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Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2013–2014

Report to Congress

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Report to Congress

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ABSTRACT

This report responds to the legislative requirement of the Food, Conservation, and Energy Act of 2008 (P.L.110-234) 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 education 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 Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires that States meet certain direct certification performance targets. For SY 2013–2014, States that fail to achieve a direct certification rate of at least 95 percent are required to develop and implement continuous improvement plans. The performance target will remain at 95 percent in future years.

Ninety-three percent of LEAs that participate in the NSLP directly certified some SNAP participants and other categorically eligible students in SY 2013–2014. These LEAs enroll 99 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 categorically eligible students.

The number of school-age SNAP participants directly certified for free school meals was 12.4 million for SY 2013–2014, an increase of 1 percent from SY 2012–2013. This year the methodology for calculating the direct certification performance rate was refined in order to make use of new data elements collected in the revised Verification Collection Report (FNS-742) and the new Direct Certification Rate Data Element Report (FNS-834). Therefore, direct certification performance rates presented in this report are not directly comparable to those in reports from prior years.

The results of the analysis in this report indicate that 87 percent of children in SNAP households were directly certified for free school meals. Twelve States achieved the HHFKA-mandated performance target of 95 percent, and no States had a direct certification rate lower than 60 percent.[1]

[1] Although Hawaii's performance rate exceeded 95 percent, the State was not able to distinguish students directly certified based on SNAP benefit receipt from those based on other program participation. For this reason, Hawaii is not considered to have met the HHFKA-mandated performance target.

CONTENTS

TABLES

FIGURES

GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey (U.S. Census Bureau)
ARC	Arkansas Research Center
BBCE	broad-based categorical eligibility
CE	categorical eligibility
CEP	Community Eligibility Provision
CIP	continuous improvement plan
CN	child nutrition
DER	Direct Certification Rate Data Element Report (FNS Form 834)
DHHS	U.S. Department of Health and Human Services
DOB	date of birth
FCEA	Food, Conservation, and Energy Act of 2008
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
FY	fiscal year
HHFKA	Healthy, Hunger-Free Kids Act of 2010
ID	identification
IT	information technology
LEA	local education agency
MDE	Minnesota Department of Education
MDHS	Minnesota Department of Human Services
NCDOE	North Carolina Department of Education
NHDOE	New Hampshire Department of Education
NSLA	Richard B. Russell National School Lunch Act
NSLP	National School Lunch Program
P.L.	Public Law
SBP	School Breakfast Program
SDE	State Department of Education (Idaho)
SIPP	Survey of Income and Program Participation
SFA	school food authority
SNAP	Supplemental Nutrition Assistance Program
SSIS	statewide student information system
SSN	Social Security number
SY	school year
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture
VCR	Verification Collection Report (FNS Form 742)
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

EXECUTIVE SUMMARY

This report responds to a legislative requirement of the Food, Conservation, and Energy Act of 2008 (FCEA) (Public Law [P.L.] 110-234, also known as the 2008 Farm Bill) 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 seventh report in the series, covering school year (SY) 2013–2014. The Food and Nutrition Service (FNS) will use results from this report in determining performance awards and identifying those States that must develop and implement direct certification improvement plans (CIPs), as required by Section 101 of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 (P.L. 111-296). For this report, the methodology for calculating direct certification performance was refined from the methodology used in previous reports in order to make use of new data elements collected in the revised Verification Collection Report (FNS-742) and the new Direct Certification Rate Data Element Report (FNS-834).

The NSLP reimburses local education agencies (LEAs) for the cost of providing nutritious meals to children in public and private schools and residential child care institutions. Average daily participation across NSLP schools and institutions totaled approximately 31 million children in fiscal year (FY) 2013.

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.

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 the next section) 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, or homeless; who are 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 their household.

Direct certification

Students' eligibility for free meals is determined by application or by direct certification. The Child Nutrition and WIC Reauthorization Act of 2004 (the 2004 Reauthorization Act) 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.

Although direct certification systems vary by State and LEA, all such systems substantially reduce the need for household applications. Many States and LEAs certify categorically eligible students through computer matching of program records against student enrollment lists. Those systems require no action by the children's parents or guardians. States and LEAs commonly incorporate participation data from programs other than SNAP, such as TANF, FDPIR, or foster care. In some States, SNAP, TANF or FDPIR agencies send letters to program participants indicating that any school-age children in the household are eligible for free school meals. Household members can forward these letters to LEA staff in order to be certified without an application. In the past, States and LEAs could consider these children directly certified. However, effective with SY 2012–2013, States may no longer use the letter method as a means of direct certification for SNAP, although they are required to continue to accept such letters in lieu of applications as documentation of categorical eligibility.

HHFKA requires that States meet certain direct certification performance targets. For SY 2013–2014, States that fail to achieve a direct certification rate of at least 95 percent are required to develop and implement CIPs. The performance target will remain at 95 percent in future years.

State performance measures

This report presents information on direct certification performance for SY 2013–2014. As noted above, the methodology for calculating the performance measure was refined for this report to make use of new data elements from the revised Verification Collection Report (FNS-742) and the new Direct Certification Rate Data Element Report (FNS-834). In order to calculate the performance rate, Mathematica Policy Research used State-reported counts of the number of school-age SNAP participants, the number of children directly certified for free school meals based on SNAP participation, and the number of SNAP children in special provision schools operating in non-base years. The refined formula provides a measure of the success of State and local systems to directly certify SNAP-participant children.

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

Key findings

At the start of SY 2013–2014, States and LEAs directly certified 11.2 million children based on participation in SNAP and 1.2 million children based on participation in programs other than SNAP, for a total of 12.4 million children. This total represents an increase of 1 percent from the previous year. The calculated percentage of SNAP-participant children directly certified for free school meals was 87 percent in SY 2013–2014. The direct certification performance rate in SY 2012–2013 was estimated at 89 percent; however, this estimate was based on different data

sources and overstated the percentage of SNAP-participant children directly certified for free school meals because it included students directly certified based on programs other than SNAP.[2]

For 38 States in SY 2013–2014, the number of students certified using direct certification, application based on categorical eligibility, or letter method was at least 95 percent of the estimated number of school-age children categorically eligible for free school meals based on participation in SNAP, TANF or FDPIR. However, this measure may overstate the effectiveness of State efforts to ensure that all categorically eligible children receiving SNAP, TANF, or FDPIR benefits are properly certified for free school meals for several reasons. Most importantly, many States and districts have improved their certification processes to directly or categorically certify categorically eligible children from programs other than SNAP, TANF, or FDPIR, such as those receiving foster care or those directly certified based on Medicaid data in States participating in the Direct Certification-Medicaid demonstration. While these represent important improvements to direct certification systems, they may also have the effect of overstating the percentage of SNAP, TANF, or FDPIR recipients who were certified because it includes children certified through other programs that allow for direct certification or confer categorical eligibility.

The number of LEAs directly certifying categorically eligible children continues to increase. In SY 2004–2005, before the congressional mandate for direct certification, 56 percent of LEAs directly certified categorically eligible children on a discretionary basis. By SY 2013–2014, 93 percent of LEAs directly certified some categorically eligible children; those LEAs enrolled 99 percent of students in NSLP-participating schools.

State best practices

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

Representatives from six states with successful or improved direct certification systems were interviewed for this report. Four of these States have revised their direct certification matching systems with the help of grant money made available by USDA. Recent direct certification changes that States link to performance improvements include improving data system capability—such as increasing use of automated processes—and increasing match frequency. Many of these changes were made with an eye toward meeting the performance benchmarks set forth in HHFKA (95 percent in SY 2013–2014 and in future years). In discussions surrounding challenges to meeting these benchmarks in future years, States frequently cited difficulties inherent in matching data from different sources, such as divergent file layout and data entry protocols across data sources. States also cited the inability of direct certification improvement measures to account for children who receive SNAP benefits but who are not enrolled in schools

[2] An estimate that more closely approximates the estimates used in previous reports can by calculated by including the counts of both SNAP and non-SNAP direct certifications from the revised FNS-742. Instead of a national direct certification rate of 87 percent found using the primary method, this alternate method generates a 95 percent national rate—6 percentage points higher than the rate in last year's report. While it is important to not misinterpret this figure, it helps to confirm that States continue to improve their direct certification performance.

and thus not eligible for direct certification. These students include home-schooled children, school dropouts, and some homeless and migrant children.

Conclusion

States and LEAs have made significant progress in complying with the 2004 Reauthorization Act. An estimated 93 percent of LEAs, enrolling 99 percent of all children in NSLP-participating schools, directly certified SNAP participants in SY 2013–2014. Eighty-seven percent of children from SNAP-participant households were directly certified for free school meals in SY 2013–2014. Twelve States achieved direct certification rates of at least 95 percent, the direct certification performance target set by HHFKA for SY 2013–2014. No States had a direct certification rate lower than 60 percent.

DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM: STATE IMPLEMENTATION PROGRESS, SCHOOL YEAR 2013–2014

I. Introduction

The National School Lunch Program (NSLP) reimburses local education agencies (LEAs) for the cost of providing nutritious low-cost or free meals to children in public and private schools and residential child care institutions. Participating schools and institutions receive cash reimbursements and foods donated by the U.S. Department of Agriculture (USDA) for each meal served. About 100,000 schools and institutions participate in the program. Average daily student participation totaled about 31 million in fiscal year (FY) 2013.[3]

In exchange for Federal assistance, participating schools and institutions serve meals that satisfy Federal nutrition and food safety standards. In addition, they must offer school meals at no cost, or at reduced price, to eligible children. Children from households with incomes at or below 130 percent of the Federal poverty level ($30,615 for a family of four during school year (SY) 2013–2014)[4] are eligible for free meals. Those from households with incomes from 130 to 185 percent of the Federal poverty level ($43,568 for a family of four during SY 2013–2014) 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

Most LEAs accept applications from households to establish the eligibility of the children who reside in them for free or reduced-price school meals.[5] Most applicants submit self-declared income and household size information, which is compared with the income thresholds for free and reduced-price benefits. Other applicants provide case numbers that demonstrate household participation in one of several other means-tested Federal assistance programs. Children in households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR) are categorically eligible for free school meals. Categorical eligibility through these assistance programs, whether determined by application or by direct certification (described next), extends to all children in the same household. 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 http://www.fns.usda.gov/sites/default/files/NSLPFactSheet.pdf.

[4] 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/sites/default/files/RPieg.pdf.

[5] Some schools receiving reimbursements under special provisions do not collect applications. These include schools using Provisions 2 or 3 and operating in a non-base year, as well as schools using the new Community Eligibility Provision.

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, at either the State or the LEA level.[6] Parents or guardians of children identified through these matching systems are notified of their children's eligibility for free school meals.[7] They need not take action for their children to be certified.[8]

The 2004 Reauthorization Act requires that each State education agency enter into an agreement with the State agency responsible for determining SNAP eligibility. The agreement must establish procedures to directly certify children from SNAP households for free school meals.[9] States may also directly certify children from TANF and FDPIR households; foster children; participants in Federally funded Head Start or Even Start programs; and certain homeless, runaway, and migrant children, but are not required to do so.

C. Purpose of this report

This report responds to Section 4301 of the Food, Conservation, and Energy Act of 2008 (FCEA),[10] which calls for an assessment of the "effectiveness of each State in enrolling school-age children in households receiving … [SNAP] benefits" for free school meals.[11] Specifically, the law requires the following:

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

The Food and Nutrition Service (FNS) will use these estimates in determining performance awards and identifying those States that must develop and implement direct certification

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

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

[8] In the past, States and LEAs could opt to send letters to SNAP, TANF, and FDPIR households with school-age children. The letters served as proof of categorical eligibility for free meals and were forwarded by the households to their children's schools. By SY 2012–2013, States were required to phase out the use of the letter method and it could no longer be used to directly certify children receiving SNAP benefits.

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

[10] Also known as the 2008 Farm Bill.

[11] This report includes analysis of the contiguous United States, Alaska, Hawaii, and Guam.

continuous improvement plans (CIPs), as required by Section 101 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) (P.L. 111-296). Specifically, for SY 2013–2014 and beyond, States that fail to achieve a direct certification rate of at least 95 percent are required to develop and implement CIPs. This year, we used a revised methodology to calculate State direct certification performance that makes use of data elements from the Verification Collection Report (VCR), a revised version of FNS Form 742 that replaced the Verification Summary Report in SY 2013–2014, and the new Direct Certification Rate Data Element Report (DER, FNS Form 834). As a result of the revised methodology, the performance measure now reflects State-reports of key components of the measure and no longer overstates the percentage of SNAP participants who were directly certified by including children directly certified based on participation in other programs.

In addition to presenting direct certification performance measures, Section 4301 of the FCEA also calls for a discussion of best practices in States with successful direct certification systems.

II. History of direct certification

In the mid-1980s, program managers and policymakers recognized a duplication of effort in certifying school children for free meals under the NSLP and the School Breakfast Program (SBP),[12] and certifying families for what are now the SNAP and TANF programs (formerly the Food Stamp Program and Aid to Families with Dependent Children, respectively). All 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.[13] Then, in 1989, P.L. 101-147 (Child Nutrition and WIC Reauthorization Act of 1989) allowed school food authorities (SFAs) to certify children, without further application, by directly communicating with the appropriate State or local agency to obtain documentation that the children were members of a household receiving either SNAP or TANF benefits. This first statutory authorization of direct certification was made optional for SFAs.

[12] 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.

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

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.[14] The 2004 act retained discretionary authority for TANF direct certification. Mandatory direct certification with SNAP was phased in over three years, beginning in SY 2006–2007. All LEAs, including private schools, were required to have direct certification systems in place for SY 2008–2009.

Because State agencies administering the NSLP and SBP recognized that direct certification would increase participation, ease the burden on families and LEAs, and result in more accurate targeting of free school meal benefits, many States chose to phase in the use of direct certification in 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 household if at least one child is certified for free meals based on receipt of SNAP, TANF, or FDPIR benefits. HHFKA required that State agencies no longer use the letter method as a means of direct certification with SNAP. This act also includes a provision that expands direct certification to include Medicaid in some districts via a demonstration project. In addition, starting in SY 2011–2012, FNS required that direct certification matching with SNAP records occurs at least three times per school year.

Even though all LEAs are now subject to the statutory direct certification mandate, there continues to be a need for household applications. 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. In addition, because children from households with incomes from 130 to 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.

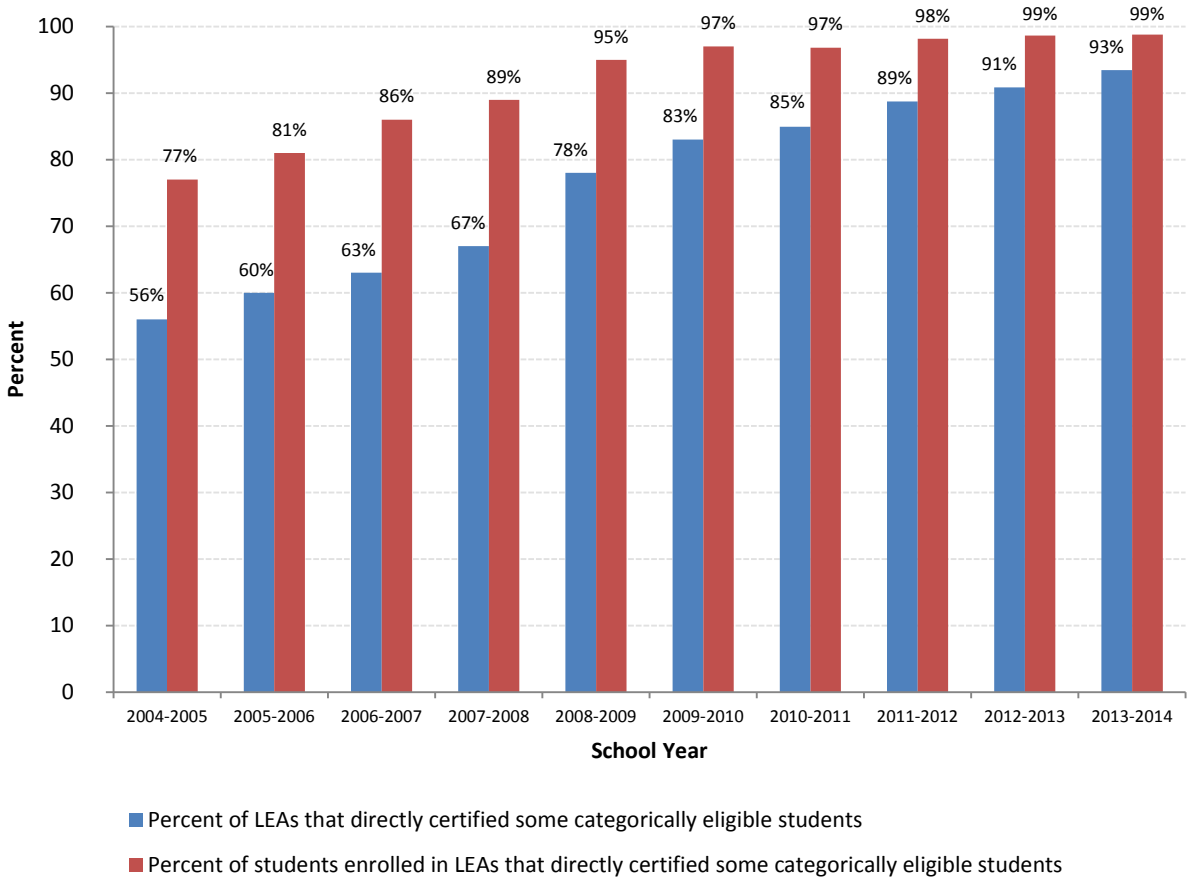
III. Current status of direct certification systems

The 2004 Reauthorization Act required that all LEAs 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.

[14] This report focuses on the role LEAs play in certifying students for free school meals. We use the terms LEA and district interchangeably.

Figure 1 and Table 1 illustrate the increases over time in both the percentage of LEAs that directly certified categorically eligible students—SNAP-participants and participants in other programs that allow for direct certification—and the percentage of students enrolled in those LEAs. For SY 2013–2014, 93 percent of LEAs directly certified some categorically eligible students, and those LEAs enrolled 99 percent of all students in NSLP-participating schools.

Figure 1. Percent of LEAs that directly certified categorically eligible students and percent of students in LEAs that directly certified categorically eligible students, SY 2004–2005 through SY 2013–2014



Note: The data for SY 2013–2014 are from the VCR form, which breaks out students directly certified through SNAP and through other programs. Districts that directly certified SNAP participants and/or other program participants are included in this count, as are districts that are not required to conduct direct certification. In SY 2013-2014, about 2 percent of districts were required to conduct direct certification and directly certified no SNAP participants but did directly certify some students based on participation in other programs. In previous years, the data were not broken out by program and might also include other students who were not directly certified, but were not subject to verification.

Table 1. Number and percent of LEAs that directly certified categorically eligible students, SY 2011–2012 through SY 2013–2014

	SY 2011–2012			SY 2012–2013			SY 2013–2014		
		Direct certification or Provision 2/3 LEAs			Direct certification or Provision 2/3 LEAs			Direct certification or special provision LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**18,643**	**16,545**	**88.7**	**18,362**	**16,684**	**90.9**	**19,707**	**18,423**	**93.5**
Alabama	156	145	92.9	159	152	95.6	191	149	78.0
Alaska	50	49	98.0	69	48	69.6	68	68	100.0
Arizona	456	404	88.6	464	407	87.7	489	479	98.0
Arkansas	289	279	96.5	284	268	94.4	312	302	96.8
California	1,094	872	79.7	1,094	1,024	93.6	1,295	1,227	94.7
Colorado	214	204	95.3	209	201	96.2	231	224	97.0
Connecticut	185	183	98.9	188	186	98.9	202	197	97.5
Delaware	42	35	83.3	44	40	90.9	48	47	97.9
District of Columbia	61	60	98.4	63	63	100.0	67	67	100.0
Florida	223	178	79.8	226	185	81.9	277	261	94.2
Georgia	229	219	95.6	222	212	95.5	236	232	98.3
Guam	3	1	33.3	2	1	50.0	3	2	66.7
Hawaii	35	25	71.4	35	35	100.0	35	34	97.1
Idaho	148	141	95.3	149	149	100.0	162	159	98.1
Illinois	1,126	1,039	92.3	1,051	984	93.6	1,152	983	85.3
Indiana	496	429	86.5	504	447	88.7	550	539	98.0
Iowa	477	428	89.7	474	419	88.4	487	456	93.6
Kansas	400	362	90.5	398	378	95.0	415	402	96.9
Kentucky	189	178	94.2	188	186	98.9	200	199	99.5
Louisiana	113	106	93.8	114	107	93.9	140	130	92.9
Maine	187	170	90.9	189	182	96.3	205	192	93.7
Maryland	55	47	85.5	55	38	69.1	67	58	86.6
Massachusetts	422	355	84.1	363	324	89.3	464	448	96.6
Michigan	845	762	90.2	847	784	92.6	876	848	96.8
Minnesota	697	472	67.7	694	458	66.0	690	534	77.4
Mississippi	175	159	90.9	172	159	92.4	186	168	90.3
Missouri	755	704	93.2	762	711	93.3	777	737	94.9
Montana	240	212	88.3	239	206	86.2	239	215	90.0
Nebraska	374	320	85.6	370	337	91.1	391	378	96.7
Nevada	20	15	75.0	25	17	68.0	32	28	87.5
New Hampshire	100	88	88.0	98	82	83.7	107	106	99.1
New Jersey	697	683	98.0	699	680	97.3	729	717	98.4
New Mexico	202	147	72.8	205	143	69.8	222	113	50.9
New York	1,101	1,001	90.9	1,093	942	86.2	1,124	1,014	90.2
North Carolina	162	152	93.8	161	152	94.4	177	176	99.4
North Dakota	203	179	88.2	202	174	86.1	207	195	94.2
Ohio	1,214	1,043	85.9	1,219	1,146	94.0	1,305	1,270	97.3
Oklahoma	573	545	95.1	572	548	95.8	604	587	97.2
Oregon	244	205	84.0	239	204	85.4	280	256	91.4
Pennsylvania	853	768	90.0	853	790	92.6	894	854	95.5
Rhode Island	54	49	90.7	53	53	100.0	79	71	89.9
South Carolina	106	84	79.2	94	84	89.4	148	132	89.2
South Dakota	210	194	92.4	208	189	90.9	219	211	96.3
Tennessee	183	174	95.1	182	174	95.6	195	193	99.0
Texas	1,259	1,148	91.2	1,247	1,154	92.5	1,251	1,160	92.7
Utah	85	81	95.3	94	94	100.0	103	103	100.0
Vermont	218	203	93.1	88	82	93.2	92	79	85.9
Virginia	155	146	94.2	151	145	96.0	173	168	97.1
Washington	326	296	90.8	319	300	94.0	337	321	95.3
West Virginia	72	57	79.2	71	58	81.7	96	93	96.9
Wisconsin	812	698	86.0	799	728	91.1	809	777	96.0
Wyoming	58	51	87.9	62	54	87.1	69	64	92.8

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

About two-thirds of the LEAs that did not directly certify categorically eligible students in SY 2013–2014 are private, and three-quarters are single-school LEAs. These schools might be less likely to enroll categorically eligible children or could face greater barriers to implementing direct certification. The information-sharing relationship between private school LEAs and the States' education agencies often differs from the relationship between public LEAs and the States. For this reason, private LEAs are sometimes excluded from State-level direct certification matching systems. Although small, single-school, and private LEAs might face special challenges in setting up direct certification systems, all are subject to the statutory mandate.

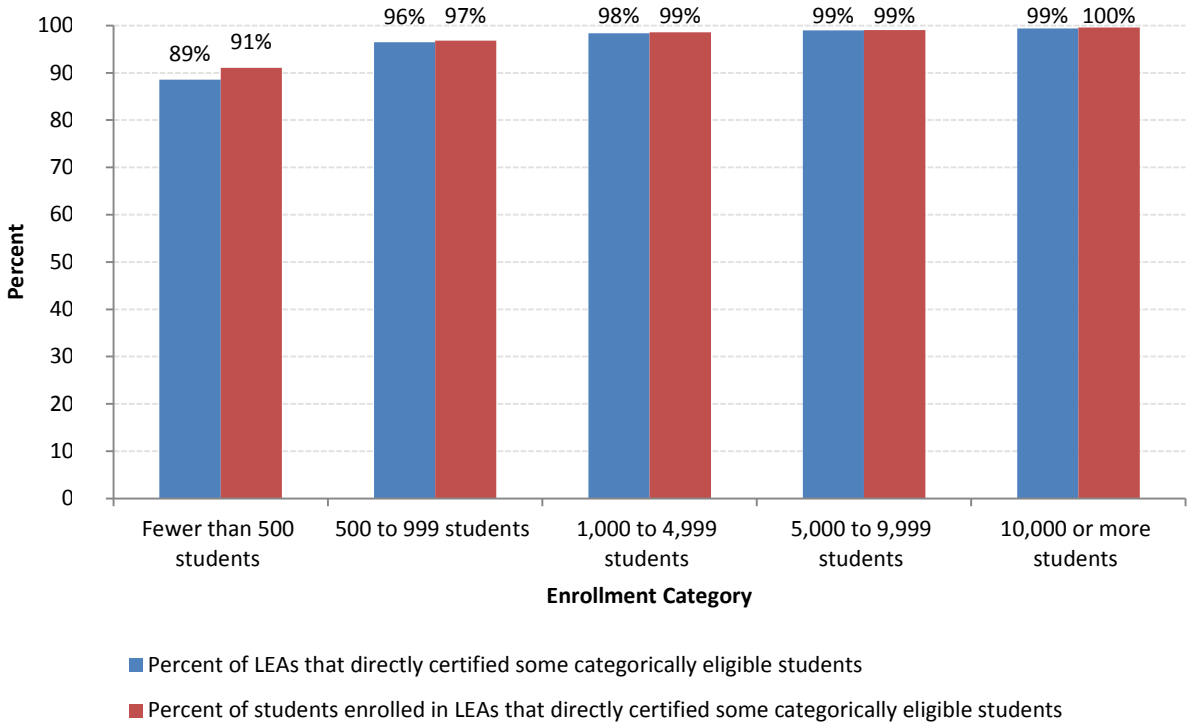
The 2004 Reauthorization Act's phased implementation of mandatory direct certification recognized that the fixed costs of establishing such a system would pose the greatest challenge to small LEAs. Although SY 2013–2014 is the sixth year that the smallest LEAs were subject to the statutory mandate, these LEAs continue to lag behind larger LEAs somewhat 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 percentage of LEAs that directly certified categorically eligible students and the percentage of students enrolled in LEAs that directly certified categorically eligible students in SY 2013–2014. Use of direct certification is nearly universal for larger LEAs; 99 percent of LEAs with enrollments of 5,000 or more students, 98 percent of those with enrollments of 1,000 to 4,999, and 97 percent of those with enrollments of 500 to 999 directly certified some categorically eligible students in SY 2013–2014. Although LEAs with enrollments of at least 500 make up about 52 percent of all LEAs, they enroll about 96 percent of students nationwide (Figure 3).

