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

Report to Congress



December 2008

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Report to Congress

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Abstract

This report responds to the legislative requirement of the Food, Conservation, and Energy Act of 2008 (P.L.110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program. Direct certification is a process conducted by the States and by local educational agencies (LEAs) to certify certain children for free school meals without the need for household applications. The 2004 Child Nutrition and WIC Reauthorization Act requires all LEAs to establish, by School Year (SY) 2008-2009, a system of direct certification of children from households that receive Supplemental Nutrition Assistance Program (SNAP – formerly Food Stamp Program) benefits. The mandate was phased in over three years; the largest LEAs were required to establish direct certification systems by SY 2006-2007. As of SY 2007-2008, 67 percent of all LEAs used direct certification. Half of all States directly certified at least 69 percent of all school-age SNAP participants. The number of directly certified SNAP children is expected to increase sharply in SY 2008-2009 as all LEAs become subject to the statutory direct certification mandate.

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Glossary of Acronyms and Abbreviations

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

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Executive Summary

Background

This report responds to a legislative requirement of the Food, Conservation, and Energy Act of 2008 (P.L. 110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program. The Act requires an initial report on State direct certification efforts in December 2008 and annual reports every June thereafter.

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for the cost of providing nutritious, low cost or free meals to children in public and private schools and residential child care institutions. Average daily participation across more than 101,000 NSLP schools and institutions totaled 31 million children in fiscal year (FY) 2008.

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

Eligibility for Program Benefits

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

Children from households that receive benefits under certain other Federal nutrition assistance programs are deemed “categorically eligible” for free meals under the NSLP. Participation in the Supplemental Nutrition Assistance Program (SNAP – formerly the Food Stamp Program), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR), confers categorical eligibility for free meals.

Direct Certification

Student eligibility for free meals is determined by application or by direct certification. Although direct certification systems vary by State and LEA, all such systems substantially reduce the need for household applications. Many States and LEAs certify eligible children through computer matching of SNAP, TANF, and FDPIR records against student enrollment lists. Those systems require no action by the children’s parents or guardians. In other States and LEAs, letters are sent to SNAP, TANF, and FDPIR households. The letters serve as proof of categorical eligibility for free meals, and must be forwarded by the households to their children’s schools.

The Child Nutrition and WIC Reauthorization Act of 2004 requires each State to establish a system of direct certification of school-age SNAP-participants. That mandate is phased-in over three years. The largest LEAs were required to establish direct certification systems by School Year (SY) 2006-2007. The smallest LEAs (those with fewer than 10,000 students) were required to begin direct certification of SNAP participant children by SY 2008-2009. Although the 2004 Reauthorization Act refers only to children participating in SNAP, States and LEAs may also directly certify children from TANF and FDPIR households.

State Performance Measures

This report presents information on the outcomes of direct certification for SY 2007-2008. FNS estimated the number of school-age SNAP participants and the number of children directly certified for free school meals in each State. The ratio of these figures is a measure of the success of State and local systems to directly certify SNAP participant children.

FNS also estimated the number of all SNAP, TANF, and FDPIR participants certified for free school meals, either by direct certification or by application. Although this measure is not a measure of the effectiveness of State direct certification systems, it recognizes that some LEAs were not required to operate a direct certification system in SY 2007-2008. It provides a more comprehensive assessment of State efforts to ensure that all categorically eligible children are properly certified for free school meals.

Key Findings

States and LEAs have increased their use of direct certification since enactment of the 2004 Reauthorization Act. In SY 2004-2005, 56 percent of LEAs operated a direct certification system on a non-mandatory basis, and schools in those LEAs accounted for nearly 79 percent of all students in NSLP participating schools. The share of LEAs with direct certification systems grew to 67 percent in SY 2007-2008. Although one third of LEAs had yet to establish a direct certification system by SY 2007-2008, virtually all of these were relatively small LEAs not required to begin direct certification until SY 2008-2009. More than 99 percent of the LEAs without direct certification systems had student enrollments under 10,000. Among the LEAs that were subject to the statutory mandate (those with enrollments of 10,000 or more), about 95 percent were successfully operating direct certification systems in SY 2007-2008.

The percentage of children participating in SNAP directly certified for free school meals in SY 2007-2008 varied greatly among the States. The States with the highest rates were able to directly certify all or nearly all SNAP participant children. The least successful certified about 35 percent of those children. Half of all States were able to directly certify at least 69 percent of all school-ages SNAP participants. Much of the difference in State performance is explained by the fact that small LEAs are not required to conduct direct certification until SY 2008-2009. Several of the States that directly certified the smallest percentage of SNAP participant children are among the States with the highest concentration of small LEAs.

The more comprehensive measure of State certification of categorically eligible children, by direct certification or by application, indicates that no State certified fewer than 50 percent in SY 2007-2008. The median certification rate was 84 percent.

State Best Practices

For this initial report, FNS surveyed officials from seven State agencies that administer the Federal school meals program. These officials described direct certification systems that vary at both the broad administrative and detailed procedural levels. Some direct certification systems operate statewide, and are administered largely by State officials. In other States, LEAs exercise far more control over the design and administration of the systems.

States are working to improve and expand direct certification systems. Some are exploring the development of continuous “real time” systems to directly certify students throughout the school year as they become SNAP or TANF participants. States that have received direct certification grants from USDA have used the funds to improve the efficiency of their systems, increase the frequency of computer matches, and train local officials in conducting direct certification.

Among the practices that the States themselves identified as particularly effective are the use of State-level rather than district level matching, the use of multiple student identifiers in matching programs, matching algorithms that allow for variations in student names, use of the most current SNAP or TANF databases, and investment in training and technical assistance. Some of the difficulties faced by the States include obtaining up-to-date SNAP or TANF participation data, and the costs of developing and operating a computer matching system.

Conclusion

This report is the first in an annual series. It is the only report in the series that will measure the effectiveness of State direct certification systems before full implementation of the 2004 Reauthorization Act’s direct certification mandate. For this reason, the results presented here provide an interim assessment of the States’ progress toward establishing direct certification systems.

States and LEAs continue to implement direct certification systems according to the schedule outlined in the 2004 Act. Although full implementation of the direct certification mandate is not required before SY 2008-2009, some States directly certified all or nearly all SNAP participant children in SY 2007-2008. Other States directly certified fewer than 40 percent of SNAP children. The performance of those States is expected to improve significantly in SY 2008-2009. States that have already established direct certification systems are working to expand their systems and improve their efficiency through the development of more effective computer matching programs and an investment in training.

