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**Direct Certification in the National
School Lunch Program:
State Implementation Progress
School Year 2010-2011**

Report to Congress

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Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011

Report to Congress

Authors:

Quinn Moore
Kevin Conway
Brandon Kyler

Submitted by:

Mathematica Policy Research
Box 2393
Princeton, NJ 08543-2393
Telephone: (609) 799-3535
Facsimile: (609) 799-0005

Submitted to:

Office of Research and Analysis P.O.
USDA Food and Nutrition Service
3101 Park Center Dr., Room 1014
Alexandria, VA 22302-1500

Project Director:

Kevin Conway

Project Officer:

Dennis Ranalli

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ABSTRACT

This report responds to the legislative requirement of the Food, Conservation, and Energy Act of 2008 (P.L.110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP). Direct certification is a process conducted by the States and by local educational agencies (LEAs) to certify certain children for free school meals without the need for household applications. The Child Nutrition and WIC Reauthorization Act of 2004 required all LEAs to establish, by school year (SY) 2008–2009, a system of direct certification of children from households that receive Supplemental Nutrition Assistance Program (SNAP) benefits. The mandate was phased in over three years. The largest LEAs were required to establish direct certification systems by SY 2006–2007; all were required to directly certify SNAP participants by SY 2008–2009.

Eighty-five percent of LEAs that participate in the NSLP directly certified some SNAP participants in SY 2010–2011. These LEAs enroll 97 percent of all students in schools that participate in the NSLP. This is an increase from SY 2004–2005, when 56 percent of LEAs, enrolling 77 percent of all students in NSLP schools, directly certified some SNAP-participant students.

Nationally, the number of school age SNAP participants was 16 percent higher at the start of SY 2010–2011 than it was at the start of SY 2009–2010, and States and LEAs directly certified 1.9 million more students in SY 2010–2011 than in the previous year. Analysis in this report estimates that 78 percent of children in SNAP households were directly certified for free school meals, substantially higher than last year's rate of 72 percent. Eight States achieved direct certification rates higher than 90 percent, whereas three had direct certification rates lower than 60 percent.

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GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey (U.S. Census Bureau)
CN	Child Nutrition
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
FY	Fiscal Year
IT	Information Technology
LEA	Local Educational Agency
NLSLA	Richard B. Russell National School Lunch Act
NSLP	National School Lunch Program
PL	Public Law
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
SY	School Year
TANF	Temporary Assistance for Needy Families
USDA	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

A. Background

This report responds to a legislative requirement of the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill, P.L.110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP). The 2008 Farm Bill requires annual reports to Congress. This is the fourth report in the series, covering school year (SY) 2010–2011. The results from this report (and from reports over the next three years) will be considered in making performance awards to States under Section 101 of the Healthy, Hunger-Free Kids Act of 2010 (PL 111-296). Under the same authority, future reports, beginning with SY 2011-12, will also be considered in identifying States that will be subject to continuous improvement plans.

The NSLP reimburses local educational agencies (LEAs) for the cost of providing nutritious meals to children in public and private schools and residential child care institutions. Average daily participation across 101,000 NSLP schools and institutions totaled approximately 32 million children in fiscal year (FY) 2011.

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

B. Eligibility for Program Benefits

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

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

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

C. Direct Certification

Student eligibility for free meals is determined by application or by direct certification. Although direct certification systems vary by State and LEA, all such systems substantially reduce the need for household applications. Many States and LEAs certify eligible children through computer matching of SNAP, TANF, and FDPIR records against student enrollment lists. Those systems require no action by the children's parents or guardians.

States and LEAs may opt instead to send letters to SNAP, TANF, and FDPIR households with school-age children. The letters serve as proof of categorical eligibility for free meals, and must be forwarded by the households to their children's schools. States are required to phase out the use of the letter method as the primary means of direct certification of school-age SNAP participants by SY 2012–2013. The letter method may continue to be used as a secondary means of direct certification of SNAP participants, and a primary means of direct certification of all other categorically eligible children.

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

D. State Performance Measures

This report presents information on the outcomes of direct certification for SY 2010–2011. Mathematica Policy Research estimated the number of school-age SNAP participants and the number of children directly certified for free school meals in each State. The ratio of these figures is a measure of the success of State and local systems to directly certify SNAP-participant children.

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

E. Key Findings

States and LEAs directly certified 1.9 million more children at the start of SY 2010–2011 than they did one year earlier, a 23 percent increase. From the start of SY 2009–2010 to SY 2010–2011, the total number of school-age children in SNAP households increased by 2.0 million, or 16 percent. As a result, the estimated percent of SNAP-participant children certified for free school meals without application increased from 72 percent in SY 2009–2010 to 78 percent in SY 2010–2011. The overall certification rate of categorically eligible children, by direct certification or by application, increased slightly from 83 percent in SY 2009–2010 to 86 percent in SY 2010–2011.

The number of LEAs directly certifying SNAP-participant children continues to increase. In SY 2004–2005, 56 percent of LEAs directly certified SNAP-participant children on a discretionary basis. The share of LEAs that directly certified students grew to 67, 78, and 83 percent in SYs 2007–2008, 2008–2009, and 2009–2010, respectively. By SY 2010–2011, 85 percent of LEAs directly certified some SNAP children; those LEAs enrolled 97 percent of students in NSLP-participating schools.

F. State Best Practices

Effective direct certification systems do not follow a single model. Among the States with the most effective systems are some that perform State-level matching and others that have district-level systems.

States continue to refine their match processes to accommodate unique local or State characteristics. For instance, one State experienced a large improvement in performance after implementing a series of changes designed to improve the user-friendliness of their direct certification system, such as simplifying the user interface, improving flexibility of data upload features, and providing detailed documentation and training manuals. Among the successful States interviewed for this year's report, there is large variation in the complexity of the matching algorithms. Some states used relatively simple systems based on a small number of identifiers, while others used more complex systems involving probabilistic matching and secondary investigation of probable (but not definite) matches.

G. Conclusion

States and LEAs have made significant progress in complying with the 2004 Reauthorization Act. An estimated 85 percent of LEAs, enrolling 97 percent of all children in NSLP-participating schools, directly certified SNAP participants in SY 2010–2011. In response to an extraordinary recession-related increase in the SNAP caseload, States and LEAs directly certified 1.9 million more SNAP participants in SY 2010–2011 than they did a year earlier. Through that effort, an estimated 78 percent of children from SNAP-participant households were certified without application for free school meals in SY 2010–2011. This is 5.5 percentage points higher than last year's direct certification rate of 72 percent. States and LEAs certified 86 percent of all categorically eligible students for free school meals, either by direct certification or by application in SY 2010–2011, 3 percentage points more than the rate achieved in SY 2009–2010.

DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM: STATE IMPLEMENTATION PROGRESS, SCHOOL YEAR 2010–2011

I. INTRODUCTION

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

In exchange for Federal assistance, participating schools and institutions serve meals that satisfy Federal nutrition and food safety standards. In addition, they must offer school meals at no cost, or at reduced price, to income-eligible children. Children from households with incomes at or below 130 percent of the Federal poverty level (\$29,055 for a family of four during school year SY 2011–2012¹) are eligible for free meals. Those with incomes between 130 and 185 percent of the Federal poverty level (\$41,348 for a family of four during SY 2011–2012) are eligible for reduced-price meals. Students are determined eligible for free meals through application or direct certification (described next); reduced-price eligibility is determined by application alone.

A. Eligibility Determination Through Application

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

¹ The income eligibility thresholds given here apply to households from the 48 contiguous States, the District of Columbia, Guam, and the other U.S. territories. The income thresholds are higher in Alaska and Hawaii. A table of income eligibility thresholds can be found at <http://www.fns.usda.gov/cnd/Governance/notices/iegs/IEGs10-11.htm>.

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

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

B. Eligibility Determination Through Direct Certification

Direct certification confirms a child’s categorical eligibility for free school meals without the need for a household application. Direct certification typically involves matching SNAP, TANF, and FDPIR records against student enrollment lists, either at the State or LEA level.⁴ Parents or guardians of children identified through these matching systems are notified of their children’s eligibility for free school meals.⁵ They need not take action for their children to be certified. Current program rules provide for an alternate method of direct certification that does not require data set matching. Under that option, SNAP, TANF, or FDPIR agencies send letters to participant households with school-age children. Those letters, which serve as proof of categorical eligibility for free meals, must be forwarded by the households to their children’s schools. This letter method of direct certification requires households to take some positive action (forwarding the letter) before their children are certified for free meals.⁶

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.⁷ States may also directly certify children from TANF and FDPIR households, foster children, Head Start or Even Start participants, and certain homeless, runaway, and migrant children but are not required to do so.

C. Purpose of this Report

This report responds to section 4301 of the Food, Conservation, and Energy Act of 2008,⁸ which calls for an assessment of the “effectiveness of each State in enrolling school-aged children in households receiving ... [SNAP] benefits” for free school meals.⁹ Specifically, the law requires the following:

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

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 Under recent regulations, State agencies are required to phase out the use of the letter method as the primary method for direct certification with SNAP by SY 2012-2013.

⁷ The Child Nutrition and WIC Reauthorization Act’s direct certification provision was phased in over a three-year period beginning with school year 2006–2007.

⁸ Also known as the 2008 Farm Bill.

⁹ This report includes analysis of the contiguous United States, Alaska, and Hawaii. The report for SY 2011-2012 will include Guam.

3. Estimates of the number of SNAP-participant students who were not candidates for direct certification because they attended Provision 2 or Provision 3 schools¹⁰ 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. In addition, Section 101 of the Healthy, Hunger-Free Kids Act of 2010 requires FNS, beginning with SY 2011-2012, to consider the results contained in this report in making performance awards to States, and in identifying States that will be subject to continuous improvement plans.

II. HISTORY OF DIRECT CERTIFICATION

In the mid-1980s, program managers and policymakers recognized a duplication of effort in certifying school children for free meals under the NSLP and the School Breakfast Program (SBP),¹¹ 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 the NSLP. Use of eligibility determinations for SNAP and TANF could improve the accuracy of certifications for NSLP.

Legislation taking a first step to link these programs was enacted in 1986. The Richard B. Russell National School Lunch Act (NSLA) was amended to make children who are members of a household receiving assistance under SNAP and TANF automatically eligible for free school meals. This action paved the way for more simplified application and certification procedures for these children. Initially, families could put their case number from these programs on the application in lieu of providing income information.¹² 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 were members of a household receiving either SNAP or TANF benefits. This first statutory authorization of direct certification was made optional for SFAs.

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

¹⁰ See http://www.fns.usda.gov/CND/Governance/prov-1-2-3/Prov1_2_3_FactSheet.htm for information on Provision 2 and 3 schools.

¹¹ 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.

¹² The option to provide a case number on the application has been retained to enable children who were not directly certified to be more easily processed by the LEAs.

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. By the time direct certification with SNAP became mandatory, many State agencies had systems in place and were familiar with the process.

In the years since the statutory mandate, additional implementation requirements have been introduced with the intention of increasing the reach and effectiveness of direct certification. In August 2009, FNS issued guidance requiring that free meal eligibility apply to all children in a family if at least one child is directly certified as categorically eligible for free school meals, beginning in SY 2009–2010. The Healthy, Hunger-Free Kids Act of 2010 (PL 111-296) required State agencies to phase out the use of the letter method as their primary method for direct certification with SNAP. This act also includes provisions that would expand direct certification to include Medicaid in some districts via a demonstration project. A 2011 interim rule requires that, starting in SY 2011–2012, direct certification matching with SNAP records occur at least three times per school year.

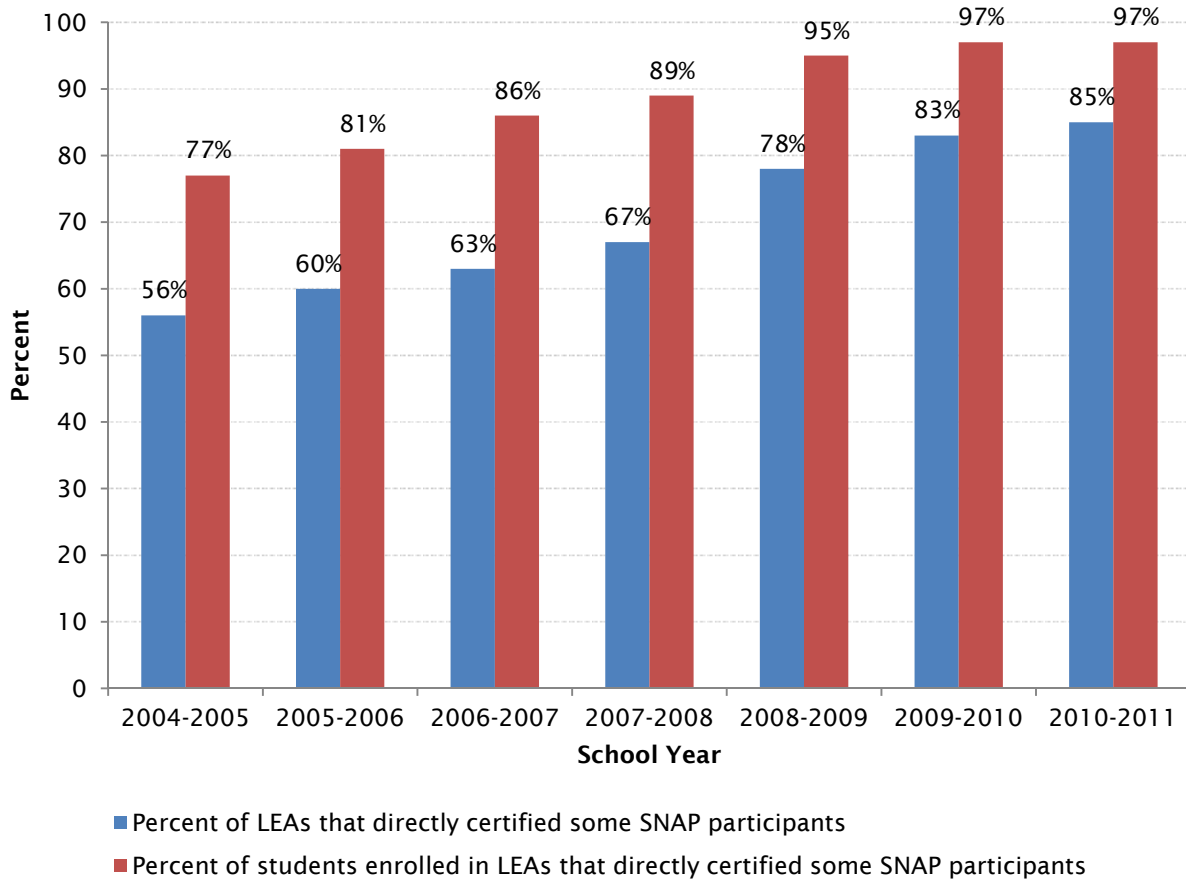
Even though all LEAs are now subject to the statutory direct certification mandate, there continues to be a need for household applications. Because children from households with incomes between 130 and 185 percent of the Federal poverty level are not eligible for SNAP, direct certification cannot be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

III. CURRENT STATUS OF DIRECT CERTIFICATION SYSTEMS

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

Figure 1 and Table 1 illustrate the increases in both the percent of LEAs that directly certified SNAP participants and the percent of students enrolled in those LEAs.¹³ For SY 2010–2011, 85 percent of LEAs directly certified some SNAP participants¹⁴ and those LEAs enrolled 97 percent of all students in NSLP-participating schools.

Figure 1. Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants, SY2004-2005 through SY2010-2011



¹³ The numbers in Figure 1 and Table 1 are estimates based on figures provided by LEAs on their annual NSLP verification summary reports (VSRs). An LEA is identified as a direct certification district if the reported number of students not subject to verification exceeds the number that are categorically eligible for free meals but approved by application, or the number not subject to verification is at least 5 percent of all students reported certified for free meals. This methodology, previously used by Cole and Logan (2007), could misclassify a small number of LEAs. Also, as noted in the next footnote, LEAs in which all students attend nonbase year Provision 2 or Provision 3 schools are sometimes omitted from Figure 1 and Table 1 because some States do not report LEAs that are not required to do verification activities. Other States do include these LEAs.

¹⁴ This percentage, and the corresponding Table 1 figures for all other school years, also includes the relatively small number of LEAs in which all students attend Provision 2 or Provision 3 schools that are not operating in a base year. Both Figure 1 and Table 1 attempt to measure the LEAs' progress in implementing direct certification systems. Students in Provision 2 and Provision 3 schools are not subject to either direct certification or certification by application in nonbase years. However, all children, including all SNAP participants, are eligible for free meals in Provision 2 and Provision 3 schools, which is consistent with the policy goal of direct certification. See Appendix A, Table A.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 directly certified some SNAP children.

Table 1. Number and Percent of LEAs that Directly Certified SNAP Participants, SY 2004-2005 through SY 2010-2011

	SY 2010-2011			SY 2009-2010			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	Percent		Number	Percent		Number	Percent
US Total	18,573	15,777	84.9	18,461	15,258	82.6	18,253	14,301	78.3
AK	51	49	96.1	49	48	98.0	48	47	97.9
AL	151	141	93.4	151	137	90.7	150	134	89.3
AR	290	279	96.2	300	265	88.3	295	280	94.9
AZ	430	365	84.9	428	357	83.4	388	327	84.3
CA	1,078	806	74.8	1,057	839	79.4	1,029	676	65.7
CO	207	191	92.3	218	202	92.7	205	181	88.3
CT	186	176	94.6	188	174	92.6	191	169	88.5
DC	57	57	100.0	62	61	98.4	61	2	3.3
DE	33	31	93.9	34	31	91.2	35	30	85.7
FL	190	133	70.0	170	122	71.8	164	107	65.2
GA	230	208	90.4	221	199	90.0	215	190	88.4
HI	36	26	72.2	37	26	70.3	40	26	65.0
IA	494	435	88.1	495	421	85.0	494	424	85.8
ID	144	137	95.1	142	103	72.5	139	121	87.0
IL	1,119	968	86.5	1,123	880	78.4	1,114	928	83.3
IN	501	424	84.6	498	405	81.3	487	341	70.0
KS	399	340	85.2	405	345	85.2	407	348	85.5
KY	189	178	94.2	197	176	89.3	190	170	89.5
LA	114	102	89.5	109	95	87.2	117	105	89.7
MA	421	311	73.9	431	303	70.3	423	305	72.1
MD	49	43	87.8	49	42	85.7	47	39	83.0
ME	192	174	90.6	194	177	91.2	235	213	90.6
MI	853	736	86.3	855	717	83.9	846	693	81.9
MN	706	471	66.7	662	457	69.0	663	448	67.6
MO	761	684	89.9	765	678	88.6	744	615	82.7
MS	176	160	90.9	177	157	88.7	179	151	84.4
MT	240	209	87.1	239	190	79.5	241	182	75.5
NC	165	154	93.3	165	151	91.5	169	144	85.2
ND	204	181	88.7	202	171	84.6	217	158	72.8
NE	379	317	83.6	383	304	79.4	382	285	74.6
NH	91	82	90.1	94	75	79.8	95	64	67.4
NJ	694	665	95.8	677	619	91.4	662	551	83.2
NM	187	134	71.7	176	132	75.0	171	166	97.1
NV	20	16	80.0	18	17	94.4	19	16	84.2
NY	1,106	985	89.1	1,113	989	88.9	1,072	935	87.2
OH	1,192	869	72.9	1,188	816	68.7	1,172	745	63.6
OK	577	496	86.0	566	458	80.9	565	429	75.9
OR	250	203	81.2	245	196	80.0	237	188	79.3
PA	853	733	85.9	851	730	85.8	855	623	72.9
RI	56	53	94.6	55	53	96.4	32	31	96.9
SC	100	85	85.0	93	85	91.4	96	85	88.5
SD	213	197	92.5	216	196	90.7	215	145	67.4
TN	175	161	92.0	165	149	90.3	167	153	91.6
TX	1,260	1,138	90.3	1,263	1,119	88.6	1,264	1,110	87.8
UT	81	75	92.6	75	72	96.0	64	56	87.5
VA	154	145	94.2	153	141	92.2	150	138	92.0
VT	238	208	87.4	225	205	91.1	214	189	88.3
WA	329	294	89.4	329	286	86.9	314	272	86.6
WI	822	650	79.1	822	584	71.0	847	474	56.0
WV	72	56	77.8	73	55	75.3	74	55	74.3
WY	58	46	79.3	58	48	82.8	53	37	69.8

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

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

Note: Figures for school years prior to SY 2010-2011 may differ from previous reports due to changes in data submitted by States. 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.