Direct certification is somewhat less prevalent among small LEAs; about 89 percent of LEAs with fewer than 500 students directly certified categorically eligible students in SY 2013–2014. Some of the LEAs might not have categorically eligible children among their enrollments, though it is also possible that technical or administrative challenges are among the reasons that these LEAs did not directly certify any categorically eligible students. The direct certification numbers for these small LEAs are a 5-percentage point improvement over the previous year. Therefore, the gap between the largest LEAs and those with fewer students is narrowing.

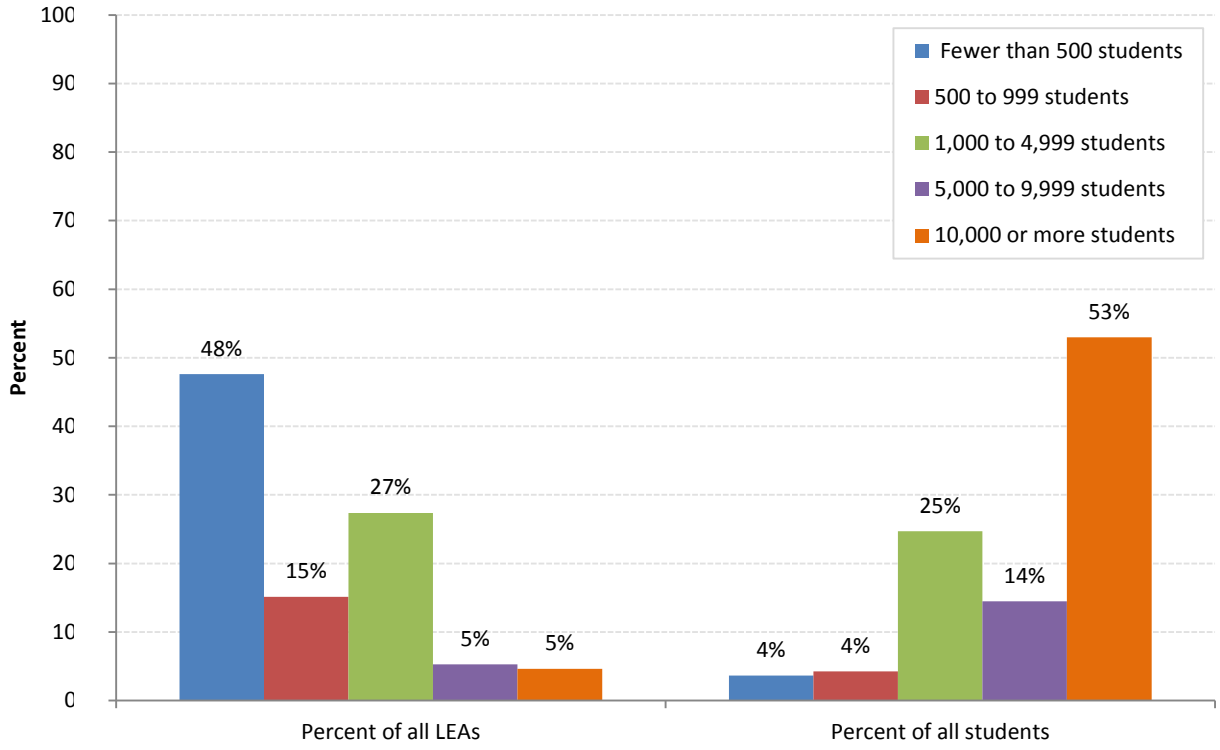
About 48 percent of all LEAs enroll fewer than 500 students; these LEAs account for only 3 percent of all enrolled students nationwide (Figure 3). Of the 1.7 million students enrolled in these LEAs, a large majority (91 percent) are enrolled in LEAs that directly certified at least some SNAP-eligible children.

Figure 2. Percent of LEAs that directly certified categorically eligible students and percent of students in LEAs that directly certified categorically eligible students by enrollment category, SY 2013–2014



Note: The percentages in this figure are rounded. For example, 99.7 percent of LEAs with 10,000 or more students directly certified some categorically eligible students in SY 2013–2014, which is rounded to 100 percent.

Figure 3. Percent of LEAs and students, by enrollment category, SY 2013–2014



A. Characteristics of LEAs that did not directly certify any SNAP children

Overall, 1,284 LEAs, about 7.0 percent of the total, did not directly certify SNAP-participant children in SY 2013–2014 (a decrease from 1,678 LEAs in SY 2012–2013). 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 7.0 percent of LEAs that did not directly certify any SNAP children enroll only 1.4 percent of students in NSLP-participating schools.

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

- About 83 percent enrolled fewer than 500 students; only 45 percent of LEAs that did directly certify SNAP participants enrolled fewer than 500 students.
- About 74 percent are single-school LEAs; only 37 percent of LEAs that did directly certify SNAP participants are single-school LEAs.
- An estimated 63 percent are private LEAs; only 20 percent of LEAs that did directly certify SNAP participants are private.
- About 24 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 303 LEAs is not in full compliance with the direct certification requirement; these LEAs might enroll very few or no children from SNAP-participant households.
- About 38 percent certified some but no more than 5 percent of their enrolled students for free meals; only 11 percent of LEAs that did directly certify SNAP participants reported having such a low concentration of students from low-income households. These LEAs have an unusually low concentration of students certified for free meals, and some might also be in compliance with the direct certification requirement, though their systems failed to identify any SNAP participants.

IV. Direct certification performance

For each State, Mathematica calculates a direct certification performance measure reflecting the percentage of school-age children in SNAP-participant households who were directly certified for free school meals. For this Report to Congress, the data sources of the components of this measure have changed in important ways from those used in previous Reports to Congress:

1. **The number of SNAP participants directly certified by the State's LEAs for free school meals.** This value is based on LEA reports on the VCR. For SY 2013–2014, the VCR was revised such that LEAs report direct certifications from SNAP separately from direct certifications based on other programs.
2. **The number of SNAP participants in the State's non-base year special provision schools.** This value is based on State reports on the DER. In previous Reports to Congress, this value was estimated based on secondary data sources.
3. **The number of school-age children in the State's SNAP-participant households.** This value is based on State reports on the DER. In previous Reports to Congress, this value was estimated based on secondary data sources.

Table 2 provides the values of these components for each State. To take advantage of the new data sources and data reported directly from States, this report's primary measure of State direct certification effectiveness is computed as follows:

$$\text{Percent of SNAP children directly certified for free school meals} = \frac{\text{Students directly certified for free school meals based on SNAP participation} + \text{SNAP children in special provision schools operating in non-base years}}{\text{School-age children in SNAP households}}$$

Although the revised methodology is more straightforward than the one used in previous reports and addresses many of the limitations of the previous methodology, some limitations to measuring direct certification performance remain. These limitations are discussed in the next section.

A. Data limitations and special circumstances affecting direct certification performance measurement

The reliability of the performance measure depends on the accuracy of the underlying data. One source of potential inaccuracy is reporting error. For example, if some districts provide inaccurate counts of students who are directly certified based on SNAP participation, then State calculations of students directly certified based on SNAP participation are incorrect—specifically this inaccuracy will affect the numerator of the performance rate equation. Reporting error can also occur if State agencies provide inaccurate counts of the number of school-age children in SNAP households or SNAP participants in special provision schools operating in non-base years. Reporting error in these counts may be particularly relevant for SY 2013-2014 counts because this is the first year that agencies have used the DER. It is likely that reporting error will decline in future years as agencies become more familiar with the steps needed to complete the form.

To identify potential data limitations, FNS asked States to indicate special circumstances in the data they submitted that would affect their performance rates.[15] Fourteen States cited such circumstances. FNS discussed these circumstances in detail with staff from the States, obtaining useful information about the challenges States face when collecting the data elements FNS requires. Special circumstances fell into two categories. The first stemmed from data system limitations. Specifically, seven States reported that their data systems prevented them from distinguishing direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP.[16] The resulting performance rates calculated for these States, therefore, overstate their actual performance.

The second type of special circumstance States cited dealt with children in households receiving SNAP benefits who do not attend schools participating in the NSLP. These children

[15] States used the DER form to report these special circumstances, and many of those circumstances pertained to limitations of the VCR data. See Appendix C for more details.

[16] Arizona, California, Connecticut, Hawaii, Ohio, Rhode Island, and Vermont could not distinguish direct certifications based on SNAP participation from direct certifications based on participation in programs other than SNAP.

Table 2. SNAP participation, direct certifications, and SNAP-participant students in special provision schools in a non-base-year, SY 2013–2014 (thousands)

	School-age SNAP participants (from DER data)	NSLP direct certifications based on SNAP participation (from VCR data)	SNAP-participant students in special provision schools in a non-base year (from DER data)
U.S. total	**15,346.4**	**11,261.8**	**2,099.7**
Alabama	300.4	254.2	4.2
Alaska	29.7	17.9	8.6
Arizona*	409.1	215.8	36.1
Arkansas	162.6	131.9	12.9
California*	1,661.8	1,037.5	288.9
Colorado	190.8	131.1	0.0
Connecticut*	109.0	69.0	30.0
Delaware	52.0	44.9	4.2
District of Columbia	35.9	9.1	25.3
Florida	937.3	790.8	122.2
Georgia	661.5	394.0	170.2
Guam	17.6	15.7	0.0
Hawaii*	49.2	50.2	0.0
Idaho	79.9	71.3	0.6
Illinois	648.7	457.4	179.7
Indiana	323.2	241.6	24.0
Iowa	135.8	116.0	9.0
Kansas	105.3	102.1	0.0
Kentucky	248.3	160.9	75.6
Louisiana	309.2	270.9	0.0
Maine	59.2	49.6	0.0
Maryland	207.6	203.0	1.2
Massachusetts	226.8	181.1	32.3
Michigan	500.6	285.0	148.7
Minnesota	176.1	168.8	1.4
Mississippi	221.7	166.4	12.3
Missouri	298.1	255.0	0.0
Montana	38.8	23.2	4.0
Nebraska	62.8	43.1	21.7
Nevada	121.8	93.8	12.4
New Hampshire	33.8	27.6	0.0
New Jersey	282.6	263.7	1.4
New Mexico	168.7	67.8	62.7
New York	908.2	544.1	296.0
North Carolina	509.1	506.8	0.0
North Dakota	17.9	12.2	4.9
Ohio*	575.4	399.1	111.6
Oklahoma	173.1	165.5	7.4
Oregon	214.6	148.9	13.7
Pennsylvania	532.1	372.9	77.2
Rhode Island*	43.4	40.9	0.0
South Carolina	287.6	232.5	0.0
South Dakota	35.6	23.5	7.1
Tennessee	415.0	391.6	0.0
Texas	1,673.3	1,104.5	230.2
Utah	97.6	72.2	1.7
Vermont*	23.0	19.8	0.5
Virginia	288.4	263.8	0.0
Washington	309.5	244.0	12.0
West Virginia	98.5	46.5	44.5
Wisconsin	262.1	250.9	2.5
Wyoming	15.6	12.1	0.4

Note: The U.S. total for each column may not equal the sum of the individual State values due to rounding. Asterisks indicate that State was unable to distinguish direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP. The count labeled “direct certifications based on SNAP participation” includes all direct certifications for these States. The true count of direct certifications based on SNAP participation is lower for these seven States.

appear in the denominator of the direct certification performance rate calculation because the children reside in SNAP households. However, they do not appear in the numerator, because the children do not attend school districts that submit VCR forms. The result decreases State performance rates. States cited children in the following categories:

- Home-schooled students
- Virtual students (who attend classes online)
- Students attending schools that do not participate in the NSLP
- School-age children who do not attend school, including
  - School drop-outs
  - Students who graduated early
  - Children at least five years old but younger than the mandatory school-start age for their State
  - Some homeless and migrant children

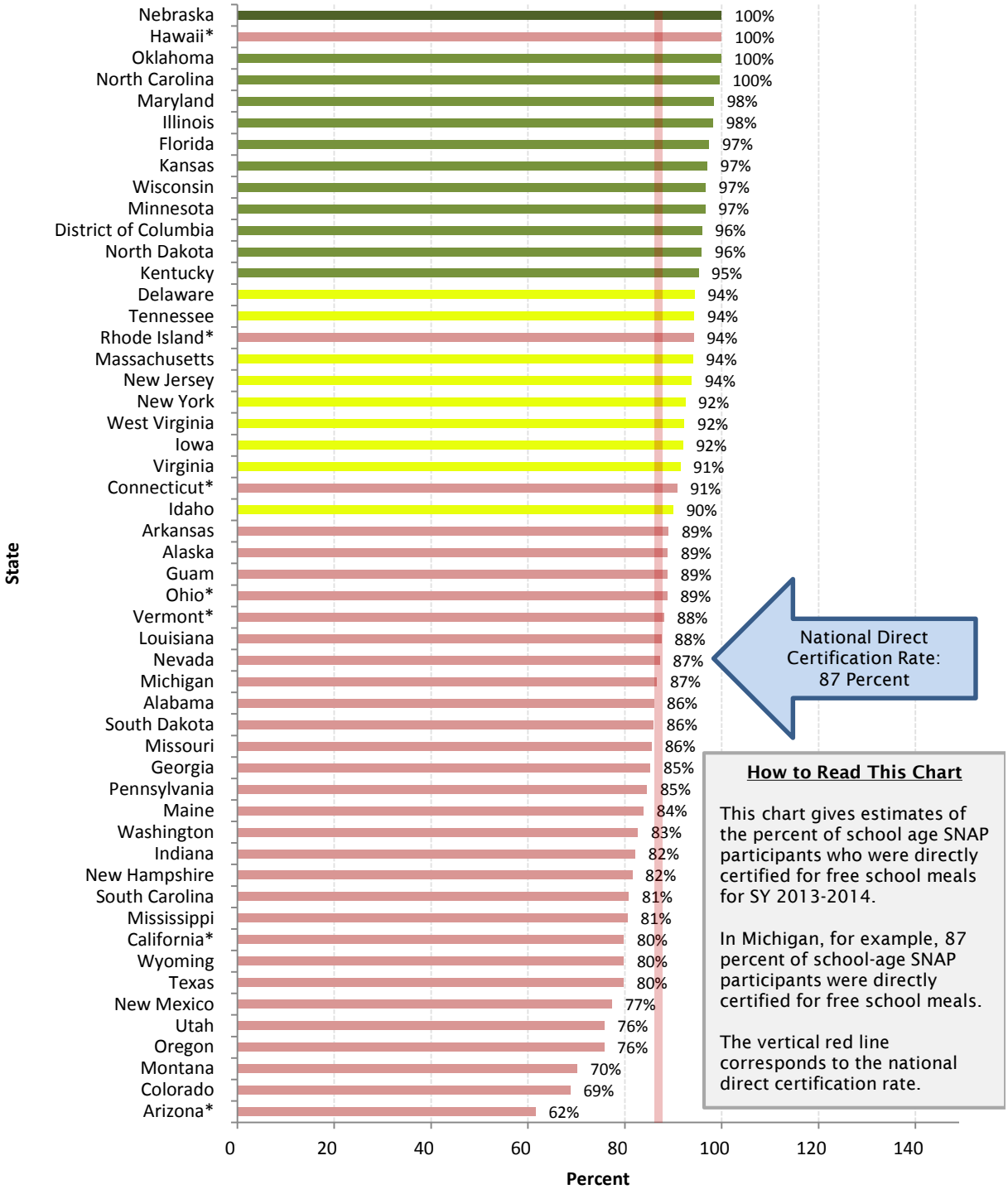
Although these types of students were cited as a special circumstance to measurement of direct certification performance by a relatively small number of States, this circumstance is likely relevant to all States. It is difficult to gauge the scope of this problem because many States do not collect individual-level data on children in these circumstances. A limited number of States that identified this as an issue offered estimated numbers for some of these populations. This provided a useful first step in determining how these challenges affect State performance. However, no firm, comprehensive counts exist for the number of school-age SNAP participants who do not attend school. FNS continues to study the issue with the goal of developing procedures that would allow for adjustments to the statistics used in the direct certification performance measure in future years. Other limitations of the data and methodology used to calculate State performance rates are discussed in Appendix C.

B. Calculations of State direct certification performance

Figure 4 ranks the States according to this performance measure.[17] When examining the percentage values associated with the States, readers should keep in mind that special circumstances might affect the measurement of direct certification performance and each of the component statistics of the measure might be subject to reporting error. For this reason, this report focuses primarily 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.

[17] Seven States were unable to distinguish direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP. The direct certification performance rate calculations for these States includes all direct certifications for these States, rather than only those that are based on SNAP. For each of the seven States, then, their rate will overstate their actual performance. The national direct certification rate is not strongly sensitive to the treatment of direct certifications in these States. If we assume that for these States the percentage of direct certifications that were based on SNAP is the same as the median State, the national direct certification performance rate is 86 percent rather than 87 percent.

Figure 4. Percent of school-age SNAP-participant children directly certified for free school meals, SY 2013–2014



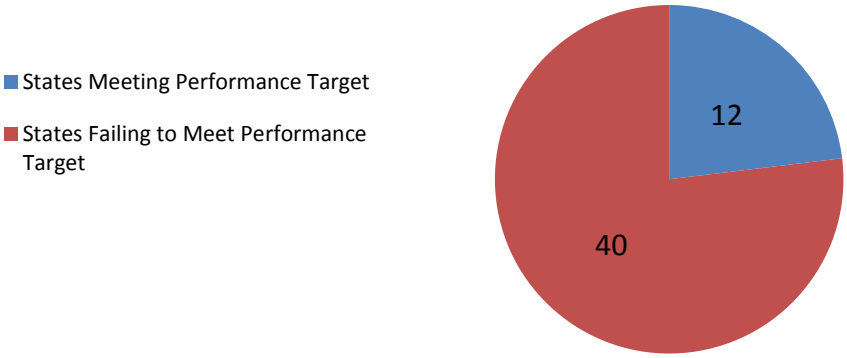
Note: Dark green shading indicates calculations that were greater than 100 percent. Light green shading indicates estimates of at least 95 percent and less than or equal to 100 percent. Yellow shading indicates estimates of at least 90 percent and less than 95 percent. Red shading indicates estimates less than 90 percent. Asterisks indicate that State was unable to distinguish direct certifications based on SNAP from direct certifications based on participation in programs other than SNAP. Performance rate calculations for these States are overstated because they include all direct certifications reported by these States. All seven of these States are shaded as red.

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 LEAs or school administrators in these States are burdened with more administrative paperwork than their counterparts in other States.

The potential for errors in measurement and State reporting minimize the significance of small differences in the percentage point scores of States that fall near one another in Figure 4, but the wide gap between States near the bottom of the chart and those near the top makes clear that some States' direct certification systems are simply less effective than other States' systems. Among States and LEAs that rely on computer matching for direct certification, 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.

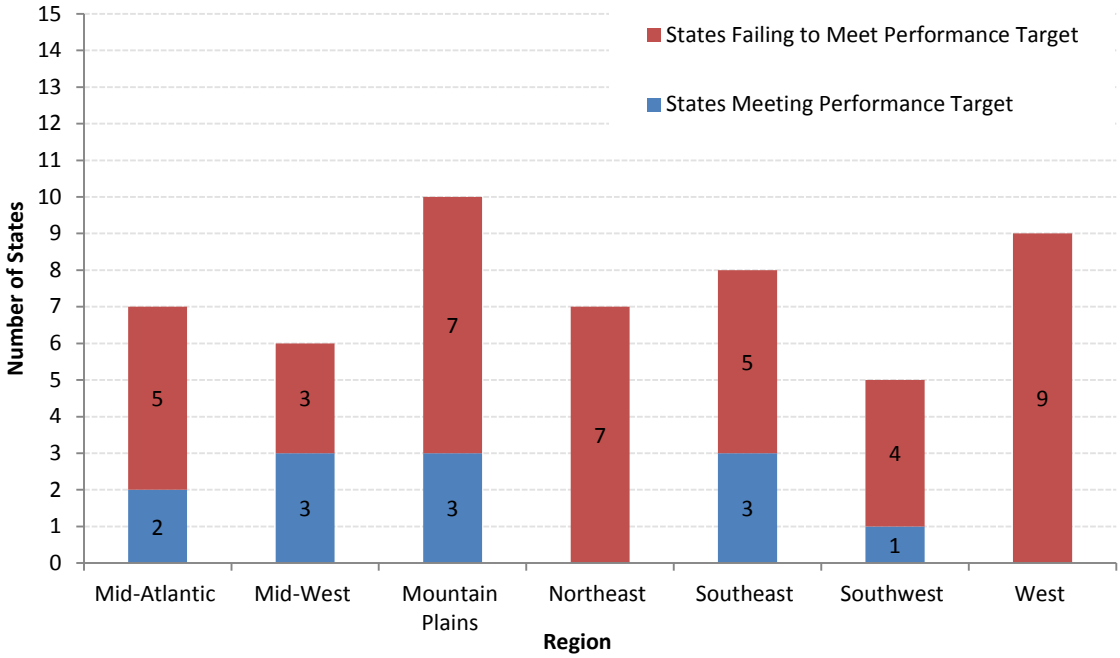
Figure 5 shows the number of States that met or exceeded the direct certification performance target established by HHFKA—95 percent for SY 2013–2014. Nationally, 12 States were at or above this benchmark.[18] Regionally, there are differences in direct certification effectiveness (Figure 6). The seven regions shown in Figure 6 are those defined for FNS administrative purposes. The Mid-West, Mountain Plains and Southeast regions have the most States at or above the direct certification performance target in SY 2013–2014 with three each. No States in the Northeast region met the target.

Figure 5. Number of States meeting direct certification performance target set by the Healthy, Hunger-Free Kids Act, SY 2013–2014



[18] Although Hawaii's performance rate exceeded 95 percent, the State was not able to distinguish students directly certified based on SNAP benefit receipt from those based on other program participation. For this reason, Hawaii is not considered to have met the HHFKA-mandated performance target.

Figure 6. Number of States with direct certification performance rates above or below the mandated performance targets, by region, SY 2013–2014



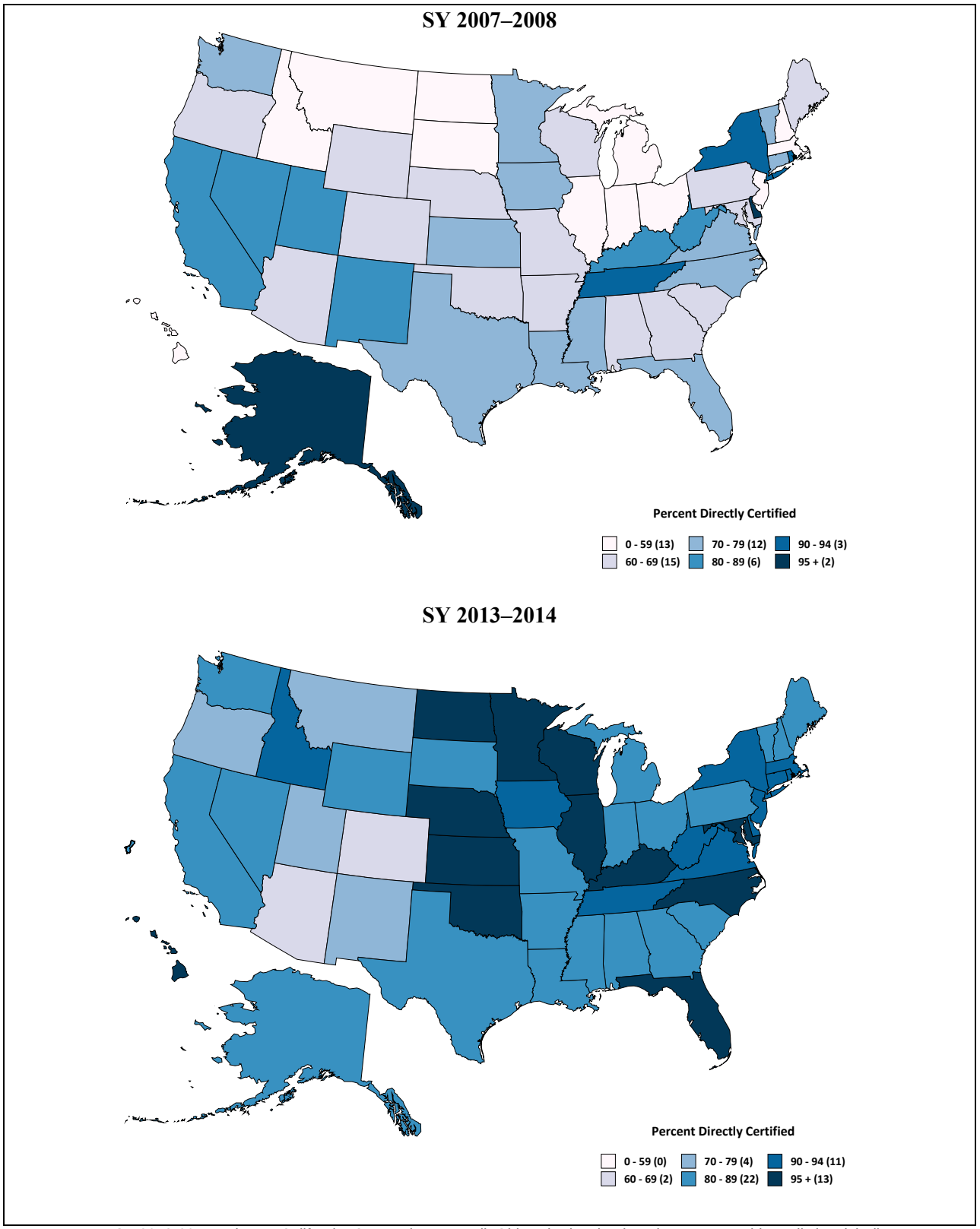
Regional differences in direct certification performance can be examined by plotting direct certification rates on a map of the United States. The top panel of Figure 7 shows the SY 2007–2008 direct certification performance measure for each State, whereas the bottom panel shows the SY 2013–2014 direct certification performance measure. The performance estimate for SY 2007–2008 was based on different data sources than the performance rate for SY 2013–2014 and overstated the percentage of SNAP-participant children directly certified for free school meals because it included students directly certified based on programs other than SNAP. Although the performance calculations used in this report are not directly comparable to the performance estimates from previous years, differences in the two panels in this figure are consistent with a marked increase in direct certification performance over time across all States. This figure also confirms the existence of limited regional differences in State performance.

C. Comparison with SY 2012-2013 direct certification performance

As discussed, the methodology used to calculate this year's direct certification performance measures includes refinements made possible by the introduction of a revised FNS-742 and the new FNS-834. The revised FNS-742 separates directly certified SNAP participant children from children certified without application through their participation in other assistance programs. In past years, this report relied on a combined figure that tended to overstate SNAP direct certification rates. This year's report takes advantage of the SNAP-only figure—the most significant of the methodological changes introduced this year. Although this change allows more precise estimates of SNAP direct certification rates, it generates estimates that are not directly comparable to those produced in the past.

An estimate that more closely approximates the estimates used in previous reports can by calculated by including the counts of both SNAP and non-SNAP direct certifications from the revised FNS-742. Instead of a national direct certification rate of 87 percent found using the

Figure 7. Percent of SNAP-participant children directly certified for free school meals, by State



Note: In SY 2013-2014, Arizona, California, Connecticut, Hawaii, Ohio, Rhode Island, and Vermont could not distinguish direct certifications based on SNAP participation from direct certifications based on participation in programs other than SNAP. The resulting performance rates calculated for these States, therefore, overstate their actual performance.

primary method, this alternate method generates a 95 percent national rate—6 percentage points higher than the rate in last year's report. While it is important to not misinterpret this figure, it helps to confirm that States continue to improve their direct certification performance.