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

I. Introduction

Direct Certification in the National School Lunch Program

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for the cost of providing nutritious, low cost or free meals to children in public and private schools and residential child care institutions. Participating schools and institutions receive cash reimbursements and USDA food assistance from the U.S. Department of Agriculture for each meal served. More than 101,000 schools and institutions participate in the program. Average daily student participation totaled 31 million in FY 2008.

In exchange for Federal assistance, participating schools and institutions serve meals that satisfy Federal nutrition and food safety standards. In addition, they must offer school meals at no cost, or at reduced price, to eligible children. Children from households with incomes at or below 130 percent of the poverty level (\$27,560 for a family of four during School Year (SY) 2008-2009¹) are eligible for free meals. Those with incomes between 130 percent and 185 percent of the poverty level (\$39,220 for a family of four during SY 2008-2009) are eligible for reduced-price meals. Students are determined eligible for free meals through application or direct certification (described below); reduced-price eligibility is determined by application alone.

Eligibility through application

All LEAs accept household applications to establish a child's income eligibility for free or reduced-price school meals. Most applicants submit self-declared income and household size information, which is compared to the income thresholds for free and reduced price benefits. Other applicants provide case numbers that demonstrate household participation in one of several other means-tested Federal nutrition programs. Children in households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP),² Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) are "categorically eligible" for free school meals.³

Eligibility through direct certification

Direct certification confirms a child's categorical eligibility for free school meals through his or her SNAP, TANF, or FDPIR participation, without the need for a household application. Direct

¹ The income eligibility thresholds given here apply to households from the 48 contiguous States, the District of Columbia, Guam, and the other U.S. territories. The income thresholds are higher in Alaska and Hawaii. A table of income eligibility thresholds can be found under "Income Eligibility Guidelines (IEGs)" on <http://www.fns.usda.gov/cnd/lunch/>.

² Formerly the Food Stamp Program.

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

certification typically involves matching SNAP, TANF, and FDPIR records against student enrollment lists, either at the State or LEA level.⁴ Parents or guardians of children identified through these matching systems are notified of their children's eligibility for free school meals.⁵ They need to take no action for their children to be certified. In some States and school districts, direct certification does not involve computer matching. Instead, SNAP, TANF, or FDPIR agencies send letters to participant households. Those letters, which serve as proof of categorical eligibility for free meals, must be forwarded by the households to their children's schools. The letter method requires households to take some positive action (forwarding the letter) before their children are certified for free meals.

The Child Nutrition and WIC Reauthorization Act of 2004 requires each State education agency to enter into an agreement with the State agency responsible for making SNAP eligibility determinations. The agreement must establish the procedures necessary to directly certify children from SNAP households for free school meals by SY 2008-2009.⁶ States may also directly certify children from TANF and FDPIR households.

Purpose of this Report

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

1. State level estimates of the number of school-age children that received SNAP benefits at any time in July, August, or September of 2007,
2. Estimates of the number of SNAP participant children who were directly certified for free school meals as of October 1, 2007, and
3. Estimates of the number of SNAP-participant students who were not candidates for direct certification because they attended Provision 2 or Provision 3 schools that were not operating in a base year in SY 2007-2008.

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

This report is the first in an annual series on the States' direct certification systems.

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

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

⁶ The Child Nutrition and WIC Reauthorization Act's direct certification provision is phased-in over a three year period beginning with School Year 2006-2007.

⁷ Also known as the 2008 Farm Bill.

II. History of Direct Certification

In the mid-1980s, it became widely recognized that there was duplication of efforts in certifying school children for free meals under the NSLP and the School Breakfast Program (SBP)⁸, and what are now the SNAP and TANF programs. All of these programs have similar income eligibility limits, and many school children participated in more than one. Further, the application processes for SNAP and TANF were, and remain, more rigorous than the certification process for free meals under NSLP. Use of eligibility determinations for SNAP and TANF could improve the accuracy of certifications for NSLP.

Legislation taking a first step to link these programs was enacted in 1986. The Richard B. Russell National School Lunch Act (NSLA) was amended to make children who are members of a household receiving assistance under SNAP and TANF automatically eligible for free school meals. This action paved the way for more simplified application and certification procedures for these children. Initially, families could put their case number from these programs on the application in lieu of providing income information.⁹ Then, in 1989, Public Law 101-147 (Child Nutrition and WIC Reauthorization Act of 1989) allowed School Food Authorities (SFAs) to certify children, without further application, by directly communicating with the appropriate State or local agency to obtain documentation that the children are members of either a household receiving SNAP or TANF benefits. This first statutory authorization of direct certification was made optional for SFAs.¹⁰

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

Because State agencies administering the NSLP and SBP recognized that direct certification would increase participation, ease the burden on families and LEAs, and result in more accurate targeting of free school meal benefits, many States chose to phase-in the use of optional direct certification. State education agencies worked in partnership with the agencies in their States that administered SNAP and TANF. At the outset, various methods were used, refined, and expanded. Therefore, at the point mandatory direct certification with SNAP was implemented, many State agencies had systems in place and were familiar with the process. By SY 2004-2005, 56 percent of LEAs had already adopted some form of direct certification.¹¹ Schools in those LEAs enrolled nearly 79 percent of all students in NSLP participating schools.

⁸ Children certified for free or reduced price meals under the NSLP are eligible for free or reduced price breakfasts under the SBP. The two programs share a single application process. Throughout this report, certification for free or reduced price benefits under the NSLP should be understood to mean certification for the SBP as well.

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

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

¹¹ This percentage includes the small number of LEAs whose entire student populations attended Provision 2 or Provision 3 schools not operating in base years. See footnote 12 for further explanation.

Even with full implementation of direct certification, there will still be a need for household applications. Children from households with incomes between 130 and 185 percent of the Federal poverty level are eligible for reduced price school meals; however, direct certification is not intended to reach those children. In addition, some households with incomes at or below 130 percent of the Federal poverty level do not participate in SNAP. Children from those households remain income eligible for free school meals, but will not be identified through direct certification.