About three-fifths of the LEAs that did not directly certify SNAP participants in SY 2010–2011 are private, and four-fifths 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 might face special challenges in setting up direct certification systems, all are subject to the statutory mandate.

The 2004 Reauthorization Act's phased implementation of mandatory direct certification recognized that the fixed costs of establishing such a system would pose the greatest challenge to small LEAs. Although SY 2010–2011 is the third year that the smallest LEAs were subject to the statutory mandate, these LEAs continue to lag larger LEAs in adopting direct certification, and it remains useful to track the progress of that group separately.

Figure 2 shows estimates by LEA enrollment category of the percent of LEAs that directly certified SNAP participants and the percent of students enrolled in LEAs that directly certified SNAP participants in SY 2010–2011.¹⁵ Use of direct certification is nearly universal for larger LEAs; 99 percent of LEAs with enrollments of 10,000 or more students and 96 percent of those with enrollments of 1,000 to 9,999 directly certified some SNAP participants in SY 2010–2011.¹⁶ Although LEAs with enrollment of at least 1,000 comprise only about one-quarter of all LEAs, they enroll about 92 percent of students nationwide (Figure 3).

Direct certification is less prevalent among smaller LEAs; about 92 percent of LEAs with 500 to 999 students directly certified SNAP participants in SY 2010–2011, whereas the figure was 73 percent for LEAs with fewer than 500 students. Some of the LEAs might not have SNAP-participant children among their enrollment, although it is also possible that technical or administrative challenges are among the reasons that these LEAs did not directly certify any SNAP-participant children. The direct certification numbers for these two groups of small LEAs are a 3 and 4 percentage point improvement over the previous year. Therefore, the gap between the largest LEAs and those with fewer students is narrowing.

¹⁵ LEAs made up entirely of Provision 2 and Provision 3 schools are included in the count of LEAs that directly certified SNAP participants. . Some States, however, do not report these LEAs because these LEAs are not required to do verification activities. 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.

¹⁶ It is possible that some of the remaining large districts operate direct certification systems but certify no SNAP participants. It is also possible, given the limitations of the VSR data, that some of these LEAs are misclassified.

Figure 2. Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants by Enrollment Category, SY2010-2011

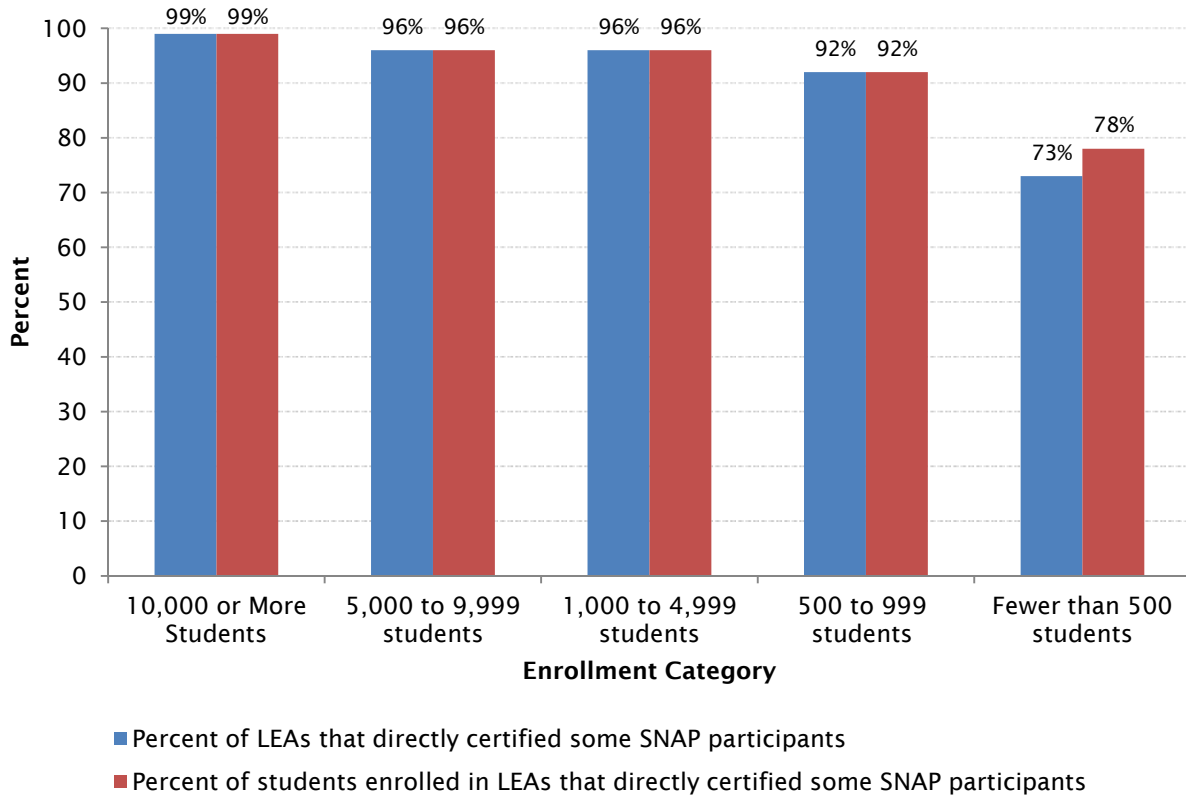
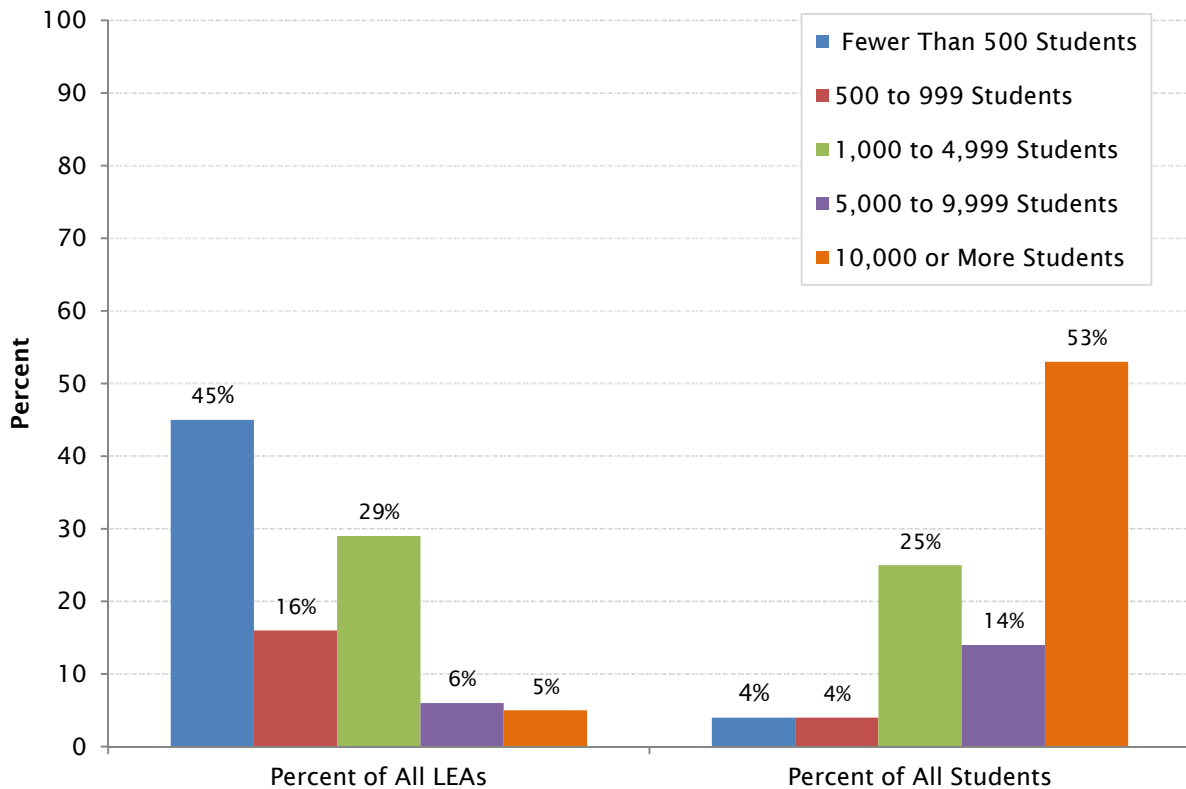


Figure 3. Percent of LEAs and Percent of Students by Enrollment Category, SY2010-2011



Almost 75 percent of all LEAs, approximately 11,000, enroll 1,000 or fewer students (Figure 3). In spite of their great number, these LEAs account for only 8 percent of all enrolled students. Of the 3.9 million students enrolled in these LEAs, the vast majority (3.2 million or 83 percent of all students enrolled in LEAs of 1,000 or fewer students) are enrolled in LEAs that directly certified at least some SNAP-eligible children.

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

Overall, about 2,800 LEAs, about 15 percent of the total, did not directly certify SNAP-participant children in SY 2010–2011 (a decrease from about 3,200 LEAs in SY 2009–2010). Although the NSLA does not exempt small or single-school districts from the direct certification requirement, both groups are overrepresented among LEAs with no directly certified students. Because they tend to be small, the 15 percent of LEAs that did not directly certify any SNAP children enroll only 3 percent of students in NSLP-participating schools.

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

- More than 90 percent of LEAs that directly certified no SNAP participants enrolled fewer than 1,000 students, and 79 percent are single-school LEAs. For comparison, 56 percent of LEAs that did directly certify SNAP participants enrolled fewer than 1,000 students, and 32 percent are single-school LEAs.
- An estimated 61 percent of LEAs that did not directly certify any SNAP students are private LEAs, compared with 13 percent of LEAs that did.
- Of LEAs that directly certified no SNAP students in SY 2010–2011, 6 percent certified no students at all for free meals, either by direct certification or by application. FNS has no reason to believe that this small group of about 166 LEAs is not in full compliance with the direct certification requirement; these LEAs might enroll very few or no children from SNAP-participant households.
- An additional 16 percent of LEAs 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 the 18,000 LEAs that filed VSRs for SY 2010–2011, only 6 percent reported having as low a concentration of low-income students. Some of these LEAs might also be in compliance with the direct certification requirement, although their systems failed to identify any SNAP participants.

IV. DIRECT CERTIFICATION PERFORMANCE

For each State, Mathematica estimates a direct certification performance measure based on three component statistics:¹⁷

1. The number of school-age children in the State’s SNAP-participant households

¹⁷ The derivation of each of these statistics is detailed in Appendix C.

2. The number of SNAP participants directly certified by the State’s LEAs for free school meals¹⁸
3. The number of SNAP participants in the State’s nonbase year Provision 2 or Provision 3 schools

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

This report’s primary measure of State direct certification effectiveness is computed as follows:¹⁹

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

Figure 4 ranks the States according to this performance measure.²⁰ Because each of the component statistics is estimated with some error, the exact percentage values associated with the States should be viewed with caution.²¹ For the 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.

¹⁸ This is proxied by the number of students that LEAs report on the FNS-742 as eligible for free meals but not subject to verification. That number includes, but is not limited to, directly certified SNAP participants.

¹⁹ With this edition of the report we modify the methodology used to estimate the number of SNAP participants. See Appendix C for details.

²⁰ See Appendix Figures A.2 through A.7 for U.S. maps providing a geographic view of these State estimates.

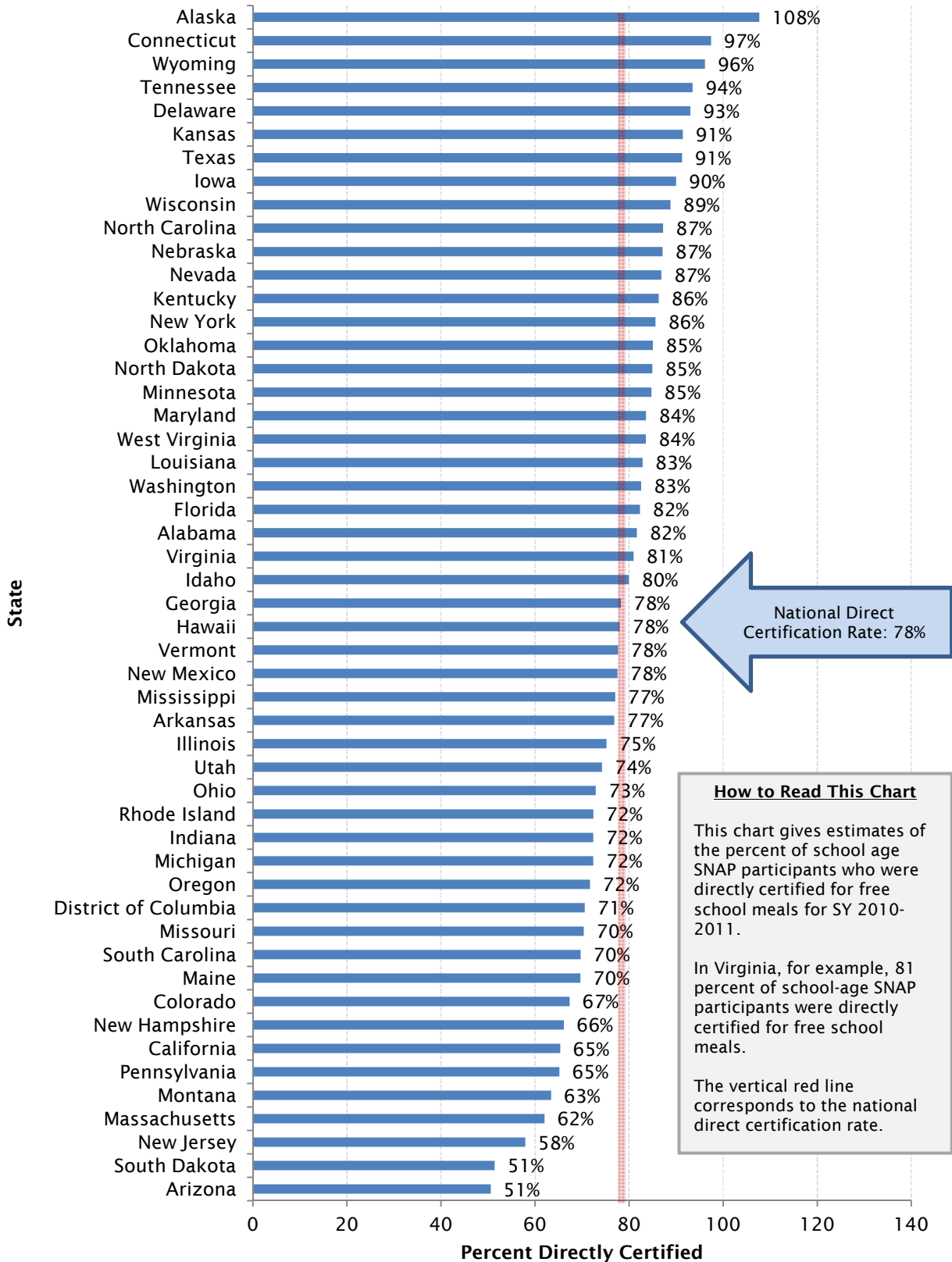
²¹ Estimation error is most obvious when State figures exceed 100 percent. However, the same methodology that overstates the performance of these States likely overstates the performance of other States near the top of the chart. Figures greater than 100 percent can be explained, at least in part, by the fact that TANF participation is commonly used by States and LEAs as a second criterion in their direct certification systems. However, 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 7 presents a more comprehensive measure of the States’ success at certifying all categorically eligible children for free school meals. That measure includes the certification of students based on their status as SNAP, TANF, or FDPIR participants.

Table 2. SNAP Participation, Direct Certifications, and SNAP-Participant Students in Non-Base-Year Provision 2 or Provision 3 Schools, SY 2010-2011 (thousands)

	School-Age SNAP Participants	NSLP Direct Certifications	SNAP Participants in Non-Base-Year NSLP Provision 2 or Provision 3 Schools
US Total	14,000.6	9,891.1	1,285.9
Alabama	281.1	224.4	6.2
Alaska	28.1	24.7	5.2
Arizona	363.4	167.7	32.0
Arkansas	148.9	104.0	13.5
California	1,527.4	768.0	352.6
Colorado	155.8	104.9	0.1
Connecticut	95.0	57.9	35.6
Delaware	41.2	36.8	1.6
District of Columbia	33.6	12.0	16.6
Florida	863.4	706.8	4.8
Georgia	588.7	444.6	20.7
Hawaii	42.2	32.9	0.0
Idaho	71.6	56.6	0.7
Illinois	564.9	419.3	7.3
Indiana	276.7	193.1	9.8
Iowa	99.8	88.1	1.9
Kansas	89.7	82.0	0.0
Kentucky	233.9	200.9	1.0
Louisiana	284.7	235.9	0.0
Maine	66.9	46.4	0.3
Maryland	186.9	156.1	0.2
Massachusetts	226.3	128.2	19.7
Michigan	542.0	392.2	0.0
Minnesota	147.5	124.3	0.9
Mississippi	204.6	148.3	12.1
Missouri	295.2	207.6	0.1
Montana	33.3	17.8	5.3
Nebraska	54.4	47.0	0.4
Nevada	98.9	82.2	4.3
New Hampshire	33.7	22.3	0.0
New Jersey	234.8	135.8	0.3
New Mexico	128.6	44.4	71.3
New York	906.5	533.9	282.8
North Carolina	474.3	413.7	0.0
North Dakota	18.5	12.4	4.0
Ohio	529.6	373.7	17.1
Oklahoma	193.9	158.4	7.6
Oregon	199.2	142.3	0.6
Pennsylvania	422.1	263.3	18.1
Rhode Island	42.6	29.1	2.4
South Carolina	271.4	189.2	0.0
South Dakota	32.3	12.3	8.4
Tennessee	387.5	361.1	1.4
Texas	1,457.5	1,052.1	304.7
Utah	97.4	71.3	1.4
Vermont	21.9	16.9	0.1
Virginia	257.9	207.9	1.1
Washington	290.5	232.4	9.0
West Virginia	95.9	80.1	0.0
Wisconsin	247.0	217.6	2.0
Wyoming	11.3	10.2	0.7

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

Figure 4. Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals, SY2010-2011



Note: The percentages in this figure are equal to the ratio of directly certified students, and other free-eligible students whose applications are not subject to verification, to all SNAP-participant school-age children. Figures above 100 percent can be explained, in part, by the fact that many LEAs directly certify TANF and FDPIR participants in addition to SNAP-participant students. TANF and FDPIR students are included in the numerator of this computation, although the denominator includes only SNAP participants. See Appendix C and Appendix D for a discussion of data sources and data limitations.