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 who are directly certified based on SNAP participation. This is the same measure of directly certified SNAP participants used in the direct certification performance measure. Added to this are students directly certified based on participation in a program other than SNAP, 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, students certified for free school meals based on the letter method, and SNAP children in special provision schools that are operating in non-base years.

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 count used here is the same one used in the performance measure developed earlier. The number of children in households that receive TANF but not SNAP benefits is estimated from data found in the U.S. Census Bureau's American Community Survey. The number of children who receive FDPIR benefits is estimated from FNS program and survey data.

Details of this computation are summarized in the following equation:

$$\text{Percent of SNAP, TANF, and FDPIR participants certified (directly or by application) for free school meals} = \frac{\text{Children directly certified for free school meals based on SNAP} + \text{Children directly certified for free school meals based on programs other than SNAP} + \text{Children certified for free school meals based on categorical eligibility by application} + \text{Children certified for free school meals through the letter method} + \text{SNAP children in special provision schools operating in non-base years}}{\text{School-age children in SNAP households} + \text{School-age children in TANF households that do not participate in SNAP} + \text{School-age children in FDPIR households}}$$

It is important to note that this measure may overstate the effectiveness of State efforts to ensure that all categorically eligible children are properly certified for free school meals for several reasons. Most importantly, many States and districts have improved their certification processes to directly or categorically certify children participating in programs other than SNAP, TANF, or FDPIR, such as those receiving foster care or those directly certified based on Medicaid data in States participating in the Direct Certification-Medicaid demonstration. While these are important improvements to direct certification systems, they will result in the measure overstating the percentage of SNAP, TANF, or FDPIR recipients who were certified because the measure includes children certified through other programs that allow for direct certification or

confer categorical eligibility. In addition, the components of this measure are subject to reporting and estimation error. Please see Appendix C for further discussion of these limitations.

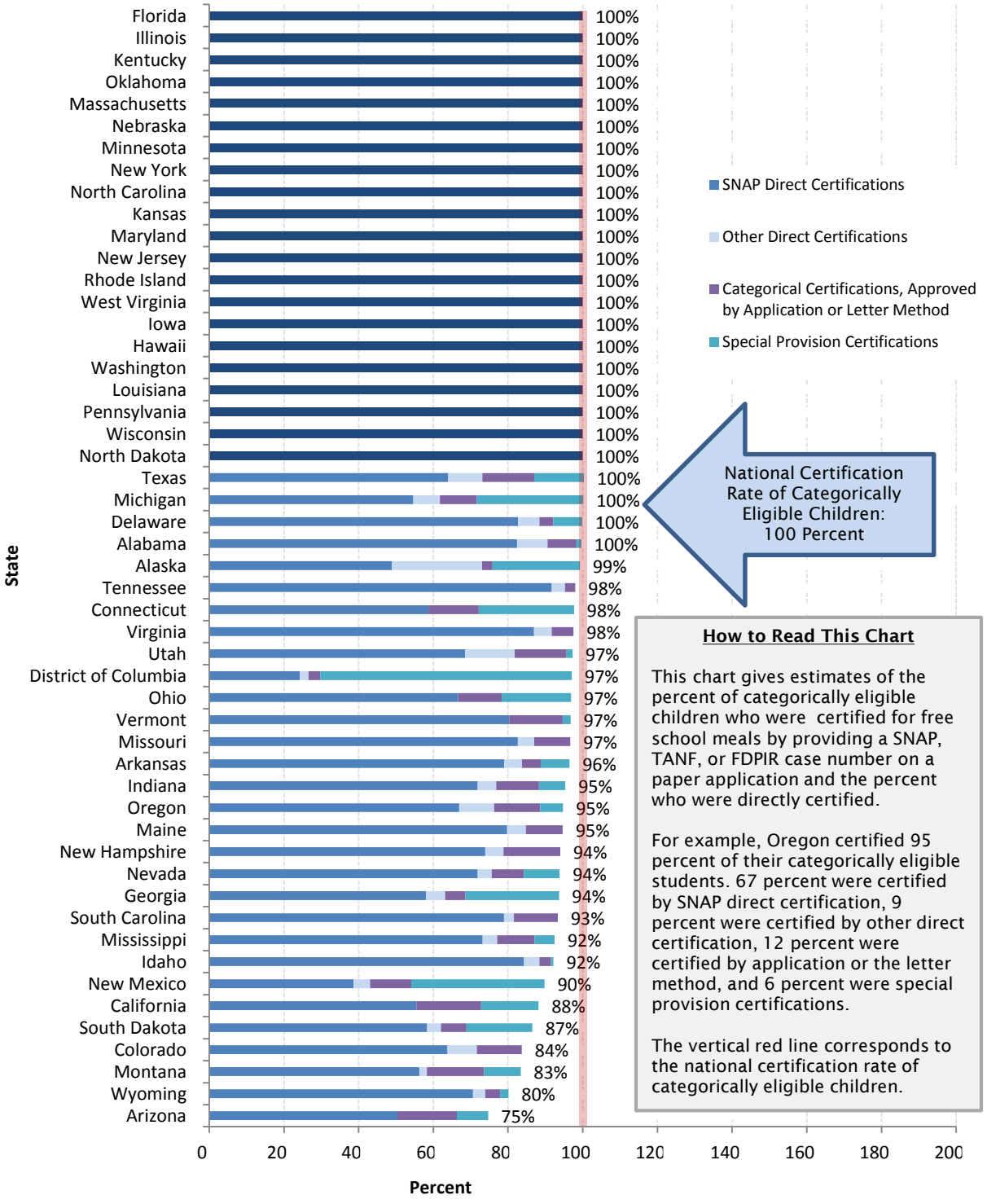
The components of the numerator and the sum of the values in the denominator are given for each State in Table 3. Figure 8 displays the same data graphically. For the 38 States at the top of Figure 8, the number of students certified using direct certification, application based on categorical eligibility, or letter method was at least 95 percent of the estimated number of school-age children categorically eligible for free school meals based on participation in SNAP, TANF or FDPIR. States at the bottom of Figure 8 are less successful at identifying and certifying these children.

Table 3. Students eligible for direct or categorical certification: Number directly certified and number approved by application, SY 2013–2014 (thousands)

	Number of children identified as categorically eligible	Directly certified based on SNAP	Directly certified based on other programs	Categorically eligible, approved by application or letter method	SNAP-participant students in special provision schools in a non-base year
U.S. total	**16,153.3**	**11,246.1**	**1,187.0**	**1,699.2**	**2,099.7**
Alabama	308.5	254.2	25.2	23.9	4.2
Alaska	36.6	17.9	8.9	1.0	8.6
Arizona	428.1	215.8	0.0	68.1	36.1
Arkansas	167.0	131.9	8.0	8.4	12.9
California	1870.4	1037.5	0.0	323.3	288.9
Colorado	205.6	131.1	16.1	24.8	0.0
Connecticut	117.5	69.0	0.0	15.8	30.0
Delaware	54.3	44.9	3.1	2.0	4.2
District of Columbia	37.6	9.1	0.9	1.2	25.3
Florida	975.8	790.8	177.1	92.8	122.2
Georgia	678.6	394.0	34.9	36.8	170.2
Hawaii	52.8	50.2	0.0	3.9	0.0
Idaho	84.6	71.3	3.5	2.6	0.6
Illinois	683.7	457.4	142.6	35.7	179.7
Indiana	336.1	241.6	16.6	38.4	24.0
Iowa	142.1	116.0	7.3	13.3	9.0
Kansas	110.7	102.1	12.4	3.4	0.0
Kentucky	256.3	160.9	51.4	14.0	75.6
Louisiana	314.7	270.9	11.1	38.0	0.0
Maine	62.2	49.6	3.1	6.1	0.0
Maryland	220.6	203.0	13.6	17.1	1.2
Massachusetts	240.3	181.1	21.4	38.8	32.3
Michigan	521.3	285.0	37.1	51.5	148.7
Minnesota	191.2	168.8	8.4	31.4	1.4
Mississippi	227.2	166.4	8.8	22.6	12.3
Missouri	308.7	255.0	13.6	30.0	0.0
Montana	41.2	23.2	0.8	6.3	4.0
Nebraska	67.0	43.1	5.9	3.9	21.7
Nevada	130.4	93.8	4.9	11.3	12.4
New Hampshire	37.3	27.6	1.8	5.7	0.0
New Jersey	309.2	263.7	14.3	47.4	1.4
New Mexico	175.5	67.8	7.8	19.3	62.7
New York	949.5	544.1	105.3	70.7	296.0
North Carolina	525.6	506.8	23.6	30.5	0.0
North Dakota	19.9	12.2	1.7	1.4	4.9
Ohio	598.9	399.1	0.0	69.7	111.6
Oklahoma	189.5	165.5	13.4	36.3	7.4
Oregon	222.5	148.9	20.8	27.4	13.7
Pennsylvania	567.4	372.9	90.8	35.3	77.2
Rhode Island	45.5	40.9	0.0	6.8	0.0
South Carolina	294.7	232.5	7.8	34.8	0.0
South Dakota	40.2	23.5	1.5	2.7	7.1
Tennessee	427.0	391.6	15.0	12.0	0.0
Texas	1725.1	1104.5	157.4	239.4	230.2
Utah	105.4	72.2	14.0	14.6	1.7
Vermont	24.6	19.8	0.0	3.5	0.5
Virginia	303.5	263.8	14.4	17.9	0.0
Washington	327.1	244.0	41.4	36.3	12.0
West Virginia	101.6	46.5	11.7	1.6	44.5
Wisconsin	275.3	250.9	7.2	18.7	2.5
Wyoming	17.1	12.1	0.6	0.7	0.4

Note: The U.S. total for each column may not equal the sum of the individual State values due to rounding. Counts of students directly certified based on other programs includes those directly certified based on administrative data available through Medicaid in States participating in the Direct Certification-Medicaid demonstration. These students may not be categorically eligible for free school meals.

Figure 8. Percent of categorically eligible children certified for free school meals, SY 2013–2014



Note: Bars shaded dark blue represent estimates greater than 100 percent. See Appendix C for a discussion of data sources and data limitations. Counts of students directly certified based on other programs includes those directly certified based on administrative data available through Medicaid in States participating in the Direct Certification-Medicaid demonstration. These students may not be categorically eligible for free school meals.

V. Direct certification best practices

The FCEA requires a discussion of best practices with States that have successful direct certification programs. To fulfill this requirement, FNS contracted with Mathematica Policy Research to conduct interviews with child nutrition (CN) administrators from six States with successful direct certification programs and two direct certification experts. Mathematica also hosted a roundtable discussion among FNS, Mathematica, and CN officials from eight States.

States were selected to participate primarily on the basis of direct certification performance during SY 2013–2014 or because they showed noteworthy improvement in their direct certification performance rates from SY 2012–2013 to SY 2013–2014. In addition, the selection reflected the diverse perspectives of States in different parts of the country and included States that had not been highlighted in the report for the past few years.

We interviewed representatives from six States for this review: Arkansas, Idaho, Minnesota, New Hampshire, New Jersey, and North Carolina. Representatives from all six States, plus Florida and Virginia, also participated in the roundtable discussion. In addition, one expert, whom FNS contracted to provide training and direct certification technical assistance to States, was consulted. This expert was able to provide insight into current methods, best practices, and emerging trends in direct certification efforts across the country. Another expert, the assistant director for the Division of Family Development in New Jersey, provided perspective on the provision of monthly SNAP data for direct certification, as well as processes used to meet the new data collection requirements of the DER.

The rest of this chapter includes a description of State practices (Section A), recent and planned strategies for improving direct certification (Section B), best practices and suggested improvements in implementing direct certification systems (Section C), and challenges States face in meeting the direct certification rate target required by the HHFKA and complying with new data collection requirements also required by the HHFKA (Section D).

A. Description of State practices

The primary goal of direct certification is to identify students who are categorically eligible for free school meals and certify them as such without a household application. States can use information on children from households enrolled in qualifying programs, such as SNAP, TANF[19] and FDPIR to determine categorical eligibility. A child's status as a foster child; enrollee in a Head Start program; or certain homeless, migratory, or runaway children may also qualify them as categorically eligible for free school meals. In SY 2013–2014, six States were authorized to evaluate the use of Medicaid data for direct certification as part of a pilot demonstration.

[19] TANF information can be used for direct certification of children for free school meals only in States with TANF income eligibility criteria comparable to 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 replaced Aid to Families with Dependent Children with TANF.

Methods for conducting direct certification have evolved. Currently, there are two main methods for conducting direct certification:

1. **Central matching system.** A State agency uses computer matching to link administrative data from SNAP and other programs conferring categorical eligibility with student enrollment records and distributes match results to LEAs.[20] In some States, LEAs initiate the match or access match results from the State-level central matching system. Methods vary, but LEAs typically access match results by downloading them from a State-level secure Web portal.
2. **Local matching system.** State agencies distribute administrative data from SNAP and other programs conferring categorical eligibility to LEAs, and LEAs match these data with their student enrollment lists.

Within these two primary matching methods, actual processes and procedures for direct certification vary considerably, even among States with the same general method of matching. Our review of State systems is similar to the reviews conducted in previous years, focusing on four key questions about direct certification:

1. Which administrative entity is responsible for matching SNAP/TANF records with student records (that is, does the State use central or local matching)?
2. How is a match made? What data elements and matching algorithms are used to form the match?
3. Is any attempt made to directly certify SNAP/TANF children initially unmatched or partially matched against school enrollment records?
4. When and how often are records matched?

Beginning with last year's report, we also asked States about (1) the effectiveness of performance targets, awards, and CIPs as incentives for improving direct certification efforts; and (2) thoughts about revisions to the SFA VCR, the new DER, and the direct certification performance rate formula.

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

[20] Central matching is sometimes referred to as State-level matching.

Table 4. Characteristics of the direct certification matching process for public LEAs in selected States, SY 2013–2014

State	Type of matching system	How does direct certification work?	Program data sources used	Frequency of direct certification
Arkansas	Central	The State Department of Education receives enrollment data from districts four times per school year. They forward this data to ARC, a State government entity. The State Department of Human Services sends ARC SNAP program participation lists monthly. ARC conducts the direct certification match four times per year (in August, September, January, and March). ARC submits the results to districts via secure email. The email contains two files: the match list and the no-match list.	SNAP (District staff conduct additional matching at the local level using data on foster care, homeless, runaway, and migrant children.)	Four times annually
Idaho	Central	Idaho offers two methods of matching. The first is the "State match," available to all public and charter schools. The statewide student information system (SSIS) contains data on students in these schools. Each week, the State automatically matches these data against SNAP, TANF, and foster care data, notifying districts when new matches are available. The second method is the "district match," available to private schools, as well as to public districts seeking to match more frequently than weekly or with data updated more recently than data in the SSIS. In this method, the school or district uploads a current enrollment list, triggering a match against program data updated daily.	SNAP, TANF, foster care	Weekly
Minnesota	Central	The Minnesota Department of Human Services (MDHS) sends a list of school-age SNAP and TANF recipients to the Minnesota Department of Education (MDE) monthly. The MDE system matches this list against enrollment data files from all public districts. MDE staff then alert districts via email that updated match results are ready to be downloaded from the claims system.	SNAP, TANF	Monthly
New Hampshire	Central	The New Hampshire Department of Education (NHDOE) receives SNAP data monthly from the Department of Health and Human Services through an automatic transfer of data and matches it against student enrollment data stored in the SSIS. Districts log in to the Web-based State system to retrieve the matching results. Districts can also trigger a match by uploading updated student enrollment data.	SNAP	At least three times annually (Districts encouraged to download updated list of matches monthly)
New Jersey	Central	The State Department of Agriculture receives a list of school-age SNAP and TANF recipients monthly from the Department of Human Services. Districts trigger matches by uploading current enrollment data. The system matches the enrollment data against the program data and produces a list of potential matches for district staff to review. District staff log in and review each potential match, indicating a legitimate match by clicking a checkbox.	SNAP, TANF	At least three times annually
North Carolina	Central	North Carolina Department of Public Instruction CN staff receive SNAP and TANF data weekly from the Department of Health and Human Services. Enrollment data are updated daily. The State system automatically matches enrollment data from the SSIS against program participation data daily. Districts log in to access the matching results. District staff are required to access the results at least weekly but can do so as often as daily.	SNAP, TANF	Daily

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

Central or local matching

All six States use central matching systems;[21] about one-quarter of States around the country use local matching for direct certification. The key distinctions between central and local matching are as follows:

- **Central matching system.** In central matching, a State agency (usually the CN agency) is responsible for a system that matches a list of children attending schools participating in the NSLP with a list of children in SNAP households. This system can be set up in several ways. For example:
  - A State agency matches State enrollment information with a State list of children in SNAP households. A list of students directly certified on the basis of this match is forwarded to districts, which then notify the households.
  - A State agency conducts an initial match and sends a list of matched students 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 and then initiate a match against a list of children in SNAP households. Students are directly certified on the basis of this match.
- **Local matching system.** With local matching, districts have primary responsibility for matching, using at least one common identifier. District staff match a list of children enrolled in their schools with a list of children in SNAP households. Some States using local matching provide districts with a list limited to children in SNAP households in the district's geographic area; others provide a full statewide list. Districts can use manual methods or their own computer systems to conduct matching.

The six States have sophisticated central matching systems with processes that have evolved to meet performance benchmarks. Most of the States feature multi-tiered matching rules and are planning technology and process improvements to extend the reach of direct certification in their States. Many States have utilized FNS direct certification grants to fund these improvements. Districts in each of these States play vital roles in initiating matching, confirming potential matches, extending categorical eligibility to other children in the household, and reporting on the VCR.

Overview of the matching process in six States

For SY 2013–2014, all six States use central matching systems—the matching occurs on State-maintained data systems. Many differences emerged among the systems, however, including the program data sources used, the source of the school enrollment data, and the specific algorithms used in matching. In five of the six States, the State Department of Education oversees direct certification. In one of these States (Arkansas), a separate State government entity conducts the actual matching. In New Jersey, the State Department of Agriculture runs the

[21] The two additional States that participated in the roundtable discussion, Florida and Virginia, provided a perspective on local matching systems. In SY 2013–2014, Virginia used a local matching system. Florida used its direct certification grant to move from a local matching system to a central matching system.

direct certification program. Four of the six States in this review use both SNAP and TANF data for direct certification. The exceptions are Arkansas and New Hampshire, which use only SNAP data in the State matching process. In Arkansas, although the primary matching method is at the State level, districts conduct additional matching at the local level using data on foster care, homeless, runaway, and migrant children.

All States studied for this report incorporated student name and date of birth (DOB) into the matching algorithm (Table 5). In New Hampshire, these were the only data elements used in the primary matching process (although districts can add additional data elements when triggering additional matches). Other States incorporated additional elements in their primary matching processes. For example, Idaho and New Jersey used parent name; Idaho, Minnesota, and North Carolina used gender. Two of the six States reported using Social Security numbers (SSNs) when available. Idaho was the only State using probabilistic and phonetic matching processes in SY 2013–2014, although other States plan to incorporate them in the future. In addition, most States incorporated multistage matching processes in which matching rules are applied in stepwise fashion, introducing additional data elements and/or lessening the stringency in the match rules. In the rest of this section, we describe the matching process, identifiers, and program data used to form direct certification matches.

Table 5. Primary matching criteria for States that use central matching systems

	Arkansas	Idaho	Minnesota	New Hampshire	New Jersey	North Carolina
First Name	●	○	○	●	○	○
Last Name	●	○	○	●	○	○
Middle Name/Initial	●					
Date of Birth	●	○	●	●	●	●
Social Security Number	●					●
Gender		○	●			●
Address		○			●	
Zip Code/Location Code		○				
Parents' Names		○			●	
Eligibility System Personal ID Number				●		
Eligibility System Family ID Number				●		
Telephone Number		○			●	

Key: ○ Data elements can be exact or inexact matches to be used for direct certification.
● Data elements must be exact matches to be used for direct certification.
No symbol indicates that the criterion is not used or not available.

Arkansas. The Arkansas Department of Education oversees the direct certification process but does not conduct the actual matching. In SY 2013–2014, the Arkansas Research Center

(ARC)[22] conducted the matching. ARC receives a list of SNAP participants ages 3 to 22 each month from the Department of Human Services. Public school districts and charter schools upload current enrollment data files in August, September, January, and March. After ARC staff receive updated enrollment data, they match the enrollment files against the most recent statewide SNAP file, matching on student first name, middle name, last name, SSN, and DOB, as well as parent first, middle, and last name. ARC staff divide each district enrollment file into a match list and a no-match list and send them to districts via secure email. District staff certify the students on the match list and check the no-match list for any students they believe should have been directly certified. Private schools participate in direct certification through a separate process, working directly with ARC staff.

In addition to the State-level matching process, districts in Arkansas conduct matching using data on foster care, homeless, runaway, and migrant children. Districts report students matched with these data sources as directly certified on the VCR form.

Idaho. The State Department of Education (SDE) oversees Idaho's NSLP direct certification system. The Department of Health and Welfare provides SDE with updated SNAP, TANF, and foster care data daily through an automated process. The SSIS contains student information from public school districts and charter schools. These data are automatically updated monthly and contain first name, last name, DOB, gender, and zip code. Idaho operates two types of direct certification: (1) State matching, and (2) district matching.[23]

The State matching option occurs weekly and is fully automated. Each weekend, the State data system matches the most recent program participation data against the most recent enrollment data for each district. The system automatically generates emails to districts each week if new matches are available. District staff then log in to a secure Web site to download the results.

In the district matching option, schools or districts upload a current enrollment file and trigger a match against the most recent program participation data. School or district staff then download the matching results. Schools or districts use the district matching option for any of three reasons: (1) they want to obtain matching results using data updated more recently than the monthly SSIS data updates, (2) they want to obtain matching results using data elements not available in the SSIS, or (3) the SSIS did not contain data on their students (this is the case for private schools and other entities such as child care organizations). Public and charter schools participate in the State match option regardless of whether they also choose to use the district match method.

In both matching methods, the State system uses probabilistic matching to categorize students in the enrollment data into three categories: (1) definite matches, (2) possible matches, and (3) non-matches. State staff manually review possible matches to see if they can correct obvious data errors that would elevate them to definite matches. After the matching process is

[22] ARC is a cross-agency team established in 2008 to link data for educational research.

[23] In this report, both are considered central matching approaches because the State data system conducts the matching in both cases.

complete, districts log in to the secure Web portal to access the results. District staff have several options when accessing the results:

1. They can choose to pull all the matches for the year or just the new matches made since the last time the district downloaded the results.
2. They can download just the absolute matches or both the definite and probable matches.
3. They can add additional student information to the records of the probable matches and resubmit them to see if they match.
4. They can look up the eligibility of individual students on the State system.

Minnesota. The MDE oversees the State's central matching system. Districts upload student enrollment data in October and again in February. The MDHS sends updated data on SNAP and TANF participants to MDE each month. MDE staff manually initiate a computer matching process each month that compares the MDHS data against student enrollment data housed in the SSIS. Exact matches are made on first name, last name, DOB, and gender. Matches can also be made on the first four letters of the first name, first three letters of the last name, and exact on gender and DOB. Districts log in to a secure Web site to download the matching results. The results from the initial match for the school year (in July) contain all students who were matched. Results from subsequent months include only new matches.

Private schools do not participate in the SSIS but can participate in direct certification by sending enrollment files to MDE staff. MDE staff then manually match these data against the statewide SNAP participation data. Both the sending of the private school enrollment file and the receipt of the results are done via the Cyber-Linked Interactive Child Nutrition System secure Web portal.

New Hampshire. The New Hampshire Department of Health and Human Services uses an automated monthly process to submit updated SNAP participation data to NHDOE. Each month, NHDOE matches these data against student enrollment data housed in the SSIS and flags students who match exactly on name and DOB as direct certifications. Student enrollment data in the SSIS are updated twice annually—in October and again at the end of the school year. Districts log in to a secure Web portal to download the results. Most districts download updated results monthly, but all are required to do so at least three times annually. District staff can trigger additional matches by uploading updated enrollment data at any time during the year. They also can look up the eligibility of individual students using the State data portal. Private and charter schools are included in the SSIS and use the same processes for direct certification as do public schools.

New Jersey. The New Jersey Department of Agriculture operates the CN programs and oversees New Jersey's direct certification system. The New Jersey Department of Human Services provides SNAP and TANF participation data at the beginning of every month. Districts trigger matches with these data by uploading enrollment data files to the State data system: the School Nutrition Electronic Application and Reimbursement System. Districts can trigger

matches as often as they choose but must do so at least three times annually.[24] The system identifies definite matches as those with exact matches on first name, last name, and DOB or the first three letters of the first name, the first four letters of the last name, and exact matches on DOB, parent name, address, and telephone number. The matching results provide a list of those students who match on a subset of data elements that district staff must review and then determine which are legitimate matches. District staff also may use the State system to look up the eligibility of individual students. Private and charter schools use the same process as public schools for direct certification.

North Carolina. North Carolina Department of Education (NCDOE) matches SNAP and TANF data against school enrollment data daily. School enrollment data are automatically updated in the SSIS in real time. The Department of Health and Human Services uses an automated weekly process to provide SNAP and TANF to NCDOE. NCDOE uses a hierarchical set of matching rules to obtain a definite match: (1) exact match on SSN; (2) exact matches on first name, last name, DOB, and gender; (3) matches on the first three letters of first name and exact matches last name, DOB, gender; and (4) matches on the first three letters of first name and last name and full matches on DOB and gender. Districts log in as often as daily to download the matching results. Matching results contain exact matches and partial matches. District staff can add additional data elements to the enrollment data for partially matched or unmatched students to attempt to obtain more matches. NCDOE monitors data used in direct certification carefully, correcting inconsistencies or data errors as they become apparent.

Private schools are not included in the SSIS. To participate in direct certification, they manually upload enrollment data to the State system. Their students are then included in the daily matching process.

Frequency of match

The frequency of data matching is an important feature of direct certification systems. Students transfer between schools throughout the school year, and families cycle on and off SNAP and other programs that confer categorical eligibility. Therefore, States must match repeatedly throughout each school year to maximize the number of matches among categorically eligible children. As described previously, federal regulations require States to match a minimum of three times per school year. Most States in this review match more frequently, and each State performs its first direct certification match before the beginning of the school year.

Matching frequency among the six States ranged from daily to the minimum requirement of three times annually. Three States conduct matching statewide on a predetermined schedule, with Arkansas matching four times per school year, Minnesota monthly, and North Carolina daily. New Jersey has no set State matching schedule; districts trigger matching by uploading enrollment data at least three times per school year.[25] Idaho and New Hampshire combine these

[24] Code of Federal Regulations, Application, eligibility and certification of children for free and reduced price meals and free milk, title 7, sec. 245.6(b)(3) requires that direct certification matching occur at least three times annually at specified times: near the beginning of the school year and again at 3 months and 6 months after the first match.

[25] New Jersey encourages districts to trigger or download matches monthly but requires only three matches per school year in accordance with Code of Federal Regulations, title 7, sec. 245.6(b)(3).

approaches, offering a set State matching schedule (weekly for Idaho and monthly for New Hampshire), and allowing districts to trigger additional matches more frequently at their discretion.