III. Current Status of State Direct Certification Systems

For SY 2007-2008, most LEAs in every State and the District of Columbia used some form of direct certification to determine if students from SNAP-participant households were eligible for free school meals. The Child Nutrition and WIC Reauthorization Act of 2004 requires the eventual use of direct certification by all LEAs. The direct certification mandate is phased in over three years. LEAs with total enrollments of 25,000 or more students were required to establish a direct certification system no later than SY 2006-2007. LEAs with enrollments of 10,000 or more followed in SY 2007-2008. Phase in will be complete in SY 2008-2009, when all LEAs are required to operate direct certification systems.

Overall, about 67 percent of LEAs used some form of direct certification in the 2007-2008 SY.¹² Figure 1 and Table 1 illustrate the increase in LEA use of direct certification as the requirements of the 2004 Reauthorization Act are phased in.¹³ In SY 2004-2005, two years before the statutory phase in period began, 56 percent of LEAs conducted direct certification. By SY 2007-2008, an additional 11 percent of LEAs established direct certification systems. Although more than one-third of LEAs reported no use of direct certification in SY 2007-2008, nearly all of these (99 percent) have fewer than 10,000 students and are not required to adopt direct certification until SY 2008-2009.

¹² This percentage, and the corresponding Table 1 figures for SY 2004-2005, 2005-2006, and 2006-2007, also includes the relatively small number of LEAs where all students attend Provision 2 or Provision 3 schools that are not operating in a base year. (Provision 2 and Provision 3 schools serve all meals free; they do not engage in annual certification of students for free and reduced price benefits.) Both Figure 1 and Table 1 attempt to measure the LEAs' progress in implementing direct certification systems. Students in Provision 2 and Provision 3 schools are not subject to either direct certification or certification by application in non-base years. However, all SNAP participants are eligible for free meals in Provision 2 and Provision 3 schools, which is consistent with the policy goal of direct certification. See Appendix A, Table A-1, for an alternate version of Table 1 with Provision 2 and Provision 3 LEAs excluded from both the total count of LEAs and the count of LEAs that have adopted a direct certification system.

¹³ The numbers in Figure 1 and Table 1 are estimates based on figures provided by LEAs on their annual NSLP Verification Summary Reports (VSRs). An LEA is identified as a direct certification district if the reported number of students not subject to verification exceeds the number who are categorically eligible for free meals but approved by application, or the number not subject to verification is at least five percent of all students reported to be eligible for free meals. However, as noted in the previous footnote, LEAs in which all students attend non-base-year Provision 2 or Provision 3 schools are also included in the direct certification count.

Figure 1
Percent of LEAs with Direct Certification Systems
SY 2004-2005 through SY 2007-2008

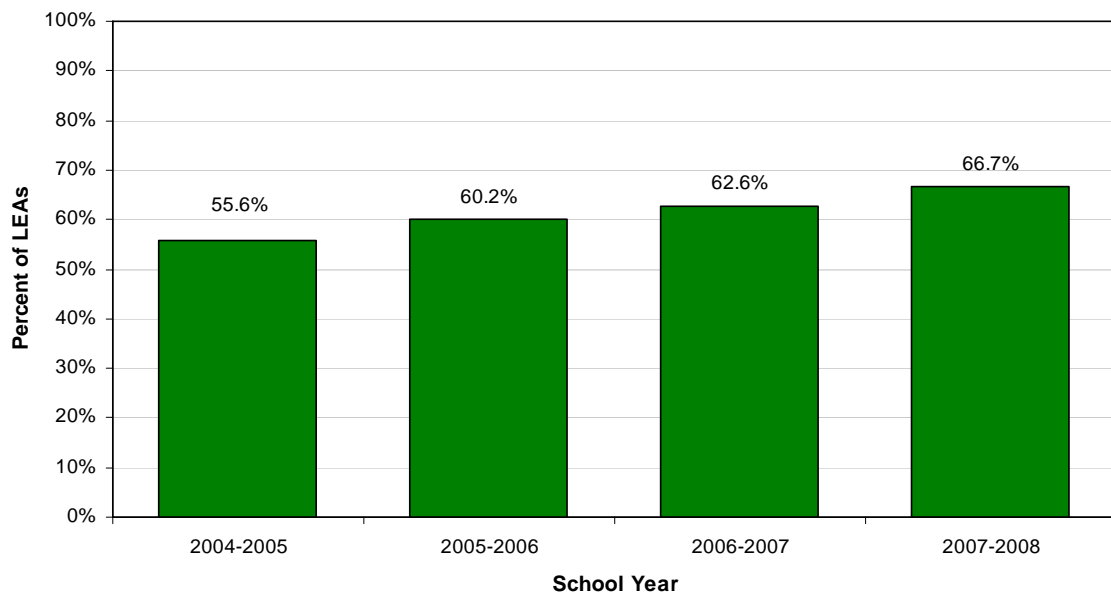


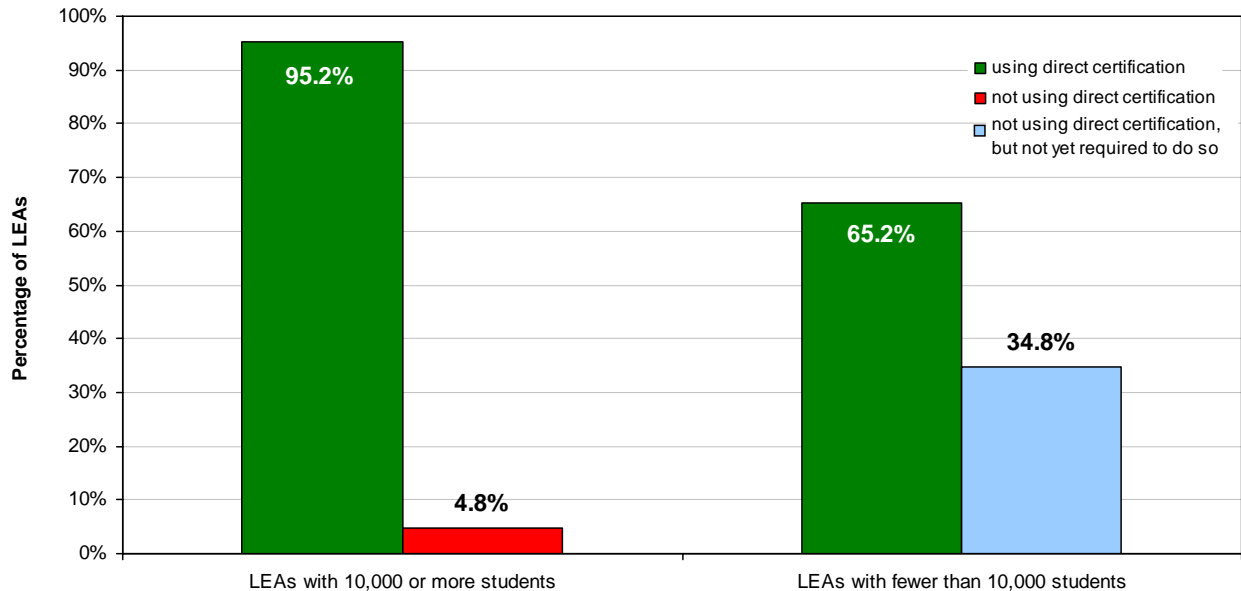
Table 1
Number and Percent of LEAs with Direct Certification Systems
SY 2004-2005 through SY 2007-2008¹⁴

