direct Certification LEAs Number	Percent	Number of non-Provision 2/3 LEAs	Direct Certification LEAs Number	Percent
US Total	16,389	9,016	55.0%	17,048	10,118	59.4%	17,382	10,747	61.8%	17,560	11,516	65.6%	17,644	13,692	77.6%
AK	44	33	75.0%	35	34	97.1%	44	40	90.9%	43	39	90.7%	38	37	97.4%
AL	163	62	38.0%	148	87	58.8%	145	93	64.1%	142	105	73.9%	145	129	89.0%
AR	242	238	98.4%	247	1	0.4%	270	245	90.7%	271	237	87.5%	279	264	94.6%
AZ	302	251	83.1%	333	243	73.0%	334	256	76.7%	338	273	80.8%	359	298	83.0%
CA	991	386	39.0%	1,005	441	43.9%	976	470	48.2%	980	507	51.7%	982	629	64.1%
CO	173	39	22.5%	168	68	40.5%	205	78	38.1%	175	81	46.3%	204	180	88.2%
CT	185	146	78.9%	187	148	79.1%	193	161	83.4%	192	161	83.9%	191	169	88.5%
DC	47	1	2.1%	51	4	7.8%	52	2	3.9%	58	2	3.5%	61	2	3.3%
DE	27	22	81.5%	34	28	82.4%	32	28	87.5%	29	27	93.1%	35	30	85.7%
FL	145	74	51.0%	96	62	64.6%	145	88	60.7%	159	98	61.6%	164	107	65.2%
GA	170	154	90.6%	174	157	90.2%	181	164	90.6%	189	160	84.7%	191	166	86.9%
HI	N/A	N/A	N/A	32	18	56.3%	38	20	52.6%	36	22	61.1%	40	26	65.0%
IA	495	338	68.3%	507	371	73.2%	506	382	75.5%	499	393	78.8%	493	423	85.8%
ID	125	97	77.6%	266	218	82.0%	133	106	79.7%	120	105	87.5%	135	117	86.7%
IL	1,035	748	72.3%	1,112	834	75.0%	1,074	838	78.0%	1,114	903	81.1%	1,112	926	83.3%
IN	407	73	17.9%	467	105	22.5%	478	143	29.9%	482	184	38.2%	487	341	70.0%
KS	403	314	77.9%	404	333	82.4%	403	335	83.1%	403	327	81.1%	407	348	85.5%
KY	194	125	64.4%	188	141	75.0%	183	148	80.9%	190	168	88.4%	186	166	89.3%
LA	97	56	57.7%	36	34	94.4%	107	92	86.0%	111	94	84.7%	117	105	89.7%
MA	N/A	N/A	N/A	357	216	60.5%	370	232	62.7%	356	244	68.5%	423	305	72.1%
MD	47	29	61.7%	47	29	61.7%	45	30	66.7%	47	39	83.0%	47	39	83.0%
ME	239	193	80.8%	228	194	85.1%	233	201	86.3%	239	216	90.4%	229	207	90.4%
MI	741	331	44.7%	698	349	50.0%	803	449	55.9%	836	570	68.2%	846	693	81.9%
MN	610	392	64.3%	620	387	62.4%	630	413	65.6%	642	425	66.2%	653	438	67.1%