States cannot identify additional matches by matching more frequently than the underlying data are updated. For example, a State will not benefit from weekly matching unless at least one of the underlying data sources is updated at least weekly. The direct certification matching frequency that each of the six States uses coincides with the frequency with which it receives (or merges with) program data from its partner agencies. For most of these States, program participation data are updated more frequently than school enrollment data. Idaho receives program data updates daily, North Carolina receives updated data weekly, and the other four States receive updated program participation data monthly.

School enrollment data updates vary more widely. Three States have set schedules for enrollment data updates: Arkansas receives updates four times annually, Idaho receives monthly updates, and North Carolina receives daily updates. In the other three States, districts can decide when to submit enrollment data updates, within State requirements. In New Jersey, districts upload their enrollment data at least three times per year to the State data matching system. In Minnesota and New Hampshire, official, edited school enrollment data are uploaded twice a year (although both States are planning to use more frequently updated files in their SSIS for more up-to-date enrollment data in the future). Idaho also allowed districts to upload enrollment data if they wished to obtain match results using more recent data than the scheduled monthly updates.

Methods to directly certify unmatched SNAP children

Most of the States researched for this report have processes for districts to identify and resolve children enrolled in SNAP or TANF who are not matched to student enrollment records through the initial match procedure (Table 6). Idaho attempts to resolve partial matches at the State level by using probabilistic matching to identify potential matches. State staff then review these potential matches to determine whether they should be certified. North Carolina uses a similar method, except that district staff (rather than State staff) review partial matches. In New Jersey, district staff review all prospective matches—students cannot be directly certified until district staff approve the match. North Carolina allows districts to include additional data elements to enrollment records of unmatched students and resubmit them for matching. In the third approach, Idaho, New Jersey, and North Carolina offer district staff the ability to look up the eligibility of individual students by logging into the State system. None of the six States provides SNAP or other program participation data, such as a statewide no-match list, to districts for secondary matching. However, North Carolina plans to begin doing so in SY 2014–2015.

Table 6. Approach for children with potential matches and for children not matched in the primary process

State	Approach for partial matches	Approach for unmatched children
Arkansas	None	Districts receive a no-match list. They are required to investigate whether any children on it should have been directly certified.
Idaho	The State system uses probabilistic matching to identify possible matches. State CN staff then manually review them to determine whether they should be directly certified.	Districts can look up the eligibility of individual students using the State system.
Minnesota	None	None
New Hampshire	None	Districts can look up the eligibility of individual students using the State system.
New Jersey	Districts review all prospective matches, indicating legitimate matches.	Districts can look up the eligibility of individual students using the State system.
North Carolina	Districts can review a list of potentially eligible students.	Districts can search on DHHS case numbers and student identifiers to identify a match. They can also add additional data elements to enrollment files and resubmit them for matching.

Extending categorical eligibility to additional children in a household

States and districts are required to extend categorical eligibility for free meals to all children in households that contain people receiving assistance from SNAP, TANF, or FDPIR. For most States studied in this report, districts are responsible for extending categorical eligibility to additional children in these households. States and districts commonly use parent/guardian name or address to identify additional categorically eligible children. The specific methods and data sources States use varied based on State procedures and the capabilities of State and district data systems.

In five of the six States, district staff identify additional children in households containing directly certified students. States are split between those using State data and those using district data to accomplish this. In Arkansas, district staff use the State data system to run reports of children likely qualifying for extended categorical eligibility. They review the list to identify those who should be directly certified. In Idaho and New Hampshire, district staff use local data to search for additional categorically eligible children. North Carolina uses a combination of these approaches. District staff can use local data to investigate potentially eligible children, or they can search for additional categorically eligible children on the State data system. Minnesota relies on communication with families to identify other children in households of directly certified students. District staff send letters and emails and post messages on their Web sites during the summer alerting families with public school students that all children in households in which anyone receives SNAP are eligible for free school meals. Following the initial direct certification match of the school year, district staff follow up with letters to households with directly certified children asking if there are any other children present in the household. Households with additional children are asked to contact their school districts so that these children can also be directly certified.

In contrast, New Jersey State staff are required to identify children for extended categorical eligibility. They use the State system to generate a list of children likely to live in households with directly certified students based on address and parent name. They review the results and

identify which students should be directly certified. They provide the results to district staff for final review and certification.

Direct certification process for nonpublic and charter schools

Nonpublic and charter schools present special challenges for the direct certification process. Both are schools of choice, often without defined enrollment areas for prospective students. In general, they also are smaller entities than public school districts. Charter schools may participate in direct certification by establishing themselves as independent reporting agencies or affiliating with an LEA, which acts as an authorizing agency for reporting purposes. States may find it difficult to incorporate private schools into their direct certification systems because, as nonpublic entities, they are not governed by the same regulations and reporting requirements as public schools.

For States studied for this report, the process for directly certifying students in participating charter schools was typically the same as the process for certifying public school students (Table 7). In Arkansas, charter schools submit enrollment data to the State four times per year and download results when the matching is complete. In Idaho, charter schools rely on either the State match or district match options. In North Carolina, charter school data are included in the daily match, enabling charter school staff to access updated results on a daily basis.

Table 7. Direct certification methods for private and charter schools

State	Direct certification process for private and charter schools
Arkansas	Charter schools participating in the NSLP participate in direct certification using the same system as other public schools. Private schools conduct direct certification directly with the Department of Human Services and do not interact with the Department of Education.
Idaho	Charter schools participate using the same method as other public schools. Private schools, which do not use the SSIS, cannot use automatic State matching. Instead, they upload enrollment lists to trigger matches against program data. They can do this as often as they wish and are required to do so at least three times per year.
Minnesota	State CN staff help private schools conduct direct certification. Because private school students are not in the SSIS and do not have statewide student identification numbers, schools upload enrollment files to the State system. State staff then conduct the matching manually.
New Hampshire	Charter schools and private schools that receive Federal funding participate in direct certification using the same method as regular public schools. The SSIS contains their enrollment data.
New Jersey	Private and charter schools use the same process as public school districts. All schools/school districts participating in direct certification log into a Web interface, upload enrollment data, and review prospective matches.
North Carolina	Charter schools participating in the NSLP conduct direct certification using the same methods as other public schools. Private schools participate in direct certification by uploading enrollment data in Excel format to the State system. They do this at least three times per school year.

For two States—New Hampshire and New Jersey—charter and private schools use the same direct certification system as public school districts. In New Hampshire, charter and private schools are included in the State's SSIS. Staff in these schools can download results monthly or trigger additional matches by uploading more current enrollment data. In New Jersey, charter and private schools upload enrollment data to trigger State matches just as public districts do.

For the other four States, private schools cannot use the same methods as public districts because the matching methods rely on State data systems that exclude private schools. In Idaho, private schools cannot use the State match option, which relies on enrollment data in the State data system. Instead, they use the district match option (also available to public districts), in which private school staff upload enrollment data to trigger a match against program data. Private schools in North Carolina use a similar process. In Minnesota, private schools upload enrollment data, and State CN staff conduct direct certification manually. In Arkansas, private schools do not interact with the State CN office for direct certification. They work directly with the State Department of Human Services to conduct the matching.

B. Recent and planned strategies for improving direct certification

Continuous improvement is a strong theme in direct certification programs. States strive to improve their data systems and procedures within the constraints of financial and staff resources. All six States made recent changes to their direct certification programs and are planning additional improvements (Table 8). The most common type of change—reported by five of the six States—was improving direct certification data system capabilities. Idaho rolled out its State match option in SY 2012–2013. The same year, New Hampshire enhanced its SSIS to enable better tracking of students transferring between schools. For SY 2013–2014, Arkansas, New Jersey, and North Carolina all made improvements to their systems. Arkansas implemented an automated method of cleaning district enrollment data. New Jersey developed a feature in the State's Web portal that allows State staff to generate lists of children likely to qualify for extended categorical eligibility. North Carolina added a feature on its portal that allows district staff to add enrollment data elements to students' files to try to increase the number of matches.

Within the past two school years, two of the States increased their matching frequency. Minnesota adopted monthly matching in SY 2011–2012. The following year, Arkansas increased its matching frequency from annually to four times per year.

In SY 2013–2014, New Hampshire revised procedures that had impeded effective matching. Before that year, the State SNAP agency had given SNAP participants the option of opting out of direct certification, which resulted in an estimated 10 to 15 percent of school-age SNAP participants being left off the program participation data used in matching. State staff worked with FNS to resolve this problem. Beginning in SY 2013–2014, all school-age SNAP participants are included in the file used in matching, and families may opt out of meal benefits after being directly certified for them.

All six States also had additional improvements planned for future years, ranging from further system upgrades to procedural changes. One of the most common planned changes is incorporating additional data sources into direct certification. New Jersey plans to incorporate foster care data in SY 2014–2015. Minnesota reported exploring this possibility as well, though with no firm plans. New Hampshire plans to incorporate data on homeless and migrant children in SY 2014–2015.

Table 8. Recent and planned strategies for improving direct certification

State	Recent changes	Planned changes
Arkansas	Before SY 2013–2014, the State matched only once per year. Before SY 2013–2014, the Department of Education had to clean district enrollment data manually. It now has an automated process for this.	Arkansas will make the following changes in SY 2014–2015: The State will launch a Web portal where districts will be able to retrieve the matched and no-match lists. They will also be able to trigger matches against current SNAP data and conduct individual lookups of students' eligibility. Arkansas State Department of Information Systems, rather than ARC, will conduct the matching. The State SNAP list will contain people ages 0–22 rather than 3–22. The State will use enrollment data updated weekly.
Idaho	Idaho initiated the automatic State match option in SY 2012–2013. Idaho recently enhanced its probabilistic algorithm to incorporate phonetic matching.	Idaho plans to incorporate group matching, improved name matching, and other enhancements to probabilistic algorithm. The CN office hopes to work with the SNAP office to inform new SNAP recipients of their children's eligibility for free school meals.
Minnesota	Minnesota adopted monthly matching in SY 2011–2012.	Beginning in SY 2014–2015, Minnesota will use all student data available on the SSIS for direct certification matching. In SY 2013–2014, the State only uses data files that districts have certified as final. This change will allow the matching process to use more recently updated enrollment data. State staff are exploring receiving program data more frequently than monthly and incorporating foster care data into direct certification.
New Hampshire	The State Department of Health and Human Services previously allowed newly certified SNAP participants to opt out of being included in the program data file delivered to the Department of Education for direct certification matching. This removed 10 to 15 percent of school-age SNAP participants from the direct certification process. Beginning in SY 2013–2014, the opt-out option occurs upon certification for school meal benefits. In 2012, the State upgraded its SSIS to better track intrastate transfers.	The State plans to incorporate data on homeless and migrant children into the direct certification process when rolling out the Community Eligibility Provision (CEP) beginning in SY 2014–2015. (This will likely not improve New Hampshire's direct certification performance rate but may improve program access.)
New Jersey	In SY 2013–2014, New Jersey added a feature to the Web portal allowing State staff to generate a list of students sharing addresses or parent names with directly certified students. It provides these lists to district staff so they can extend categorical eligibility.	In SY 2014–2015, New Jersey plans to incorporate foster care data into its direct certification system. New Jersey plans to incorporate probabilistic matching, as well as Soundex and name variation functionality, in SY 2014–2015.
North Carolina	In SY 2013–2014, North Carolina added an option in the Web portal for district staff to add additional data elements to their enrollment data to try to identify additional matches beyond those captured in the primary match.	In SY 2014–2015, districts will have access to elements of the SNAP and TANF data for children in their county and will be able to review possible matches. In SY 2014–2015, the State system will use an enhanced matching algorithm. The system will incorporate Soundex and inexact matching. It also will suggest candidates for extended categorical eligibility based on address and parent/guardian name. Beginning in SY 2014–2015, the State will no longer be able to use SSN for direct certification matching, due to State statute.

Most States also reported planning changes to their direct certification procedures (Table 8). In SY 2014–2015, North Carolina plans to give district staff access to SNAP and TANF data elements for children in their counties to conduct secondary matching. Idaho SDE staff plans to work with staff in the State SNAP office to inform all new SNAP recipients of their children's

eligibility for free school meals. Arkansas and Minnesota both plan changes to how they use existing data sources. Beginning in SY 2014–2015, Arkansas plans to expand the age range of the SNAP data used for direct certification from 3–22 to 0–22. Minnesota plans to begin using the most recently updated student enrollment data available on the SSIS for matching. In SY 2013–2014 and in earlier years, the State only used SSIS data for matching after districts had completed the data review process. The review process improved data quality, but it delayed the availability of data for matching.

Three States in this review reported planning enhancements to their matching algorithms. Idaho plans to incorporate more complex matching algorithms and improved name matching. New Jersey plans to introduce probabilistic matching, as well as Soundex and name variation functionality. North Carolina also plans to add Soundex matching, as well as probabilistic matching.

Two States reported planning additional data system enhancements. In SY 2014–2015, Arkansas plans to roll out a Web portal where district staff can retrieve the matching results, rather than waiting to receive the results via secure email. The portal also will contain an individual lookup option for districts. In the same year, North Carolina plans an upgrade to the State data system that will allow staff to generate a list of students who likely qualify for extended categorical eligibility.

Finally, Arkansas has planned an administrative change to its direct certification system. Beginning in SY 2014–2015, the State Department of Information Systems will assume responsibility for conducting direct certification matching, rather than ARC, which conducted it in SY 2013–2014.

C. Best practices in implementation of direct certification systems

Advice for low-performing States in meeting performance targets

Section 101(b) of the HHFKA requires that States develop CIPs if they do not meet the direct certification performance rate benchmarks. The CIPs must include a step-by-step plan for implementing changes that will improve direct certification rates. In the best practice interviews, State SNAP staff were asked what suggestions they would offer to staff in a low-performing State in developing a CIP. Experts in direct certification were also consulted on this topic. Five of the six States provided suggestions, which can be grouped into three categories: (1) administrative practices, (2) direct certification procedures, and (3) system capabilities (Table 9).

Staff in three States commented on administrative practices in their advice to States seeking to improve their direct certification performance. Staff in New Jersey and North Carolina stressed the importance of strong interagency relationships. New Jersey staff advised initiating direct certification reforms by holding a meeting with agency partners so that all stakeholders understand the direct certification system and their specific roles. Staff in North Carolina had similar advice, noting that State SNAP staff may play essential roles in direct certification even if it is not a core mission of their agency. Strong relationships can help them keep in mind the importance of their role in direct certification. New Jersey staff stressed the importance of realistic goal setting, noting that enacting changes in interagency activities can take years. States including plans to reform administrative aspects of direct certification systems in their CIPs

Table 9. Suggestions for improving direct certification rates

State	Suggestions for improvement
Arkansas	• Set up system to catch students as soon as they become eligible for direct certification. Match frequently enough to certify students as they enroll in SNAP. • Set up an automated method of identifying other children residing in households with directly certified students so categorical eligibility can be extended.
Idaho	• Align CIP with grant application plans.
Minnesota	• Training and technical assistance for districts is very important.
New Jersey	• Set attainable goals for improvement within a single year. It can take time to negotiate and implement changes to interagency efforts. • When setting up or reforming a direct certification system, begin by bringing all partners and stakeholders together in a group meeting. This can impress upon everybody the importance of direct certification and make clear how everyone's roles fit together.
North Carolina	• Data monitoring is very important. Have someone screen data to identify and correct inconsistencies across data sets. • Maintain strong relationships with your data partners. It helps to have a dedicated person in the SNAP agency to contact when questions arise. The SNAP agency may be collecting data that are used only for direct certification. Keeping in contact can help them keep in mind how important complete and consistent data are.

should keep this in mind. Staff in New Jersey also recommended aligning CIPs with planned changes outlined in grant proposals.

Three States recommended specific direct certification procedures. Staff in Arkansas advised designing direct certification systems to catch students as they become categorically eligible. This entails matching frequently and using regularly updated program data. Arkansas also recommended adding functionality to State matching systems to automatically identify students likely to qualify for extended categorical eligibility. Systems typically do this by identifying students with the same address or parent/guardian name as directly certified students. Staff in North Carolina recommended having staff members tasked with assuring the quality of the data used in direct certification matching. Inconsistencies across data sets can impede effective matching. Staff in Minnesota stressed the importance of training. Making sure district staff understand proper procedures for their direct certification tasks—including correctly completing the VCR form—can help ensure strong direct certification performance.

One expert who has worked extensively with States on training and technical assistance advises States to contact FNS' Operational Support Branch if they have questions and use the tools available to help them with continuous improvement. The expert also emphasized the importance of understanding the objectives and context of best practices when adopting them. Finally, working toward developing a system that uses current and accurate data with a sophisticated, monitored matching system—thus reducing burden on district staff—is ideal.

Performance targets, awards, and CIPs as incentives and tools for improvement

States studied for this report changed their direct certification systems to try to increase their performance rates. When asked how effective HHFKA performance targets, performance awards, and CIPs are as incentives for further improvements, States responded that extending

meal benefits to children who need them was their primary incentive. State staff appreciate recognition for strong performance—and the related performance awards as an incentive—but the real commitment to direct certification comes from staff recognition of the importance of the program. Staff in several States said the Federal mandates helped them demonstrate the importance of direct certification to colleagues in other State agencies. Respondents in Minnesota reported that the Federal requirements elevated direct certification as a priority within the State. Staff in New Jersey said it made it easier to secure cooperation from agency partners.

However, staff in several States expressed frustration with the Federal mandate, citing factors beyond their control that constrain performance. In particular, some staff did not believe five percent was a sufficient cushion to account for the share of school-age SNAP participants who did not attend NSLP-participating schools. Staff in one State suggested that being found noncompliant with program rules due to factors program staff could not change was problematic.

In December 2012, FNS issued the "CIP Development Guide" to help States design and implement a CIP that would help them achieve the desired performance improvements. The first step in the guide is for the State agency to perform a self-assessment using a tool that lists components and features of strong direct certification systems. In the interviews, the State staff were asked whether they were familiar with the tool and whether they had used it to plan changes to their direct certification system. Staff in all six States were familiar with the tool, and most found it helpful, particularly for prompting them to think about areas for improvement they may not have previously focused on. One staff member described it as a useful comprehensive framework for thinking about improvements to direct certification systems.

Staff in a few States highlighted some uncertainties regarding the CIP tool. Staff in one State found useful ideas in the tool, but were unclear on the specific expectations FNS had for CIPs. Although the CIP was designed to encompass improvement efforts spanning multiple years, staff in one State were unsure whether this was the case and reported challenges in aligning their long-term reform plans with the CIP.

D. Challenges in meeting performance rate targets

HHFKA mandated that States meet direct certification performance targets that have increased annually since SY 2011-2012. For SY 2013–2014 and future years, the direct certification performance target rate is 95 percent. This means that 95 percent of children in households receiving SNAP benefits must be directly certified for free school meals (95 percent of program records must be matched to student enrollment records). During interviews with State staff, we asked about the challenges they have experienced, or believe they might experience, in meeting this performance rate target. Direct certification operations comprise complex processes, which States across the country continue to refine. As States encounter technological and administrative challenges to effective and efficient operations, they enact new procedures and invest in upgraded IT tools and systems. As Table 10 shows, all States identified at least one challenge they were working to overcome in meeting the performance target. Challenges States cited fell into three distinct categories: (1) data sharing and governance, (2) school-age SNAP recipients not attending NSLP schools, and (3) transfer students.

The most commonly cited type of challenge pertained to data sharing and other interagency operations. In many States, the office conducting the match and responsible for the performance

Table 10. Challenges identified by States in meeting direct certification rate target

	Arkansas	Idaho	Minnesota	New Hampshire	New Jersey	North Carolina
Incorporating data from divergent sources	✓	✓	✓		✓	✓
Private schools participating in NSLP but not integrated into State data systems			✓			✓
SNAP agency overhauled data system						✓
Name variations		✓				
Large homeschooled population	✓	✓				✓
Many charter schools do not participate in NSLP						✓
Virtual students		✓				
Frequent student transfers				✓		

rate does not control the underlying data. Staff in one State described being at the "mercy" of the entities controlling the data. Although all States in this review described their relationships with other agencies partners as productive and collaborative, staff in several States pointed out that those agencies had their own priorities. North Carolina staff described how the State SNAP agency's overhaul of its data system led to delays in processing SNAP applications, impeding effective direct certification for more than six months. New Jersey staff stated that data security concerns can make agency and district partners reluctant to share certain data elements.

The second most common type of challenge States reported was school-age SNAP recipients who did not attend NSLP-participating schools. These children appear in the denominator of the performance rate calculation but are not reported on the VCR form. Arkansas, Idaho, and North Carolina cited large homeschooled populations as a barrier to meeting the performance rate target. North Carolina staff reported that many charter schools do not participate in the NSLP; therefore, children from SNAP households attending these schools cannot be directly certified. Idaho has a large population of virtual students, who attend classes online. The State is able to identify these students and could potentially match them against the SNAP list. However, because they are not associated with LEAs, they are not reported on the VCR and are therefore not included in the performance rate calculation.

The last type of challenge States cited was intrastate transfers. New Hampshire staff reported that a significant portion of students transfer between schools throughout the year. They observed that children likely to be eligible for free meals may be more likely to transfer. The

State has made system enhancements to improve its ability to track transfer students, but it remains a challenge.

Challenges in meeting new data collection requirements

This year, the key data elements used to determine the effectiveness of State direct certification efforts were collected and reported in a different way. Specifically, the revised VCR form now collects the count of children from SNAP households directly certified for free school meals (cell 3-2B). The new DER form collects two data elements separately: State SNAP agencies report the number of school-age children in SNAP households (Data Element #2); State NSLP agencies report the number of SNAP children in special provision schools operating in a non-base year and CEP schools (Data Element #3). States reported some challenges adopting the new VCR and DER data collection forms. Difficulties primarily pertained to the transition rather than to intrinsic difficulties with the forms themselves. The most common challenge was conducting the training necessary to ensure district staff completed the VCR form correctly. Staff in Minnesota conducted statewide webinars and worked with schools individually to ensure accurate data reports. New Jersey reported particular challenges getting district staff to enter the correct count of students for the CEP and Special Provision 2/3 fields of the VCR. North Carolina staff said the timing of transition left them very little time to reprogram their data systems to support the new forms.

Two States also reported challenges with the DER form. The SNAP agency in Minnesota had difficulty providing the count of school-age children in households receiving SNAP benefits resulting from confusion over exactly what number was required. MDE worked closely with the SNAP agency to understand the requirement and to correct the information on the forms. Other States reported no difficulty obtaining this number. New Jersey SNAP staff reported that they identified the data needed for Data Element #2 by deduplicating the SNAP file they provided earlier to the Department of Agriculture for direct certification. New Jersey did report confusion in identifying the count of children in households receiving SNAP benefits attending CEP, Provision 2, or Provision 3 schools during nonbase years, however. North Carolina anticipated similar challenges in SY 2014–2015 when that State will adopt CEP in some districts. North Carolina expects that with more training and new software catching up to the changes that any initial difficulties with the new forms will be eased in subsequent years. Despite the challenges associated with adopting the new data collection forms, staff in North Carolina commented that the new direct certification performance rate calculation would be easier to interpret. The new forms allow States to understand more clearly which data elements are used in the calculation compared to the formula used in previous years.

Other direct certification challenges

Some States reported challenges in obtaining participation data from programs other than SNAP. Although this challenge would not likely affect their performance rates, it nonetheless impedes effective direct certification of categorically eligible students. North Carolina has had difficulty securing a data-sharing agreement that would allow it to incorporate foster care data into direct certification. New Jersey has been unable to incorporate data from FDPIR into direct certification for similar reasons.

VI. Conclusion

The number of students with access to free school meals continues to grow with the expanded use of direct certification and the improved performance of direct certification systems. As of SY 2013–2014, 99 percent of students nationwide are enrolled in districts that conduct direct certification.

For this report, the methodology for calculating direct certification performance was refined from the methodology used in previous reports in order to make use of new data elements collected in the revised VCR (FNS-742) and the new DER (FNS-834). Based on the calculations, States and LEAs directly certified 87 percent of school-age children from SNAP-participant households in SY 2013–2014. Twelve States achieved direct certification rates of at least 95 percent, the direct certification target set by HHFKA for SY 2013–2014. No States had a direct certification rate lower than 60 percent. The direct certification performance rate in SY 2012–2013 was estimated at 89 percent; however, this estimate was based on different data sources and overstated the percentage of SNAP-participant children directly certified for free school meals because it included students directly certified based on programs other than SNAP.

States and LEAs continue to find success with different direct certification models. States and LEAs are making investments in their direct certification systems that promise improved performance in the coming years. Among the six states, recent direct certification changes that States link to performance improvements most commonly involved improving data system capabilities. Examples of such improvements include increasing automation, adding additional matching options for districts, and implementing better procedures for identifying children likely to qualify for extended categorical eligibility. Two States also recently increased matching frequency. States made many of these changes to help meet the performance benchmark set forth in HHFKA, which will remain at 95 percent in future years. In discussions surrounding challenges to meeting these benchmarks in future years, States frequently cited difficulties inherent in matching data from different sources. File layout and data entry protocols can vary between program participation and school enrollment data, impeding effective matching. Additionally, the agency responsible for matching typically does not control the matching data. States also cited the inability of direct certification improvement measures to account for children who receive SNAP benefits but who are not enrolled in schools and thus not eligible for direct certification. These students include home-schooled children, school dropouts, and some homeless and migrant children. Changes that States and LEAs make to their direct certification systems as they continue to seek new ways to address these challenges likely will affect direct certification rates in coming years.