	SY 2004 2005			SY 2005 2006			SY 2006 2007			SY 2007 2008		
	Number of Districts	Direct Certification or Provision 2/3 LEAs		Number of Districts	Direct Certification or Provision 2/3 LEAs		Number of Districts	Direct Certification or Provision 2/3 LEAs		Number of Districts	Direct Certification or Provision 2/3 LEAs	
		Number	Percent		Number	Percent		Number	Percent		Number	Percent
US Total	16,612	9,239	55.6%	17,397	10,467	60.2%	17,748	11,113	62.6%	18,141	12,097	66.7%
AK	54	43	79.6%	35	34	97.1%	47	43	91.5%	50	46	92.0%
AL	163	62	38.0%	148	87	58.8%	145	93	64.1%	147	110	74.8%
AR	251	247	98.4%	258	12	4.7%	281	256	91.1%	286	252	88.1%
AZ	302	251	83.1%	333	243	73.0%	334	256	76.6%	372	307	82.5%
CA	1,004	399	39.7%	1033	469	45.4%	1,024	518	50.6%	1028	555	54.0%
CO	178	44	24.7%	168	68	40.5%	205	78	38.0%	175	81	46.3%
CT	185	146	78.9%	187	148	79.1%	193	161	83.4%	192	161	83.9%
DC	47	1	2.1%	51	4	7.8%	52	2	3.8%	58	2	3.4%
DE	27	22	81.5%	34	28	82.4%	32	28	87.5%	29	27	93.1%
FL	145	74	51.0%	96	62	64.6%	145	88	60.7%	159	98	61.6%
GA	171	155	90.6%	175	158	90.3%	183	166	90.7%	216	187	86.6%
HI	N/A	N/A	N/A	32	18	56.3%	38	20	52.6%	36	22	61.1%
IA	496	339	68.3%	508	372	73.2%	507	383	75.5%	499	393	78.8%
ID	125	97	77.6%	266	218	82.0%	133	106	79.7%	121	106	87.6%
IL	1,036	749	72.3%	1113	835	75.0%	1,075	839	78.0%	1115	904	81.1%
IN	407	73	17.9%	468	106	22.6%	478	143	29.9%	482	184	38.2%
KS	403	314	77.9%	404	333	82.4%	403	335	83.1%	403	327	81.1%
KY	197	128	65.0%	192	145	75.5%	189	154	81.5%	193	171	88.6%
LA	98	57	58.2%	36	34	94.4%	107	92	86.0%	112	95	84.8%
MA	N/A	N/A	N/A	357	216	60.5%	370	232	62.7%	357	245	68.6%
MD	47	29	61.7%	47	29	61.7%	46	31	67.4%	48	40	83.3%
ME	245	199	81.2%	228	194	85.1%	233	201	86.3%	246	223	90.7%
MI	741	331	44.7%	698	349	50.0%	803	449	55.9%	836	570	68.2%
MN	610	392	64.3%	620	387	62.4%	630	413	65.6%	650	433	66.6%
MO	762	453	59.4%	711	476	66.9%	749	490	65.4%	756	510	67.5%
MS	183	93	50.8%	72	47	65.3%	184	134	72.8%	179	144	80.4%
MT	236	130	55.1%	233	159	68.2%	234	177	75.6%	244	188	77.0%
NC	N/A	N/A	N/A	172	117	68.0%	178	133	74.7%	170	141	82.9%
ND	160	126	78.8%	216	170	78.7%	193	142	73.6%	223	170	76.2%
NE	407	241	59.2%	433	313	72.3%	381	290	76.1%	381	297	78.0%
NH	82	57	69.5%	88	65	73.9%	89	60	67.4%	92	65	70.7%
NJ	661	159	24.1%	661	185	28.0%	663	206	31.1%	660	247	37.4%
NM	142	98	69.0%	150	118	78.7%	167	119	71.3%	189	135	71.4%
NV	40	35	87.5%	39	34	87.2%	19	15	78.9%	20	16	80.0%
NY	1,096	797	72.7%	1054	889	84.3%	1,042	857	82.2%	1083	951	87.8%
OH	1,093	178	16.3%	1196	302	25.3%	1,129	223	19.8%	1166	258	22.1%
OK	533	248	46.5%	613	322	52.5%	573	333	58.1%	568	373	65.7%
OR	205	166	81.0%	227	178	78.4%	232	185	79.7%	235	183	77.9%
PA	724	368	50.8%	776	458	59.0%	826	501	60.7%	837	523	62.5%
RI	N/A	N/A	N/A	55	47	85.5%	55	50	90.9%	53	50	94.3%
SC	86	85	98.8%	85	83	97.6%	88	84	95.5%	87	84	96.6%
SD	223	119	53.4%	227	127	55.9%	221	127	57.5%	222	128	57.7%
TN	169	132	78.1%	175	154	88.0%	171	144	84.2%	168	142	84.5%
TX	1,202	741	61.6%	1026	797	77.7%	1,189	839	70.6%	1264	989	78.2%
UT	51	45	88.2%	53	50	94.3%	49	45	91.8%	55	51	92.7%
VA	160	136	85.0%	141	138	97.9%	152	139	91.4%	151	139	92.1%
VT	204	186	91.2%	217	200	92.2%	215	201	93.5%	219	194	88.6%
WA	292	215	73.6%	345	260	75.4%	330	260	78.8%	325	266	81.8%
WI	842	177	21.0%	823	138	16.8%	840	180	21.4%	853	218	25.6%
WV	73	54	74.0%	68	54	79.4%	73	55	75.3%	75	55	73.3%
WY	54	48	88.9%	54	37	68.5%	53	37	69.8%	56	41	73.2%

¹⁴ Data for Hawaii, North Carolina, Massachusetts, Rhode Island, and one of two State agencies in both Oklahoma and Arkansas are omitted from the School Year 2004-2005 totals; these agencies either did not submit school verification data, or submitted unusable data.