MO	759	450	59.3%	711	476	67.0%	749	490	65.4%	756	510	67.5%	744	615	82.7%
MS	163	73	44.8%	60	35	58.3%	168	118	70.2%	167	132	79.0%	167	139	83.2%
MT	236	130	55.1%	233	159	68.2%	234	177	75.6%	227	171	75.3%	223	164	73.5%
NC	N/A	N/A	N/A	172	117	68.0%	178	133	74.7%	170	141	82.9%	169	144	85.2%
ND	160	126	78.8%	199	153	76.9%	193	142	73.6%	202	149	73.8%	196	137	69.9%
NE	405	239	59.0%	433	313	72.3%	381	290	76.1%	381	297	78.0%	382	285	74.6%
NH	82	57	69.5%	88	65	73.9%	89	60	67.4%	92	65	70.7%	95	64	67.4%
NJ	653	151	23.1%	654	178	27.2%	656	199	30.3%	658	245	37.2%	661	550	83.2%
NM	93	49	52.7%	88	56	63.6%	104	56	53.9%	106	52	49.1%	67	62	92.5%
NV	39	34	87.2%	39	34	87.2%	19	15	79.0%	20	16	80.0%	19	16	84.2%
NY	1,090	791	72.6%	945	780	82.5%	937	752	80.3%	963	831	86.3%	950	813	85.6%
OH	1,090	175	16.1%	1,189	295	24.8%	1,125	219	19.5%	1,161	253	21.8%	1,166	739	63.4%
OK	499	214	42.9%	579	288	49.7%	539	299	55.5%	540	345	63.9%	530	394	74.3%
OR	203	164	80.8%	217	168	77.4%	222	175	78.8%	232	180	77.6%	229	180	78.6%
PA	723	367	50.8%	773	455	58.9%	823	498	60.5%	834	520	62.4%	852	620	72.8%
RI	N/A	N/A	N/A	55	47	85.5%	55	50	90.9%	53	50	94.3%	32	31	96.9%
SC	86	85	98.8%	85	83	97.7%	88	84	95.5%	87	84	96.6%	96	85	88.5%
SD	194	90	46.4%	188	88	46.8%	187	93	49.7%	184	90	48.9%	179	109	60.9%
TN	169	132	78.1%	175	154	88.0%	171	144	84.2%	168	142	84.5%	167	153	91.6%
TX	1,198	737	61.5%	1,026	797	77.7%	1,189	839	70.6%	1,184	909	76.8%	1,194	1,040	87.1%
UT	50	44	88.0%	51	48	94.1%	49	45	91.8%	55	51	92.7%	64	56	87.5%
VA	160	136	85.0%	141	138	97.9%	151	138	91.4%	151	139	92.1%	150	138	92.0%
VT	204	186	91.2%	217	200	92.2%	215	201	93.5%	219	194	88.6%	214	189	88.3%
WA	291	214	73.5%	345	260	75.4%	322	252	78.3%	323	264	81.7%	309	267	86.4%
WI	833	168	20.2%	823	138	16.8%	832	172	20.7%	845	210	24.9%	838	465	55.5%
WV	73	54	74.0%	68	54	79.4%	73	55	75.3%	75	55	73.3%	74	55	74.3%
WY	54	48	88.9%	54	37	68.5%	53	37	69.8%	56	41	73.2%	53	37	69.8%