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APPENDIX A

ADDITIONAL TABLES AND FIGURES

Table A.1.a. Number and percent of LEAs that directly certified categorically eligible students, SY 2004–2005 through SY 2006–2007

	SY 2004–2005			SY 2005–2006			SY 2006–2007		
		Direct certification or Provision 2/3 LEAs			Direct certification or Provision 2/3 LEAs			Direct certification or Provision 2/3 LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**16,612**	**9,239**	**55.6**	**17,397**	**10,467**	**60.2**	**17,748**	**11,113**	**62.6**
Alabama	163	62	38.0	148	87	58.8	145	93	64.1
Alaska	54	43	79.6	35	34	97.1	47	43	91.5
Arizona	302	251	83.1	333	243	73.0	334	256	76.6
Arkansas	251	247	98.4	258	12	4.6	281	256	91.1
California	1,004	399	39.7	1,033	469	45.4	1,024	518	50.6
Colorado	178	44	24.7	168	68	40.5	205	78	38.0
Connecticut	185	146	78.9	187	148	79.1	193	161	83.4
Delaware	27	22	81.5	34	28	82.4	32	28	87.5
District of Columbia	47	1	2.1	51	4	7.8	52	2	3.8
Florida	145	74	51.0	96	62	64.6	145	88	60.7
Georgia	171	155	90.6	175	158	90.3	183	166	90.7
Guam	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hawaii	NA	NA	NA	32	18	56.2	38	20	52.6
Idaho	125	97	77.6	266	218	82.0	133	106	79.7
Illinois	1,036	749	72.3	1,113	835	75.0	1,075	839	78.0
Indiana	407	73	17.9	468	106	22.6	478	143	29.9
Iowa	496	339	68.4	508	372	73.2	507	383	75.5
Kansas	403	314	77.9	404	333	82.4	403	335	83.1
Kentucky	197	128	65.0	192	145	75.5	189	154	81.5
Louisiana	98	57	58.2	36	34	94.4	107	92	86.0
Maine	245	199	81.2	228	194	85.1	233	201	86.3
Maryland	47	29	61.7	47	29	61.7	46	31	67.4
Massachusetts	NA	NA	NA	357	216	60.5	370	232	62.7
Michigan	741	331	44.7	698	349	50.0	803	449	55.9
Minnesota	610	392	64.3	620	387	62.4	630	413	65.6
Mississippi	183	93	50.8	72	47	65.3	184	134	72.8
Missouri	762	453	59.4	711	476	67.0	749	490	65.4
Montana	236	130	55.1	233	159	68.2	234	177	75.6
Nebraska	407	241	59.2	433	313	72.3	381	290	76.1
Nevada	40	35	87.5	39	34	87.2	19	15	79.0
New Hampshire	82	57	69.5	88	65	73.9	89	60	67.4
New Jersey	661	159	24.0	661	185	28.0	663	206	31.1
New Mexico	142	98	69.0	150	118	78.7	167	119	71.3
New York	1,096	797	72.7	1,054	889	84.4	1,042	857	82.2
North Carolina	NA	NA	NA	172	117	68.0	178	133	74.7
North Dakota	160	126	78.8	216	170	78.7	193	142	73.6
Ohio	1,093	178	16.3	1,196	302	25.2	1,129	223	19.8
Oklahoma	533	248	46.5	613	322	52.5	573	333	58.1
Oregon	205	166	81.0	227	178	78.4	232	185	79.7
Pennsylvania	724	368	50.8	776	458	59.0	826	501	60.6
Rhode Island	NA	NA	NA	55	47	85.4	55	50	90.9
South Carolina	86	85	98.8	85	83	97.6	88	84	95.4
South Dakota	223	119	53.4	227	127	56.0	221	127	57.5
Tennessee	169	132	78.1	175	154	88.0	171	144	84.2
Texas	1,202	741	61.6	1,026	797	77.7	1,189	839	70.6
Utah	51	45	88.2	53	50	94.3	49	45	91.8
Vermont	204	186	91.2	217	200	92.2	215	201	93.5
Virginia	160	136	85.0	141	138	97.9	152	139	91.4
Washington	292	215	73.6	345	260	75.4	330	260	78.8
West Virginia	73	54	74.0	68	54	79.4	73	55	75.3
Wisconsin	842	177	21.0	823	138	16.8	840	180	21.4
Wyoming	54	48	88.9	54	37	68.5	53	37	69.8

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.1.b. Number and percent of LEAs that directly certified categorically eligible students, SY 2007–2008 through SY 2009–2010

	SY 2007–2008			SY 2008–2009			SY 2009–2010		
		Direct certification or Provision 2/3 LEAs			Direct certification or Provision 2/3 LEAs			Direct certification or Provision 2/3 LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**18,141**	**12,097**	**66.7**	**18,253**	**14,301**	**78.3**	**18,461**	**15,258**	**82.6**
Alabama	147	110	74.8	150	134	89.3	151	137	90.7
Alaska	50	46	92.0	48	47	97.9	49	48	98.0
Arizona	372	307	82.5	388	327	84.3	428	357	83.4
Arkansas	286	252	88.1	295	280	94.9	300	265	88.3
California	1,028	555	54.0	1,029	676	65.7	1,057	839	79.4
Colorado	175	81	46.3	205	181	88.3	218	202	92.7
Connecticut	192	161	83.8	191	169	88.5	188	174	92.6
Delaware	29	27	93.1	35	30	85.7	34	31	91.2
District of Columbia	58	2	3.4	61	2	3.3	62	61	98.4
Florida	159	98	61.6	164	107	65.2	170	122	71.8
Georgia	216	187	86.6	215	190	88.4	221	199	90.0
Guam	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hawaii	36	22	61.1	40	26	65.0	37	26	70.3
Idaho	121	106	87.6	139	121	87.0	142	103	72.5
Illinois	1,115	904	81.1	1,114	928	83.3	1,123	880	78.4
Indiana	482	184	38.2	487	341	70.0	498	405	81.3
Iowa	499	393	78.8	494	424	85.8	495	421	85.0
Kansas	403	327	81.1	407	348	85.5	405	345	85.2
Kentucky	193	171	88.6	190	170	89.5	197	176	89.3
Louisiana	112	95	84.8	117	105	89.7	109	95	87.2
Maine	246	223	90.6	235	213	90.6	194	177	91.2
Maryland	48	40	83.3	47	39	83.0	49	42	85.7
Massachusetts	357	245	68.6	423	305	72.1	431	303	70.3
Michigan	836	570	68.2	846	693	81.9	855	717	83.9
Minnesota	650	433	66.6	663	448	67.6	662	457	69.0
Mississippi	179	144	80.4	179	151	84.4	177	157	88.7
Missouri	756	510	67.5	744	615	82.7	765	678	88.6
Montana	244	188	77.0	241	182	75.5	239	190	79.5
Nebraska	381	297	78.0	382	285	74.6	383	304	79.4
Nevada	20	16	80.0	19	16	84.2	18	17	94.4
New Hampshire	92	65	70.6	95	64	67.4	94	75	79.8
New Jersey	660	247	37.4	662	551	83.2	677	619	91.4
New Mexico	189	135	71.4	171	166	97.1	176	132	75.0
New York	1,083	951	87.8	1,072	935	87.2	1,113	989	88.9
North Carolina	170	141	82.9	169	144	85.2	165	151	91.5
North Dakota	223	170	76.2	217	158	72.8	202	171	84.6
Ohio	1,166	258	22.1	1,172	745	63.6	1,188	816	68.7
Oklahoma	568	373	65.7	565	429	75.9	566	458	80.9
Oregon	235	183	77.9	237	188	79.3	245	196	80.0
Pennsylvania	837	523	62.5	855	623	72.9	851	730	85.8
Rhode Island	53	50	94.3	32	31	96.9	55	53	96.4
South Carolina	87	84	96.6	96	85	88.5	93	85	91.4
South Dakota	222	128	57.7	215	145	67.4	216	196	90.7
Tennessee	168	142	84.5	167	153	91.6	165	149	90.3
Texas	1,264	989	78.2	1,264	1,110	87.8	1,263	1,119	88.6
Utah	55	51	92.7	64	56	87.5	75	72	96.0
Vermont	219	194	88.6	214	189	88.3	225	205	91.1
Virginia	151	139	92.0	150	138	92.0	153	141	92.2
Washington	325	266	81.8	314	272	86.6	329	286	86.9
West Virginia	75	55	73.3	74	55	74.3	73	55	75.3
Wisconsin	853	218	25.6	847	474	56.0	822	584	71.0
Wyoming	56	41	73.2	53	37	69.8	58	48	82.8

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.1.c. Number and percent of LEAs that directly certified categorically eligible students, SY 2010–2011 through SY 2011–2012

	SY 2010–2011			SY 2011–2012		
		Direct certification or Provision 2/3 LEAs			Direct certification or Provision 2/3 LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**18,574**	**15,778**	**84.9**	**18,643**	**16,545**	**88.7**
Alabama	151	141	93.4	156	145	92.9
Alaska	51	49	96.1	50	49	98.0
Arizona	430	365	84.9	456	404	88.6
Arkansas	290	279	96.2	289	279	96.5
California	1,078	806	74.8	1,094	872	79.7
Colorado	207	191	92.3	214	204	95.3
Connecticut	186	176	94.6	185	183	98.9
Delaware	34	32	94.1	42	35	83.3
District of Columbia	57	57	100.0	61	60	98.4
Florida	190	133	70.0	223	178	79.8
Georgia	229	207	90.4	229	219	95.6
Guam	NA	NA	NA	3	1	33.3
Hawaii	36	26	72.2	35	25	71.4
Idaho	144	137	95.1	148	141	95.3
Illinois	1,119	968	86.5	1,126	1,039	92.3
Indiana	501	424	84.6	496	429	86.5
Iowa	494	435	88.1	477	428	89.7
Kansas	399	340	85.2	400	362	90.5
Kentucky	189	178	94.2	189	178	94.2
Louisiana	114	102	89.5	113	106	93.8
Maine	192	174	90.6	187	170	90.9
Maryland	49	43	87.8	55	47	85.5
Massachusetts	421	311	73.9	422	355	84.1
Michigan	853	736	86.3	845	762	90.2
Minnesota	706	471	66.7	697	472	67.7
Mississippi	176	160	90.9	175	159	90.9
Missouri	761	684	89.9	755	704	93.2
Montana	240	209	87.1	240	212	88.3
Nebraska	379	317	83.6	374	320	85.6
Nevada	20	16	80.0	20	15	75.0
New Hampshire	91	82	90.1	100	88	88.0
New Jersey	694	665	95.8	697	683	98.0
New Mexico	187	134	71.7	202	147	72.8
New York	1,106	985	89.1	1,101	1,001	90.9
North Carolina	165	154	93.3	162	152	93.8
North Dakota	204	181	88.7	203	179	88.2
Ohio	1,192	869	72.9	1,214	1,043	85.9
Oklahoma	577	496	86.0	573	545	95.1
Oregon	250	203	81.2	244	205	84.0
Pennsylvania	853	733	85.9	853	768	90.0
Rhode Island	56	53	94.6	54	49	90.7
South Carolina	100	85	85.0	106	84	79.2
South Dakota	213	197	92.5	210	194	92.4
Tennessee	175	161	92.0	183	174	95.1
Texas	1,260	1,138	90.3	1,259	1,148	91.2
Utah	81	75	92.6	85	81	95.3
Vermont	238	208	87.4	218	203	93.1
Virginia	154	145	94.2	155	146	94.2
Washington	330	295	89.4	326	296	90.8
West Virginia	72	56	77.8	72	57	79.2
Wisconsin	822	650	79.1	812	698	86.0
Wyoming	58	46	79.3	58	51	87.9

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.1.d. Number and percent of LEAs that directly certified categorically eligible students, SY 2012–2013 through SY 2013–2014

	SY 2012–2013			SY 2013–2014		
		Direct certification or Provision 2/3 LEAs			Direct certification or Special Provision LEAs	
	Number of LEAs	Number	Percent	Number of LEAs	Number	Percent
U.S. Total	**18,362**	**16,684**	**90.9**	**19,707**	**18,423**	**93.5**
Alabama	159	152	95.6	191	149	78.0
Alaska	69	48	69.6	68	68	100.0
Arizona	464	407	87.7	489	479	98.0
Arkansas	284	268	94.4	312	302	96.8
California	1,094	1,024	93.6	1,295	1,227	94.7
Colorado	209	201	96.2	231	224	97.0
Connecticut	188	186	98.9	202	197	97.5
Delaware	44	40	90.9	48	47	97.9
District of Columbia	63	63	100.0	67	67	100.0
Florida	226	185	81.9	277	261	94.2
Georgia	222	212	95.5	236	232	98.3
Guam	2	1	50.0	3	2	66.7
Hawaii	35	35	100.0	35	34	97.1
Idaho	149	149	100.0	162	159	98.1
Illinois	1,051	984	93.6	1,152	983	85.3
Indiana	504	447	88.7	550	539	98.0
Iowa	474	419	88.4	487	456	93.6
Kansas	398	378	95.0	415	402	96.9
Kentucky	188	186	98.9	200	199	99.5
Louisiana	114	107	93.9	140	130	92.9
Maine	189	182	96.3	205	192	93.7
Maryland	55	38	69.1	67	58	86.6
Massachusetts	363	324	89.3	464	448	96.6
Michigan	847	784	92.6	876	848	96.8
Minnesota	694	458	66.0	690	534	77.4
Mississippi	172	159	92.4	186	168	90.3
Missouri	762	711	93.3	777	737	94.9
Montana	239	206	86.2	239	215	90.0
Nebraska	370	337	91.1	391	378	96.7
Nevada	25	17	68.0	32	28	87.5
New Hampshire	98	82	83.7	107	106	99.1
New Jersey	699	680	97.3	729	717	98.4
New Mexico	205	143	69.8	222	113	50.9
New York	1,093	942	86.2	1,124	1,014	90.2
North Carolina	161	152	94.4	177	176	99.4
North Dakota	202	174	86.1	207	195	94.2
Ohio	1,219	1,146	94.0	1,305	1,270	97.3
Oklahoma	572	548	95.8	604	587	97.2
Oregon	239	204	85.4	280	256	91.4
Pennsylvania	853	790	92.6	894	854	95.5
Rhode Island	53	53	100.0	79	71	89.9
South Carolina	94	84	89.4	148	132	89.2
South Dakota	208	189	90.9	219	211	96.3
Tennessee	182	174	95.6	195	193	99.0
Texas	1,247	1,154	92.5	1,251	1,160	92.7
Utah	94	94	100.0	103	103	100.0
Vermont	88	82	93.2	92	79	85.9
Virginia	151	145	96.0	173	168	97.1
Washington	319	300	94.0	337	321	95.3
West Virginia	71	58	81.7	96	93	96.9
Wisconsin	799	728	91.1	809	777	96.0
Wyoming	62	54	87.1	69	64	92.8

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.2.a. Number and percent of LEAs that directly certified categorically eligible students, excluding Special Provision LEAs, SY 2004–2005 through SY 2006–2007

	SY 2004–2005			SY 2005–2006			SY 2006–2007		
		Direct certification LEAs			Direct certification LEAs			Direct certification LEAs	
	Number of non-Provision 2/3 LEAs	Number	Percent	Number of non-Provision 2/3 LEAs	Number	Percent	Number of non-Provision 2/3 LEAs	Number	Percent
U.S. Total	**16,389**	**9,016**	**55.0**	**17,048**	**10,118**	**59.4**	**17,382**	**10,747**	**61.8**
Alabama	163	62	38.0	148	87	58.8	145	93	64.1
Alaska	44	33	75.0	35	34	97.1	44	40	90.9
Arizona	302	251	83.1	333	243	73.0	334	256	76.7
Arkansas	242	238	98.4	247	1	0.4	270	245	90.7
California	991	386	39.0	1,005	441	43.9	976	470	48.2
Colorado	173	39	22.5	168	68	40.5	205	78	38.1
Connecticut	185	146	78.9	187	148	79.1	193	161	83.4
Delaware	27	22	81.5	34	28	82.4	32	28	87.5
District of Columbia	47	1	2.1	51	4	7.8	52	2	3.9
Florida	145	74	51.0	96	62	64.6	145	88	60.7
Georgia	170	154	90.6	174	157	90.2	181	164	90.6
Guam	NA	NA	NA	32	18	56.3	38	20	52.6
Hawaii	495	338	68.3	507	371	73.2	506	382	75.5
Idaho	1,035	748	72.3	1,112	834	75.0	1,074	838	78.0
Illinois	407	73	17.9	467	105	22.5	478	143	29.9
Indiana	403	314	77.9	404	333	82.4	403	335	83.1
Iowa	125	97	77.6	266	218	82.0	133	106	79.7
Kansas	194	125	64.4	188	141	75.0	183	148	80.9
Kentucky	97	56	57.7	36	34	94.4	107	92	86.0
Louisiana	NA	NA	NA	357	216	60.5	370	232	62.7
Maine	741	331	44.7	698	349	50.0	803	449	55.9
Maryland	239	193	80.8	228	194	85.1	233	201	86.3
Massachusetts	47	29	61.7	47	29	61.7	45	30	66.7
Michigan	610	392	64.3	620	387	62.4	630	413	65.6
Minnesota	759	450	59.3	711	476	67.0	749	490	65.4
Mississippi	236	130	55.1	233	159	68.2	234	177	75.6
Missouri	163	73	44.8	60	35	58.3	168	118	70.2
Montana	NA	NA	NA	172	117	68.0	178	133	74.7
Nebraska	82	57	69.5	88	65	73.9	89	60	67.4
Nevada	1,090	791	72.6	945	780	82.5	937	752	80.3
New Hampshire	653	151	23.1	654	178	27.2	656	199	30.3
New Jersey	93	49	52.7	88	56	63.6	104	56	53.9
New Mexico	39	34	87.2	39	34	87.2	19	15	79.0
New York	1,090	175	16.1	1,189	295	24.8	1,125	219	19.5
North Carolina	160	126	78.8	199	153	76.9	193	142	73.6
North Dakota	405	239	59.0	433	313	72.3	381	290	76.1
Ohio	499	214	42.9	579	288	49.7	539	299	55.5
Oklahoma	203	164	80.8	217	168	77.4	222	175	78.8
Oregon	723	367	50.8	773	455	58.9	823	498	60.5
Pennsylvania	NA	NA	NA	55	47	85.5	55	50	90.9
Rhode Island	86	85	98.8	85	83	97.7	88	84	95.5
South Carolina	194	90	46.4	188	88	46.8	187	93	49.7
South Dakota	169	132	78.1	175	154	88.0	171	144	84.2
Tennessee	1,198	737	61.5	1,026	797	77.7	1,189	839	70.6
Texas	50	44	88.0	51	48	94.1	49	45	91.8
Utah	160	136	85.0	141	138	97.9	151	138	91.4
Vermont	291	214	73.5	345	260	75.4	322	252	78.3
Virginia	204	186	91.2	217	200	92.2	215	201	93.5
Washington	833	168	20.2	823	138	16.8	832	172	20.7
West Virginia	54	48	88.9	54	37	68.5	53	37	69.8
Wisconsin	73	54	74.0	68	54	79.4	73	55	75.3
Wyoming	0	0	0.0	0	0	0.0	0	0	0.0

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.2.b. Number and percent of LEAs that directly certified categorically eligible students, excluding Special Provision LEAs, SY 2007–2008 through SY 2009–2010

	SY 2007–2008			SY 2008–2009			SY 2009–2010		
		Direct certification LEAs			Direct certification LEAs			Direct certification LEAs	
	Number of non-Provision 2/3 LEAs	Number	Percent	Number of non-Provision 2/3 LEAs	Number	Percent	Number of non-Provision 2/3 LEAs	Number	Percent
U.S. Total	**17,560**	**11,516**	**65.6**	**17,644**	**13,692**	**77.6**	**17,886**	**14,667**	**82.0**
Alabama	142	105	73.9	145	129	89.0	148	134	90.5
Alaska	43	39	90.7	38	37	97.4	41	40	97.6
Arizona	338	273	80.8	359	298	83.0	406	335	82.5
Arkansas	271	237	87.5	279	264	94.6	284	249	87.7
California	980	507	51.7	982	629	64.1	1,004	786	78.3
Colorado	175	81	46.3	204	180	88.2	208	192	92.3
Connecticut	192	161	83.9	191	169	88.5	188	174	92.6
Delaware	29	27	93.1	35	30	85.7	33	30	90.9
District of Columbia	58	2	3.5	61	2	3.3	62	61	98.4
Florida	159	98	61.6	164	107	65.2	170	122	71.8
Georgia	189	160	84.7	191	166	86.9	200	178	89.0
Guam	36	22	61.1	40	26	65.0	37	26	70.3
Hawaii	499	393	78.8	493	423	85.8	495	421	85.1
Idaho	1,114	903	81.1	1,112	926	83.3	1,121	878	78.3
Illinois	482	184	38.2	487	341	70.0	498	405	81.3
Indiana	403	327	81.1	407	348	85.5	405	345	85.2
Iowa	120	105	87.5	135	117	86.7	138	99	71.7
Kansas	190	168	88.4	186	166	89.3	194	173	89.2
Kentucky	111	94	84.7	117	105	89.7	109	95	87.2
Louisiana	356	244	68.5	423	305	72.1	431	303	70.3
Maine	836	570	68.2	846	693	81.9	855	717	83.9
Maryland	239	216	90.4	229	207	90.4	188	172	91.5
Massachusetts	47	39	83.0	47	39	83.0	49	42	85.7
Michigan	642	425	66.2	653	438	67.1	656	451	68.8
Minnesota	756	510	67.5	744	615	82.7	765	678	88.6
Mississippi	227	171	75.3	223	164	73.5	220	171	77.7
Missouri	167	132	79.0	167	139	83.2	164	144	87.8
Montana	170	141	82.9	169	144	85.2	165	151	91.5
Nebraska	92	65	70.7	95	64	67.4	94	75	79.8
Nevada	963	831	86.3	950	813	85.6	987	863	87.4
New Hampshire	658	245	37.2	661	550	83.2	677	619	91.4
New Jersey	106	52	49.1	67	62	92.5	104	60	57.7
New Mexico	20	16	80.0	19	16	84.2	18	17	94.4
New York	1,161	253	21.8	1,166	739	63.4	1,181	809	68.5
North Carolina	202	149	73.8	196	137	69.9	196	150	76.5
North Dakota	381	297	78.0	382	285	74.6	381	302	79.3
Ohio	540	345	63.9	530	394	74.3	538	430	79.9
Oklahoma	232	180	77.6	229	180	78.6	238	189	79.4
Oregon	834	520	62.4	852	620	72.8	850	729	85.8
Pennsylvania	53	50	94.3	32	31	96.9	54	52	96.3
Rhode Island	87	84	96.6	96	85	88.5	93	85	91.4
South Carolina	184	90	48.9	179	109	60.9	173	153	88.4
South Dakota	168	142	84.5	167	153	91.6	165	149	90.3
Tennessee	1,184	909	76.8	1,194	1,040	87.1	1,187	1,043	87.9
Texas	55	51	92.7	64	56	87.5	75	72	96.0
Utah	151	139	92.1	150	138	92.0	153	141	92.2
Vermont	323	264	81.7	309	267	86.4	323	280	86.7
Virginia	219	194	88.6	214	189	88.3	227	206	90.8
Washington	845	210	24.9	838	465	55.5	809	571	70.6
West Virginia	56	41	73.2	53	37	69.8	56	45	80.4
Wisconsin	75	55	73.3	74	55	74.3	73	55	75.3
Wyoming	0	0	0.0	0	0	0.0	0	0	0.0

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.2.c. Number and percent of LEAs that directly certified categorically eligible students, excluding Special Provision LEAs, SY 2010–2011 through SY 2011–2012

	SY 2010–2011			SY 2011–2012		
	Number of non-Provision 2/3 LEAs	Direct certification LEAs		Number of non-Provision 2/3 LEAs	Direct certification LEAs	
		Number	Percent		Number	Percent
U.S. Total	**17,964**	**15,168**	**84.4**	**18,037**	**15,939**	**88.4**
Alabama	147	137	93.2	151	140	92.7
Alaska	41	39	95.1	44	43	97.7
Arizona	400	335	83.8	419	367	87.6
Arkansas	273	262	96.0	273	263	96.3
California	1,025	753	73.5	1,027	805	78.4
Colorado	205	189	92.2	205	195	95.1
Connecticut	186	176	94.6	184	182	98.9
Delaware	34	32	94.1	42	35	83.3
District of Columbia	57	57	100.0	61	60	98.4
Florida	190	133	70.0	223	178	79.8
Georgia	209	187	89.5	208	198	95.2
Guam	NA	NA	NA	3	1	33.3
Hawaii	36	26	72.2	35	25	71.4
Idaho	141	134	95.0	145	138	95.2
Illinois	1,115	964	86.5	1,124	1,037	92.3
Indiana	501	424	84.6	496	429	86.5
Iowa	494	435	88.1	477	428	89.7
Kansas	399	340	85.2	400	362	90.5
Kentucky	188	177	94.1	189	178	94.2
Louisiana	114	102	89.5	113	106	93.8
Maine	186	168	90.3	181	164	90.6
Maryland	48	42	87.5	54	46	85.2
Massachusetts	420	310	73.8	419	352	84.0
Michigan	853	736	86.3	845	762	90.2
Minnesota	697	462	66.3	686	461	67.2
Mississippi	162	146	90.1	160	144	90.0
Missouri	758	681	89.8	753	702	93.2
Montana	221	190	86.0	219	191	87.2
Nebraska	377	315	83.6	372	318	85.5
Nevada	20	16	80.0	20	15	75.0
New Hampshire	91	82	90.1	100	88	88.0
New Jersey	694	665	95.8	697	683	98.0
New Mexico	115	62	53.9	135	80	59.3
New York	992	871	87.8	1,003	903	90.0
North Carolina	165	154	93.3	162	152	93.8
North Dakota	183	160	87.4	181	157	86.7
Ohio	1,182	859	72.7	1,199	1,028	85.7
Oklahoma	546	465	85.2	544	516	94.9
Oregon	246	199	80.9	236	197	83.5
Pennsylvania	850	730	85.9	850	765	90.0
Rhode Island	55	52	94.5	54	49	90.7
South Carolina	100	85	85.0	106	84	79.2
South Dakota	169	153	90.5	186	170	91.4
Tennessee	175	161	92.0	183	174	95.1
Texas	1,178	1,056	89.6	1,175	1,064	90.6
Utah	81	75	92.6	85	81	95.3
Vermont	237	207	87.3	217	202	93.1
Virginia	154	145	94.2	155	146	94.2
Washington	316	281	88.9	309	279	90.3
West Virginia	72	56	77.8	72	57	79.2
Wisconsin	811	639	78.8	806	692	85.9
Wyoming	55	43	78.2	54	47	87.0

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.2.d. Number and percent of LEAs that directly certified categorically eligible students, excluding Special Provision LEAs, SY 2012–2013 through SY 2013–2014

	SY 2012–2013			SY 2013–2014		
	Number of non-Provision 2/3 LEAs	Direct certification LEAs		Number of non-Special Provision LEAs	Direct certification LEAs	
		Number	Percent		Number	Percent
U.S. Total	**17,744**	**16,066**	**90.5**	**17,220**	**15,936**	**92.5**
Alabama	157	150	95.5	191	149	78.0
Alaska	63	42	66.7	41	41	100.0
Arizona	427	370	86.7	375	365	97.3
Arkansas	270	254	94.1	268	258	96.3
California	1,038	968	93.3	1,053	985	93.5
Colorado	196	188	95.9	205	198	96.6
Connecticut	188	186	98.9	181	176	97.2
Delaware	41	37	90.2	39	38	97.4
District of Columbia	63	63	100.0	41	41	100.0
Florida	225	184	81.8	215	199	92.6
Georgia	199	189	95.0	167	163	97.6
Guam	2	1	50.0	2	1	50.0
Hawaii	33	33	100.0	28	27	96.4
Idaho	144	144	100.0	139	136	97.8
Illinois	1,051	984	93.6	1,152	983	85.3
Indiana	504	447	88.7	469	458	97.7
Iowa	474	419	88.4	425	394	92.7
Kansas	398	378	95.0	398	385	96.7
Kentucky	188	186	98.9	185	184	99.5
Louisiana	114	107	93.9	121	111	91.7
Maine	186	179	96.2	200	187	93.5
Maryland	54	37	68.5	51	42	82.4
Massachusetts	358	319	89.1	399	383	96.0
Michigan	847	784	92.6	719	691	96.1
Minnesota	681	445	65.3	652	496	76.1
Mississippi	157	144	91.7	159	141	88.7
Missouri	760	709	93.3	746	706	94.6
Montana	216	183	84.7	216	192	88.9
Nebraska	370	337	91.1	360	347	96.4
Nevada	25	17	68.0	21	17	81.0
New Hampshire	98	82	83.7	92	91	98.9
New Jersey	698	679	97.3	700	688	98.3
New Mexico	129	67	51.9	177	68	38.4
New York	1,002	851	84.9	915	805	88.0
North Carolina	161	152	94.4	163	162	99.4
North Dakota	179	151	84.4	174	162	93.1
Ohio	1,200	1,127	93.9	1,026	991	96.6
Oklahoma	543	519	95.6	549	532	96.9
Oregon	232	197	84.9	225	201	89.3
Pennsylvania	848	785	92.6	826	786	95.2
Rhode Island	53	53	100.0	58	50	86.2
South Carolina	94	84	89.4	114	98	86.0
South Dakota	179	160	89.4	173	165	95.4
Tennessee	182	174	95.6	179	177	98.9
Texas	1,157	1,064	92.0	1,097	1,006	91.7
Utah	93	93	100.0	94	94	100.0
Vermont	88	82	93.2	91	78	85.7
Virginia	151	145	96.0	156	151	96.8
Washington	303	284	93.7	297	281	94.6
West Virginia	71	58	81.7	70	67	95.7
Wisconsin	793	722	91.0	766	734	95.8
Wyoming	61	53	86.9	60	55	91.7

Note: Figures for school years before SY 2013–2014 may differ from previous reports due to changes in data submitted by States.