Figure 2 illustrates the extent of implementation of direct certification for larger and smaller LEAs in SY 2007-2008.¹⁵

Figure 2
Percent of LEAs with Direct Certification Systems, by LEA Size
SY 2007-2008



About 95 percent of LEAs with enrollments of 10,000 or more students operated direct certification systems in SY 2007-2008. An estimated 5 percent of those LEAs had not yet established direct certification systems, despite the statutory requirement.¹⁶ LEAs with fewer than 10,000 students are not required to adopt direct certification systems until SY 2008-2009. Nevertheless, 65 percent were operating direct certification systems a year ahead of the deadline. The remaining 35 percent, or about 6,000 small LEAs, were required to set up direct certification systems before the start of SY 2008-2009.

The number of students enrolled in LEAs with direct certification systems is presented in Figure 3.¹⁷ As in Figure 2, LEAs are separated by size. The area of each circle in the figure is proportional to the total number of students in NSLP participating LEAs.¹⁸ While 35 percent of LEAs with enrollments under 10,000 had not adopted direct certification by SY 2007-2008 (from

¹⁵ LEAs made up entirely of Provision 2 and Provision 3 schools are included in the count of LEAs that operate a direct certification system. See Appendix A, Figure A-1 for the same chart with Provision 2 and Provision 3 LEAs excluded from both the total count of LEAs and the count of LEAs that have adopted a direct certification system.

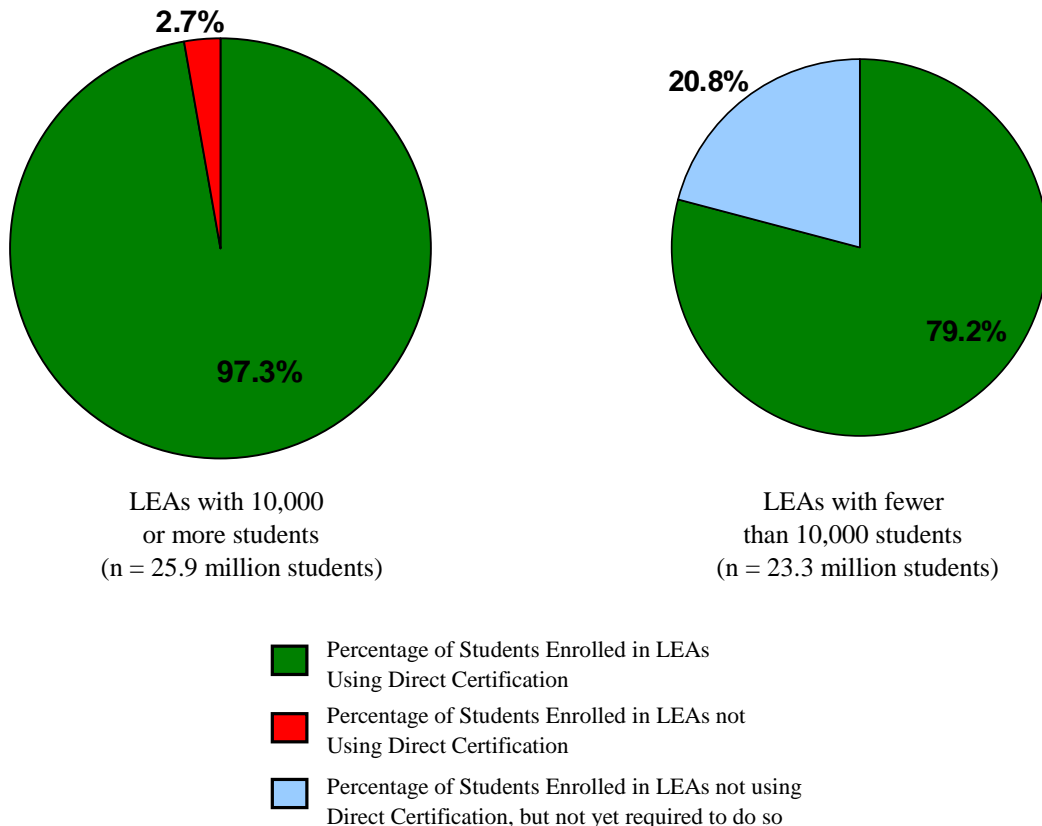
¹⁶ It is possible that some of these districts do operate direct certification systems, but certified no SNAP participants. It is also possible, given the limitations of the VSR data, that some of these LEAs are misclassified here.

¹⁷ As in Figure 1, Figure 2 and Table 1, LEAs in which all students attend non-base-year Provision 2 or Provision 3 schools are also included in Figure 3's direct certification count

¹⁸ Approximately 53 percent of all students in NSLP participating schools are in LEAs with enrollments above 10,000, and 47 percent are in LEAs with enrollments under 10,000. See Appendix Table A-3 for additional detail.

Figure 2), they accounted for just 21 percent of the students in LEAs with enrollments under 10,000. This means that the LEAs that had not established direct certification systems by SY 2007-2008 tend to be smaller than the average LEA with fewer than 10,000 students.

Figure 3
Students in LEAs with Direct Certification Systems, by LEA Size
(Pies are Proportional in Size to the Number of Students Enrolled)
SY 2007-2008



IV. Direct Certification Performance

A. Estimation of Component Statistics

The direct certification performance measures presented here are based on State level estimates of (1) the number of school-age children that received SNAP benefits at any time in July, August, or September of 2007; (2) the number of SNAP participant children who were directly certified for free school meals as of October 1, 2007; and (3) the number of SNAP-participant students who were not candidates for direct certification because they attended Provision 2 or

Provision 3 schools that were not operating in a base year in SY 2007-2008. The methods and sources used for these estimates are described below.¹⁹

Estimate of school-age population in SNAP-participant households

The partnership between FNS and State SNAP agencies provides for monthly reporting of the number of participating households, people, and benefits issued. These data are not reported by participant age, or by other participant characteristics. States provide demographic data for a sample of SNAP participants as part of the program's Quality Control (QC) System. Although the QC dataset can be used to estimate the number of participants by age, the sample in any given State is not large enough to allow FNS to estimate the number of school-age children by month of SNAP benefit receipt.²⁰

For this reason, this report uses two primary sources to estimate the number of school-age SNAP participants at the State level. The first is SNAP program data reported to FNS by State SNAP agencies each month. SNAP program data include State agency counts of the number of individual participants in households that are issued SNAP benefits. The figures used in this report are the final participant counts for July through September 2007. While these are the best available monthly estimates of SNAP participation, the data do not separate school-age children from other members of the SNAP household.