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

Measurement and State reporting error minimize the significance of small differences in the percentage point scores of States that fall near each other in Figure 6, but the wide gap between States near the bottom of the chart and those near the top makes clear that some States' direct certification systems are simply less effective than other States' systems. Among States and LEAs that rely on computer matching, variation in direct certification effectiveness might be explained in part by differences in matching algorithms, use of probabilistic matching, the nature and quality of data used as input into the matching process, procedures for handling nonmatches, access to a supplemental student-level look-up system, or other system characteristics.²²

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

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 6 compares SY 2010–2011 State-level measures of direct certification effectiveness (from Figure 4) to the same measures computed with SY 2009–2010 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.²⁴

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

²³ See table A.4 for a listing of States by FNS administrative region.

²⁴ Some of the percentages in Figure 6, particularly those near the top and bottom of the chart, are due, at least in part, to factors unrelated to the States' direct certification performance. These factors include corrections to prior year VSR reporting, possible errors in current year reporting, and the technical characteristics of the performance estimate itself. For example:

- About half of the percentage gain reported for Connecticut is due to the inclusion of data for one large LEA in SY 2010-2011 that did not submit VSR data in past years. That LEA did not submit VSR data in the past because all of its schools were operating in non-base years under Provisions 2 or 3; the LEA had no applications subject to verification, and did not submit VSR data to the State.
- Nebraska's gain is due in part to an incomplete direct certification count for SY 2009-2010.
- In the case of the District of Columbia (D.C.), several Provision 2 or Provision 3 schools entered their first non-base year in SY 2010-2011. Applying the methodology described in Appendix C, subsection C, we estimate that 90 percent of the students certified as free-eligible in those schools' last base year (SY 2009-2010) are SNAP participants, and we remove them from the SNAP participant count in the denominator of our direct certification performance measure equation. Any error in that SNAP participant adjustment will be reflected in D.C.'s current year performance measure, and in the year over year change in Figure 6. Note that the same applies to any State with students in Provision 2 or Provision 3 schools not operating in a base year.

Figure 5. Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals by Region, SY2010-2011

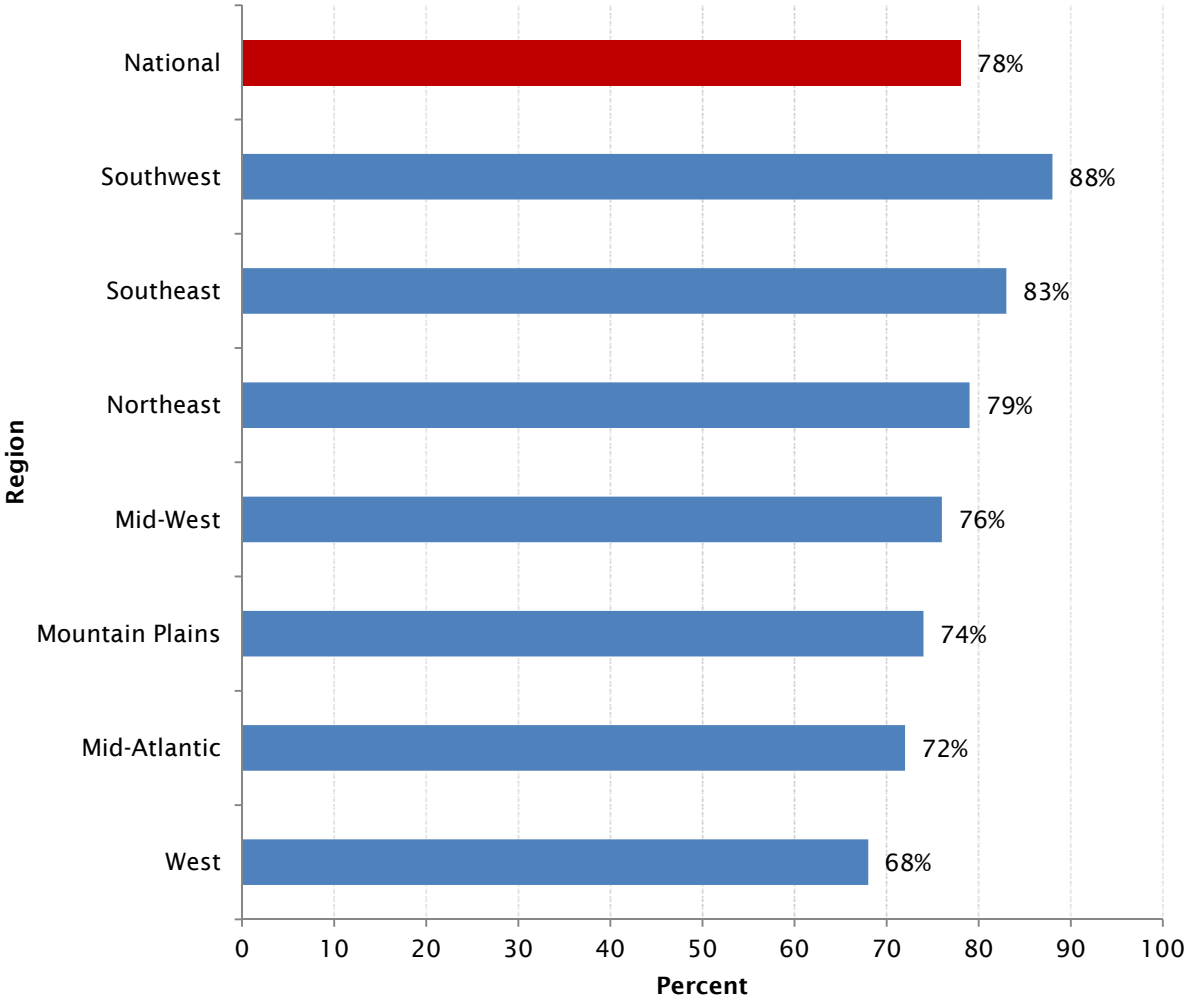
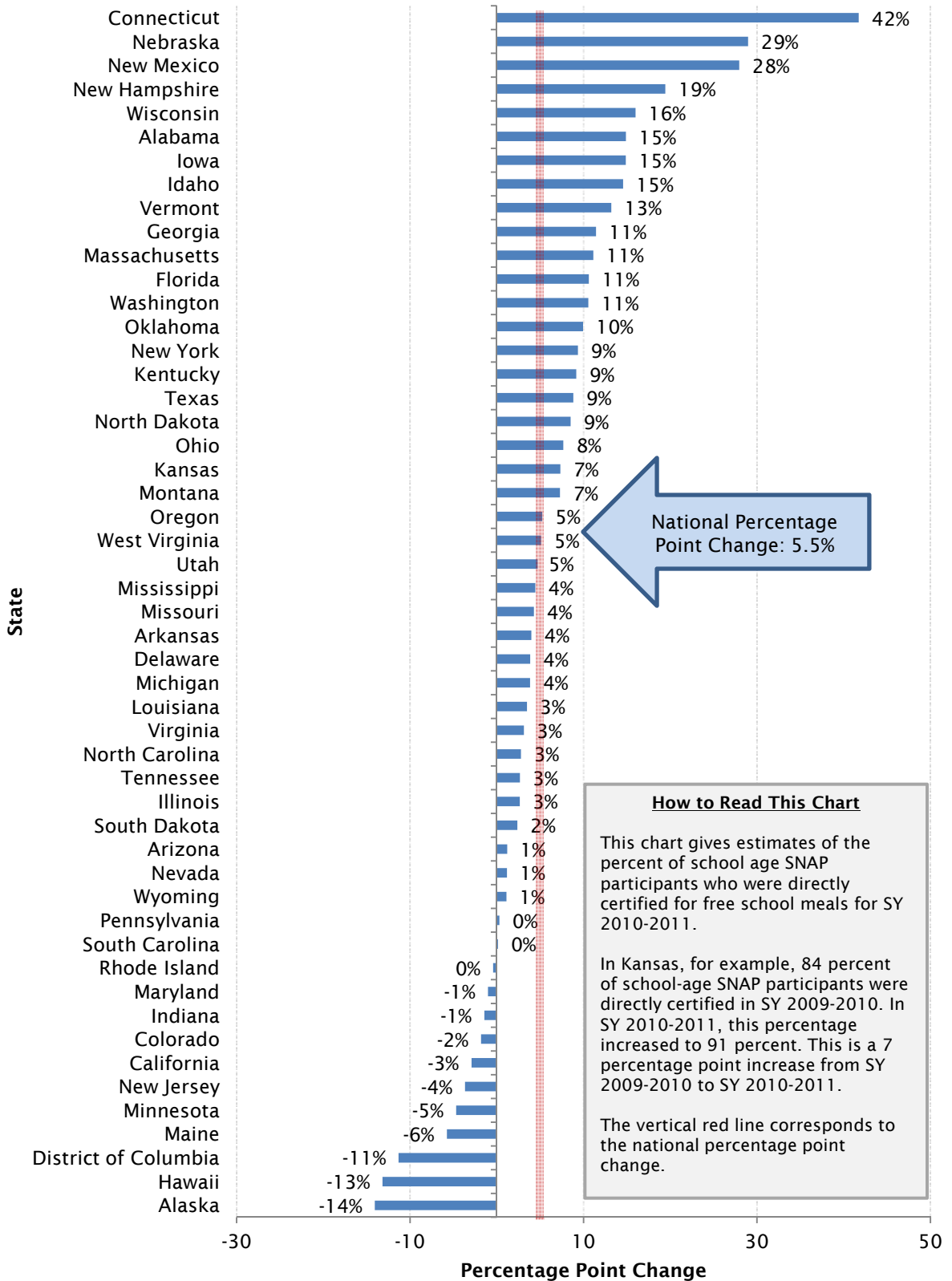


Figure 6. Percentage Point Change in the Share of SNAP-Participant Children Directly Certified for Free School Meals, SY2009-2010 to SY2010-2011



Note: Some year-to-year changes in share of SNAP-participant children directly certified for free school meals, particularly the extreme changes at the top and bottom of this figure, can be attributed to factors other than direct certification performance, such as State reporting error and methodological limitations of the performance measure. See footnote 24 for specific examples of these issues.

Like the numeric values in Figure 4, the values in Figure 6 are best viewed as relative measures between States rather than absolute measures of improved direct certification performance across years.²⁵

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

The measure starts with the number of students whose eligibility for free school meals is not subject to verification. This is the same proxy measure of directly certified SNAP participants used earlier. Added to this are the students whose approval for free school meals is based on the household's submission of a SNAP, TANF, or FDPIR case number on an NSLP application.²⁶ The sum of these two numbers, the numerator in the equation below, is the population of students that are recognized by LEAs as categorically eligible for free school meals.²⁷ This number excludes children who are not identified as categorically eligible, but could 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.²⁸ The number of children who receive FDPIR benefits is estimated from FNS program and survey data.²⁹

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

²⁶ All of this information is taken, as above, from LEA VSRs.

²⁷ Some children might not be identified as categorically eligible even if they are current recipients of SNAP, TANF, or FDPIR benefits. These students might be missed by the States' direct certification systems. Others might fail to submit SNAP, TANF, or FDPIR case numbers on paper applications for free meals. Some of these children are nevertheless certified for free meals based on income information submitted by application. Others are misclassified as ineligible for free meals.

²⁸ 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 nonbase year Provision 2 or Provision 3 schools.

²⁹ The FDPIR population survey is discussed in Usher, et al. (1990). See Appendix D for a discussion of data limitations. Note that FDPIR households may not simultaneously participate in SNAP. No adjustment is made for FDPIR (or TANF) participants who attend nonbase year Provision 2 or Provision 3 schools.

Details of this computation are summarized in the following equation. The two statistics in the numerator and the sum of the values in the denominator are given for each State in Table 3. Figure 7 displays the same data graphically.

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

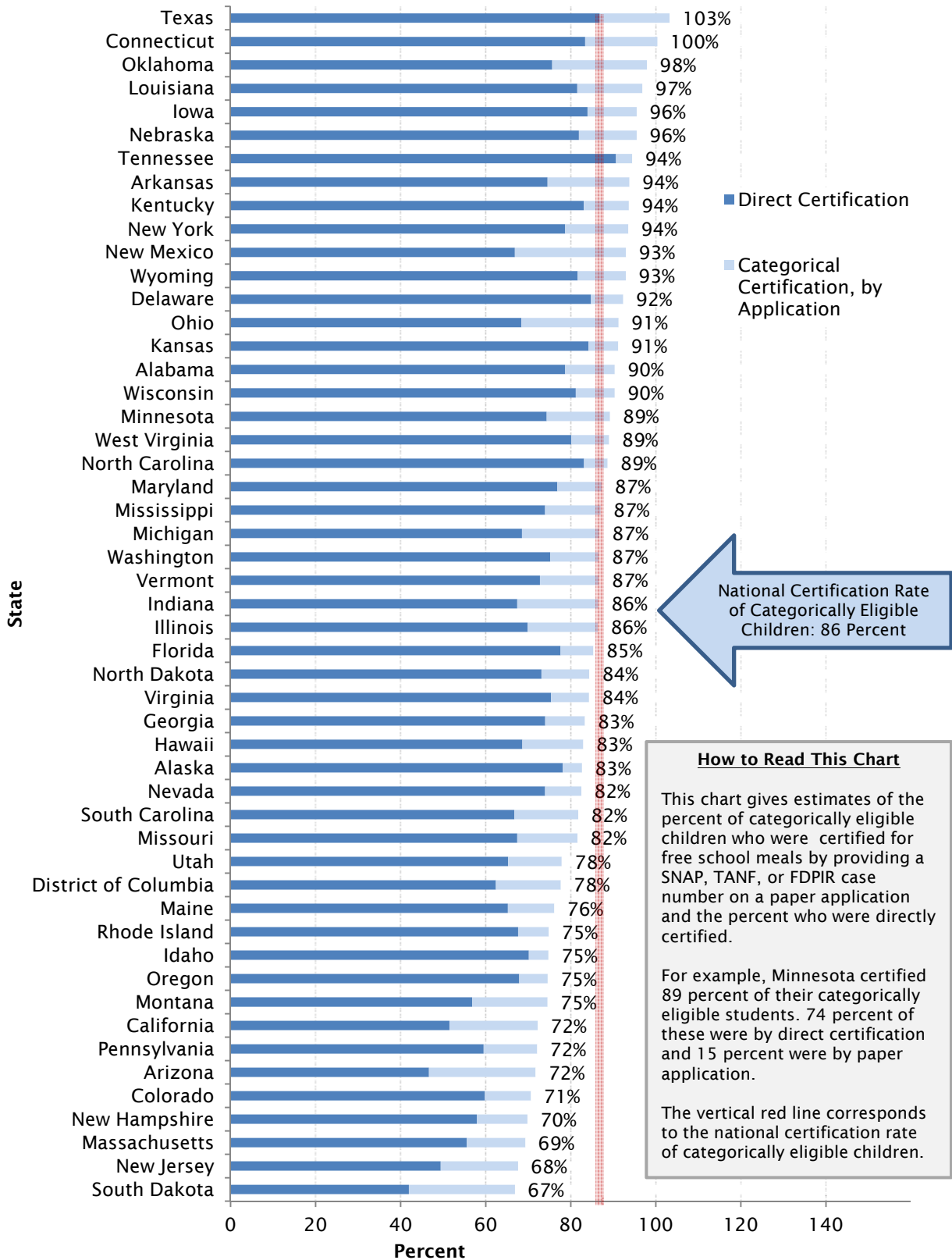
The 17 States at the top of Figure 7 certified at least 90 percent of students who were categorically eligible for free meals based on their participation in SNAP, TANF, or FDPIR. States at the bottom of Figure 7 are the least successful at identifying and certifying these children.³⁰

³⁰ See Appendix Figures A.6 through A.9 for U.S. maps providing a geographic view of these State estimates.

Table 3. Categorically Eligible Students: Number Directly Certified and Number Approved by Application, SY 2010-2011 (thousands)

	Number of Children Identified as Categorically Eligible	Directly Certified	Categorically Eligible, Approved by Application
US Total	13,874.3	9,891.1	1,984.6
Alabama	285.2	224.4	33.2
Alaska	31.7	24.7	1.4
Arizona	359.4	167.7	90.1
Arkansas	139.5	104.0	26.9
California	1,491.9	768.0	309.3
Colorado	175.3	104.9	19.0
Connecticut	69.4	57.9	11.8
Delaware	43.5	36.8	3.3
District of Columbia	19.3	12.0	2.9
Florida	910.9	706.8	70.5
Georgia	600.8	444.6	56.0
Hawaii	47.9	32.9	6.9
Idaho	80.8	56.6	3.7
Illinois	600.2	419.3	99.0
Indiana	286.5	193.1	54.6
Iowa	104.9	88.1	12.1
Kansas	97.4	82.0	6.8
Kentucky	241.9	200.9	25.7
Louisiana	289.4	235.9	44.3
Maine	71.1	46.4	7.8
Maryland	203.2	156.1	21.3
Massachusetts	230.8	128.2	31.9
Michigan	572.4	392.2	104.2
Minnesota	167.2	124.3	24.9
Mississippi	200.5	148.3	26.2
Missouri	308.1	207.6	43.7
Montana	31.3	17.8	5.5
Nebraska	57.4	47.0	7.8
Nevada	111.1	82.2	9.5
New Hampshire	38.5	22.3	4.6
New Jersey	274.9	135.8	50.1
New Mexico	66.4	44.4	17.3
New York	678.5	533.9	100.7
North Carolina	497.8	413.7	27.7
North Dakota	16.9	12.4	1.9
Ohio	546.5	373.7	125.0
Oklahoma	209.4	158.4	46.6
Oregon	209.7	142.3	14.0
Pennsylvania	442.4	263.3	55.6
Rhode Island	43.1	29.1	3.1
South Carolina	283.4	189.2	42.6
South Dakota	29.3	12.3	7.3
Tennessee	398.5	361.1	15.3
Texas	1,211.7	1,052.1	199.2
Utah	109.2	71.3	13.8
Vermont	23.2	16.9	3.2
Virginia	275.9	207.9	24.7
Washington	309.2	232.4	35.5
West Virginia	100.0	80.1	8.9
Wisconsin	268.0	217.6	24.5
Wyoming	12.5	10.2	1.4

Figure 7. Percent of Categorically Eligible Children Certified for Free School Meals, SY2010-2011



Note: The percentages in this figure are equal to the ratio of categorically eligible students certified for free meals by application, directly certified students, and other free-eligible students whose applications are not subject to verification, to all SNAP-, TANF-, and FDIPIR-participant school-age children. Figures above 100 percent can be explained, in part, by inaccurate VSR reporting and inaccurate estimates of SNAP-, TANF-, and FDIPIR-participant school-age children. See Appendix C and Appendix D for a discussion of data sources and data limitations.