⁴¹ LEAs are excluded if every school in the LEA is a Provision 2 or Provision 3 school.

Figure A-1
Percent of LEAs that Directly Certified SNAP Participants, by LEA Size:
Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts⁴²
SY 2008-2009



⁴² LEAs are excluded if every school in the LEA is a Provision 2 or Provision 3 school.

Table A-2
Summary State Statistics from Figures 4 and 7

State	Percent of SNAP Children Directly Certified for Free School Meals (see Figure A-2 and A-3 maps)			Percent of All Categorically Eligible Children Certified for Free School Meals (see Figure A-4 and A-5 maps)		
	SY 2008-2009	SY 2007-2008	Percentage Point Change	SY 2008-2009	SY 2007-2008	Percentage Point Change
Alabama	64%	61%	3	80%	84%	-4
Alaska	131%	125%	6	89%	87%	3
Arizona	66%	69%	-3	84%	86%	-2
Arkansas	71%	69%	1	91%	93%	-2
California	65%	85%	-19	71%	89%	-18
Colorado	81%	61%	19	83%	66%	17
Connecticut	74%	73%	1	84%	81%	2
Delaware	96%	106%	-10	103%	107%	-4
District of Columbia	50%	54%	-5	73%	71%	2
Florida	82%	80%	2	93%	91%	2
Georgia	64%	65%	-2	81%	87%	-7
Hawaii	79%	60%	20	84%	68%	16
Idaho	50%	49%	0	62%	65%	-3
Illinois	57%	35%	22	77%	66%	11
Indiana	66%	56%	10	83%	84%	-1
Iowa	85%	71%	14	89%	84%	5
Kansas	83%	73%	10	85%	78%	7
Kentucky	78%	82%	-4	94%	96%	-2
Louisiana	87%	76%	11	103%	97%	6
Maine	74%	67%	7	80%	76%	4
Maryland	75%	70%	5	88%	79%	9
Massachusetts	62%	59%	3	73%	68%	5
Michigan	64%	58%	6	89%	80%	9
Minnesota	78%	74%	4	91%	89%	2
Mississippi	74%	72%	2	91%	91%	0
Missouri	45%	44%	1	55%	54%	1
Montana	58%	55%	3	72%	65%	7
Nebraska	76%	68%	8	95%	84%	11
Nevada	88%	86%	2	83%	79%	4
New Hampshire	31%	35%	-4	70%	67%	2
New Jersey	56%	44%	12	72%	66%	6
New Mexico	84%	86%	-2	107%	115%	-8
New York	96%	95%	0	115%	125%	-10
North Carolina	81%	78%	3	85%	83%	2
North Dakota	55%	57%	-1	61%	61%	0
Ohio	67%	35%	33	95%	86%	9
Oklahoma	78%	60%	18	106%	92%	14
Oregon	70%	61%	9	76%	68%	7
Pennsylvania	68%	65%	3	79%	78%	1
Rhode Island	54%	94%	-39	65%	96%	-30
South Carolina	62%	60%	2	81%	77%	4
South Dakota	52%	55%	-3	72%	81%	-9
Tennessee	93%	92%	1	97%	96%	1
Texas	74%	73%	1	96%	99%	-3
Utah	76%	82%	-6	87%	96%	-9
Vermont	68%	74%	-6	90%	98%	-8
Virginia	78%	79%	-1	84%	83%	0
Washington	68%	76%	-8	79%	84%	-5
West Virginia	85%	89%	-4	96%	94%	2
Wisconsin	72%	61%	12	83%	78%	5
Wyoming	61%	65%	-4	63%	71%	-7

Table A-3
Enrollment of NSLP-Participating LEAs,
SY 2008-2009

LEA Size	Total Enrollment (millions)			
	LEAs that Directly Certified SNAP Participants	LEAs in which all Schools are Non-Base Year Provision 2 or Provision 3	All Other LEAs	All NSLP-Participating LEAs
25,000 students or more	17.1	0.2	0.0	17.3
10,000 to 25,000 students	8.7	0.2	0.1	9.0
Fewer than 10,000 students	21.2	0.5	1.7	23.4
All LEAs	47.0	0.9	1.8	49.7

Figure A-2⁴³
Percent of SNAP-Participant Children Directly Certified for Free School Meals
SY 2008-2009