The school-age SNAP subpopulation can be estimated from QC data. The QC dataset is based on statistically representative samples drawn by the States from participating SNAP households.²¹ The number of school-age children in SNAP households can be estimated for each State from the QC data. However, given the size of the State samples, monthly participation by State and age group are not sufficiently reliable and State estimates of the average monthly school-age population for the entire fiscal year are used instead.

With these two inputs, FNS is able to estimate the number of school-age SNAP participants by State for the target months of July through September. From official SNAP program data, FNS computes average monthly participation from July through September as a percent of average monthly participation for the entire fiscal year. This is multiplied by QC estimates of average monthly school-age SNAP participation for the year. The result is a set of State estimates of average school-age SNAP participants for the months of July through September 2007.

A final adjustment is needed to convert this average monthly figure into an estimate of school-age children who received SNAP benefits at any time in those three months. Across any period of time, the total number of individuals served by the SNAP program is higher than the average monthly caseload over the same period. The participant "turnover rate" is defined as the total number of SNAP participants over a given period divided by the period's average monthly

¹⁹ See Appendix C for a discussion of data limitations.

²⁰ Monthly reporting of more detailed data, or increasing the size of the State's QC samples, would impose a significant new burden on State agencies.

²¹ USDA, Food and Nutrition Service, (October 2003). *FNS Handbook 310: Food Stamp Program Quality Control Review Handbook*. http://www.fns.usda.gov/snap/qc/pdfs/310_Handbook_2004.pdf

caseload. FNS estimates that the turnover rate across an entire year is about 1.4.²² That is, if the average monthly caseload for the year is 100, the unduplicated number of individual participants for any portion of the year is 140. For the July through September period, FNS estimates a turnover rate of about 1.09. This factor is applied to the July through September average to give an estimate of the unduplicated count of school-age SNAP participants at any time during those three months.²³

Note that the turnover rate applied here is a national estimate. The estimate is based on the Survey of Income and Program Participation (SIPP), a Census dataset that contains information on a representative panel of households over time. The longitudinal nature of the dataset is well-suited to estimating the SNAP turnover rate over the July through September period of concern to this report. However, SIPP data are not designed for State-level analysis. Use of a national turnover rate introduces some uncertainty into the estimates of SNAP participation developed here. On balance, though, an imperfect (national) turnover rate adjustment is preferred to no adjustment at all.

$$\begin{array}{ccccccc}
 \text{unduplicated count} & & \text{average monthly} & & \text{average monthly} & & \text{Estimated July-} \\
 \text{of school-age SNAP} & & \text{SNAP participation,} & & \text{school-age SNAP} & & \text{September SNAP} \\
 \text{participants, July-} & = & \text{FNS program data,} & \times & \text{participant} & \times & \text{participant} \\
 \text{September 2007} & & \text{July-September 2007} & & \text{population, QC} & & \text{"turnover rate"} \\
 & & \text{average monthly} & & \text{estimate, FY 2007} & & \\
 & & \text{SNAP participation,} & & & & \\
 & & \text{FNS program data, FY} & & & & \\
 & & \text{2007} & & & &
 \end{array}$$

Estimate of SNAP participants directly certified for free school meals

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

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

²² Turnover rate for fiscal year 2003. Cody, Scott, Laura Castner, James Mabli, Julie Sykes (November 2007). *Dynamics of Food Stamp Program Participation, 2001-2003*. Mathematica Policy Research, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service.

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

²³ The July through September turnover rate is based on 2006 data. Castner, Laura, and Julie Sykes (October 3, 2008). *FSP Three-Month Turnover Rate for School-Age Children*. Mathematica Policy Research, Inc. Memorandum to U.S. Department of Agriculture, Food and Nutrition Service.

corresponding number of applications and students whose status was confirmed or changed as a result of the verification review.²⁴

The VSRs are intended primarily to document the results of the verification process. For this reason, most of the information contained in the reports concerns the verification outcomes of applications initially approved for free or reduced price meals. However, the reports also contain counts of students whose eligibility for free or reduced price meals was not determined by application and are not subject to verification. These counts include, but are not limited to, directly certified SNAP participants. This report uses LEA counts of students certified for free school meals, but not subject to verification, as a proxy for directly certified SNAP participants.²⁵

Estimate of SNAP participants in Provision 2 and Provision 3 schools

The population of SNAP participant children who are candidates for direct certification does not include children who attend Provision 2 or Provision 3 schools that are not operating in a base year. These schools directly certify (and accept applications from) SNAP participant children only in base years, when they establish the percentage of meals served free, at reduced price, and at the paid rate for NSLP reimbursement. In non-base years, the schools are reimbursed at these previously determined percentages; individual children are not subject to certification or re-certification in non-base years.²⁶

In order to remove these children from the estimated population of SNAP participants, FNS used data reported by LEAs on their SY 2007-2008 VSRs. LEAs are required to report the total number of students eligible for free (and reduced price) meals for Provision 2 and Provision 3 schools that are not operating in base years. The information provided by the LEAs does not distinguish SNAP participant children from other income or categorically eligible children in Provision 2 or Provision 3 schools.

Children in Provision 2 or Provision 3 schools who were determined eligible for free meals in the schools' base years must have met the NSLP's income or categorical requirements in those years. Virtually all of those children were also income eligible for SNAP benefits. However, not all households that are income eligible for SNAP benefits are SNAP participants. Some fraction of income eligible households do not meet SNAP's asset test. An additional fraction of income and asset eligible households do not participate in SNAP for other reasons.²⁷

²⁴ The annual NSLP eligibility verification and reporting process is described in 7 CFR 245.6a. The Verification Summary Report, FNS form 742, is reprinted as Appendix B.

²⁵ Some limitations of this measure are discussed in Appendix C.