V. DIRECT CERTIFICATION BEST PRACTICES

The Food, Conservation, and Energy Act of 2008 (P.L. 110-234) requires a discussion of best practices 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 (CN) administrators and direct certification experts and to host a roundtable discussion among FNS, Mathematica, and CN officials from several States with successful direct certification programs.

States were included in the best practice portion of the study on the basis of the direct certification performance measure described in Section IV—the percentage of school-age SNAP-participant children directly certified for free school meals. Successful State direct certification programs were identified as those with either (1) the highest percentage of eligible children directly certified during school year (SY) 2010–2011 or (2) the largest improvement in the percentage of eligible children directly certified compared with the previous school year.

Six States participated in interviews for this review: Alabama, Connecticut, Delaware, North Dakota, Texas, and Wisconsin. Delaware and Texas are among the top 10 States in direct certification performance. Alabama and North Dakota are among the top 10 States in terms of improvement in direct certification performance. Connecticut and Wisconsin are among the top 10 States in terms of both performance and improvement. Representatives from all six of these States, plus Oklahoma and Washington, participated in the roundtable discussion.

Two experts on direct certification information technology (IT) and processes provided their perspectives on best practices. One oversees direct certification for Meriden Public Schools in Connecticut, a State that performs direct certification at the district level. Meriden was identified as one of the exemplary districts in terms of direct certification process and performance. The other expert is the product manager for the direct certification matching tool maintained by North Dakota’s centralized Information Technology Department (ITD), which provides statewide IT services to all agencies.

The remainder of this chapter includes a description of State practices in Section A; recent and planned strategies for improving direct certification in Section B; best practices in implementing direct certification systems in Section C; and best practices in addressing changes in legislation and policy for direct certification in Section D.

A. Description of State Practices

The primary goal of direct certification is to identify children in SNAP-participant households and certify them as eligible for free school meals without application. States may also use information about children enrolled in qualifying TANF programs, where available.³¹ Methods for

³¹ TANF information can be used for direct certification of children for free school meals only in states with TANF income eligibility criteria comparable with or more restrictive than those in effect on June 1, 1995 (P.L. 104-193), when the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) replaced Aid to Families with Dependent Children with TANF. All States interviewed use both SNAP and TANF program data for direct certification.

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 LEAs; (2) district-level matching, whereby a State agency distributes SNAP data to LEAs and LEAs match these data with student enrollment; and (3) the letter method, whereby a State agency or LEA sends letters to SNAP-participant households, which then take the letter to their schools in lieu of a school meal benefit application.³² Methods of direct certification vary considerably, even among States with successful programs. Our review of State systems is similar to the reviews conducted in previous years, focusing on five key questions about direct certification:

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

This year, we also asked States about several additional issues: (1) whether and how States calculate their own direct certification performance; (2) the potential for States to use Medicaid or foster care children data for direct certification; and (3) role of the State in monitoring LEAs' participation in direct certification. We collected data on direct certification for foster children because the Healthy, Hunger Free Kids Act of 2010 (P.L. 111-296; December 13, 2010) made foster children categorically eligible for free school meals and encouraged use of direct certification procedures with courts and agencies to identify these children without further application by the foster family.

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

State- or District-Level Matching

Four of the States included in this review use a State-level matching process: Delaware, North Dakota, Texas, and Wisconsin. The remaining two States, Alabama and Connecticut, use district-level matching. The key distinctions between State- and district-level matching include the following:

- **State-level matching.** With State-level matching, a State agency (usually the CN agency) is responsible for a system that matches a list of children attending schools participating in the NSLP with a list of children in SNAP households using a common identifier or identifiers. This system can be set up in a variety of ways. Some examples include:
 - A State agency matches State enrollment information with a State list of children in SNAP households. A list of students directly certified on the basis of this match is forwarded to districts.

³² See Cole and Logan (2007).

Table 4. Characteristics of the Direct Certification Matching Process for Public LEAs in Select States, SY 2010–2011

State	Who Performs Match?	How Does Direct Certification Work?	Approach for Unmatched Students?	Frequency of Direct Certification	Self-Assessment of Performance
Alabama	District	For 2010-2011, the State assembled a statewide file containing SNAP and TANF recipients and then put the file on a secure website. Public and private districts were able to download these data and import them for matching into their point-of-sale (POS) system. ^a	District discretion	Monthly	None
Connecticut	District	Connecticut Department of Social Services provides log-in information to districts to download SNAP and TANF data. Districts download and import data into their POS systems ^a to apply individual matching rules.	District discretion	Twice a year	None
Delaware	State	Delaware HHS sends SNAP and TANF data each month to Dept. of Ed IT staff, who implement a set of matching procedures to identify exact and possible matches with the student database. Exact matches are directly certified. Possible matches are sent back to HHS, which then verifies students who should be matched. Foster care data comes from another agency and are matched as part of a separate process.	List of unmatched students is matched weekly against updated enrollment list	Weekly	None
North Dakota	State	Student enrollment data are uploaded into data matching hub, used by Department of Human Services (DHS) and matched with SNAP and TANF data. Matches are made and broadcast to school district via email. Districts confirm matches and notify households. Partial matches are identified and scored and then put into a resolution queue, where they are resolved manually by Child Nutrition (CN) staff.	Unmatched children are sent to the five closest school districts based on child’s zip code; email notification to private districts for unmatched children	Continuous starting in August	Percentage of enrolled students directly certified
Texas	State	Texas Department of Education receives data from state HHS agencies (SNAP and TANF) that are then matched with student enrollment data by the Department of Education. Students must match on 4 data elements among SSN, first name, last name, gender, and DOB. Matched student lists are placed on the system for LEAs to download.	None	Monthly	Percentage of enrolled students directly certified
Wisconsin	State	Wisconsin uses a web based system in which schools upload an enrollment file and then receive a list that identifies whether or not the system was able to match the students on the enrollment file to TANF or SNAP records. The system was developed by the Department for Children and Families (DCF).	None	At school discretion; up to weekly	None

DOB = date of birth; HHS = Health and Human Services; LEA = local education agency; SNAP = Supplemental Nutrition Assistance Program; SSN = Social Security number; SY = school year; TANF = Temporary Assistance for Needy Families.

^a The term “point-of-sale system” refers to the system for processing school meal transactions. These systems often store students’ school meal benefit status electronically.

- The State agency conducts an initial match. A list of matched students is sent to districts, which then verify the matches, obtain further information on students who are potential matches, or conduct other types of secondary matching.
- Districts upload enrollment information into a State-maintained computer or web-based system that conducts a match against a list of children in SNAP households. Students are directly certified on the basis of this match.
- **District-level matching.** With district-level matching, LEAs have primary responsibility for matching a list of children enrolled in their schools with a list of children in SNAP households using a common identifier or identifiers. Some States using district-level matching provide districts with a list limited to children in SNAP households living in the district's geographic area while others provide a full statewide list. Districts may use manual methods or their own computer systems to conduct matching.

The four States that use State-level matching each have relatively small school districts that do not coincide with county boundaries. In these States, it would be burdensome for all LEAs to develop and implement a matching process due to staffing or other resource constraints. In some cases, it would be difficult to divide the statewide file of SNAP/TANF children into files that correspond to individual LEAs. These States cited the gains in efficiency and accuracy of a State-level match.

North Dakota introduced its State-level electronic matching and notification system in SY 2010–2011; State officials attribute the large improvement in direct certification performance to the new system. Wisconsin also updated its system for SY 2010–2011. Key changes include a simplified interface, a more flexible system for uploading enrollment data, and a thorough documentation and training manual. Texas has used the same system generally since the late 1990s, with revisions related to the frequency of matches and the introduction of a two-step matching process for partial matches. The Delaware system has been in place for five years; State officials attribute success to the efficiency of the State-level system in linking students across agencies and the ease with which districts can reliably use the system.

Alabama and Connecticut use district-level matching. For SY 2010–2011, Alabama and Connecticut provided a statewide SNAP and TANF file monthly to all the districts, including private schools, on a secured website for download. Connecticut also supplements its direct certification process by using the letter method twice a year. Although both Alabama and Connecticut believe that districts have the incentives and detailed knowledge of student circumstances to make district-level matching successful in their States, both States are exploring the efficacy of centralizing some elements of their direct certification processes.

The Matching Process: Algorithms and Identifiers

In SY 2010–2011, all six States in this review used electronic matching algorithms. All six States used students' names (first and/or last) and dates of birth as identifiers in the direct certification matching process. Three of the six States reported using Social Security numbers (SSNs) 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, identifiers, and geographic level of data used to form the match.

a. Matching Process for States with State-level Matching

In Delaware and Texas, the respective State departments of education conduct the State-level match of SNAP/TANF data to student records by using software developed, at least in part, with internal department resources. North Dakota and Wisconsin use systems developed and maintained by the North Dakota Department of Human Services (DHS) and the Wisconsin Department of Children and Families (DCF), respectively. Delaware, North Dakota, and Texas use statewide SNAP/TANF data and statewide student enrollment data files for the matching process. In Wisconsin, where there is no statewide student enrollment file, each LEA is responsible for uploading a separate, district-level student enrollment file into the State-level direct certification system, which is then matched on the statewide SNAP/TANF data file.

All four States using State-level matching mentioned the importance of strong, in-house programming and IT resources in developing their matching systems. There is also some commonality in the criteria used in assigning matches (see Table 5). All but one State (Texas) distinguishes between definite matches (which are directly certified automatically) and potential matches (which can be directly certified based on further, manual investigation). Additionally, all but one State (North Dakota) requires exact matches on the primary identifiers to determine a definite match.

In SY 2010–2011, North Dakota began using a data matching system that has a tailored, probabilistic matching algorithm that provides a score indicating the likelihood of a match. Scores higher than a certain threshold for definite matches are directly certified. Scores below the threshold for definite matches but above a second threshold are considered potential matches subject to further review by CN staff.

Delaware bases the matching algorithm on SSN (if available), first name, last name, gender, date of birth, and race. If all identifiers match exactly, the match is deemed definite and directly certified. Partial or probable matches in which not all identifiers are matched exactly or with slight variation in some fields are classified as probable matches to be investigated manually by the State.

In Wisconsin, LEAs upload their student enrollment information into the State-level direct certification system and the system matches using first name, last name, and date of birth. Exact matches on all three identifiers are considered a definite match. Students with matches on certain variations of these identifiers (such as first three letters of first name or last name, and transposed date of birth), are considered potential matches. The system provides schools with a list of potential matches to investigate further. These investigations to resolve potential matches can include follow-up with program administrators or the family (by letter or telephone) or other measures the school deems appropriate.

Texas employs a monthly two-step direct certification match process. In the first step, students can be directly certified based on an exact match of SSN and on three of four additional identifiers (first name, last name, date of birth, and gender). In the second step, students can be directly certified based on an exact match of all four additional identifiers. After the matching process is complete, direct certification results are made available to LEAs for download. LEAs then notify the households.

Table 5. Primary Matching Criteria for States that Use State-level Matching

	Delaware	North Dakota	Texas	Wisconsin
First Name	○	○	●	○
Last Name	○	○	●	○
Middle Initial				
Date of Birth	○	○	●	○
Social Security Number	○		●	
Gender	○	○	●	
Race	○			
Address		○		

Notes: ● Exact match can be used in identifying a definite match (without a match, other criteria can be used to identify a definite match).
 ○ Exact match can be used in identifying a definite match; inexact match can be used to identify a potential match.
 Absence of symbol indicates that criterion is not used or not available.

b. Matching Process for States with District-Level Matching

Alabama and Connecticut provide SNAP and TANF enrollment information to LEAs, which are then responsible for conducting direct certification matching. Table 6 summarizes the direct certification data available to LEAs in these States. Both Alabama and Connecticut make available to LEAs an electronic file of children enrolled in both SNAP and TANF for the entire State. These files are available for download on secured sites maintained by the respective States. In Alabama statewide program data are available monthly, but LEAs can download the data at their discretion. Before SY 2010–2011, Alabama provided LEAs with a zip code-specific file once before the school year. In Connecticut, statewide program data are made available twice a year. That both Alabama and Connecticut make available statewide program data to all districts reduces the potential for distributing SNAP or TANF records to the wrong LEAs; distributing records to the wrong LEA would prevent direct certification of some eligible students. However, the larger, full-State file can present problems to smaller LEAs that do not have the technical infrastructure or processes to handle a large file.

Alabama provides LEAs with a file that includes SSN, first name, last name, middle initial, date of birth, address, race, gender, eligibility type (either SNAP or TANF), guardian’s first name, guardian’s last name, and guardian’s middle initial. All LEAs use electronic matching, although the quality of matching and the use of available identifiers vary across LEAs. Some districts match only on SSN, whereas others incorporate more fields. Starting in SY 2011–2012 Alabama will require matches on first name, last name, and SSN, among other changes.

Table 6. Data Available for States in Which Districts Do the Matching

	Alabama	Connecticut
File Allows for Computerized Matching?	✓	✓
TANF Participation Provided?	✓	✓
Social Security Number	✓	—
First Name	✓	✓
Last Name	✓	✓
Date of Birth	✓	✓
Address	✓	✓
Parent Name	✓	✓
Gender	✓	✓
Race	✓	—

Note: ✓ Indicates yes.
 — Indicates no.

TANF = Temporary Assistance for Needy Families.

Connecticut provides LEAs with a data file containing the following identifiers for SNAP/TANF children: first and last names, date of birth, address, parent’s first name, parent’s last name, parent’s date of birth, parent’s address, and client ID. LEAs log in to the system, download the data file, and edit and load the data into their point-of sale (POS) systems to perform the matches.³³ As with Alabama, Connecticut does not require LEAs to match on certain fields although it does provide technical assistance.

Methods to Directly Certify Unmatched SNAP/TANF Children

Most of the States interviewed for this review have methods (formal and informal) to directly certify those students who are not directly certified through the initial match procedure. Although these methods vary, the most commonly used are measures that identify students as potential matches to children listed on SNAP or TANF files and who may be directly certified with further investigation.

North Dakota and Delaware have formal procedures designed to improve direct certification rates above their initial match rates. North Dakota estimates that 10 to 20 percent of matches are based on resolving potential matches and other methods related to unmatched students. In addition to the system for dealing with potential matches (described in the previous section), North Dakota has a process for directly certifying unmatched students. Lists of unmatched school-age children are sent to the five closest school districts based on the child’s zip code. Those districts then confirm enrollment. Those not confirmed by the districts are sent back to the State for additional research. Delaware has a system for dealing with potential matches (described in the previous section) and one for dealing with remaining unmatched students. Specifically, the State compares lists of unmatched children to updated enrollment lists weekly through scheduled matching routines.

³³ Not all LEAs in Connecticut have point-of-sale systems to perform computer matching.

Wisconsin also has a system for identifying potential matches, but does not have a formal method for dealing with children who are neither definite nor potential matches.

In Connecticut and Alabama there is no formal guidance given to LEAs for certifying unmatched children; however in both States some districts do perform additional manual matches to directly certify students who were not matched through the initial process. In Connecticut, unmatched students may also be directly certified via the letter-method.

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. All States conduct direct certification 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 during the school year.

A single direct certification match performed near the beginning of a new school year enables States to directly certify only children who are eligible before 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 more continuous and dynamic process.

In States with State-level matching, the frequency of direct certification varies. The LEAs in North Dakota upload an initial student enrollment list to the statewide student enrollment system at the beginning of the school year. LEAs can then update the enrollment files in the system at any time during the school year. The SNAP/TANF data are continuously updated throughout the year and matching is conducted nightly. Texas conducts the initial match of student enrollment lists and SNAP/TANF data in July, followed by monthly matches throughout the school year. In Wisconsin, the individual LEAs upload their student enrollment data to the direct certification system in July through a secure web portal. This system links SNAP/TANF data to the uploaded student enrollment data. Program data in the system are updated weekly and direct certification matching can be done on a weekly basis. The actual matching frequency depends on how often districts upload updated student enrollment data. In Delaware, matches take place monthly throughout the year as SNAP/TANF participation data are updated. In addition, Delaware conducts weekly matches of unmatched children with updated student enrollment data.

The two States with district-level matching had different approaches to the frequency of direct certification matching. In Alabama, SNAP/TANF data are updated monthly and LEAs are given discretion about how often the program data is downloaded and matched (some LEAs are more proactive than others). In Connecticut, LEAs provide program participation data to LEAs twice a year (in August and February). The State also performs direct certification via the letter method twice a year.

Direct Certification Process for Nonpublic and Charter Schools

Nonpublic and charter schools present special challenges for the direct certification process. Both nonpublic and charter schools are schools of choice, often without defined enrollment areas for prospective students. They are also generally smaller entities, compared with public school districts. In addition, nonpublic schools do not receive public funding and therefore are not governed by the same regulations and reporting requirements present in public schools. Charter

schools may either establish themselves as independent reporting agencies or be affiliated with an LEA, which acts as an authorizing agency for reporting purposes.

In one of the four States with State-level matching systems (Wisconsin), both charter school and nonpublic school students are included in the direct certification match the same way as public school students (Table 7). Both Texas and Delaware include charter school students as part of the statewide match, but have differing methods for the treatment of nonpublic schools. In Texas, nonpublic school students are not centrally managed and thus are not included in the statewide match; private schools use the letter method instead. Delaware conducts a statewide match once annually using nonpublic schools’ enrollment lists. The State is considering increasing the frequency of nonpublic school matches to three times a year. In North Dakota, where there are no charter schools, very few nonpublic schools participate in the State-level direct certification process. A handful of private schools partner with nearby public schools and are included in the regular direct certification match.

States using district-level matching (Alabama and Connecticut) have similar approaches to incorporating nonpublic and charter schools. Alabama nonpublic schools (there are no charter schools in Alabama) participate in the direct certification matching process the same way as public schools do—by downloading a statewide file of program data and performing the matches at their discretion. Similarly, charter and nonpublic schools in Connecticut have the same access to the program data provide from DSS to download and apply their matching method.

Table 7. Direct Certification Methods for Nonpublic Schools

State	Direct Certification Process for Nonpublic Schools (NPS)
Alabama	Private schools have access to the same state program data as public schools. Alabama does not have charter schools.
Connecticut	Private schools and some charter schools will participate in the same process as public schools beginning in school year 2011-2012.
Delaware	Charter schools use the same system as traditional public schools. Private schools send enrollment lists to the State for matching once annually.
North Dakota	Some private schools partnered with nearby public schools to participate in the State direct certification system. Email notifications are sent of unmatched children to private schools that are in close proximity of the unmatched child’s zip code.
Texas	Charter schools are included in the State student enrollment database. Private schools are not centrally managed and not part of the system. Private schools use the letter method.
Wisconsin	Private and charter schools participate in the State’s web-based direct certification system in the same way as traditional public schools.