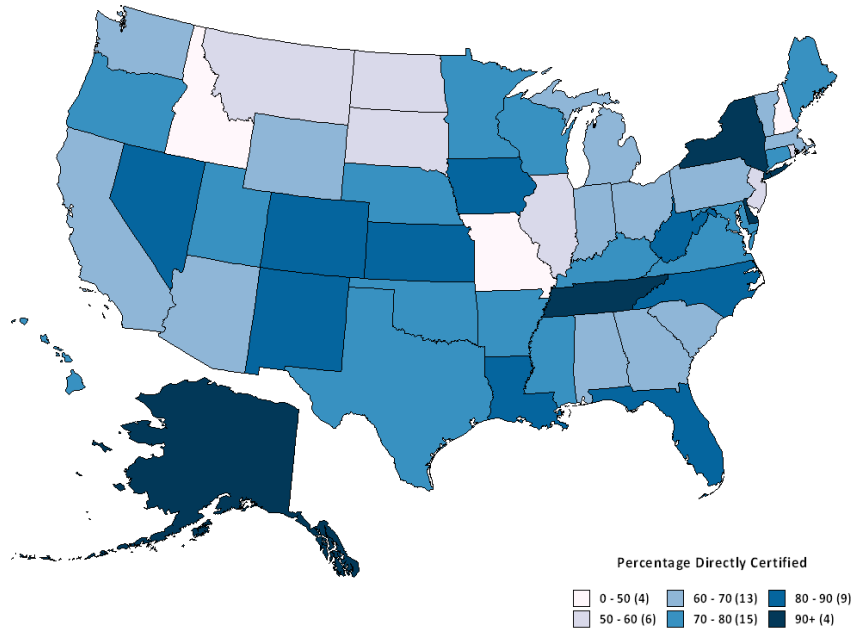
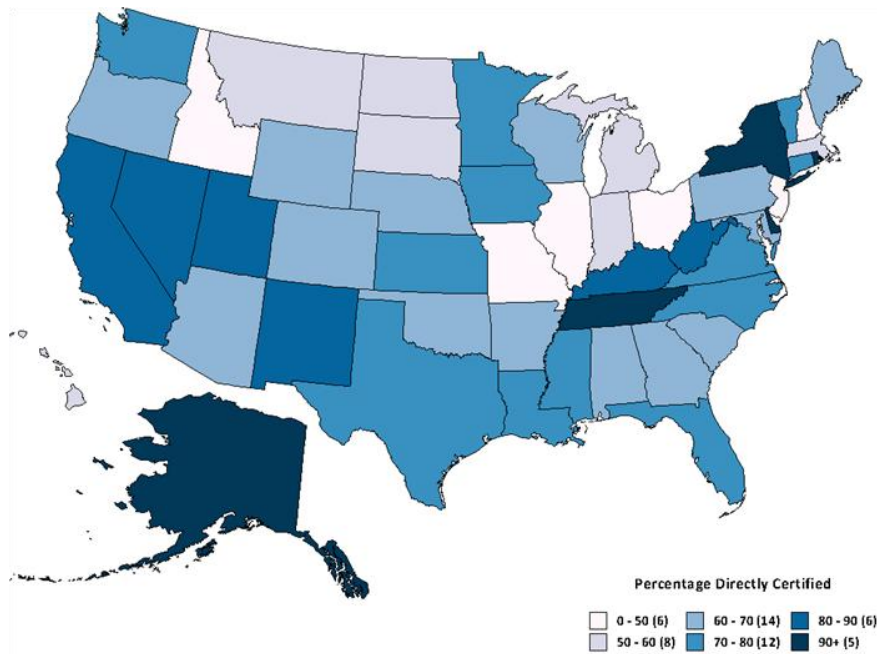


Figure A-3
Percent of SNAP-Participant Children Directly Certified for Free School Meals
SY 2007-2008



⁴³ State values for Figures A-2, A-3, A-4, and A-5 are in Table A-2.