Table A.3. Enrollment of NSLP-participating LEAs, SY 2013–2014 (millions of students)

	LEAs that directly certified SNAP participants or in which all schools are special provision in a non-base year	All other LEAs	All NSLP-participating LEAs
All LEAs	49.8	0.6	50.4
Number of students in LEA			
10,000 or more	26.6	0.1	26.7
5,000 to 9,999	7.2	0.1	7.3
1,000 to 4,999	12.3	0.2	12.4
500 to 999	2.1	0.1	2.1
Fewer than 500	1.7	0.2	1.8

Note: Because of rounding, values in the All NSLP-participating LEAs column might not equal the sum of values in the other two columns.

LEA = local education agency; SNAP = Supplemental Nutrition Assistance Program; SY = school year.

Table A.4. States by FNS administrative region

FNS region	State	FNS region	State
Mid-Atlantic	District of Columbia	Northeast	Connecticut
	Delaware		Maine
	Maryland		Massachusetts
	New Jersey		New Hampshire
	Pennsylvania		New York
	Virginia		Rhode Island
	West Virginia		Vermont
Mid-West	Illinois	Southeast	Alabama
	Indiana		Florida
	Michigan		Georgia
	Minnesota		Kentucky
	Ohio		Mississippi
	Wisconsin		North Carolina
			South Carolina
			Tennessee
Mountain-Plains	Colorado	Southwest	Arkansas
	Iowa		Louisiana
	Kansas		New Mexico
	Missouri		Oklahoma
	Montana		Texas
	Nebraska	West	Alaska
	North Dakota		Arizona
	South Dakota		California
	Utah		Guam
	Wyoming		Hawaii
			Idaho
			Nevada
			Oregon
			Washington

Figure A.1. Percent of LEAs that directly certified categorically eligible students and percent of students in LEAs that directly certified categorically eligible students, by enrollment category size: special provision LEAs excluded from direct certification counts, SY 2013–2014

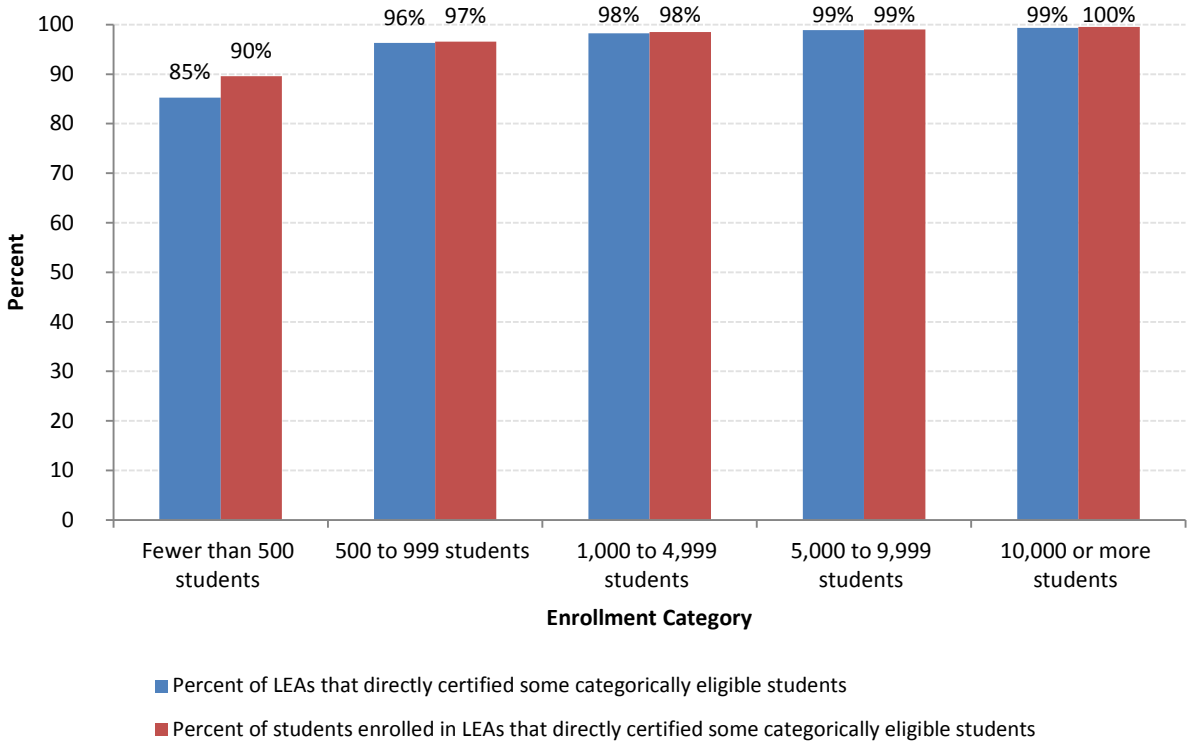


Figure A.2. Percent of SNAP-participant children directly certified for free school meals, SY 2007–2008

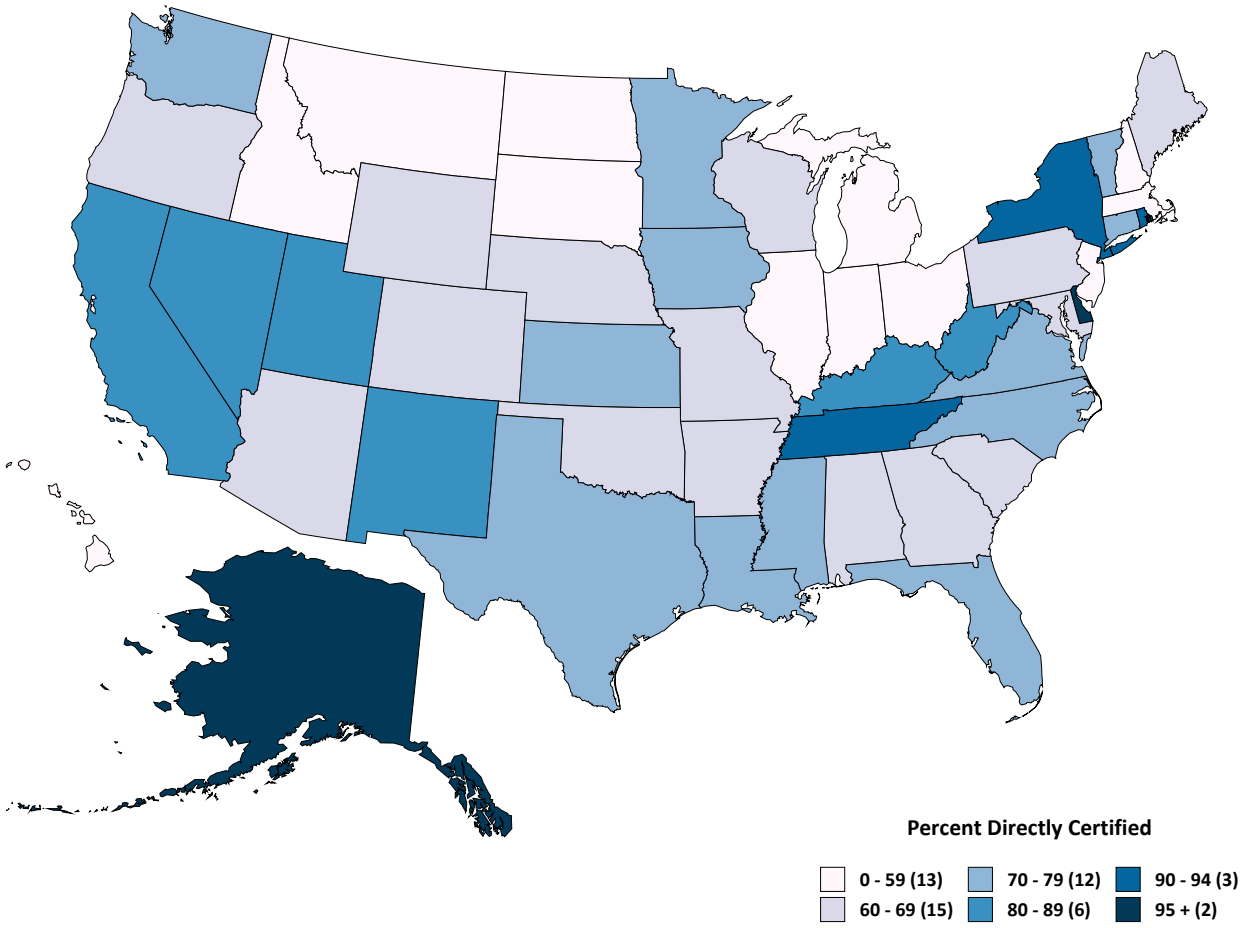


Figure A.3. Percent of SNAP-participant children directly certified for free school meals, SY 2008–2009

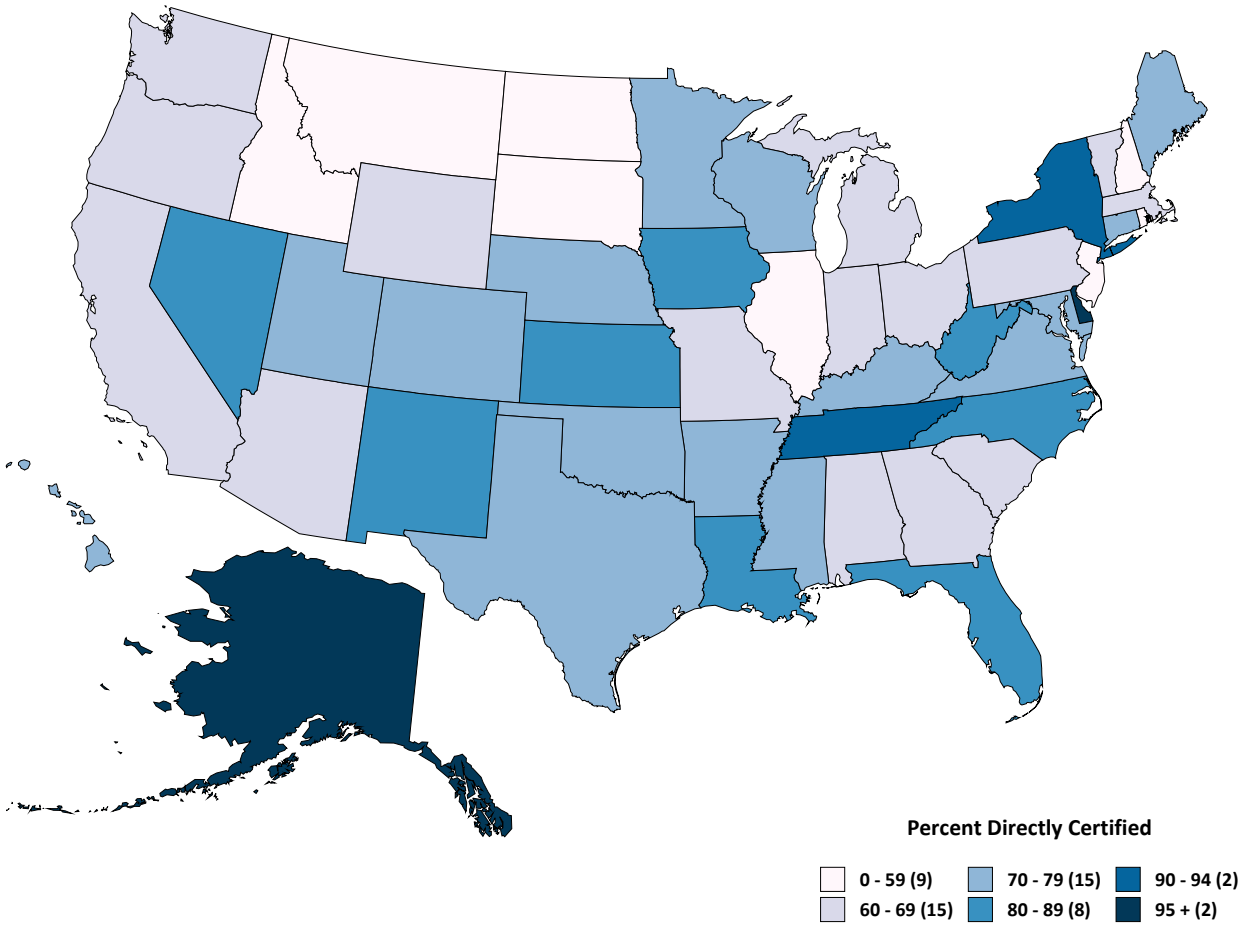


Figure A.4. Percent of SNAP-participant children directly certified for free school meals, SY 2009–2010

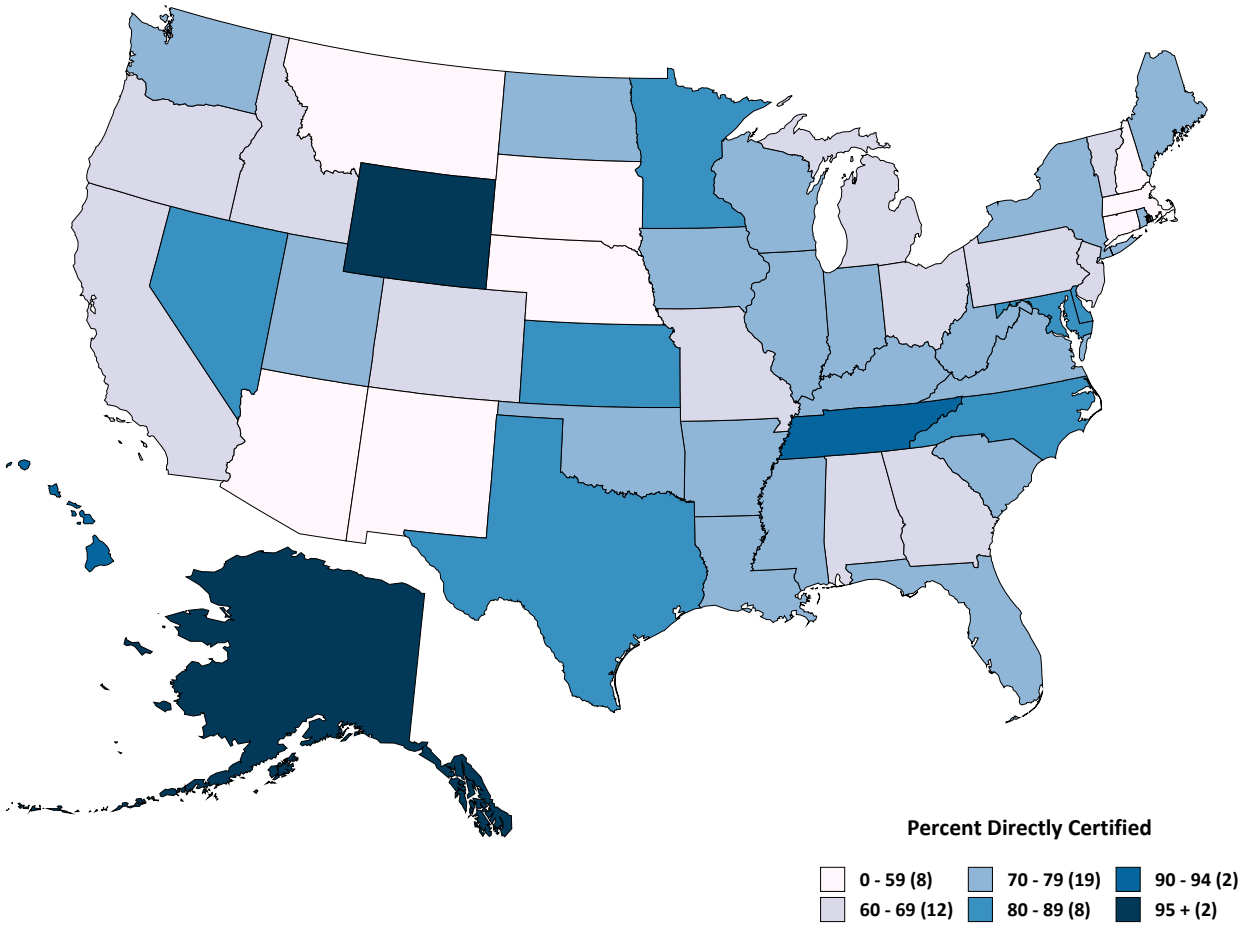


Figure A.5. Percent of SNAP-participant children directly certified for free school meals, SY 2010–2011

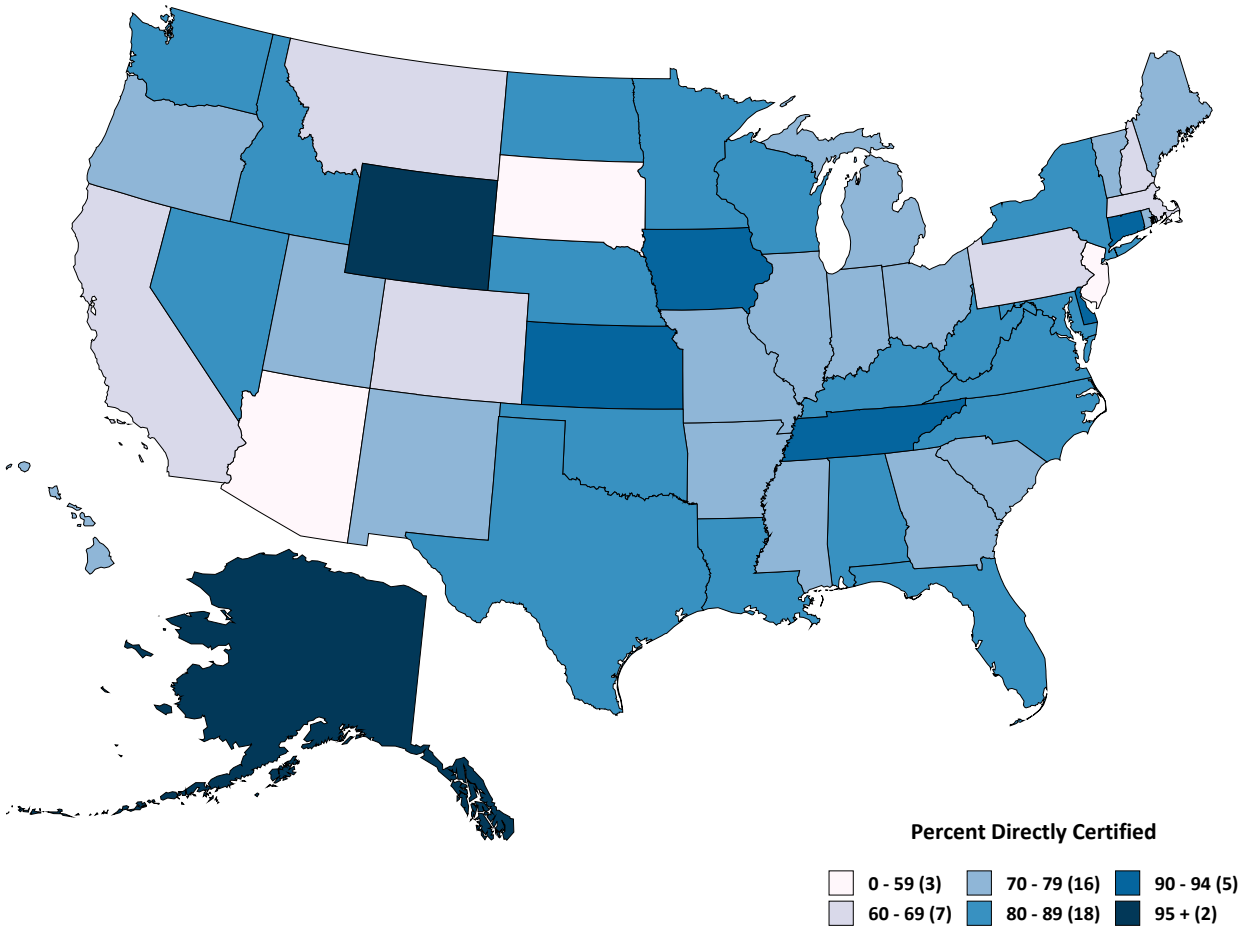


Figure A.6. Percent of SNAP-participant children directly certified for free school meals, SY 2011–2012

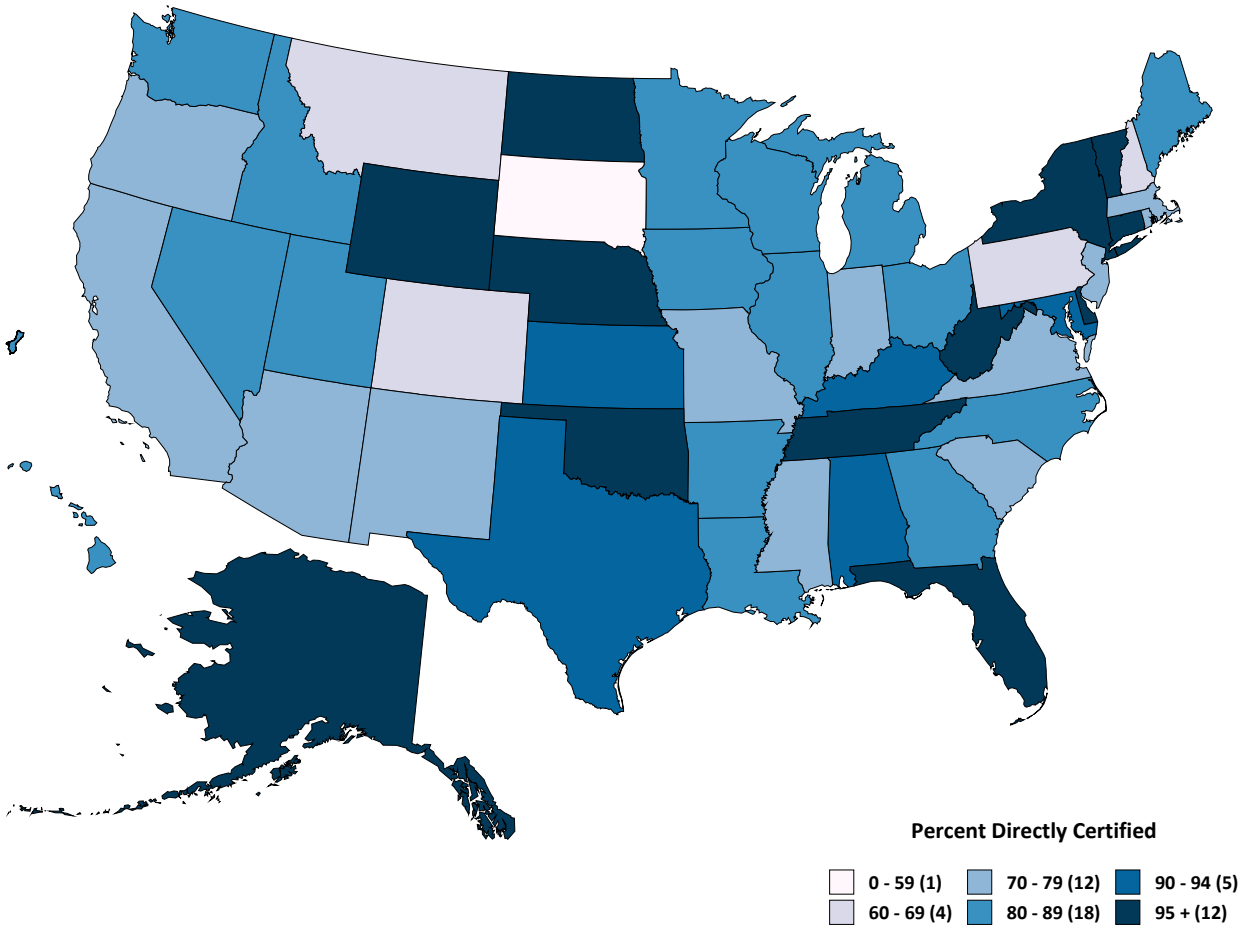


Figure A.7. Percent of SNAP-participant children directly certified for free school meals, SY 2012–2013