B. Recent and Planned Strategies for Improving Direct Certification

Effective and/or improved direct certification systems characterize the States selected for this review. These States indicated that improvements can be linked to the following changes in the direct certification process:

- North Dakota introduced an updated electronic State-level match system in SY 2010–2011. In previous years, North Dakota used the letter method and before this year used a simplified State-level matching process that performed matches only twice a year. North

Dakota used direct certification grants to help fund its State-level direct certification system and assist in post-implementation technical assistance.

- Texas has a long history of conducting direct certification and attributes much of its high match rate to having a straightforward system that districts are comfortable using. In addition, Texas cites increasing frequency of matches as an important change in the system.
- Wisconsin updated its system for SY 2010–2011 from an older system that had implementation problems and was difficult to use. The revisions to the system were in response to problems identified by schools and other users with the older system. Three main changes to its system were seen as contributing to the improvement in the direct certification rate: (1) a simplified interface, including clearer, simpler directions and easier to use functions; (2) a more flexible process for uploading different types of enrollment data; and (3) a thorough documentation and training manual.
- Delaware attributes much of its success in direct certification to the ability to match children in its enrollment data to a wide variety of program data through the linking of a child to a unique ID. This ID allows the student to be tracked throughout the State systems and makes the matching process more efficient.
- Alabama cited the ease of use of its system in downloading the statewide program data file and the LEAs' motivation in using the program data for direct certification rather than paper applications, which are more time-consuming and burdensome. Alabama suggests that LEAs performing direct certification matches have reduced paperwork up to 75 percent.
- Connecticut believes its improved performance was due to increased training and technical assistance provided to the districts, particularly in addressing reporting issues on the districts' verification summary reports. The State also cited greater use of electronic matching by districts in SY 2010–2011.

Future Improvements

Most States included in this review have made, or plan to make, changes to the direct certification systems used in SY 2010–2011. As a result, they anticipate additional improvement in direct certification rates documented in this report:

- North Dakota plans to upgrade its system by implementing a look-up search tool for SY 2011–2012. The State also plans to encourage LEAs to provide address information in their enrollment data to help identify students in eligible households. In the longer term, North Dakota plans to implement a longitudinal data system project that will enable it to upload data from each school district directly (as opposed to districts uploading information currently).
- Texas also is considering updating enrollment data more frequently and is considering adding a look-up feature to its system

- Delaware is considering implementing an increase in match frequency with its nonpublic schools from one to three times a year.
- Starting in SY 2011–2012, Alabama will incorporate the program participation information into the State student management system, which is already used for other purposes. The State will then conduct matches based on first name, last name, and SSN, and potential matches will be listed. The system will also incorporate foster care data starting in July 2011.

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

C. Best Practices in Implementation of Direct Certification Systems

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

A consistent theme among the State-level matching States was the importance of strong relationships with other agencies within the State that provide the necessary program data. Each State cited this as an important factor in either strengthening its direct certification approach or in the development of a new system. For some States, that relationship enables the State to use existing systems in these agencies for purposes of direct certification, thus leveraging resources to manage enhancements and improvements in house. For example, North Dakota cites this advantage as well as building and fostering relationships to establish an interagency group of people devoted to direct certification. This cohesion leads to statewide buy-in that gives States the control and flexibility, both financially and operationally, that contribute to their success. This collaboration among agencies is also particularly important to Wisconsin because it does not own any of the data used to directly certify eligible students. Officials in Wisconsin emphasized the importance of existing, strong working relationships between relevant agencies in building the direct certification system into an existing State cross-agency data system.

Both Texas and Delaware also highlighted the importance of having good relationships with other agencies involved in the direct certification process. Texas, in which the Department of Agriculture conducts the matching, credited strong relationships with the Departments of Education, Family and Protective Services (DFPS), and Health and Human Services (HHS) as critical to its success. Texas officials believe that great partnerships lead to better cohesion and trust in the integrity of data that comes from the agencies. Delaware's CN director is very focused on a high level of collaboration of agencies and the political will/organizational culture of willingness to work together and share information.

In addition to the importance of establishing strong relationships with other agencies, States interviewed also identified other important implementation factors in improving their direct certification rates or maintaining their high matching rates. Several States cited the importance of considering the needs and incentives of the users of the direct certification system. Delaware touted the user-friendliness and streamlined nature of its system. Wisconsin cited recent improvements to simplify the system and making it web-based as important factors. Alabama suggested an important factor was districts' motivation to directly certify students, thereby reducing the time and resources

devoted to processing paper applications. Alabama also credited the system's ease of use as a factor in its success.

Several States also indicated that technical assistance to LEAs is an important part of their overall success. Technical assistance can take the form of working with LEAs on their reporting of verification results on Form FNS-742, advising LEAs on the importance of direct certification and the value of accurate reporting, and assisting LEAs in uploading or downloading match lists and program data.

Monitoring LEA Compliance and Assessing Direct Certification Performance

An important aspect of successful direct certification may be tracking and monitoring LEAs' use of the direct certification system. Monitoring of LEA direct certification compliance in the interviewed States is largely done through coordinated review effort (CRE) reviews of selected LEAs in the respective States, although some States have features in their systems that enable them to track LEA interactions within the system. North Dakota's system can track whether LEAs process the information available for them to download through their notification systems. Wisconsin has modified the monitoring process in its system so that it is informed when LEAs initiate matches in the system. Delaware tracks whether LEAs download the list of matched students each month from the central web-based system. Alabama also verifies that districts download program data through its system logs.

In the coming years, States will be required to meet a set of direct certification performance benchmarks established by PL111-296. However, the interviewed States typically did not measure or track the performance of their direct certification systems. North Dakota did some calculations to compare the number of directly certified students from previous years with the current year, although the calculations do not align with federal benchmarks. In the roundtable discussion, Oklahoma indicated that in the upcoming school year it will start measuring performance at the State level. In the same discussion, both Texas and Washington indicated that they have explored how to construct performance measures that align better with the measures that FNS will use to determine whether States meet the standards for performance in the coming years.

D. Best Practices in Addressing Policy Changes to Direct Certification

An issue discussed in detail with States was the set of challenges involved in implementing the new FNS policy "Extending Categorical Eligibility to Additional Children in a Household." This policy, which was released in August 2009 effective for SY 2009–2010, extends categorical eligibility for free meals to all children in a household receiving assistance from the SNAP, TANF, or Food Distribution Program on Indian Reservations (FDPIR). Most States interviewed for this review have not implemented revisions to their direct certification procedures beyond notifying districts of the policy change and providing the districts with technical assistance in interpreting the policy. Wisconsin did revise its system in response to this policy, however. Wisconsin's State cross-agency database identifies a head of household/adult for each child. The system uses this information to identify other children in the same household. North Dakota also implemented some updated procedures to respond to the policy. Specifically, the State has LEAs download a spreadsheet of matched students and then it manually adds names of other children in the matched student's household. The State adopted this manual process because not every district uploads address information with its enrollment files. As mentioned previously, North Dakota will now mandate the inclusion of address information in the uploaded enrollment file. North Dakota expects that when

all the address information is in the system, it will introduce a new procedure that will centralize and automate the process of extending eligibility.

Other State-level matching States commented that implementation of this policy has been largely delegated to the LEAs themselves without major changes made to their systems. Similarly, the two district-level States interviewed provided only training and guidance and left the mechanics of the process to their LEAs' discretion. In Connecticut, some districts may extend categorical eligibility with an automated process through their POS systems, whereas other districts do so manually. In order to learn more about this process, we interviewed the administrator who oversees direct certification for Meriden Public Schools, which Connecticut identified as one of the leading LEAs in the State in terms of direct certification. The POS system in this district has a feature that allows for a look-up of siblings through a query function. However, the districts also implemented a manual process for identifying siblings to augment this feature. The manual process involves exporting an Excel spreadsheet with a list of names, addresses, and parent's/guardian's names of those children already directly matched through the POS system.³⁴ The district then manually identifies siblings based on address and/or parent's name. The POS system then links those siblings identified in the manual process. The administrator attributes most of the State's success to its vigilance in checking the data that are in both the POS system and the program data downloaded from the State.

Feasibility and Use of Medicaid Data for Direct Certification

Changes resulting from the Healthy, Hunger-Free Kids Act of 2010 (PL 111-296) provide additional opportunities for data matching, which will be accompanied by new challenges. Section 103 of the legislation includes provisions that would expand direct certification to include Medicaid in some districts via a demonstration project. The feasibility of obtaining access and making use of Medicaid data for direct certification was discussed in detail with States. All interviewed States had made preliminary inquiries into the use of Medicaid data. Although most States do not consider access to Medicaid data to be a problem³⁵, they cite the incompatible income level requirements for Medicaid and free school lunches in their respective States to be the biggest barrier to the use of Medicaid data. One State (North Dakota) mentioned that most children receiving SNAP benefits are also enrolled in Medicaid and it does not believe that incorporating Medicaid recipients would improve direct certification rates appreciably. Another State (Wisconsin) has had preliminary conversations with its Department of Health Services to create appropriate thresholds for school meal eligibility; however, it is unlikely to go much further at the present time due to resource limitations in the State. Alabama was the only State in which the income level thresholds between Medicaid and direct certification for free school lunches were compatible. It is currently in discussion to add Medicaid data to its planned system. Alabama did consider incorporating Medicaid data this year (SY 2011–2012), but chose to defer because it was implementing its student management system among many other changes.

³⁴ This LEA matches children directly through exact matches on first name, last name, and date of birth. It has a second manual process to identify partial matches and unmatched children.

³⁵ Connecticut has not explored the feasibility of obtaining access to Medicaid data but thinks that it would be possible because Medicaid data are maintained by the Department of Social Services, which also provides the SNAP and TANF program data. The State is also exploring how it would share Medicaid data with its LEAs.

Table 8. Feasibility of Using Medicaid Data for Direct Certification

State	Plans to Use Medicaid Data?	Description of Correspondence of Medicaid and Free School Meal Eligibility
Alabama	Exploratory	Has had discussions about incorporating these data. Thresholds match so main barrier is incorporating the data.
Connecticut	No plans	Medicaid data do not have comparable income thresholds.
Delaware	No plans	Medicaid income eligibility is significantly different than for free or reduced-price school meal eligibility.
North Dakota	No plans	Medicaid income eligibility is significantly different than for free or reduced-price school meal eligibility. Looked closely at aligning system but found that most children receiving Medicaid would also be enrolled in SNAP or TANF, and thus not much would be gained by adding another program relative to cost.
Texas	No plans	Texas currently used Medicaid data for direct verification but not direct certification. Medicaid data do not have comparable income level thresholds.
Wisconsin	Exploratory	Has explored the feasibility of using Medicaid data but would require more resources than are feasible at this time. Medicaid data do not have comparable income level thresholds.

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

Foster Care Data

The selected States were also asked about their progress incorporating foster care children’s data into their direct certification systems. Most States do not use foster care data for direct certification. Exceptions are Delaware and Alabama, each of which currently uses or plans to use foster care data for direct certification. Starting in July 2011, Alabama incorporated foster care data into its revised system. It has reported no issues with accessing the data or concerns about data quality. For SY 2010–2011, Delaware implemented a process that is separate from its main data matching process for matching foster care data. Delaware also incorporates homeless status into direct certification matching, which the district records and then processes into the system.

Among States with no plans to use foster care data for direct certification, several suggested that one of the major barriers is data access. In Texas and Connecticut, agencies not currently required to provide data for direct certification manage the foster care data. Therefore it is difficult to incorporate foster care data into the direct certification system because the other agency either does not want to provide it (Texas) or there is no legal consent in place for the agency to provide it (Connecticut). Wisconsin has had talks with the agency in charge of the foster care system, but does not currently have the resources to incorporate a new set of data into its web-based system. North Dakota mentioned that gathering foster children’s data is a possibility, but it has concerns about the compatibility of data from the foster children’s system.

VI. CONCLUSION

States and LEAs directly certified 1.9 million more children at the start of SY 2010–2011 than they did a year earlier, an increase of 23 percent. That growth was driven in part by a historic increase in SNAP participation.

States and LEAs directly certified an estimated 78 percent of school-age children from SNAP-participant households in SY 2010–2011, a figure substantially higher than the 72 percent figure estimated for the previous year. Eight States achieved direct certification rates higher than 90 percent, while only three had direct certification rates lower than 60 percent. With both direct certification and paper applications, States and LEAs certified 86 percent of all categorically eligible SNAP, TANF, and FDPIR children for free school meals in SY 2010–2011; this is up slightly from the 83 percent figure computed for SY 2009–2010.

States and LEAs continue to find success with different direct certification models. States with the most effective or most improved direct certification systems for SY 2010–2011 include ones that operate both State-level matching systems and district-level systems. States and LEAs are making investments in their direct certification systems that promise improved performance in the coming years. These include mandating or facilitating computer matching of student enrollment and SNAP participation lists more frequently than once per year and enhancing computer matching procedures. Changes such as these may impact direct certification and free certification rates in coming years.

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APPENDIX A

ADDITIONAL TABLES AND FIGURES

Table A.1. Number and Percent of LEAs that Directly Certified SNAP Participants Excluding Provision 2 and Provision 3 LEAs, SY 2004-2005 through SY 2010-2011

	SY 2010-2011			SY 2009-2010			SY 2008-2009		
	Number of Non-Provision 2/3 LEAS	Direct Certification LEAs		Number of Non-Provision 2/3 LEAS	Direct Certification LEAs		Number of Non-Provision 2/3 LEAS	Direct Certification LEAs	
		Number	Percent		Number	Percent		Number	Percent
US Total	17,964	15,168	84.4	17,886	14,667	82.0	17,644	13,692	77.6
AK	41	39	95.1	41	40	97.6	38	37	97.4
AL	147	137	93.2	148	134	90.5	145	129	89.0
AR	273	262	96.0	284	249	87.7	279	264	94.6
AZ	400	335	83.8	406	335	82.5	359	298	83.0
CA	1,025	753	73.5	1,004	786	78.3	982	629	64.1
CO	205	189	92.2	208	192	92.3	204	180	88.2
CT	186	176	94.6	188	174	92.6	191	169	88.5
DC	57	57	100.0	62	61	98.4	61	2	3.3
DE	33	31	93.9	33	30	90.9	35	30	85.7
FL	190	133	70.0	170	122	71.8	164	107	65.2
GA	210	188	89.5	200	178	89.0	191	166	86.9
HI	36	26	72.2	37	26	70.3	40	26	65.0
IA	494	435	88.1	495	421	85.1	493	423	85.8
ID	141	134	95.0	138	99	71.7	135	117	86.7
IL	1,115	964	86.5	1,121	878	78.3	1,112	926	83.3
IN	501	424	84.6	498	405	81.3	487	341	70.0
KS	399	340	85.2	405	345	85.2	407	348	85.5
KY	188	177	94.2	194	173	89.2	186	166	89.3
LA	114	102	89.5	109	95	87.2	117	105	89.7
MA	420	310	73.8	431	303	70.3	423	305	72.1
MD	48	42	87.5	49	42	85.7	47	39	83.0
ME	186	168	90.3	188	172	91.5	229	207	90.4
MI	853	736	86.3	855	717	83.9	846	693	81.9
MN	697	462	66.3	656	451	68.8	653	438	67.1
MO	758	681	89.8	765	678	88.6	744	615	82.7
MS	162	146	90.1	164	144	87.8	167	139	83.2
MT	221	190	86.0	220	171	77.7	223	164	73.5
NC	165	154	93.3	165	151	91.5	169	144	85.2
ND	183	160	87.4	196	150	76.5	196	137	69.9
NE	377	315	83.6	381	302	79.3	382	285	74.6
NH	91	82	90.1	94	75	79.8	95	64	67.4
NJ	694	665	95.8	677	619	91.4	661	550	83.2
NM	115	62	53.9	104	60	57.7	67	62	92.5
NV	20	16	80.0	18	17	94.4	19	16	84.2
NY	992	871	87.8	987	863	87.4	950	813	85.6
OH	1,182	859	72.7	1,181	809	68.5	1,166	739	63.4
OK	546	465	85.2	538	430	79.9	530	394	74.3
OR	246	199	80.9	238	189	79.4	229	180	78.6
PA	850	730	85.9	850	729	85.8	852	620	72.8
RI	55	52	94.6	54	52	96.3	32	31	96.9
SC	100	85	85.0	93	85	91.4	96	85	88.5
SD	169	153	90.5	173	153	88.4	179	109	60.9
TN	175	161	92.0	165	149	90.3	167	153	91.6
TX	1,178	1,056	89.6	1,187	1,043	87.9	1,194	1,040	87.1
UT	81	75	92.6	75	72	96.0	64	56	87.5
VA	154	145	94.2	153	141	92.2	150	138	92.0
VT	237	207	87.3	227	206	90.8	214	189	88.3
WA	316	281	88.9	323	280	86.7	309	267	86.4
WI	811	639	78.8	809	571	70.6	838	465	55.5
WV	72	56	77.8	73	55	75.3	74	55	74.3
WY	55	43	78.2	56	45	80.4	53	37	69.8

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

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

Note: LEAs are excluded if every school is a Provision 2 or Provision 3 school.

Table A.2. Percent of SNAP Children Directly Certified for Free School Meals and Percent of All Categorically Eligible Children Certified for Free School Meals, SY 2009-2010 and SY 2010-2011

	Percent of SNAP Children Directly Certified for Free School Meals			Percent of All Categorically Eligible Children Certified for Free School Meals		
	SY 2010-2011	SY 2009-2010	Change	SY 2010-2011	SY 2009-2010	Change
Alabama	82	67	15	90	79	12
Alaska	108	122	-14	83	92	-9
Arizona	51	49	1	72	73	-1
Arkansas	77	73	4	94	93	1
California	65	68	-3	72	75	-3
Colorado	67	69	-2	71	73	-3
Connecticut	97	56	42	100	64	36
Delaware	93	89	4	92	89	3
District of Columbia	71	82	-11	78	89	-11
Florida	82	72	11	85	80	5
Georgia	78	67	11	83	80	3
Hawaii	78	91	-13	83	95	-12
Idaho	80	65	15	75	68	6
Illinois	75	73	3	86	84	2
Indiana	72	74	-1	86	92	-5
Iowa	90	75	15	96	82	13
Kansas	91	84	7	91	85	6
Kentucky	86	77	9	94	88	6
Louisiana	83	79	3	97	94	2
Maine	70	75	-6	76	78	-2
Maryland	84	85	-1	87	89	-1
Massachusetts	62	51	11	69	62	7
Michigan	72	69	4	87	87	0
Minnesota	85	89	-5	89	96	-7
Mississippi	77	73	4	87	86	1
Missouri	70	66	4	82	83	-1
Montana	63	56	7	75	70	5
Nebraska	87	58	29	96	76	19
Nevada	87	86	1	82	82	0
New Hampshire	66	47	19	70	66	4
New Jersey	58	62	-4	68	77	-9
New Mexico	78	50	28	93	69	24
New York	86	76	9	94	83	11
North Carolina	87	84	3	89	87	1
North Dakota	85	76	9	84	78	6
Ohio	73	65	8	91	89	2
Oklahoma	85	75	10	98	92	6
Oregon	72	66	5	75	71	4
Pennsylvania	65	65	0	72	75	-3
Rhode Island	72	73	0	75	72	3
South Carolina	70	70	0	82	83	-1
South Dakota	51	49	2	67	67	0
Tennessee	94	91	3	94	92	3
Texas	91	82	9	103	99	5
Utah	74	70	5	78	82	-5
Vermont	78	64	13	87	79	8
Virginia	81	78	3	84	83	1
Washington	83	72	11	87	79	7
West Virginia	84	78	5	89	85	4
Wisconsin	89	73	16	90	79	11
Wyoming	96	95	1	93	94	-1

Note: Percentages above 100 percent in the left half of Table A.2 can be explained, in part, by limitations of the component figures used to estimate them. See the footnote to Figure 4 and the discussions of data sources and methodology in Appendix C and Appendix D. Figures above 100 percent in the right half of the table are due to data limitations and data estimation error.