Figure A-4
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2008-2009

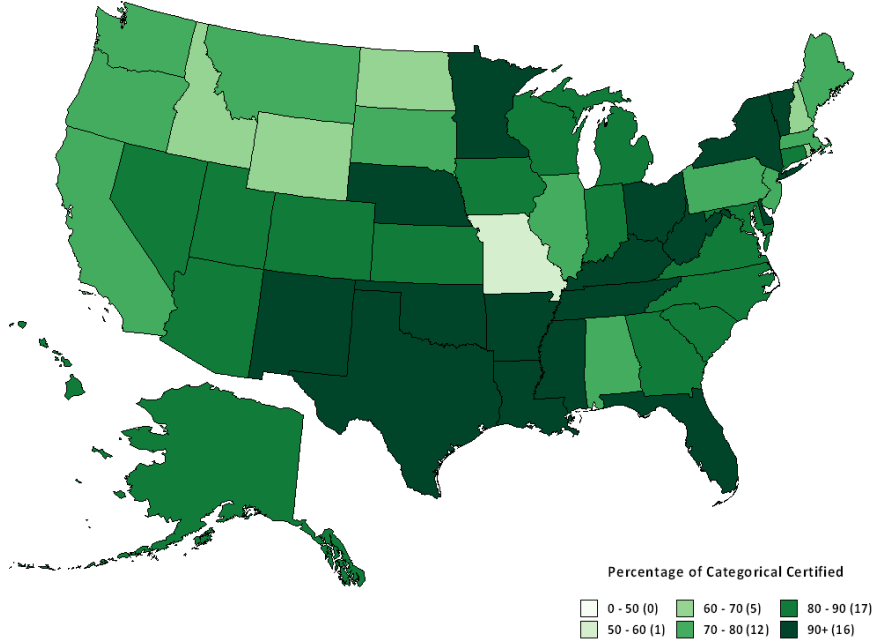
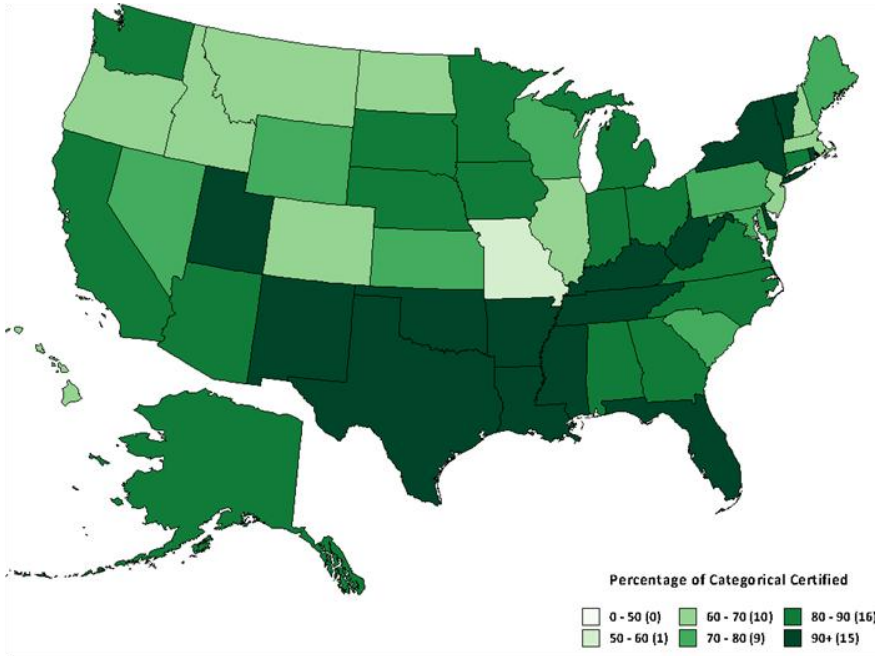


Figure A-5
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2007-2008



**Table A-4
States by FNS Administrative Region**

FNS Region	State
Mid-Atlantic	DC
	DE
	MD
	NJ
	PA
	VA
	WV
Mid-Western	IL
	IN
	MI
	MN
	OH
	WI
Mountain-Plains	CO
	IA
	KS
	MO
	MT
	ND
	NE
	SD
	UT
	WY

FNS Region	State
Northeast	CT
	MA
	ME
	NH
	NY
	RI
	VT
Southeast	AL
	FL
	GA
	KY
	MS
	NC
Southwest	SC
	TN
	AR
	LA
	NM
	OK
Western	TX
	AK
	AZ
	CA
	HI
	ID
	NV
	OR
	WA