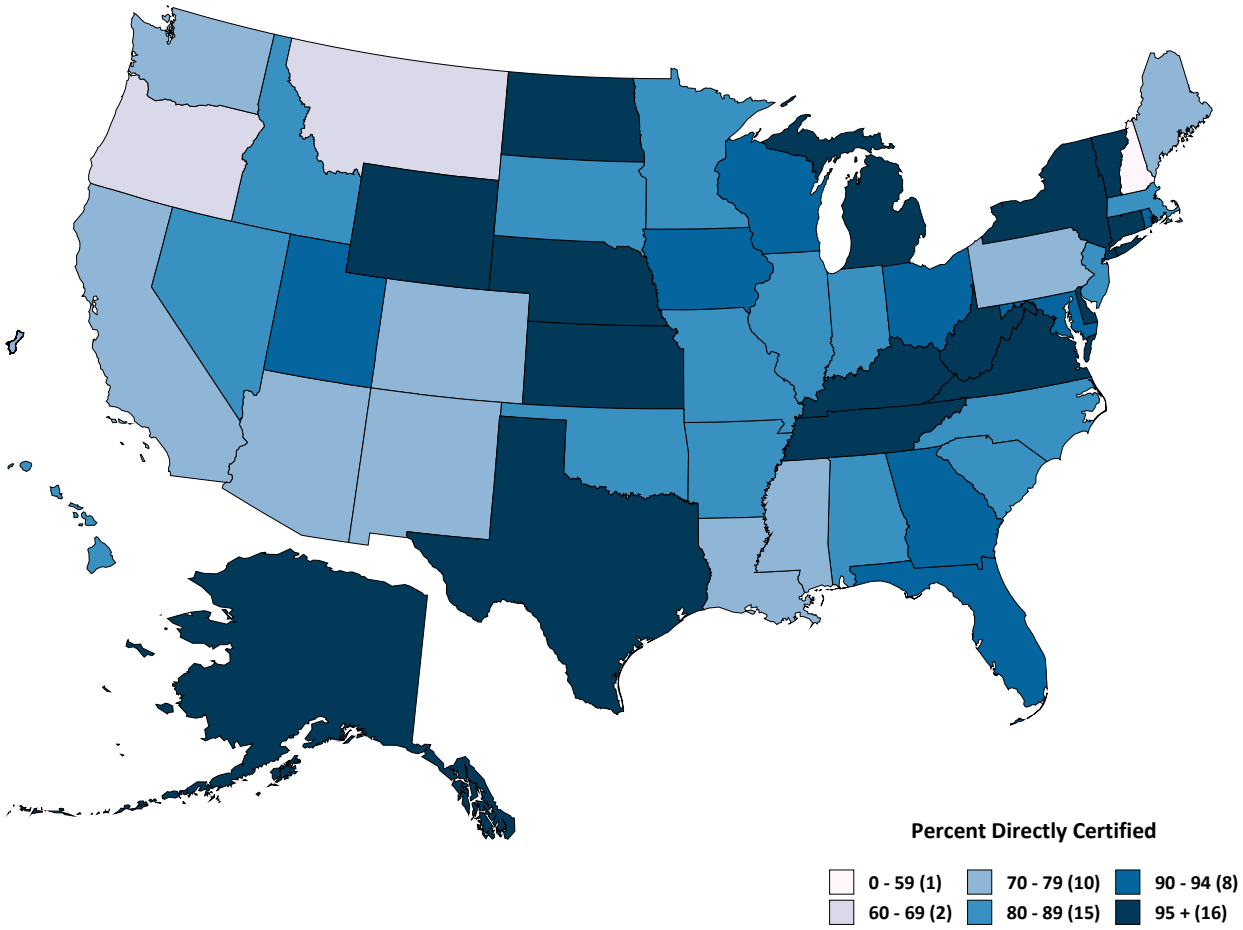
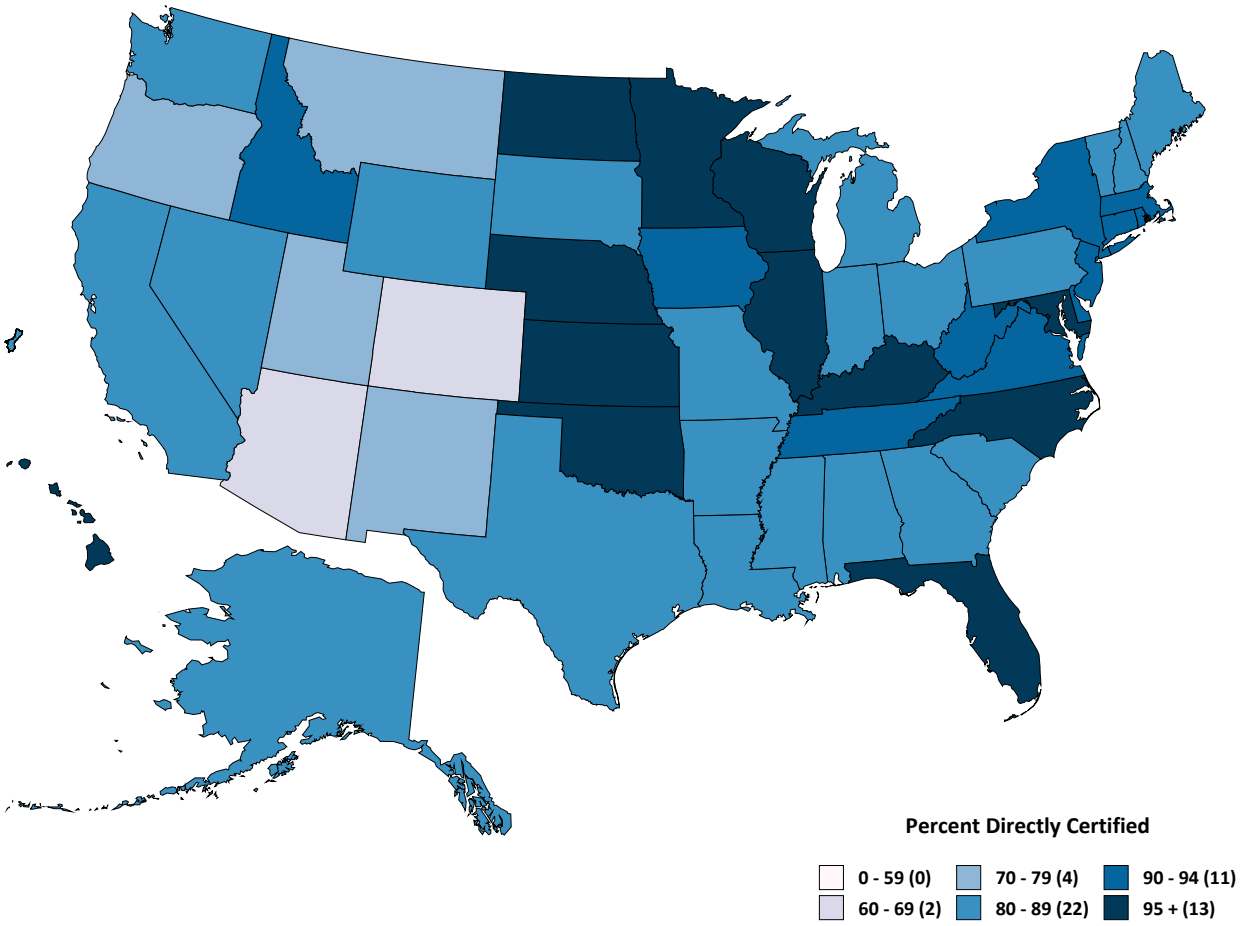


Figure A.8. Percent of SNAP-participant children directly certified for free school meals, SY 2013–2014



Note: In SY 2013-2014, Arizona, California, Connecticut, Hawaii, Ohio, Rhode Island, and Vermont could not distinguish direct certifications based on SNAP participation from direct certifications based on participation in programs other than SNAP. The resulting performance rates calculated for these States, therefore, overstate their actual performance.

Figure A.9. Percent of categorically eligible children certified for free school meals, SY 2007–2008

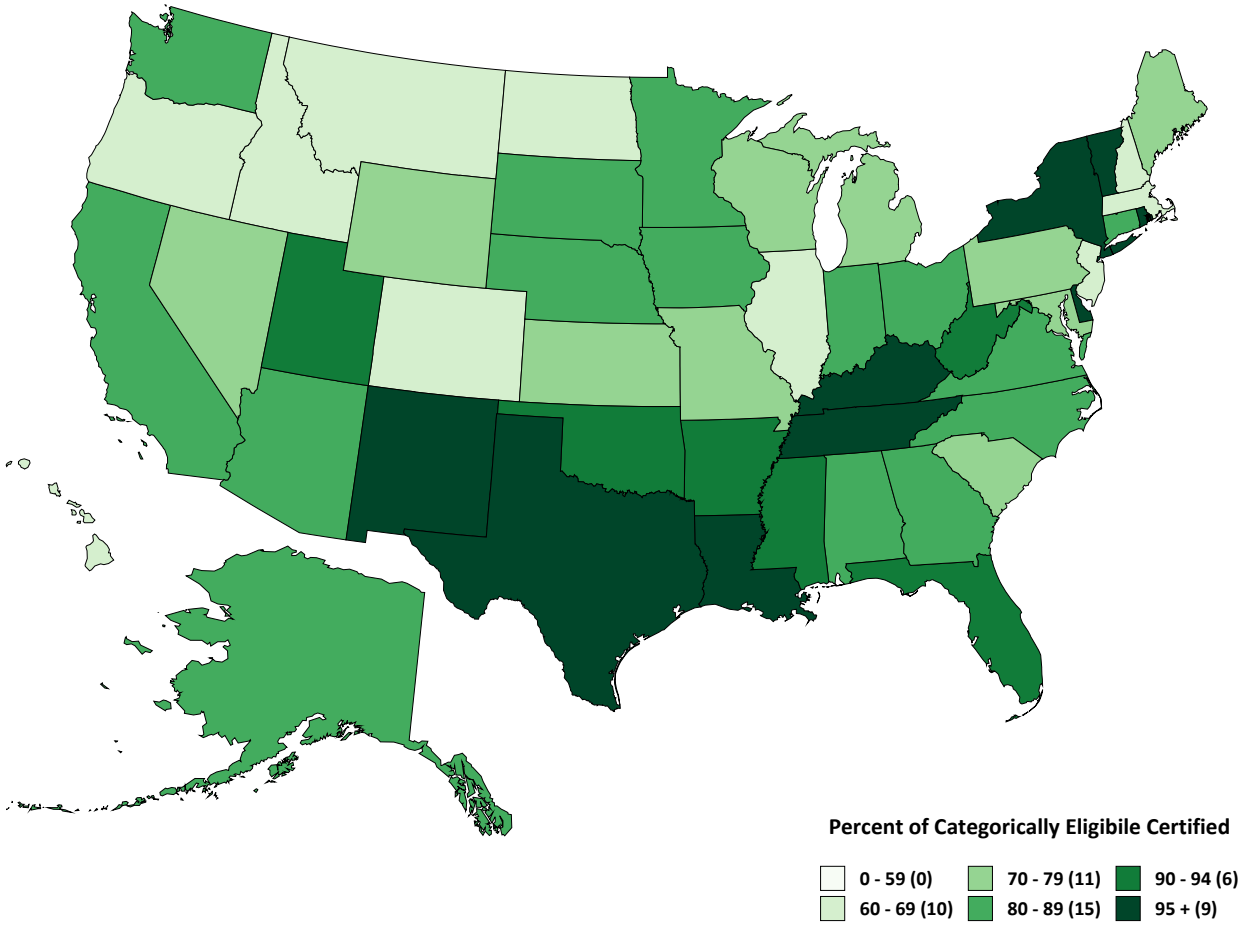


Figure A.10. Percent of categorically eligible children certified for free school meals, SY 2008–2009

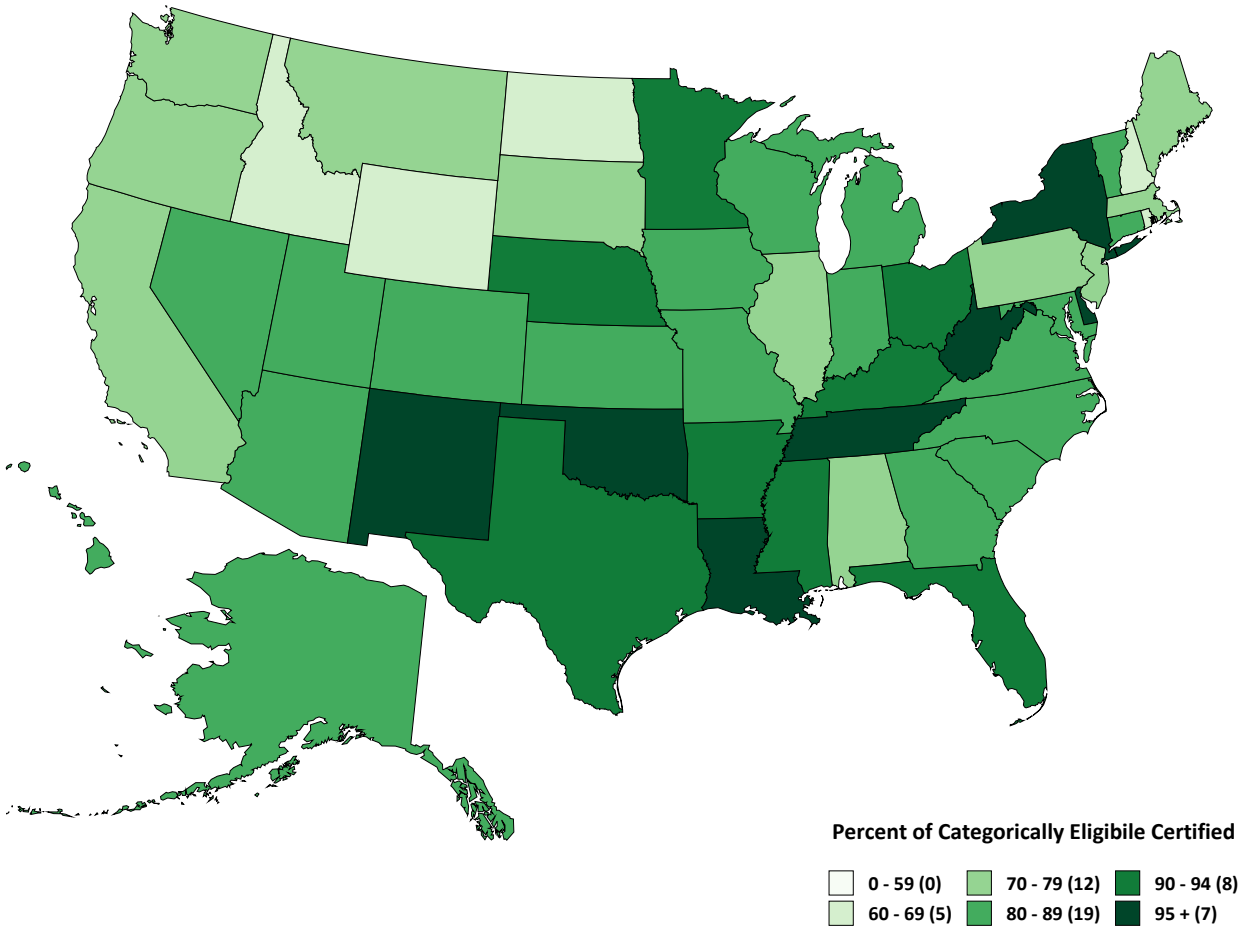


Figure A.11. Percent of categorically eligible children certified for free school meals, SY 2009–2010

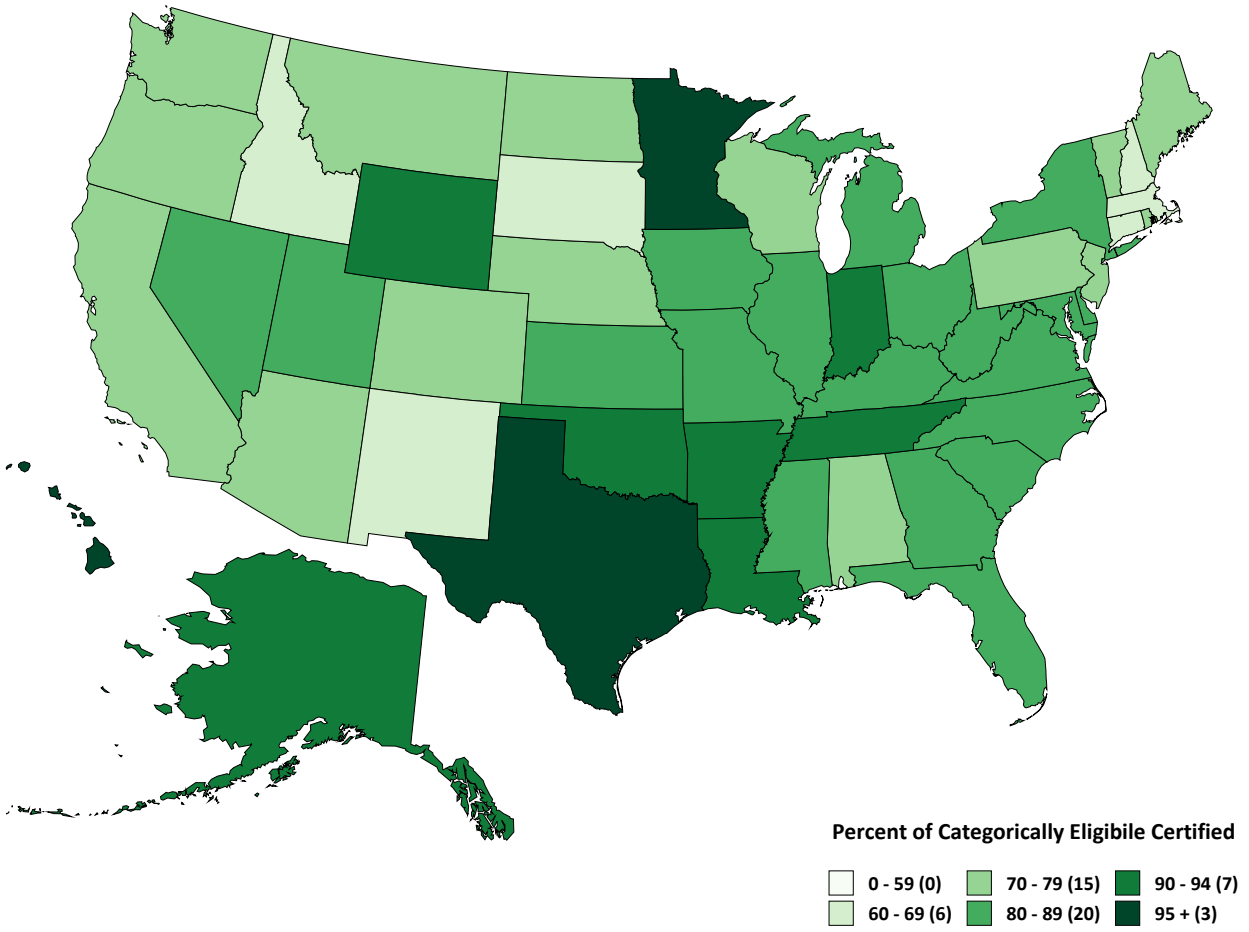


Figure A.12. Percent of categorically eligible children certified for free school meals, SY 2010–2011

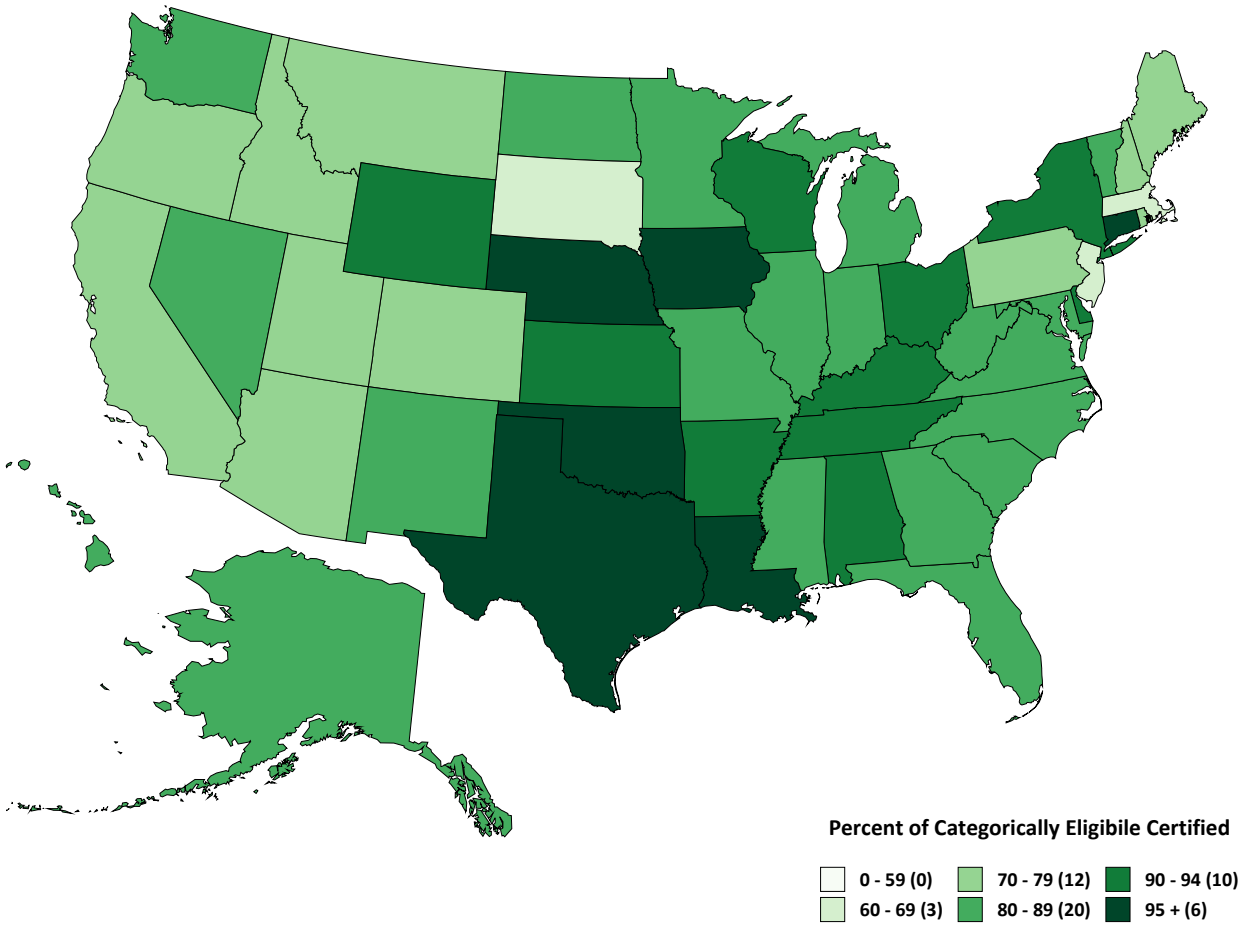


Figure A.13. Percent of categorically eligible children certified for free school meals, SY 2011–2012

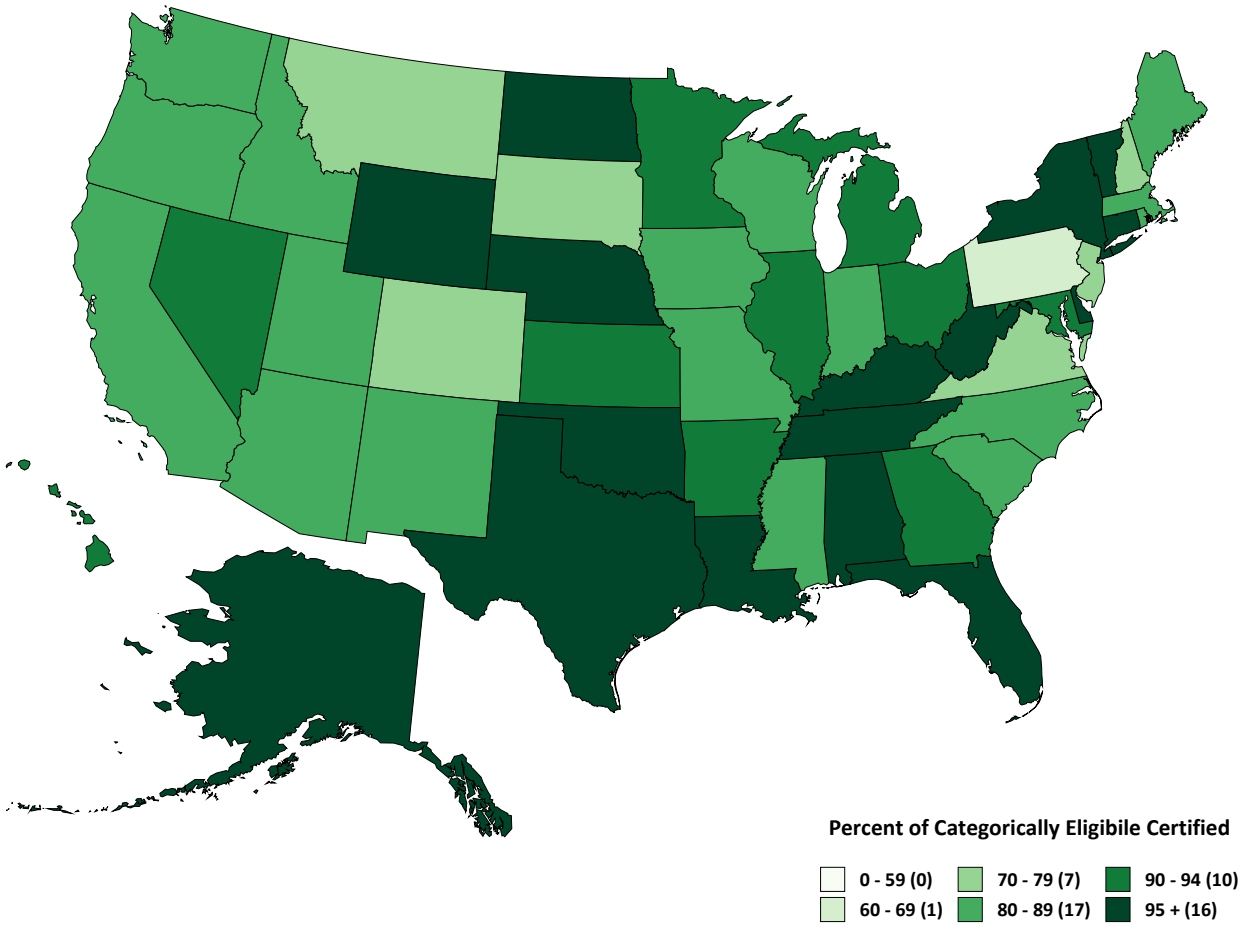


Figure A.14. Percent of categorically eligible children certified for free school meals, SY 2012–2013