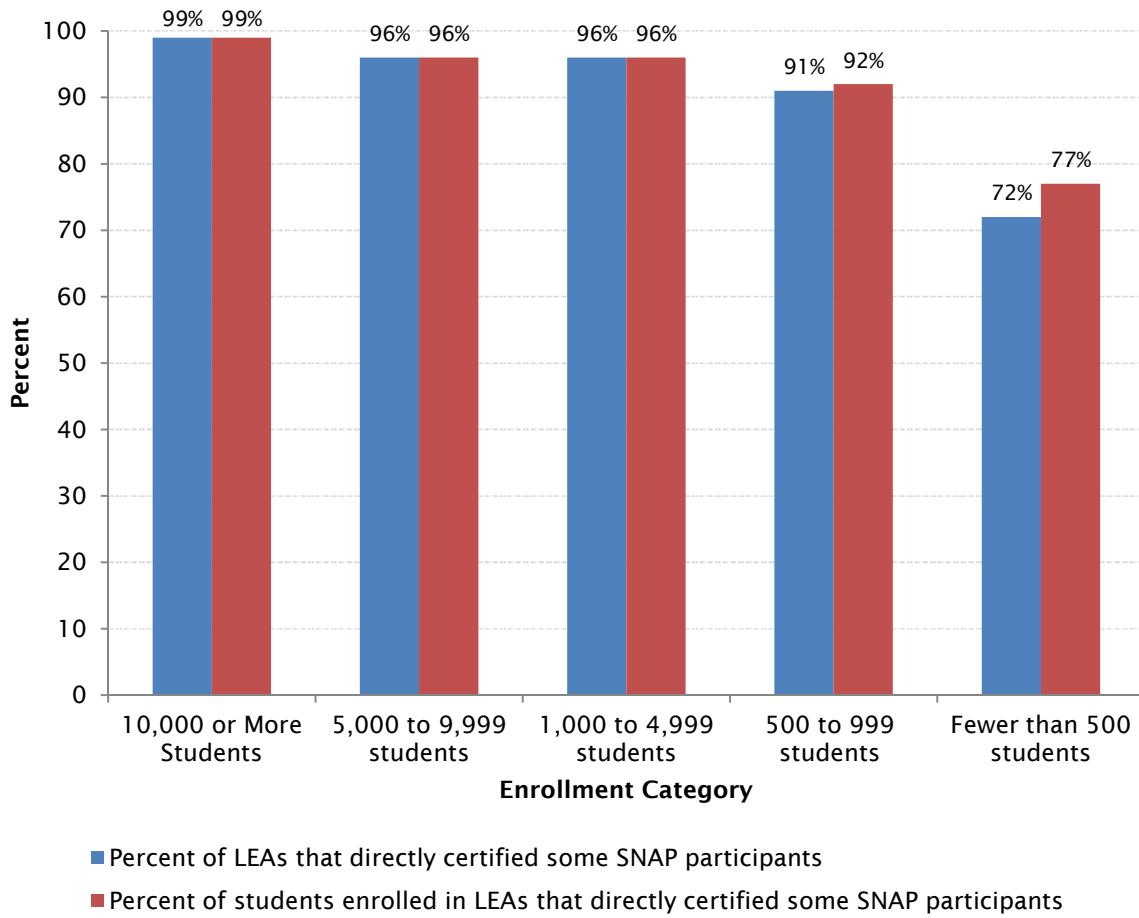
Table A.3. Enrollment of NSLP-Participating LEAs, SY 2010-2011 (millions of students)

	LEAs that Directly Certified SNAP Participants or in which all Schools are Non-Base Year Provisions 2 or 3	All Other LEAs	All NSLP- Participating LEAs
All LEAs	48.4	1.6	50.0
LEA Size			
10,000 students or more	26.2	0.3	26.5
5,000 to 9,999 students	6.9	0.3	7.2
1,000 to 4,999 students	11.9	0.5	12.4
500 to 999 students	1.9	0.2	2.1
Fewer than 500 students	1.4	0.4	1.8

Table A.4. States by FNS Administrative Region

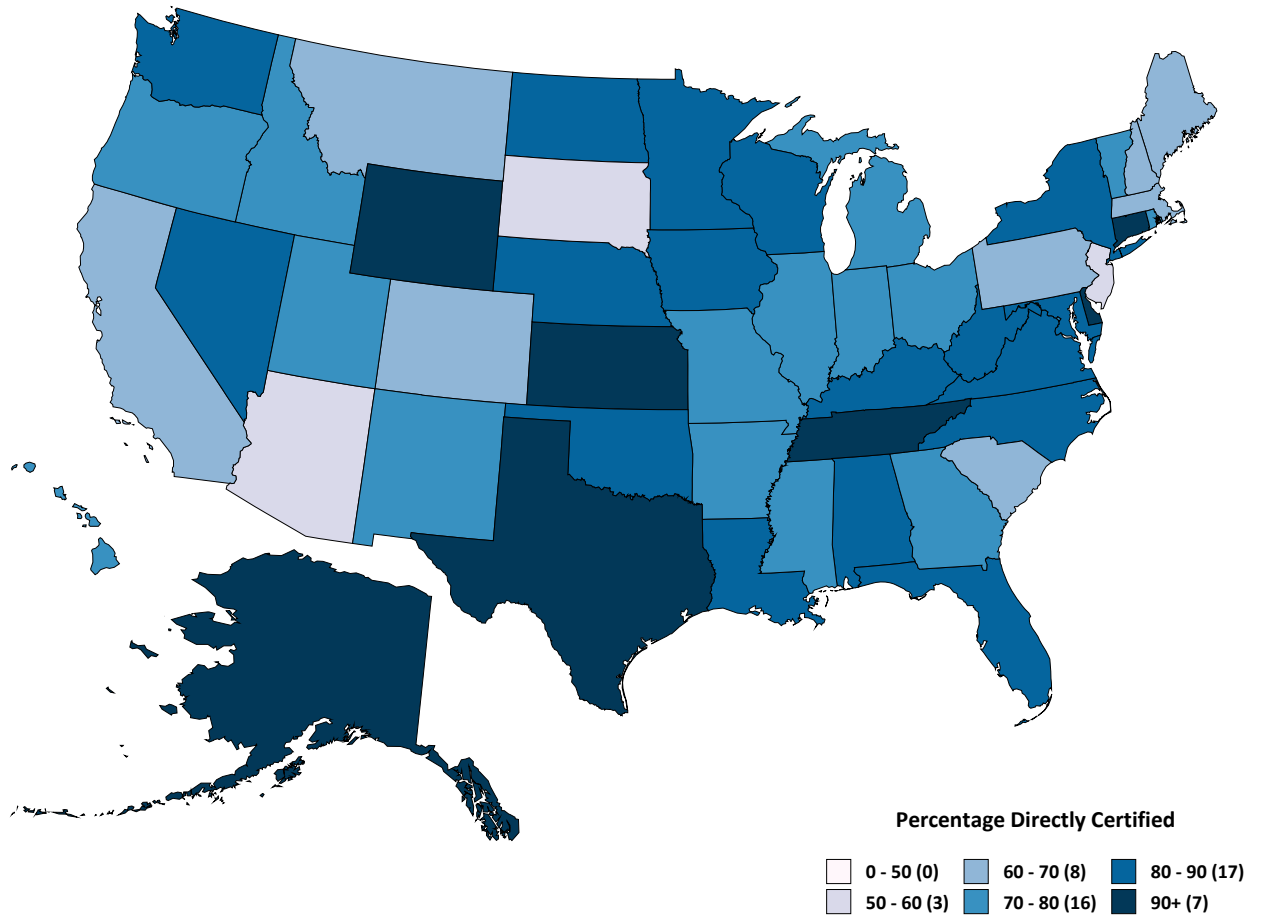
FNS Region	State	FNS Region	State
Mid-Atlantic	DC	Northeast	CT
	DE		MA
	MD		ME
	NJ		NH
	PA		NY
	VA		RI
	WV		VT
Mid-West	IL	Southeast	AL
	IN		FL
	MI		GA
	MN		KY
	OH		MS
	WI		NC
Mountain-Plains	CO	Southwest	SC
	IA		TN
	KS		AR
	MO	LA	
	MT	NM	
	ND	OK	
	NE	TX	
	SD	West	AK
	UT		AZ
	WY		CA
	HI		
	ID		
	NV	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

Figure A.1. Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants by Enrollment Category Size: Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts, SY2010-2011



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

Figure A.2. Percent of SNAP-Participant Children Directly Certified for Free School Meals SY2010-2011³⁶



³⁶ State values for Figures A.2 and A.3 are in Table A.2. Data for Figure A.4 are provided in the Direct Certification Report for 2010. Data for Figure A.5 are based on slightly revised calculations originally contained in the Direct Certification Report for 2009.

Figure A.3. Percent of SNAP-Participant Children Directly Certified for Free School Meals SY2009-2010

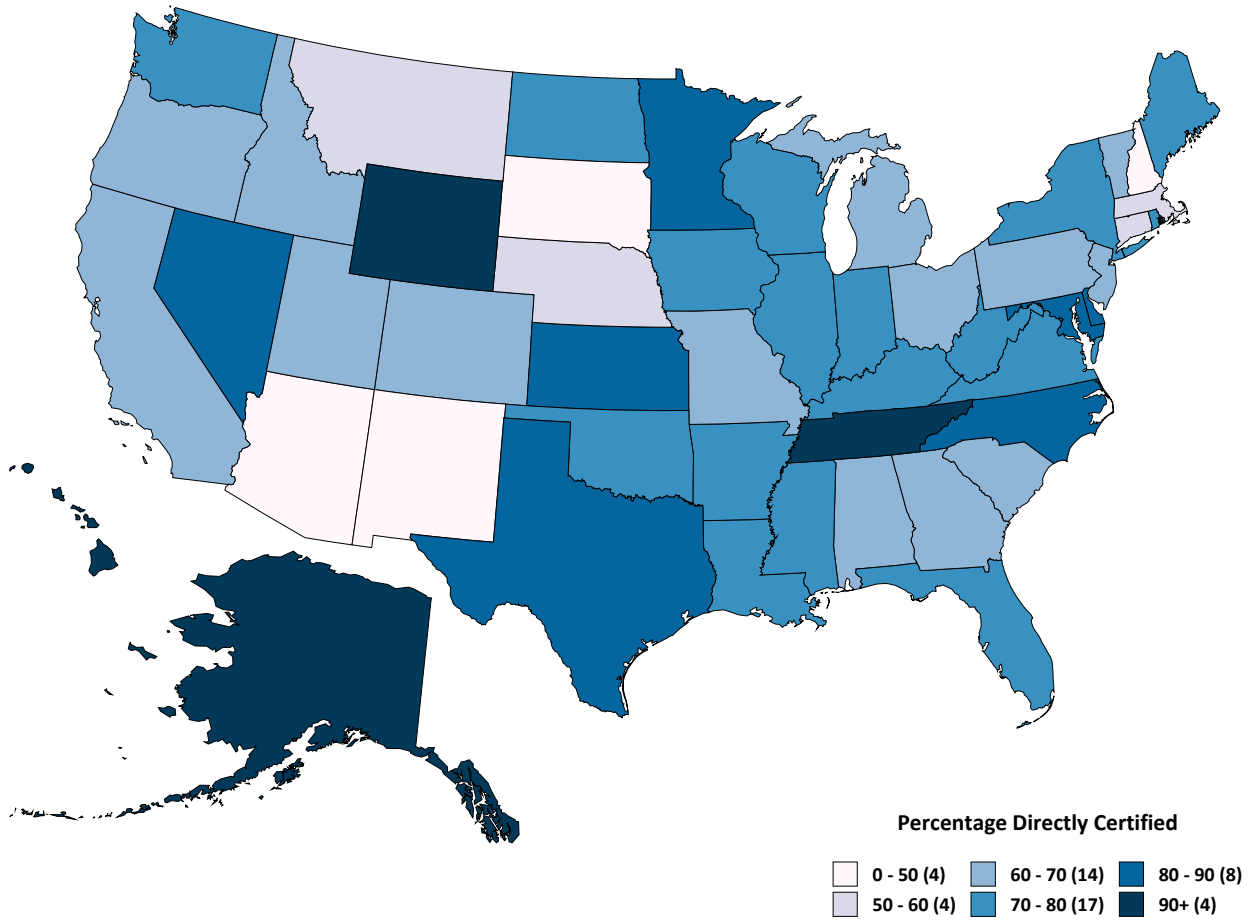


Figure A.4. Percent of SNAP-Participant Children Directly Certified for Free School Meals SY2008-2009

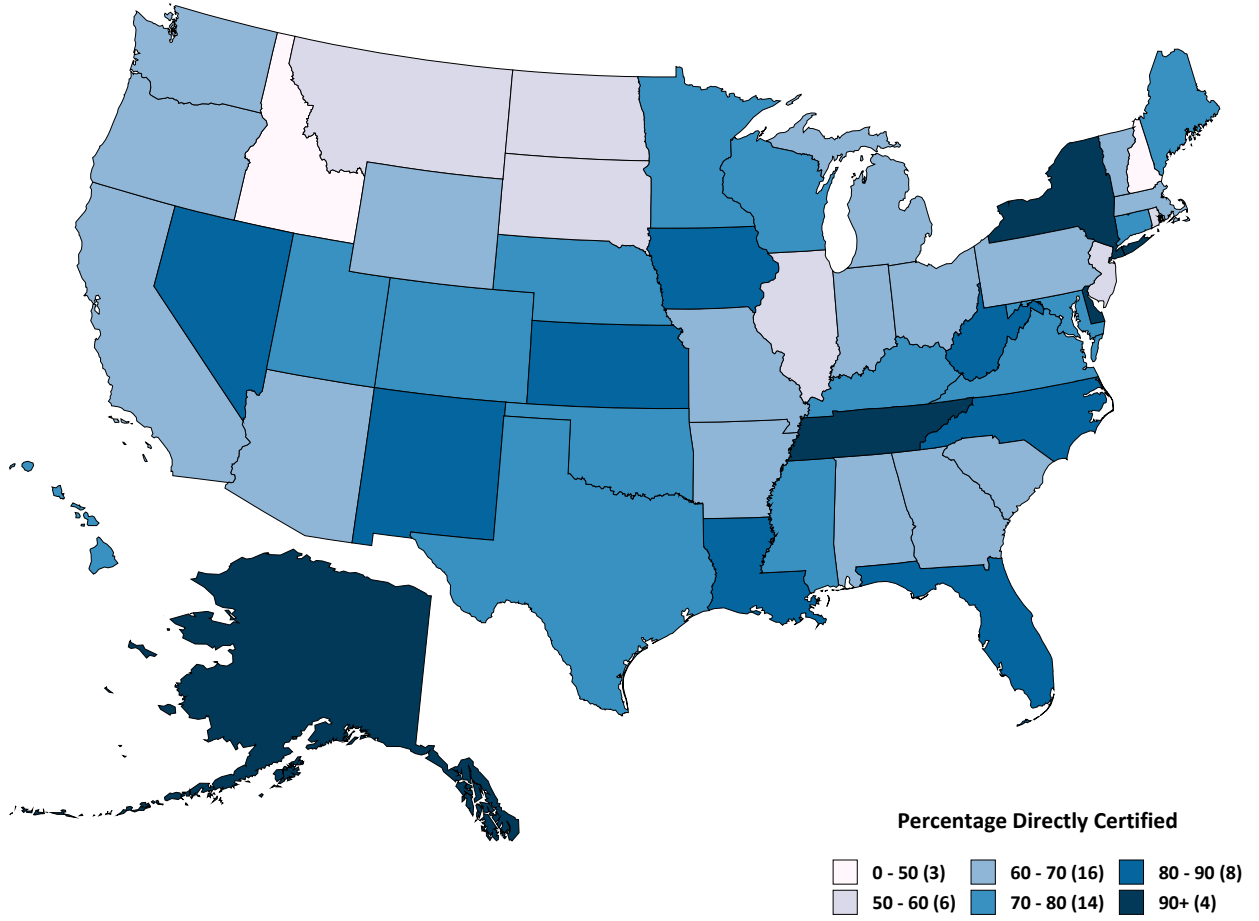


Figure A.5. Percent of SNAP-Participant Children Directly Certified for Free School Meals SY2007-2008