²⁶ Provision 2 and Provision 3 schools operating in non-base years serve all meals at no charge, although they are reimbursed by the USDA at rates consistent with their free, reduced-price, and paid claiming percentages. Provision 2 and Provision 3 are offered to schools as administrative cost-saving options. In exchange for a much reduced meal counting and claiming burden, and no certification costs in non-base years, Provision 2 and Provision 3 schools absorb any difference between their Federal reimbursement and the cost of meals served.

²⁷ Reasons for nonparticipation in SNAP by fully eligible households include real or perceived access barriers and personal preference. For additional discussion of reasons for SNAP nonparticipation, see Bartlett, Susan, and Nancy Burstein, *Food Stamp Program Access Study: Eligible Nonparticipants*. Abt Associates, December 2003. <http://www.ers.usda.gov/publications/efan03013/efan03013-2/efan03013-2.pdf>

FNS reduced the reported number of children from Provision 2 or Provision 3 schools who received free meals by two factors. The first is a national estimate of the percentage of the population that is income eligible for SNAP benefits but not asset eligible (82.3 percent).²⁸ The second is a national estimate of the participation rate of school-age children from households that meet both the SNAP income and asset tests (86.2 percent).²⁹ Both of these adjustment factors are national estimates that necessarily mask some variation between the States; available data, however, do not permit the estimation of State-specific factors.

The three component statistics described in this section are summarized in Table 2.

²⁸ Trippe, Carole and Bruce Schechter, (May 2007). *Tables Describing the Asset and Vehicle Holdings of Low-Income Households in 2002*. Table 28. Mathematica Policy Research, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service.

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

²⁹ Wolkwitz, Kari, (June 2008). *Trends in Food Stamp Program Participation Rates: 2000 to 2006*, Table A-1. Mathematica Policy Research, Inc. for the Department of Agriculture, Food and Nutrition Service, <http://www.fns.usda.gov/oane/MENU/Published/FSP/FILES/Participation/Trends2000-2006.pdf>

Table 2
SNAP Participation, Direct Certifications, and
SNAP Participant Students in Non-Base Year Provision 2 or Provision 3 Schools
SY 2007-2008³⁰
(thousands)

State	School Age SNAP Participants	NSLP Direct Certifications	SNAP Participants in non-Base-Year NSLP Provision 2/3 Schools
Alabama	205.5	121.9	6.5
Alaska	19.1	18.0	4.8
Arizona	211.8	130.5	23.0
Arkansas	126.5	78.4	13.7
California	936.3	662.2	153.4
Colorado	89.0	54.5	0.0
Connecticut	60.7	33.9	14.2
Delaware	25.4	25.2	1.5
District of Columbia	28.3	15.4	0.0
Florida	415.8	331.9	0.7
Georgia	336.4	203.9	24.7
Hawaii	26.2	15.6	0.0
Idaho	29.8	14.4	0.6
Illinois	434.4	152.2	0.3
Indiana	195.6	100.6	16.3
Iowa	71.7	50.5	0.5
Kansas	60.0	43.6	0.3
Kentucky	187.9	149.1	6.5
Louisiana	233.5	177.5	0.0
Maine	47.0	31.6	0.2
Maryland	114.7	80.1	0.2
Massachusetts	144.3	75.8	16.0
Michigan	404.7	232.8	0.0
Minnesota	99.4	73.0	0.8
Mississippi	154.4	101.1	13.5
Missouri	307.0	135.1	0.0
Montana	22.9	10.7	3.5
Nebraska	40.7	27.7	0.0
Nevada	42.7	31.9	5.6
New Hampshire	18.2	6.3	0.0
New Jersey	144.8	63.1	2.0
New Mexico	85.6	28.0	53.2
New York	526.2	353.7	155.5
North Carolina	314.4	244.7	0.0
North Dakota	13.8	7.8	0.0
Ohio	347.4	116.2	13.7
Oklahoma	135.6	78.7	5.1
Oregon	137.5	82.3	2.7
Pennsylvania	275.6	178.3	1.4
Rhode Island	26.9	25.2	0.0
South Carolina	198.0	119.3	0.0
South Dakota	18.1	6.0	7.3
Tennessee	279.9	256.3	1.3
Texas	942.9	522.1	228.5
Utah	42.5	33.1	1.9
Vermont	12.6	9.3	0.0
Virginia	170.3	133.1	1.2
Washington	158.2	117.8	2.7
West Virginia	75.9	67.6	0.0
Wisconsin	139.5	84.1	1.1
Wyoming	6.8	4.4	0.0

B. State Performance Measures

An initial measure of the States' success at directly certifying SNAP participant children for free school meals is computed with the three statistics described above:

³⁰ The number of school-age SNAP participant children in Pennsylvania is greater than the number reflected in Table 2. The SNAP participant count for Pennsylvania has been reduced by an estimate of SNAP participant children who attend Philadelphia schools operating under a "Universal Feeding" pilot program.

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

Figure 4 ranks the States according to this measure of direct certification performance.³¹ Because each of the component measures is estimated with some error, the exact percentage values associated with the States should be viewed with caution.³² For this reason, this report focuses on the States' relative positions in the chart. States near the top of the chart are among the most successful at directly certifying SNAP participant children for free school meals; relatively few SNAP households in those States are burdened with paper applications. Children from SNAP-participant households in those States are also among the least likely to be misclassified as ineligible for free school meals.

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

Note that a position near the bottom of Figure 4 does not necessarily indicate that a State's direct certification system is ineffective. Figure 4's performance measures are based on statistics from SY 2007-2008, the year before full phase-in of the statutory direct certification mandate. LEAs with enrollments of fewer than 10,000 students were not required to operate direct certification systems until SY 2008-2009. And many of the States near the bottom of the chart have among the highest percentage of students in small LEAs. Although these small LEAs may have directly certified relatively few of their SNAP participant students in SY 2007-2008, they were not yet required to do so.

There are insufficient data to estimate school-age SNAP participation at the school district level; it is not possible, therefore, to limit this analysis to LEAs with enrollments of 10,000 or more students. Figure 5 ranks the States according to the percentage of total enrollment accounted for by LEAs with fewer than 10,000 students. Four of the ten States at the bottom of Figure 4 – with

³¹ See Appendix Figure A-2 for a U.S. map providing a geographic view of these State estimates.