Appendix B – Verification Summary Report

FORM APPROVED OMB # 0584-0026

[INSERT STATE AGENCY NAME]		SFA ID #				
SCHOOL FOOD AUTHORITY VERIFICATION SUMMARY REPORT		SFA NAME				
		TYPE OF SFA	<input type="checkbox"/> Public <input type="checkbox"/> Private			
		SCHOOL YEAR	-			
<small>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 control number for this collection is 0584-0026. The time required to complete this information collection is 6 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.</small>						
I. Enrollment, Application, and Eligibility Information (Pre Verification)			II. Results of Verification, by Application Type			
1. Type of Free/Reduced Price Application Used <input type="checkbox"/> Household			6. Type of Verification Used <input type="checkbox"/> Basic <input type="checkbox"/> Alternate-Random <input type="checkbox"/> Alternate-Focused <input type="checkbox"/> No Verifications Performed			
	A. All Schools	B. Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR	<i>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.</i>	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
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	7. No Change	# applications		
4. Total FREE ELIGIBLE reported				# students		
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)			8. Responded, Changed to Free	# applications		
4-2. # approved as FREE ELIGIBLE based on FS/TANF/FDPIR case number submitted on an application (Categorically Eligible)				# students		
4-3. # approved as FREE ELIGIBLE based on income/household size information submitted on an application			9. Responded, Changed to Reduced Price	# applications		
4-4. # FREE ELIGIBLES reported for Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR				# students		
5. Total REDUCED PRICE ELIGIBLE reported			10. Responded, Changed to Paid	# applications		
5-1. # reduced price eligibles reported for Provision 2/3 schools WHICH ARE NOT OPERATING A BASE YEAR				# students		
			11. Did Not Respond	# applications		
				# students		
			12. Reapplied and Reapproved on or Before Feb. 15	# applications		
				# students		

Form FNS - 742 (February 2004)

This form, and the accompanying instructions for completion, are available on the Web at:
<http://www.fns.usda.gov/cnd/Governance/Forms/default.htm>

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 2008; (2) the number of SNAP-participant children who were directly certified for free school meals as of October 1, 2008; and (3) the number of SNAP-participant students who 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 2008-2009. The methods and sources used for these estimates are described below.⁴⁴

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 program data reported to FNS by State SNAP agencies each month. SNAP program 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 2008. While 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 subpopulation are estimated from the SNAP Quality Control (QC) dataset, which is based on statistically representative samples drawn by the States from participating SNAP households.⁴⁵ 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 program data, FNS computes average monthly participation from July through September as a percent 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 2008.

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 of time, 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 1.4.⁴⁶ 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. For the July through September period, FNS

⁴⁴ See Appendix D for a discussion of data limitations.

⁴⁵ USDA, 2003

⁴⁶ Cody, 2007

estimates a turnover rate of about 1.08. This factor is applied to the July through September average to give an estimate of the unduplicated count of school-age children who were SNAP participants at any time during those three months.⁴⁷

Note that the turnover rate applied here is a national estimate. The estimate is based on the Survey of Income and Program Participation (SIPP), a Census dataset that contains information on a representative panel of households over time. The longitudinal nature of the dataset is well-suited to estimating 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. On balance, though, an imperfect (national) turnover rate adjustment is preferred to no adjustment at all.

$$\begin{array}{l} \text{unduplicated count of} \\ \text{school-age SNAP} \\ \text{participant population,} \\ \text{July-September 2008} \end{array} = \frac{\begin{array}{l} \text{average monthly SNAP} \\ \text{participation, FNS program} \\ \text{data, July-September 2008} \end{array}}{\begin{array}{l} \text{average monthly SNAP} \\ \text{participation, FNS program} \\ \text{data, FY 2008} \end{array}} \times \begin{array}{l} \text{average monthly} \\ \text{school-age SNAP} \\ \text{participant} \\ \text{population, QC} \\ \text{estimate, FY 2008} \end{array} \times \begin{array}{l} \text{Estimated July-} \\ \text{September SNAP} \\ \text{participant} \\ \text{"turnover rate"} \end{array}$$

Estimate of SNAP participants directly certified for free school meals

This report uses data collected by FNS from the States and local LEAs to estimate the number of children in SNAP participant households who 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 benefits. Although these data were not designed specifically to support the requirements of this report, they remain the best and most current 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 Verification Summary Reports (VSR) 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.⁴⁸

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

⁴⁷ The July through September turnover rate is based on 2007 data. See Gothro, 2009.