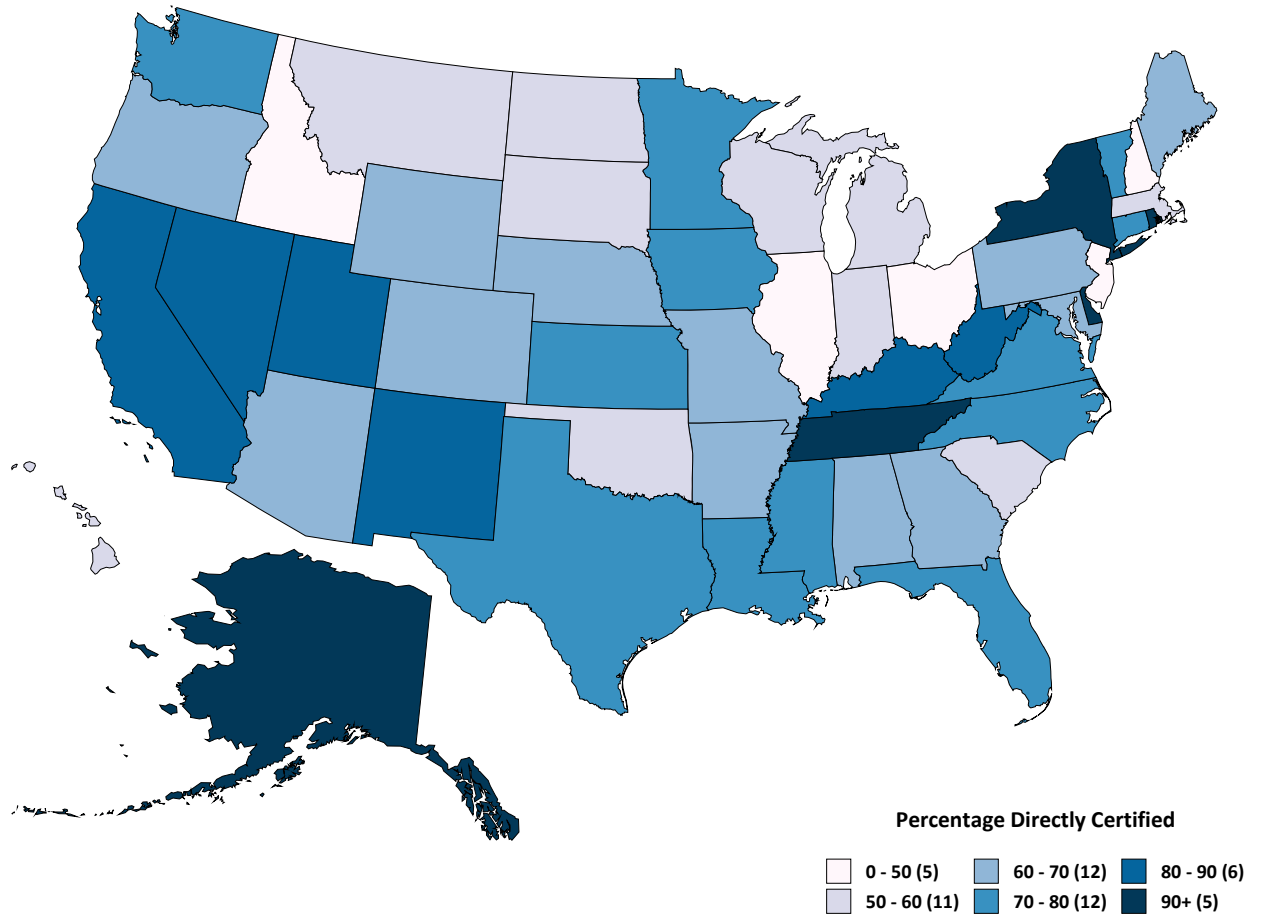
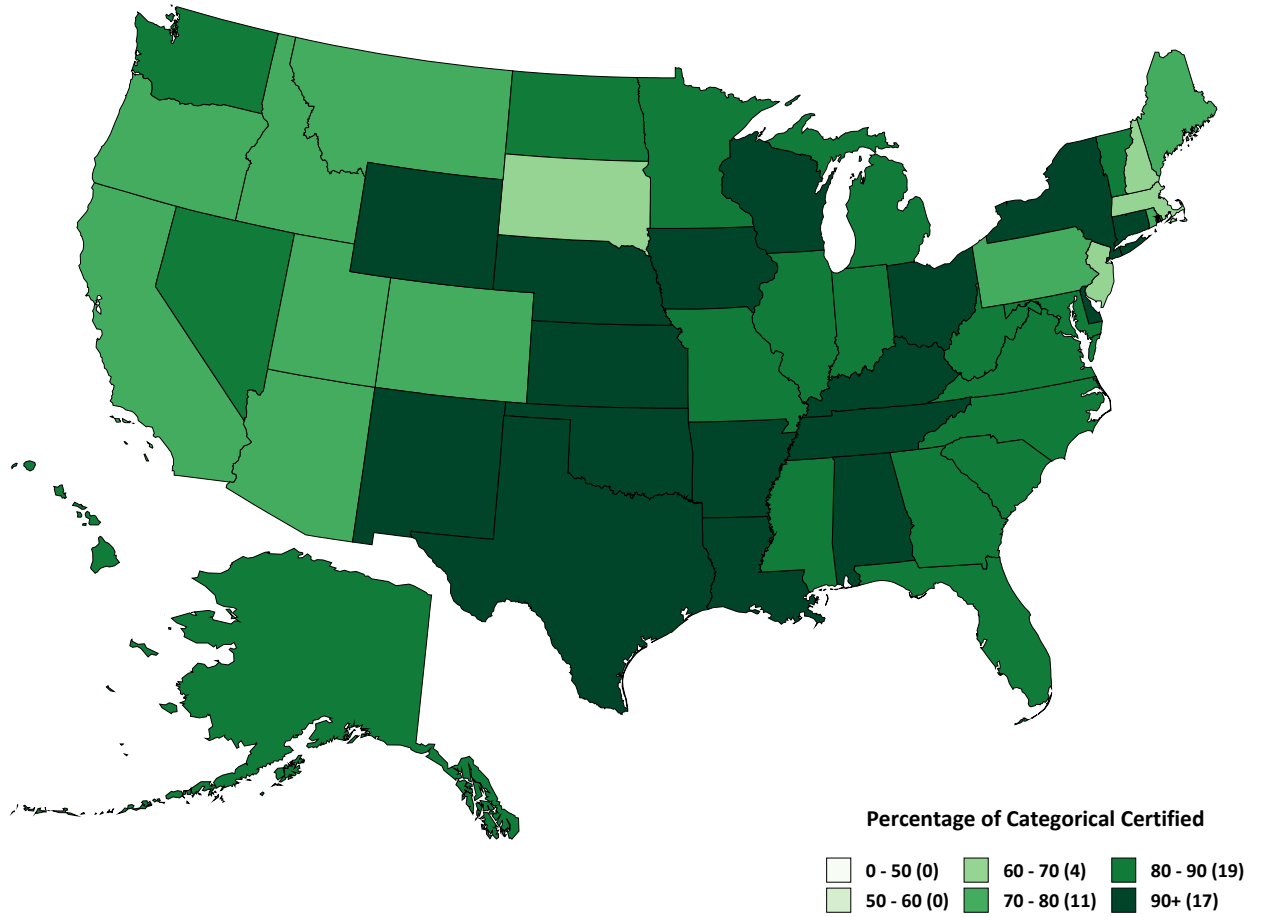


Figure A.6. Percent of Categorically Eligible Children Certified for Free School Meals SY2010-2011³⁷



³⁷ State values for Figures A.6 and A.7 are in Table A.2. Data for Figure A.8 are provided in the Direct Certification Report for 2010. Data for Figure A.9 are provided in the Direct Certification Report for 2009.

Figure A.7. Percent of Categorically Eligible Children Certified for Free School Meals SY2009-2010

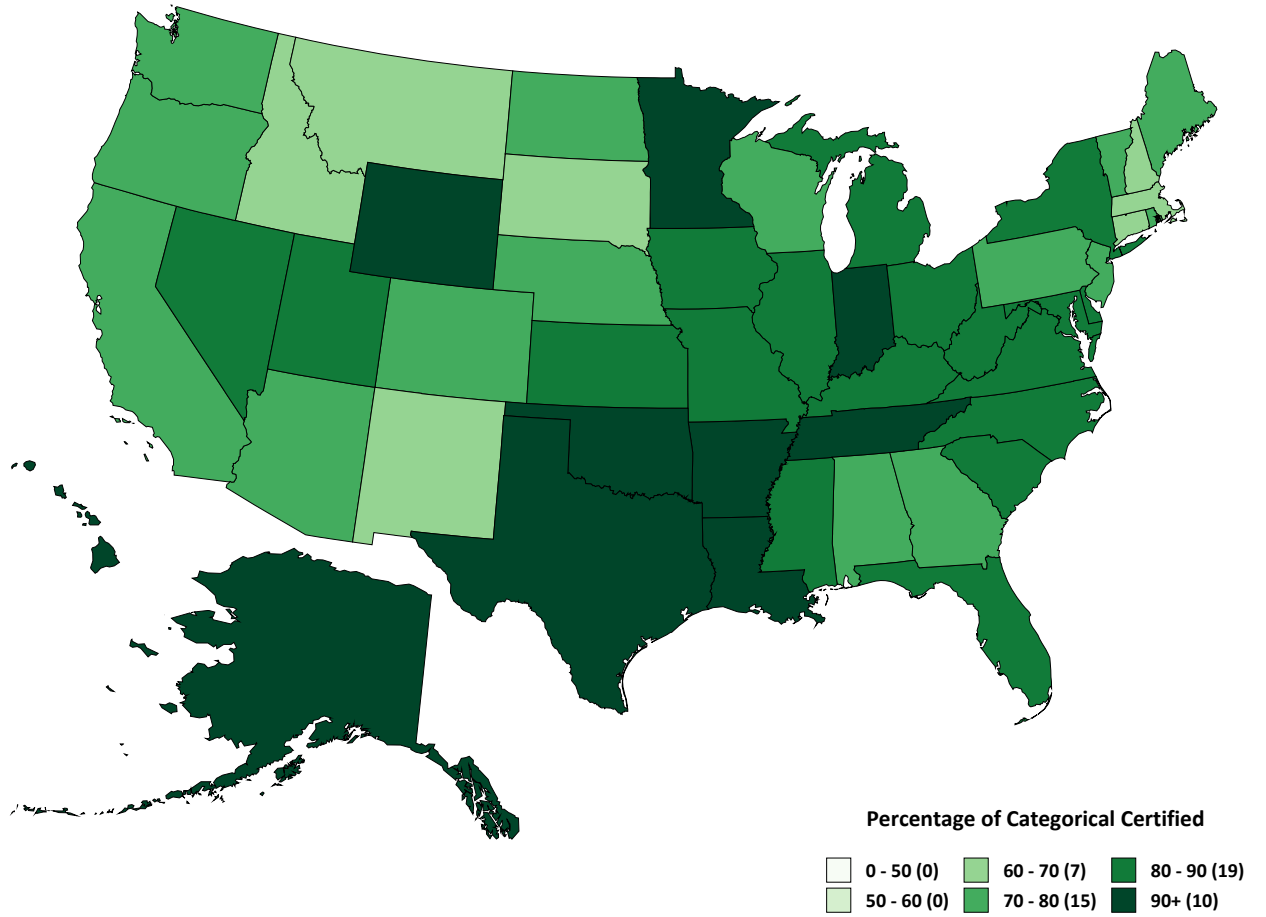


Figure A.8. Percent of Categorically Eligible Children Certified for Free School Meals SY2008-2009

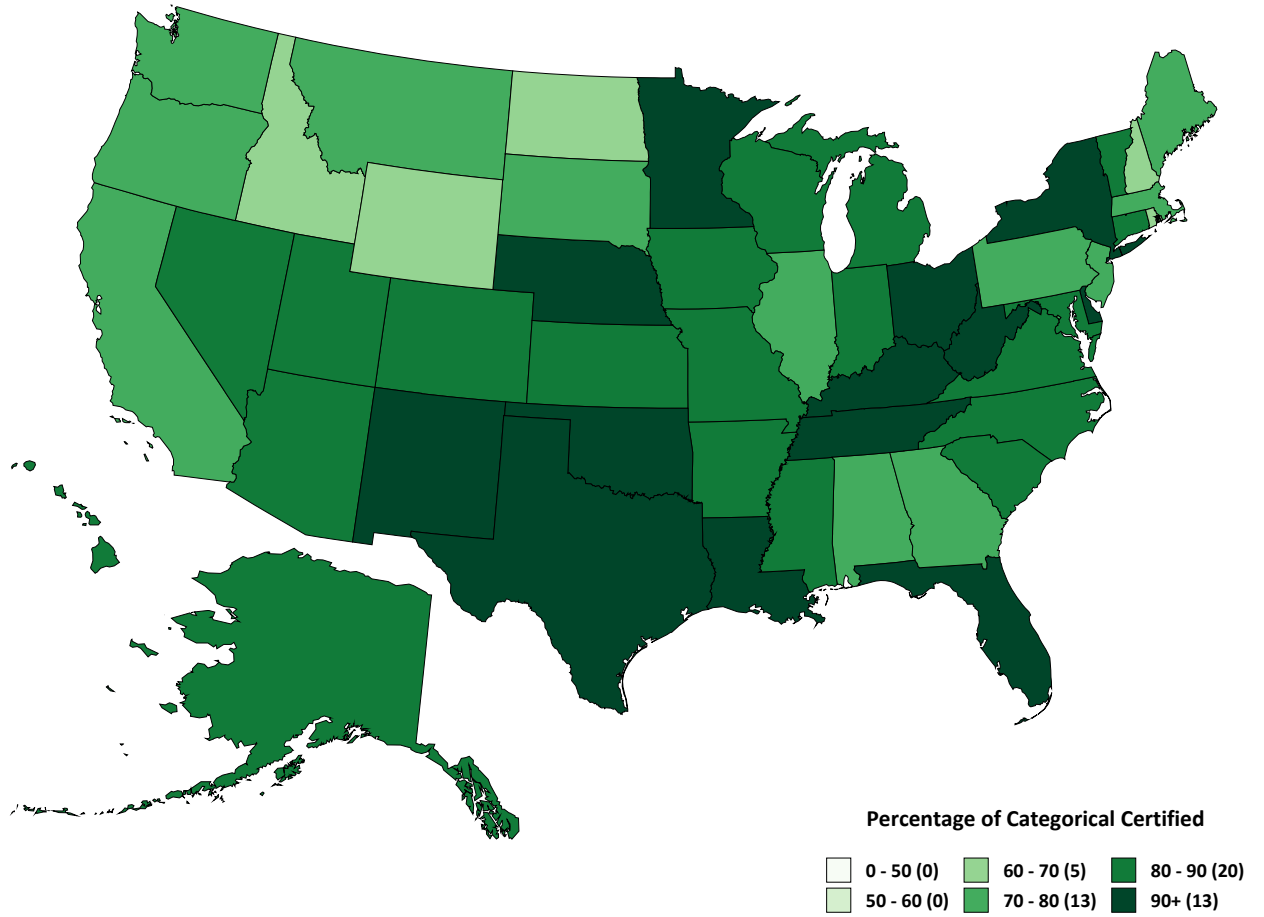
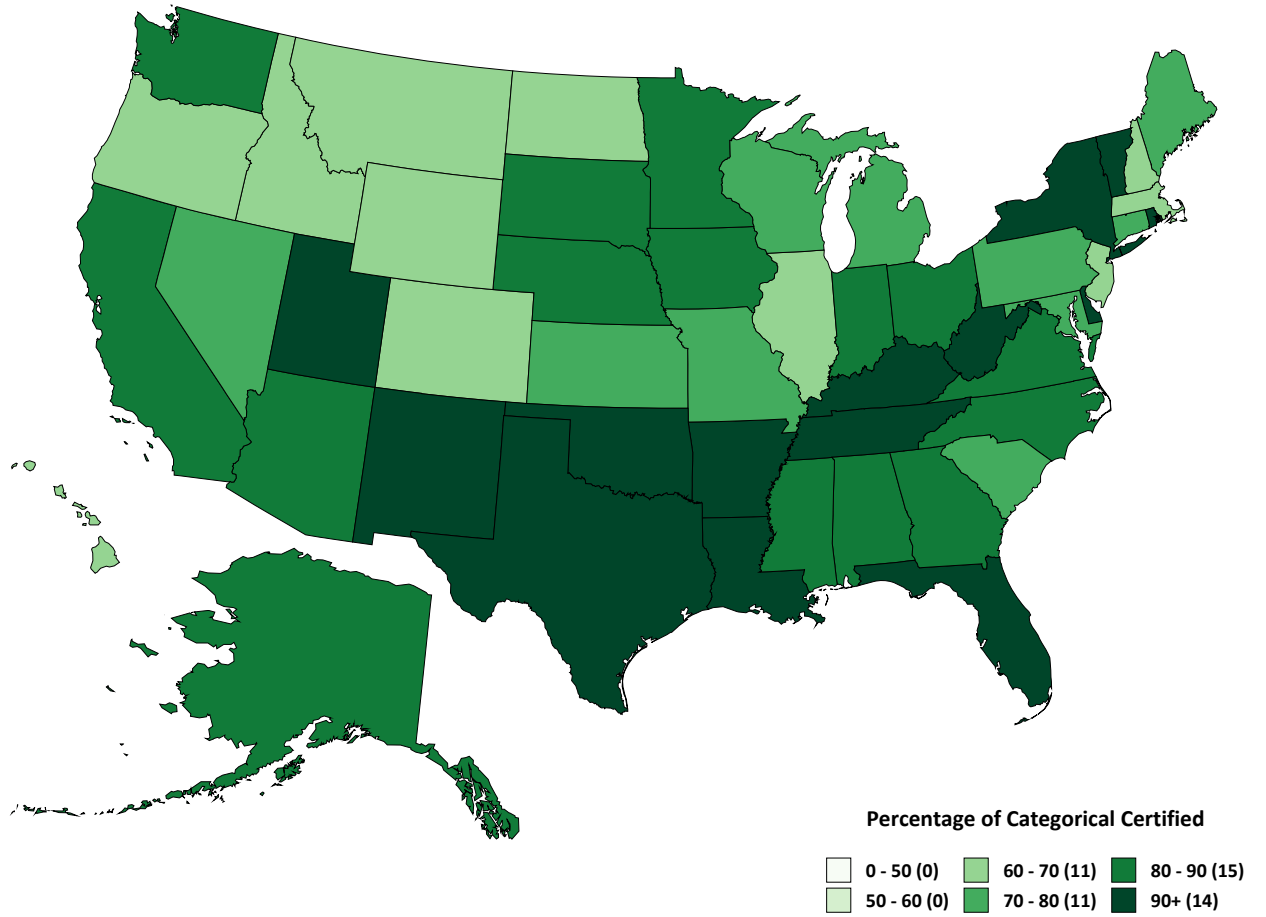


Figure A.9. Percent of Categorically Eligible Children Certified for Free School Meals SY2007-2008



APPENDIX B

VERIFICATION SUMMARY REPORT

[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 number for this collection is 0584-0026. The time required to complete this information collection is 30 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.</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"/> Individual Student <input type="checkbox"/> Household <input type="checkbox"/> Both			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				
<small>Report items 2 through 5 as of the last operating day in October</small>		<small>A. All Schools</small>	<small>B. Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR</small>	<small>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.</small>	<small>A. FREE ELIGIBLE based on FS/TANF/FDPIR Application (Categorically Eligible)</small>	<small>B. FREE ELIGIBLE based on Income/ Household Size Application (Income Eligible)</small>	<small>C. REDUCED PRICE ELIGIBLE</small>
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)							
		<small>A. # of Students</small>	<small>B. # of Approved Applications</small>	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 (2/04)

SBU

Electronic Form Version Designed in Adobe 7.1 Version

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

APPENDIX C

ESTIMATION OF COMPONENT STATISTICS

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 Supplemental Nutrition Assistance Program (SNAP) benefits at any time in July, August, or September of 2010; (2) the number of SNAP-participant children that were directly certified for free school meals as of October 1, 2010; and (3) the number of SNAP-participant students that were not candidates for direct certification because they attended Provision 2 or Provision 3 schools that were not operating in a base year in school year (SY) 2010–2011. The methods and sources used for these estimates are described below.³⁸

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

The report uses two primary sources to estimate the number of school-age SNAP participants at the State level. The first is SNAP data reported to the Food and Nutrition Service (FNS) by State SNAP agencies each month. SNAP data include State agency counts of the number of individual participants in households that are issued SNAP benefits. The figures used in this report are the final participant counts for July through September 2010. Although these are the best available monthly estimates of SNAP participation, the data do not separate school-age children from other members of the SNAP household.

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

With these two inputs, FNS is able to estimate the number of school-age SNAP participants by State for the target months of July through September. From official SNAP data, FNS computes average monthly participation from July through September as a percentage of average monthly participation for the entire fiscal year. This is multiplied by QC estimates of average monthly school-age SNAP participation for the year. The result is a set of State estimates of average school-age SNAP participation for the months of July through September 2010.