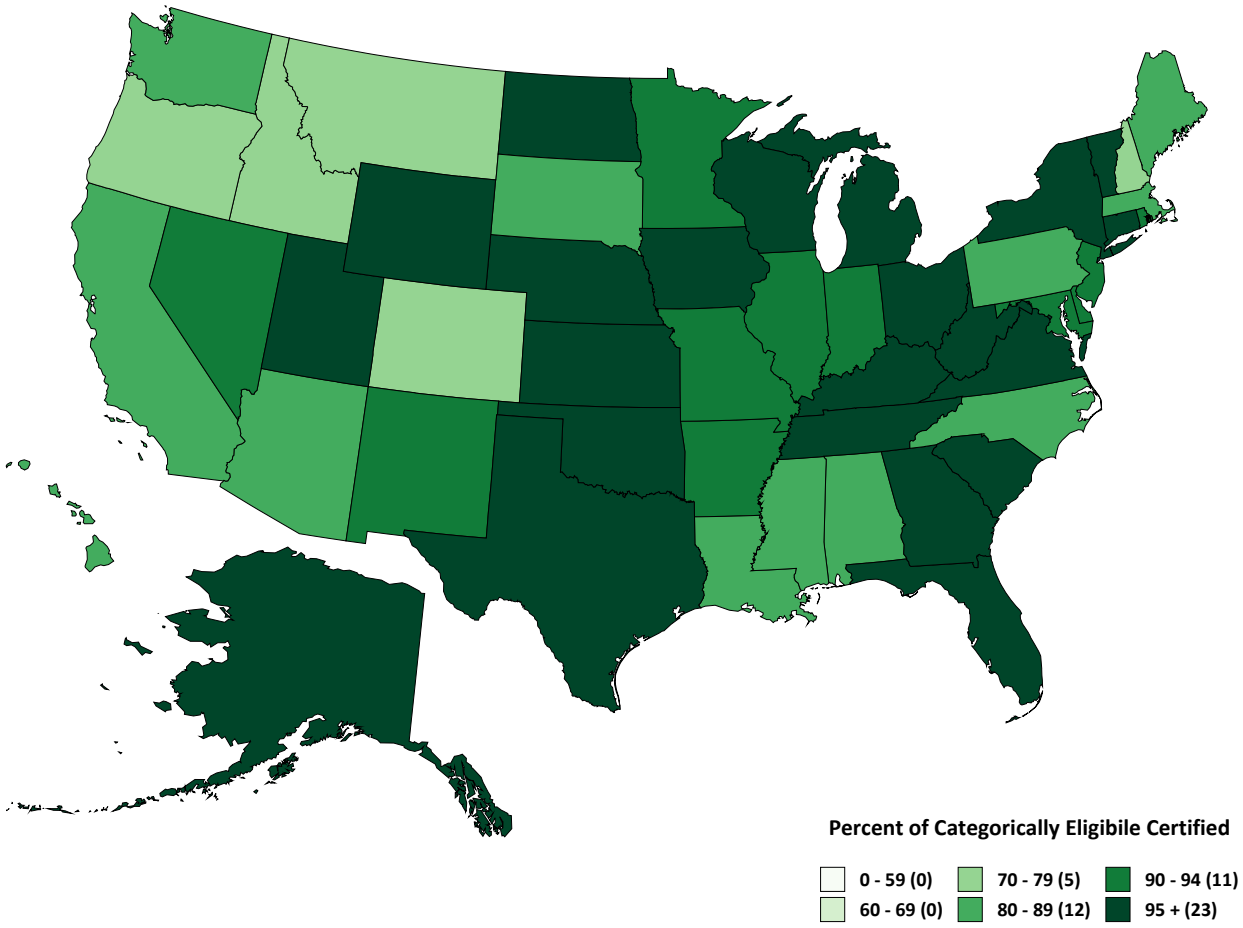
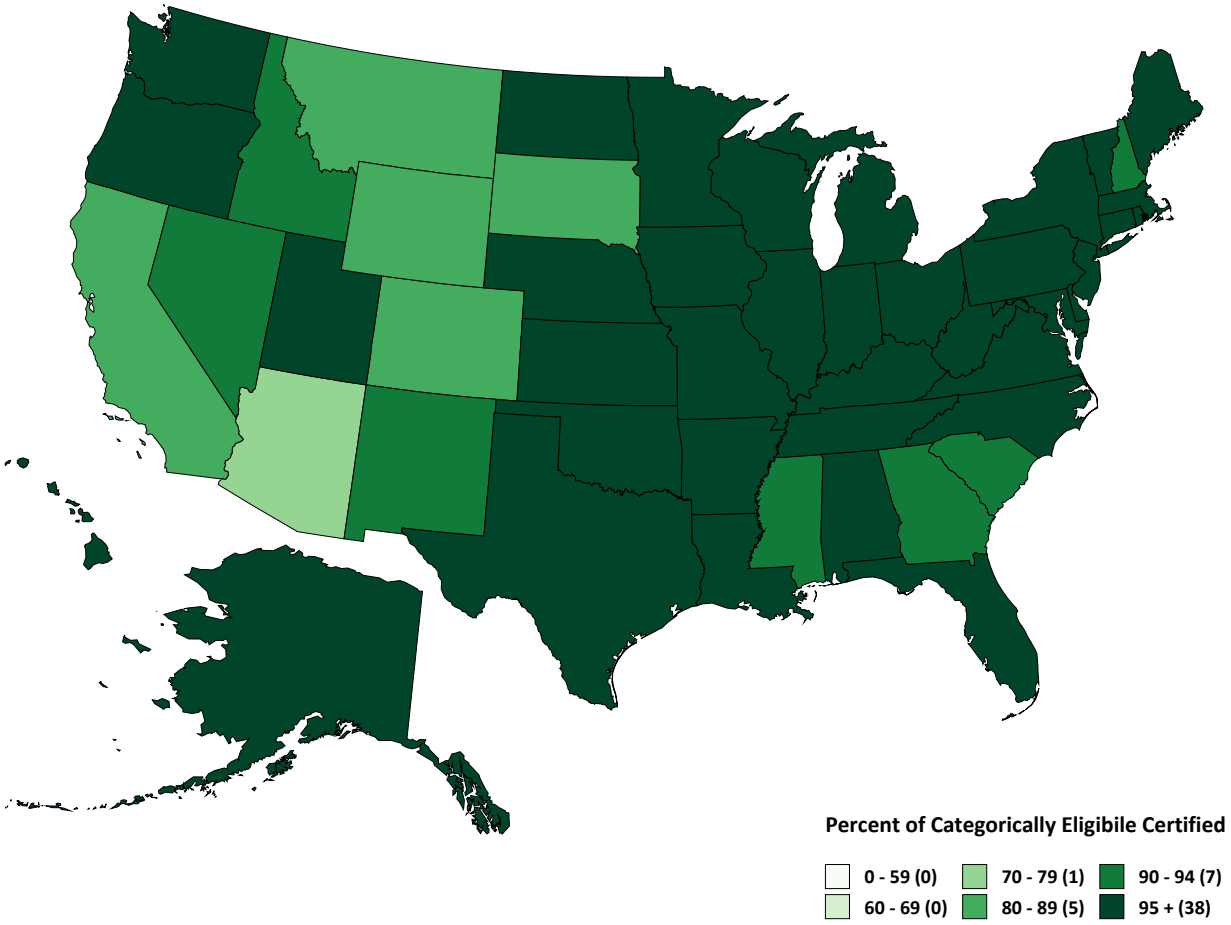


Figure A.15. Percent of categorically eligible children certified for free school meals, SY 2013–2014



APPENDIX B

SCHOOL FOOD AUTHORITY VERIFICATION COLLECTION REPORT (FORM FNS-742)

AND

STATE AGENCY (NSLP/SNAP) DIRECT CERTIFICATION RATE DATA ELEMENT REPORT (FORM FNS-834)

Figure B.1. School food authority Verification Collection Report (FNS-742)

OMB APPROVED NO. 0584-0026
Expiration Date: 04/30/2016

Department of Agriculture, Food and Nutrition Service

School Food Authority (SFA) Verification Collection Report

State agencies must report the information on this form ANNUALLY for each SFA with schools operating the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP).
All SFAs, including SFAs with all schools exempt from verification requirements, must complete applicable sections.

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 45 minutes per response, including the time to review instructions, search existing data resources, gather the data needed and complete and review the information collection.

State Agency Name:	SFA ID#:	Type of SFA: ☐ Public ☐ Nonprofit/Private	School Year: From: 20 To: 20
SFA Name:		SFA City:	SFA Zip code: ☐☐☐☐☐

		****All SFAs must report Section 1****	**A. Number of Schools OR Institutions**	**B. Number of Students**
Section 1	Total Schools, Residential Child Care Institutions (RCCIs) and Enrolled Students	**1-1: Total schools** *(Do not include RCCIs):*		
		1-2: Total RCCIs *(Do not include schools counted in 1-1):*		
		1-2a: RCCIs with day students *(Report ONLY day students in 1-2aB):*		
		1-2b: RCCIs with NO day students:		

		****ONLY SFAs with alternate provisions must report Section 2****	**A. Number of Schools AND Institutions**	**B. Number of Students**
Section 2	SFAs with schools operating alternate provisions	**2-1: Operating Provision 2/3 in a BASE year for NSLP and SBP:**		
		2-2: Operating Provision 2/3 in a NON BASE year for NSLP and SBP:		
		2-2a: Provision 2/3 students reported as FREE in a NON BASE year:		
		2-2b: Provision 2/3 students reported as REDUCED PRICE in a NON BASE year:		
		2-3: Operating the Community Eligibility Option:		
		2-4: Operating other alternatives for NSLP and SBP:		
		2-5: Operating an alternate provision(s) for only SBP or only NSLP:		

		*****ALL SFAs must report Section 3 or check box 3-1 if applicable*****	**B. Number of FREE Students**
Section 3	Students approved as FREE eligible NOT subject to verification	**3-1:** ☐ Check the box only if all schools and/or RCCIs in the SFA were not required to perform direct certification with SNAP *(i.e. NON BASE year Provision 2/3 for all schools)*	
		3-2: Students directly certified through Supplemental Nutrition Assistance Program (SNAP): *Do not include students certified with SNAP through the letter method.*	
		3-3: Students directly certified through other programs: *Include those directly certified through Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), or Medicaid (if applicable); those documented as homeless, migrant, runaway, foster, Head Start, Pre-K Even Start, or non-applicant but approved by local officials.* ***DO NOT include SNAP students already reported in 3-2.***	
		3-4: Students certified categorically FREE eligible through SNAP letter method: *Include students certified for free meals through the family providing a letter from the SNAP agency.*	

		*****ALL SFAs collecting applications must report Section 4*****	**A. Number of Applications**	**B. Number of Students**
Section 4	Students approved as FREE or REDUCED PRICE eligible through a household application	**4-1: Approved as categorically FREE Eligible:** *Based on those providing documentation (e.g. a case number for SNAP, TANF, FDPIR on an application)*		
		4-2: Approved as FREE eligible: *Based on household size and income information*		
		4-3: Approved as REDUCED PRICE eligible: *Based on household size and income information*		

T-1: Total FREE Eligible Students Reported:		T-2: Total REDUCED PRICE Eligible Students Reported:	

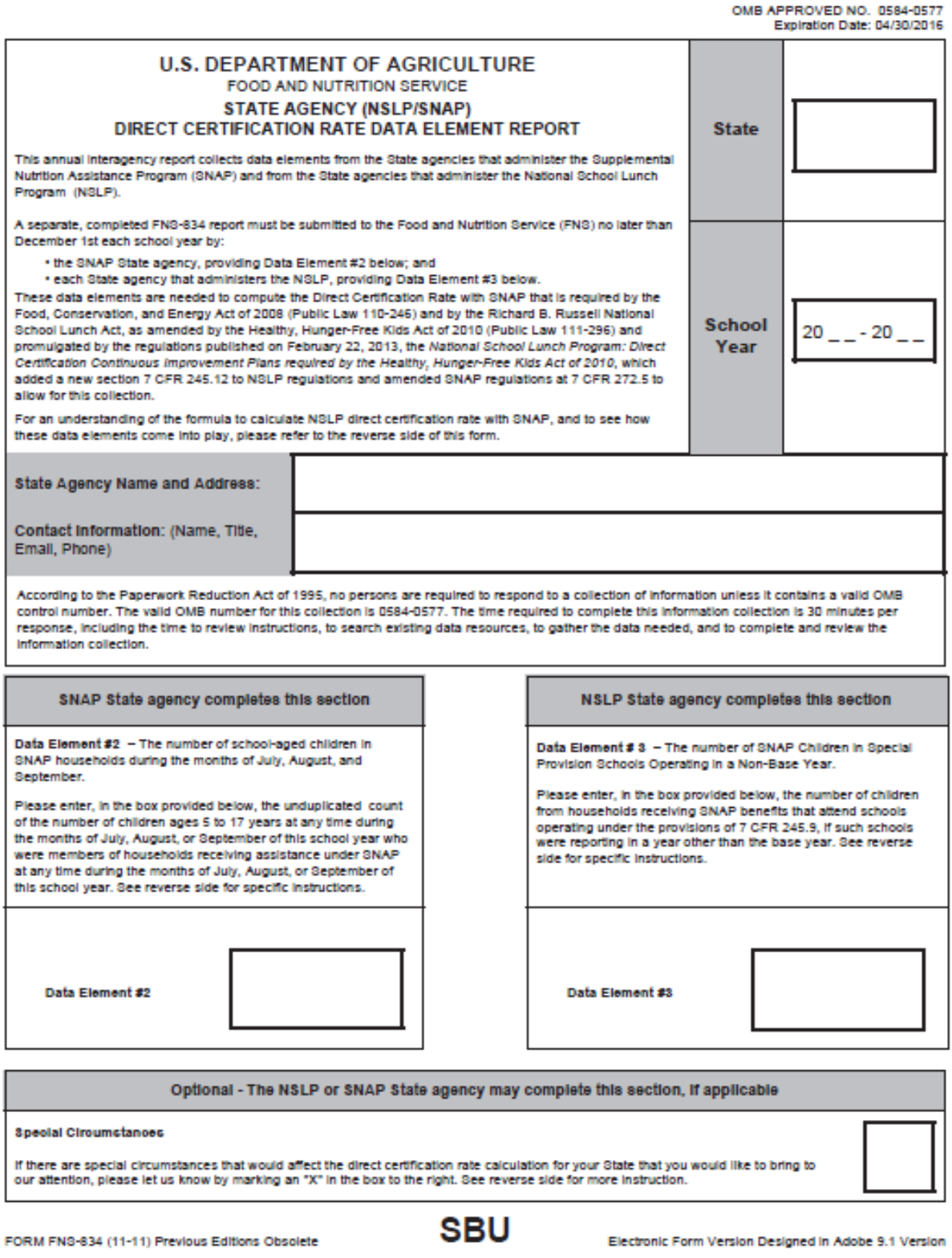
Form FNS-742 (10/12) Previous Editions are Obsolete

SBU

Electronic Form Version Designed in Adobe 10.0 version

This form and the accompanying instructions for completion are available for download at http://www.fns.usda.gov/forms/.

Figure B.2. State agency (NSLP/SNAP) Direct Certification Rate Data Element Report (Form FNS-834)



OMB APPROVED NO. 0584-0577
Expiration Date: 04/30/2016

U.S. DEPARTMENT OF AGRICULTURE
FOOD AND NUTRITION SERVICE
STATE AGENCY (NSLP/SNAP)
DIRECT CERTIFICATION RATE DATA ELEMENT REPORT

This annual interagency report collects data elements from the State agencies that administer the Supplemental Nutrition Assistance Program (SNAP) and from the State agencies that administer the National School Lunch Program (NSLP).

A separate, completed FNS-834 report must be submitted to the Food and Nutrition Service (FNS) no later than December 1st each school year by:

- the SNAP State agency, providing Data Element #2 below; and
- each State agency that administers the NSLP, providing Data Element #3 below.

These data elements are needed to compute the Direct Certification Rate with SNAP that is required by the Food, Conservation, and Energy Act of 2008 (Public Law 110-246) and by the Richard B. Russell National School Lunch Act, as amended by the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296) and promulgated by the regulations published on February 22, 2013, the *National School Lunch Program: Direct Certification Continuous Improvement Plans required by the Healthy, Hunger-Free Kids Act of 2010*, which added a new section 7 CFR 245.12 to NSLP regulations and amended SNAP regulations at 7 CFR 272.5 to allow for this collection.

For an understanding of the formula to calculate NSLP direct certification rate with SNAP, and to see how these data elements come into play, please refer to the reverse side of this form.

State

School Year 20 _ _ - 20 _ _

State Agency Name and Address:

Contact Information: (Name, Title, Email, Phone)

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 0584-0577. The time required to complete this information collection is 30 minutes per response, including the time to review instructions, to search existing data resources, to gather the data needed, and to complete and review the information collection.

SNAP State agency completes this section

Data Element #2 – The number of school-aged children in SNAP households during the months of July, August, and September.

Please enter, in the box provided below, the unduplicated count of the number of children ages 5 to 17 years at any time during the months of July, August, or September of this school year who were members of households receiving assistance under SNAP at any time during the months of July, August, or September of this school year. See reverse side for specific instructions.

Data Element #2

NSLP State agency completes this section

Data Element # 3 – The number of SNAP Children in Special Provision Schools Operating in a Non-Base Year.

Please enter, in the box provided below, the number of children from households receiving SNAP benefits that attend schools operating under the provisions of 7 CFR 245.9, if such schools were reporting in a year other than the base year. See reverse side for specific instructions.

Data Element #3

Optional - The NSLP or SNAP State agency may complete this section, if applicable

Special Circumstances

If there are special circumstances that would affect the direct certification rate calculation for your State that you would like to bring to our attention, please let us know by marking an "X" in the box to the right. See reverse side for more instruction.

FORM FNS-834 (11-11) Previous Editions Obsolete

SBU

Electronic Form Version Designed in Adobe 9.1 Version

This form and the accompanying instructions for completion are available for download at http://www.fns.usda.gov/forms/.

APPENDIX C

DESCRIPTION AND LIMITATIONS OF DATA SOURCES USED FOR DIRECT CERTIFICATION PERFORMANCE MEASURE CALCULATIONS

This report presents two measures of State success in certifying categorically eligible children for free school meals:

1. The direct certification performance rate measures the percentage of school-age Supplemental Nutrition Assistance Program (SNAP) participants each State directly certifies for free school meals.
2. The broader measure of certification estimates the percentage of all categorically eligible students each State certifies directly, by application, or by letter method, based on their participation in or association with any of the programs or institutions that confer categorical eligibility (CE) for free school meals.

Both measures use State-reported counts for component statistics where possible, using the FNS data collection forms newly available in school year (SY) 2013–2014. The broader measure supplements these State-reported numbers with data from the U.S. Census Bureau's American Community Survey (ACS), a survey of Food Distribution Program on Indian Reservations (FDPIR) participants, and FDPIR administrative data. This appendix contains descriptions of these data sources and their limitations.

A. Direct certification performance rate

The main direct certification performance rate described in this report is calculated using State counts of three data elements from two FNS data forms: the Verification Collection Report (VCR, FNS Form 742) and the Direct Certification Rate Data Element Report (DER, FNS Form 834).

1. Verification Collection Report

The VCR is a revised version of the Verification Summary Report (VSR) used in previous years. The primary purpose of this form is to enable States to report statistics pertaining to school meal certification verification. FNS has used VSR data to calculate direct certification performance rates since SY 2007–2008. However, the original VSR form was not designed for this purpose and did not contain a field for the number of SNAP participants who were directly certified, the primary data element used to calculate State performance. This statistic, therefore, had to be approximated based on other fields. The revisions that led to the new VCR form retain the fields necessary for program verification while offering the specific data elements needed to calculate direct certification performance.

The data reported on the VCR suffer from two limitations. The first is the inability of seven States—Arizona, California, Connecticut, Hawaii, Ohio, Rhode Island, and Vermont—to distinguish students directly certified based on SNAP participation from those directly certified based on participation in other programs in SY 2013–2014. The performance rate calculation for these States includes all directly certified students, not just those who were directly certified

based on SNAP.[26] The performance rate, therefore, overstates the percentage of school-age SNAP recipients who were directly certified in those States, as well as for the nation.

The second limitation of the VCR data is that they do not capture school-age SNAP participants who do not attend NSLP-participating schools. Table C.1 presents the types of children in these circumstances whom States reported to FNS, including the number of States that provided estimates of the number of children in each category based on valid individual-level data.

Table C.1. State-reported special circumstances affecting direct certification performance rate calculations

Circumstance	Number of States citing it	Number of States attempting to quantify it	Comments
School drop-outs	3	1	This circumstance likely applies to all States.
Five-year-olds below mandatory school age	6	0	The extent of this circumstance depends on State-specific school enrollment policies. This circumstance includes students old enough to be eligible, but not required, to enroll in school. In some States it also includes students too young to enroll in school.[a]
Home-schooled students	5	2	This circumstance likely applies to all States. An estimated 1.5 million students were home-schooled nationwide in 2007.[b]
Virtual students	2	1	The extent of this circumstance likely varies by State.
Students attending schools not participating in the NSLP	7	2	The extent of this circumstance likely varies by State.

[a]State SNAP lists used for direct certification include children residing in households receiving SNAP benefits who turn five years old in September. In some States, children must be at least five years old on September 1 to enroll in school. Children in these States who turn five during the month of September appear on the State SNAP list but not in the school enrollment data.

[b]U.S. Department of Education 2008.

Other types of children that appear in State SNAP data but might not attend schools participating in the NSLP include school-age children who graduate early as well as some homeless or migrant children. Children who appear on State lists of school-age SNAP participants but do not attend schools participating in the NSLP are included in the denominator of the direct certification performance rate calculation but not the numerator. This reduces State performance rates and might limit some States' ability to meet the performance rate target. However, the performance rate target of 95 percent accounts for this by allowing States to meet the standard while leaving up to 5 percent of the school-age SNAP population uncertified. The estimate some States provided for the number of children in these categories provides a useful first step in gauging the scope of this problem. However, firm, consistent numbers do not currently exist and the size of these groups likely varies considerably across States.

[26] This is similar to the count of directly certified students used in the direct certification performance rates presented in previous years.

2. Direct Certification Rate Data Element Report

FNS introduced the DER in SY 2013–2014 in order to simplify and improve two data elements used in the direct certification performance rate calculation. States use the DER to submit counts of the number of school-age children in SNAP households during July, August, or September and the number of SNAP children in special provision schools operating in non-base years.[27]

Direct State reports of counts of SNAP children and SNAP children in non-base-year special provision schools likely improve performance rate accuracy compared with methods used in previous years. Nonetheless, some States might have difficulty providing accurate counts for one or both of these data elements—responses State staff provided in the best practices interviews confirmed that some States found this challenging. Comparisons between State-reported and estimated counts revealed large differences in some States and it is not always clear which count might be more accurate. These differences underscore the importance of refraining from comparing State performance across years using performance rates calculated using different methodologies.

B. Broader certification rate

The broader direct certification rate estimates the percentage of all categorically eligible students who are directly certified for free school meals. This measure uses the same data sources as the performance rate and adds data for other categorically eligible students, such as Temporary Assistance for Needy Families (TANF) or FDPIR participants. Variables for these data components remain the same as in previous years and do not rely on direct State reports of counts of students. Instead, they use national survey and Federal administrative program data, as described below.

1. American Community Survey

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."[28] 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 public assistance benefits—SNAP benefits in particular. 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.

[27] Before SY 2013–2014, the performance rate relied on estimates derived from SNAP program operations data, SNAP quality control data, and the U.S. Census Bureau's SIPP, as discussed later in this appendix.

[28] See U.S. Census Bureau 2012, p.80.

Finally, ACS data are not available for Guam. Therefore, Guam is not included in the analysis of the more comprehensive CE certification measure.

2. Survey of FDPIR participants

The estimated count of school-age FDPIR participants used to develop the broader certification measure presented in Figure 10 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,[29] by State, for fiscal year (FY) 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.

[29] FNS FDPIR program data.

APPENDIX D

DATA UPDATES FOR SCHOOL YEAR 2012–2013

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

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

1. Updated school year (SY) 2012–2013 SNAP school-age participation rate from a new report (as discussed in Appendix C, the participation rate was revised upward from 0.929 to 0.932)
2. Updated SY 2012–2013 asset adjustment (as discussed in Appendix C, the asset adjustment was revised upward from 0.829 to 0.836)

The updated estimates are reflected in the amended version of Figure 4 from the October 2013 Report to Congress. The national direct certification rate increased by 0.03 percentage points, from 89.27 to 89.30 percent. When rounded to the nearest percentage point, 48 States, including the District of Columbia and Guam, have the same direct certification rate under both the previously published and the updated data. One of the four States that shows a change to its direct certification rate remained above 100 percent—Alaska. Of the remaining three States, each had changes of 1 percentage point—California, Texas, and South Dakota.

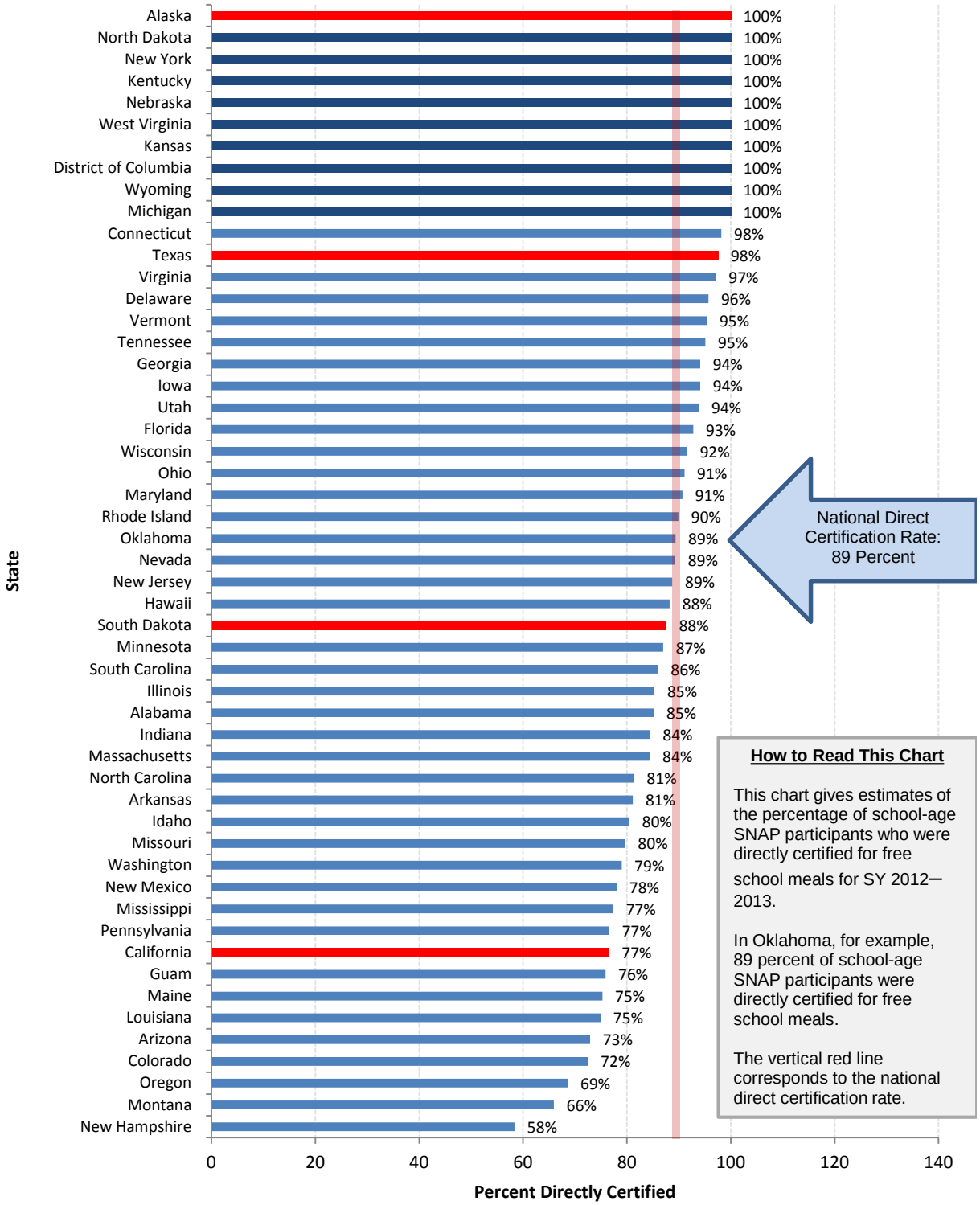
In SY 2012–2013, the direct certification performance target established by the Healthy, Hunger-Free Kids Act of 2010 was 90 percent. Every State has the same performance target status using either the original or the revised estimates.

The revised participation rate drives all notable changes to the direct certification estimate. The change in the asset adjustment had a negligible impact—it increased the count of children from non-base year Provision 2 or 3 schools by just 362 children nationally, which led to no change in the national direct certification rate.[30]

The increase in the SNAP participation rate increases the estimated count of SNAP participants attending non-base year Provision 2 or 3 schools. Increasing the estimate of SNAP participants in non-base year Provision 2 or 3 schools increases the direct certification rate estimate because it leads to a smaller denominator for the direct certification rate. Nationally, the participation rate change (alone) increased the number of SNAP participants in Provision 2 or 3 schools by 3,835, with three States—California, Texas, and New York—accounting for 70 percent of that increase.

[30] An increase in the asset factor serves to increase the count of children from non-base year Provision 2 and 3 schools that are determined to be income eligible for free meals. However, the change can affect only the 10 non-BBCE States: Alaska, Arkansas, Indiana, Kansas, Missouri, South Dakota, Tennessee, Utah, Virginia, and Wyoming. In addition, the slight increase of .007 had a negligible impact for these States—only Alaska, Arkansas, Indiana, and South Dakota had an increase of more than 50 children from Provision 2 and 3 schools.

Amended Figure 4. Revised percentage of school-age SNAP-participant children directly certified for free school meals, SY 2012–2013



Note: This figure has been revised to account for revisions to the methodology for calculating the SNAP participation rate and the asset factor. Revised values are indicated with red shading. Direct certification estimates are capped at 100 percent and shaded in dark blue (except for Alaska, which had a change in its estimate).

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