⁴⁸ 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.

of students certified for free school meals, but not subject to verification, as a proxy for directly certified SNAP participants.⁴⁹

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 non-base years, the schools are reimbursed at these previously determined percentages; individual children are not subject to certification or re-certification in non-base years.⁵⁰

In order to remove these children from the estimated population of SNAP participants, FNS used data reported by LEAs on their SY 2008-2009 VSRs. LEAs are required to report the total number of students eligible for free (and reduced-price) meals for 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 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 NSLP's income or categorical requirements 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.⁵¹

FNS reduced the reported number of children from Provision 2 or Provision 3 schools who received free meals by two factors. The first is a national estimate of the percentage of the population that is income eligible for SNAP benefits but not asset eligible (82.3 percent).⁵² The second is a national estimate of the participation rate of school-age children from households that meet both the SNAP income and asset tests (84.2 percent).⁵³ Both of these adjustment factors are national estimates that necessarily mask some variation between the States; available data, however, do not permit the estimation of State-specific factors.

⁴⁹ Some limitations of this measure are discussed in Appendix D.

⁵⁰ Provision 2 and Provision 3 schools operating in non-base years serve all meals at no charge, although they are reimbursed by the 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 non-base years, Provision 2 and Provision 3 schools absorb any difference between their Federal reimbursement and the cost of meals served.

⁵¹ 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, 2003.

⁵² Trippe and Schechter, 2007

⁵³ Leftin and Wolkwitz, 2009

The three component statistics described in this section are presented in Table 2 in the main body of the report.

Appendix D – Data Limitations

1. Local educational agency Verification Summary Reports

LEAs that participate in the NSLP are required each school year to review a sample of applications that were approved for free or reduced-price benefits. LEAs record the results of this review on Verification Summary Reports (VSRs) that are submitted through State education agencies to FNS. These VSRs are the source for two key data elements used in this report.

a. Students certified for free meals and not subject to verification

This data element is used in this report as a proxy for directly certified children from SNAP-participant households. In many States, however, free-eligible students whose status is not subject to verification also include directly certified TANF or FDPIR participants, income-eligible children enrolled in 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 relied on district level matching, the States provided both SNAP and TANF databases to the LEAs for use in the matching process.⁵⁴ Since 2005, many additional LEAs have established direct certification systems.⁵⁵ To the extent that those LEAs adopted already established State or district level matching 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 free-eligible students not subject to verification is an imperfect proxy for directly certified SNAP participants. Although the proxy tends to overstate the number of directly certified SNAP participants, the 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 may be in full compliance with the statutory direct certification mandate. As a result, the estimates of direct certification performance developed in this report may exaggerate the differences between the States.

b. 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

This data element is used in this report to reduce the number of SNAP-participant children who are candidates for direct certification. The problem with this variable, for purposes of this report,

⁵⁴ LEAs in the remaining States relied solely on the letter method of direct certification. See Cole and Logan (2007), pp. ix, 34-36.

⁵⁵ See Table 1.

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 that is based on this data element will be inaccurate.

2. SNAP Quality Control System dataset

This dataset 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 have been one that identified 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 high drop-out rates, this variable will overstate the relevant population.

3. American Community Survey (ACS)

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." ACS documentation defines public assistance as "general assistance and Temporary Assistance to Needy Families."⁵⁶ For this report, the ACS count of households that receive "public assistance" is used 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, and especially differences in underreporting, reduces the reliability of the ratio constructed from the two ACS variables.

4. 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.⁵⁷ The study found that 37 percent of FDPIR participants were under age 18. FNS multiplied this figure by a factor of 13/18 (the expected number of 5-17 year old children among those age 0-17) and applied it to the average monthly FDPIR caseload,⁵⁸ by State, for FY 2008. The primary weakness of this

⁵⁶ U.S. Census Bureau, 2007

⁵⁷ Usher, et. al., 1990

⁵⁸ FNS FDPIR program data

estimate is clear: the share of children in households that currently receive FDPIR benefits may have changed significantly, at least in some States, since 1990.