A final adjustment is needed to convert this average monthly figure into an estimate of school-age children who received SNAP benefits at any time in those three months. Across any period, the total number of individuals served by the SNAP program is higher than the average monthly caseload over the same period. The participant turnover rate is defined as the total number of SNAP participants over a given period divided by the period's average monthly caseload. FNS estimates that the turnover rate across an entire year is about 1.4 (Cody et al. 2007). 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.

³⁸ See Appendix D for a discussion of data limitations.

The turnover rate applied here is a national estimate. The estimate is based on the Survey of Income and Program Participation (SIPP), a U.S. Census Bureau data set that contains information on a representative panel of households over time. The longitudinal nature of the data set allows for estimation of the SNAP turnover rate over the July-through-September period of concern to this report. However, SIPP data are not designed for State-level analysis. Use of a national turnover rate introduces some uncertainty into the estimates of SNAP participation developed here.

In the first two reports in this series, we used single-year point estimates of the turnover rate for July through September based on the most current SIPP data available. That approach generated estimates that varied significantly from year to year. Given the error inherent in a turnover rate estimated over such a short (three-month) period, we were concerned that much of the variation observed over time could be largely random. Beginning last year, we compensated for the uncertainty in single-year point estimates by applying a three-year moving average of estimated turnover rates to the SNAP participant counts for each of the years examined in the report.³⁹ We continue to use the three-year moving average for this year’s report. The three-year moving average of the estimated turnover rate is about 1.10, which is the same as that which was estimated in last year’s report.

$$\begin{array}{l}
 \text{Unduplicated count of} \\
 \text{school-age SNAP-} \\
 \text{participant population,} \\
 \text{July–September 2010}
 \end{array}
 =
 \frac{\begin{array}{l}
 \text{Average monthly SNAP} \\
 \text{participation, FNS} \\
 \text{program data, July–} \\
 \text{September 2010}
 \end{array}}{\begin{array}{l}
 \text{Average monthly SNAP} \\
 \text{participation, FNS} \\
 \text{program data, FY 2010}
 \end{array}}
 \times
 \begin{array}{l}
 \text{Average monthly} \\
 \text{school-age SNAP-} \\
 \text{participant population,} \\
 \text{QC estimate, FY 2010}
 \end{array}
 \times
 \begin{array}{l}
 \text{Estimated} \\
 \text{SNAP-} \\
 \text{participant} \\
 \text{turnover rate,} \\
 \text{July–September} \\
 \text{2010}
 \end{array}$$

FY = fiscal year.

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

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

All household applications approved for free and reduced-price benefits are subject to annual verification by local LEAs. LEAs are required to draw a sample from approved applications and review applicant documentation. LEAs report the results of the verification process to FNS through their State education agencies. These Verification Summary Reports (VSRs) include the number of applications and students initially certified for free or reduced-price benefits and the corresponding

³⁹ As described in last year’s report, when the move to a three-year rolling average was applied to SY 2007–2008, the national direct certification rate was revised downward from 69 percent to 68 percent. For SY 2008–2009, the national rate was unchanged at 71 percent.

number of applications and students whose status was confirmed or changed as a result of the verification review.⁴⁰

The VSRs are intended primarily to document the results of the verification process. For this reason, most of the information contained in the reports concerns the verification outcomes of applications initially approved for free or reduced-price meals. However, the reports also contain counts of students whose eligibility for free or reduced-price meals was not determined by application and whose certifications are therefore not subject to verification. These counts include, but are not limited to, directly certified SNAP participants. This report uses LEA counts of students certified for free school meals, but not subject to verification, as a proxy for directly certified SNAP participants.⁴¹

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

The population of SNAP-participant children who are candidates for direct certification does not include children who attend Provision 2 or Provision 3 schools that are not operating in a base year. These schools directly certify (and accept applications from) SNAP-participant children only in base years when they establish the percentage of meals served free, at reduced-price, and at the paid rate for NSLP reimbursement. In nonbase years, the schools are reimbursed at these previously determined percentages; individual children are not subject to certification or recertification in nonbase years.⁴²

In order to remove these children from the estimated population of SNAP participants, FNS used data reported by LEAs on their SY 2010–2011 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 income or categorical requirements of the NSLP in those years. Virtually all of those children were also income eligible for SNAP benefits. However, not all households that are income eligible for SNAP benefits are SNAP participants. Some fraction of income-eligible households do not meet SNAP's asset test. An additional fraction of income- and asset-eligible households do not participate in SNAP for other reasons.⁴³

⁴⁰ 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.

⁴¹ Some limitations of this measure are discussed in Appendix D.

⁴² Provision 2 and Provision 3 schools operating in nonbase years serve all meals at no charge, although they are reimbursed by USDA at rates consistent with their free, reduced-price, and paid claiming percentages. Provision 2 and Provision 3 are offered to schools as administrative cost-saving options. In exchange for a much-reduced meal counting and claiming burden and no certification costs in nonbase years, Provision 2 and Provision 3 schools absorb any difference between their Federal reimbursement and the cost of meals served.

⁴³ Reasons for nonparticipation in SNAP by fully eligible households include real or perceived access barriers and personal preference. For additional discussion of reasons for SNAP nonparticipation, see Bartlett and Burstein (2004).

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

1. An estimate of the percentage of the population that is income eligible for SNAP benefits but not asset eligible⁴⁴
2. A national estimate of the participation rate of school-age children from households that meet both the SNAP income and asset tests⁴⁵

A recent trend has been for States to adopt noncash categorical eligibility (CE) for SNAP benefits. Under CE, households that receive a noncash benefit from a means-tested cash assistance program (such as Temporary Assistance for Needy Families [TANF]) may be held categorically eligible for SNAP benefits. States may choose to maintain a traditional asset test for eligibility or they may adopt broad-based or narrow categorical eligibility requirements. Under broad-based categorical eligibility, if a household receives a noncash TANF or State maintenance of effort (MOE) benefit (for example, information on a service) then the household is considered categorically eligible for SNAP benefits. Under narrow categorical eligibility, households become categorically eligible for SNAP benefits if they receive a noncash TANF-/MOE-funded service, such as child care or employment assistance, for which a small subset of the SNAP population is eligible.⁴⁶

⁴⁴ In last year's report, the estimate of the percentage of the population that is income eligible for SNAP benefits but not asset eligible was a national estimate, which includes broad-based categorical eligibility (BBCE) States and those that have narrow or no categorical eligibility. However, this serves to overestimate the percentage of the population that is income eligible but not asset eligible in States that have narrow or no categorical eligibility. As such, we made the following improvement:

To estimate the percentage of SNAP income-eligible households that are also asset eligible in states that have retained a traditional SNAP asset test, we reestimated the values in Table A.1 of the report, *Assets of Low-Income Households by SNAP Eligibility and Participation in 2010* (Trippe and Schechter 2011) over households residing only in states that have *not* implemented BBCE policies. We estimated the percentage based on the group of non-BBCE states in 2010 as identified in FNS' SNAP State Options Report (9th edition). The national estimate shown in Table A.1 was 0.912, compared with the estimate of 0.795 that applies only to non-BBCE States.

To ensure consistency with last year's report, we also implemented the same procedures to the set of non-BBCE States in SY 2009–2010 as identified in FNS' SNAP State Options Report (8th edition). The estimate was revised downward from 0.823 to 0.801. We include the revised rate when presenting the corrected direct certification estimates for SY 2009–2010 shown in Appendix E.

⁴⁵ The national estimate of the participation rate of school-age children used in last year's Report to Congress was taken from the report *Trends in Food Stamp Program Participation Rates: 2000 to 2008* (Leftin 2010). That report has since been updated and includes methodological improvements that make use of more recent data and of methodologies developed for the Survey of Income and Program Participation (SIPP)-based microsimulation model. See Leftin et al. (2011) for full details regarding the methodological changes. The methodology changes revised the participation rate used last year upward from 0.851 to 0.877. We include the revised participation rate when presenting the corrected direct certification estimates for SY 2009–2010 shown in Appendix E.

⁴⁶ See Trippe and Gilly (2010) for more details regarding noncash CE.

The policy that provides for CE has been in use since 2001, when eight States used broad-based criteria for determining eligibility. Its use has grown considerably, with large numbers of States adopting CE in fiscal year (FY) 2008 through FY 2010. Currently, 45 States have a noncash CE system, 38 have a broad-based system, 6 have a narrow system, and one State utilizes both broad-based and narrow designations. In recognition of this expansion of noncash CE, we make the following change:

In States with broad-based CE policies we apply an asset adjustment factor of one (no asset test) and a national participation adjustment of 0.902 (Leftin et al. 2011) to the count of NSLP income-eligible nonbase year Provision 2 and Provision 3 students. In all other States we apply an asset adjustment factor of 0.795⁴⁷ and the national participation adjustment of 0.902.

⁴⁷ This is an asset adjustment factor that is estimated only for the 13 States that do not have BBCE policies.

APPENDIX D
DATA LIMITATIONS

A. Local Educational Agency Verification Summary Reports

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

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

This data element is used as a proxy for directly certified children from households that participate in the SNAP. In many States, however, students eligible for free meals whose status is not subject to verification also include directly certified TANF or FDPIR participants,⁴⁸ children who are categorically eligible based on their status as a migrant or homeless child, or their enrollment 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.⁴⁹ Since school year (SY) 2004–2005, the percentage of LEAs that directly certify children from SNAP-participant households has increased from 55.6 to 84.9 percent in SY 2010–2011.⁵⁰ 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 might be in full compliance with the statutory direct certification mandate. As a result, the estimates of direct certification performance developed in this report could exaggerate the differences between the States.

Separately, State counts of children in SNAP households include home-schooled students⁵¹ or students in schools that do not participate in the NSLP. These school-age SNAP participants are categorically eligible for free school meals, however, the NSLP cannot reach these students and they are not counted in the VSR data. Therefore, the existence of home-schooled students and students in schools that do not participate in the NSLP will reduce the direct certification performance measure. Moreover, the number of these students varies across States.

⁴⁸ For example, the inclusion of FDPIR participants might be the main reason that Alaska has achieved direct certification rates greater than 100 percent in the current and each of the previous Reports to Congress.

⁴⁹ LEAs in the remaining States relied solely on the letter method of direct certification. See Cole and Logan (2007), pp. ix, 34–36.

⁵⁰ See Table 1.

⁵¹ An estimated 1.5 million students were home-schooled in 2007 (U.S. Department of Education 2008).

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

2. Students eligible for free meals, based on claiming percentages reported by Provision 2 and Provision 3 schools that are not operating in a base year

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

B. SNAP Quality Control System Data Set

This data set contains the data necessary to estimate the school-age participant share of each States' SNAP population. The quality control (QC) data element used here is the number of children between the ages of 5 and 17. A more appropriate variable would be one that identifies children by their educational status rather than their ages. In States or districts with widespread or mandatory pre-kindergarten programs or all-day kindergarten, this QC variable will understate the SNAP population eligible for free school meals. In States with high drop-out rates, this variable will overstate the relevant population.

C. American Community Survey

This report's alternate measure of the States' success at certifying categorically eligible children for free school meals relies in part on a factor developed with American Community Survey (ACS) data from the U.S. Census Bureau. The ACS offers estimates of households that receive SNAP benefits and households that receive both SNAP benefits and public assistance, which ACS documentation defines as "general assistance and Temporary Assistance to Needy Families."⁵² For this report, we use the ACS count of households that receive public assistance as a proxy for households that receive TANF benefits. This proxy will overstate the TANF population by an unknown amount that varies according to the size of the States' general assistance programs.

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

⁵² U.S. Census Bureau 2007.

D. Survey of FDPIR Participants

The estimated count of school-age FDPIR participants used to develop the performance measure presented in Figure 7 is based in part on a survey conducted for a 1990 study (Usher et al. 1990). The study found that 37 percent of FDPIR participants were younger than 18. FNS multiplied this figure by a factor of 13/18 (the expected number of children ages 5 to 17 among those ages 0 to 17) and applied it to the average monthly FDPIR caseload,⁵³ by State, for fiscal year 2008. The primary weakness of this estimate is clear: the share of children in households that currently receive FDPIR benefits likely has changed, significantly in some states, since 1990.

⁵³ FNS FDPIR program data.

APPENDIX E
CORRECTIONS

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

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

1. Revised school year (SY) 2009–2010 742 data from several states
2. Updated SY 2009–2010 SNAP school-age participation rate from a newly released report (as discussed in Appendix C, the participation rate revised upward from 0.851 to 0.877)
3. Updated SNAP asset adjustment factor from a revised calculation methodology (as discussed in Appendix C, the SNAP asset adjustment factor was revised downward from 0.823 to 0.801).

North Dakota's direct certification estimate⁵⁴ of directly certified school-age SNAP participants had the most significant increase of 20 percentage points—from 56 to 76 percent. This change results from VSR revisions that increased the number of Provision 2 and Provision 3 certifications by 4,009 compared to the originally submitted data. These changes were a result of LEAs that originally reported and corrected their data. The updates to the SNAP participation and asset adjustment factors had no substantial impact on the estimate.

Wyoming's direct certification estimate of directly certified school-age SNAP participants increased from 88 to 95 percent. This change is due to VSR revisions that increased Provision 2 and Provision 3 certifications by 667 compared to the original VSR submission. These changes were due to the addition of two LEAs that did not report originally and had 100 percent Provision 2 and Provision 3 certifications. Both of these LEAs reported 100 percent participation in the SY 2010–2011 data. The updates to the SNAP participation and asset adjustment factors had no substantial impact on the estimate.

Delaware's direct certification estimate of directly certified school-age SNAP participants increased from 85 to 89 percent. This change was due to VSR revisions that increased direct certification cases by 263 and Provision 2 and Provision 3 certifications by 1,549 compared to the original VSR submission. These changes were due to the addition of one LEA that did not report originally and one LEA that did not report Provision 2 and Provision 3 certifications originally. This new LEA has reported in the SY 2010–2011 data. The updates to the SNAP participation and asset adjustment factors had no substantial impact on the estimate.

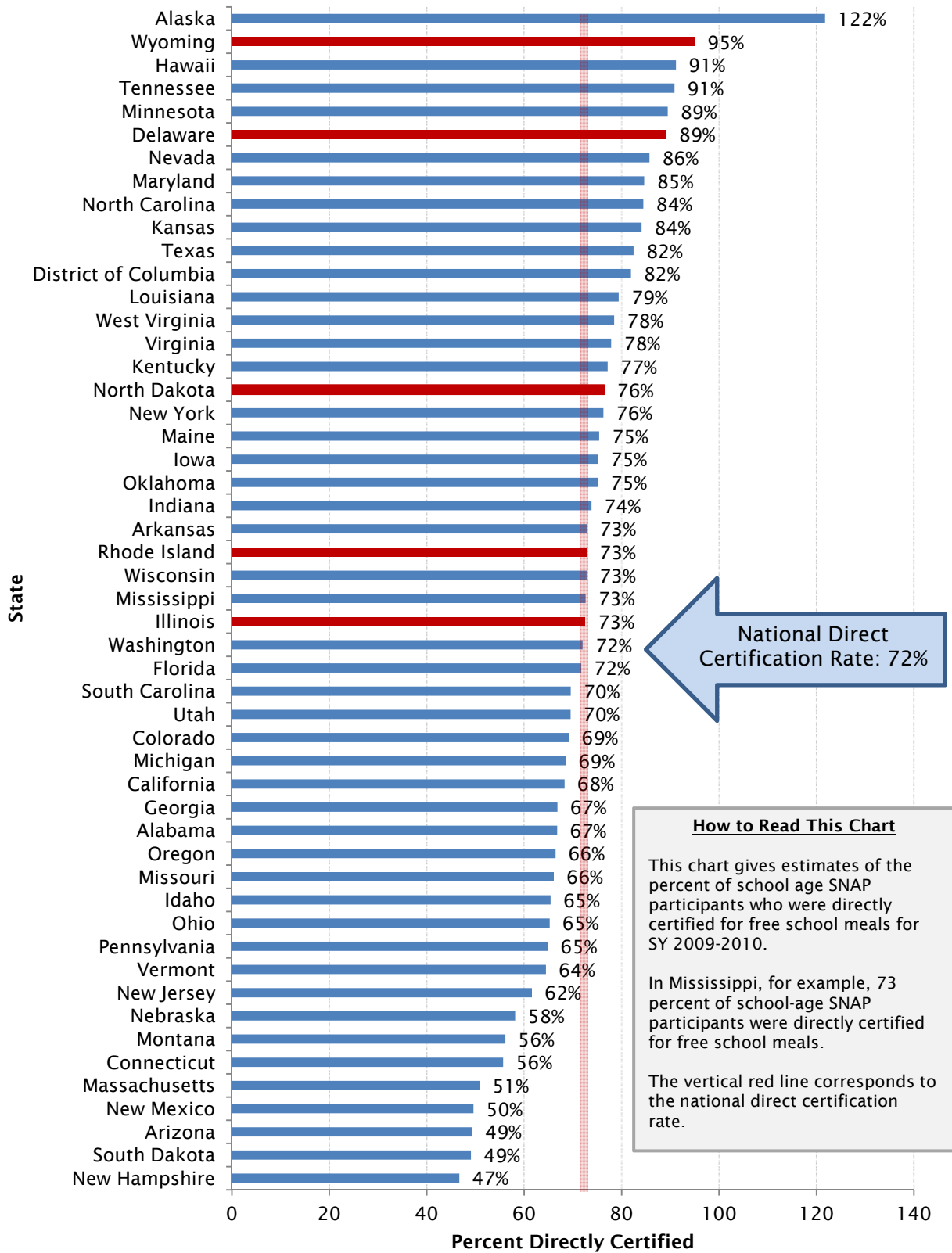
⁵⁴ For Delaware, Rhode Island, and Wisconsin, the four new LEAs reported 100 percent Provision 2 and Provision 3 certifications. Technically these LEAs are not required to complete a verification summary report (VSR). Including LEAs that have 100 percent Provision 2 and Provision 3 certifications has the effect of increasing the state's percentage of directly certified school-age students. Although it is not incorrect to include these LEAs in the calculation, not all LEAs* that have 100 percent Provision 2 and Provision 3 students submit a VSR because they are not required to do so.

Rhode Island's direct certification estimate of directly certified school-age SNAP participants increased from 69 to 73 percent. This change was due to 1,886 new Provision 2 and Provision 3 certifications since last year's data set. These changes were due to the addition of one LEA that did not report originally and had 100 percent Provision 2 and Provision 3 certifications. This LEA has reported in the SY 2010–2011 data. The updates to the SNAP participation and asset adjustment factors had no substantial impact on the estimate.

The updates to the SNAP participation and asset adjustment factors had a minimal impact on Vermont's direct certification estimates (reduced by 1 percent) and New Mexico's direct certification estimates (increased by 1 percent).

The revised estimates are reflected in the amended version of Figure 5 from the October 2010 Report to Congress.

Amended Figure 5. Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals, SY2009-2010



Note: The percentages in this figure are equal to the ratio of directly certified students, and other free-eligible students whose applications are not subject to verification, to all SNAP-participant school-age children. Figures above 100 percent can be explained, in part, by the fact that many LEAs directly certify TANF and FDPIR participants in addition to SNAP-participant students. TANF and FDPIR students are included in the numerator of this computation, although the denominator includes only SNAP participants. See Appendix C and Appendix D for a discussion of data sources and data limitations.



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