³² Estimation error is most obvious where State figures exceed 100 percent. However, the same methodology that overstates the performance of these States likely overstates the performance of other States near the top of the chart. Figures above 100 percent can be explained, at least in part, by the fact that TANF participation is commonly used by States and LEAs as a second criterion in their direct certification systems. However, because TANF participation is not an element of all direct certification systems, an adjustment for TANF participants has not been made to the denominator of the equation presented at the top of this section. Figure 6 presents a more comprehensive measure of the States' success at certifying all categorically eligible children for free school meals. That measure includes the certification of students based on their status as SNAP, TANF, and FDPIR participants.

the lowest rates of direct certification – are among the top ten States in Figure 5 – with the highest percentage of enrollment in smaller LEAs.

Although differences in the relative number of small LEAs may help explain the variation in direct certification percentages among the States, it cannot provide a complete explanation. Some States' direct certification systems are simply less effective than other States' systems. Among the factors that may contribute to a system's effectiveness is the use of computer matching rather than reliance on the letter method.³³ According to a 2005 survey on State direct certification practices,³⁴ eleven States relied solely on the letter method of direct certification.³⁵ Six of those States are among the bottom eleven in directly certifying SNAP participants for free school meals.

Some of the States that relied exclusively on a letter system of direct certification in 2005 may have since supplemented or replaced their letter systems with computer matching systems. Nevertheless, the 2005 survey and the direct certification percentages in Figure 4 suggest a strong relationship between current or recent reliance on the letter method, and the effectiveness of a State's direct certification system. Once all LEAs are subject to direct certification, and the relative mix of small and large LEAs no longer complicates comparisons between the States, the effect of direct certification method on direct certification effectiveness should become clearer. This issue will be explored further in next year's edition of this report.

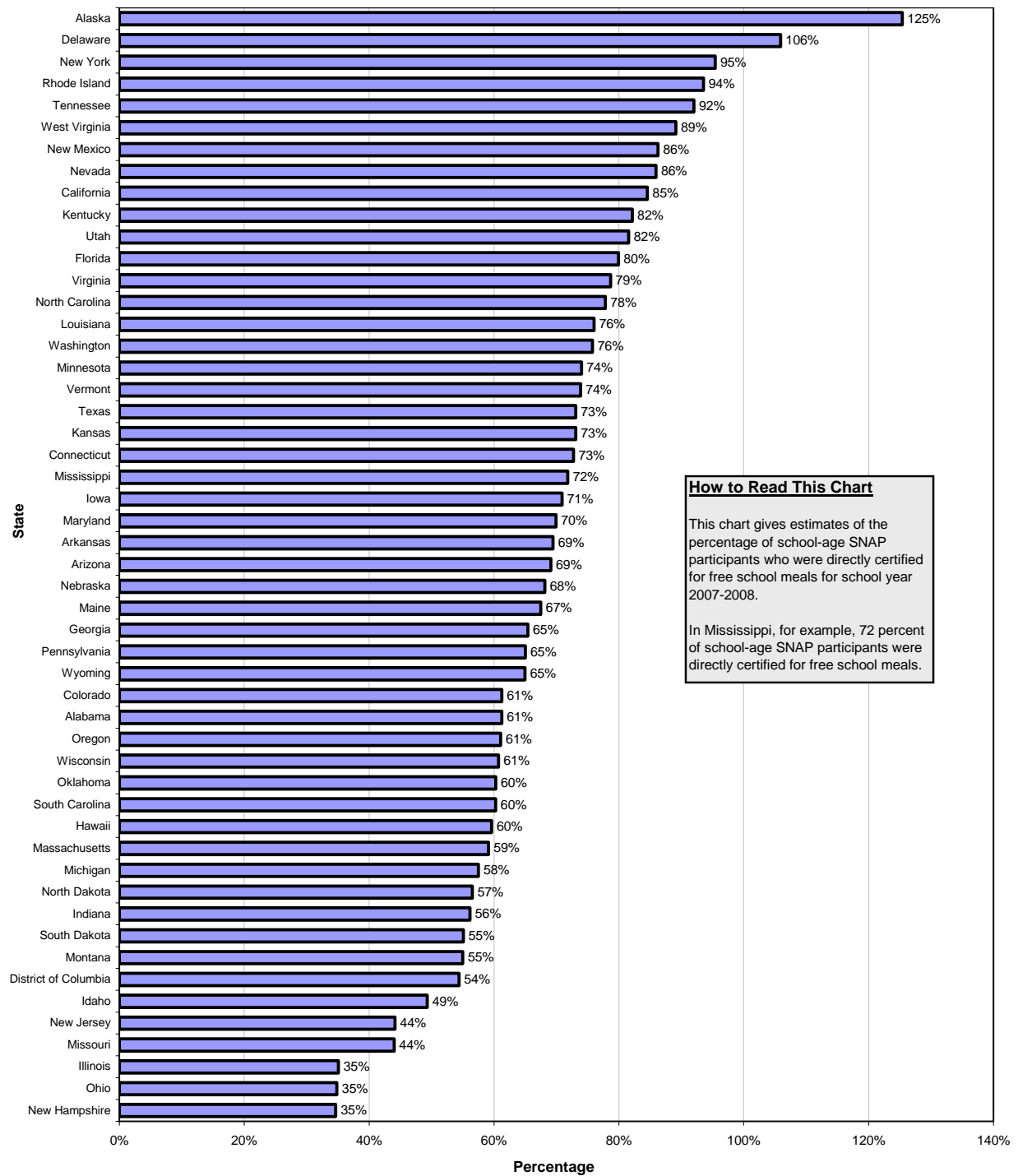
³³ See Section I for a discussion of the letter method of direct certification. The key distinction between a letter system of direct certification and a computer match system is that a child cannot be directly certified through a letter system without some action on the part of his or her parent or guardian. A computer match system requires no action by the parent or guardian.

³⁴ FNS did not survey all of the States for this report; the most recent FNS survey of State direct certification practices was conducted in 2005. See Cole, Nancy and Christopher Logan (February 2007). *Data Matching in the National School Lunch Program: 2005 Volume 1: Final Report*. Abt Associates, Inc. for the U.S. Department of Agriculture, Food and Nutrition Service.

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

³⁵ Cole and Logan (2007), Exhibit 2-5.

Figure 4
Percent of School-Age SNAP Participant Children Directly Certified for Free School Meals
SY 2007-2008



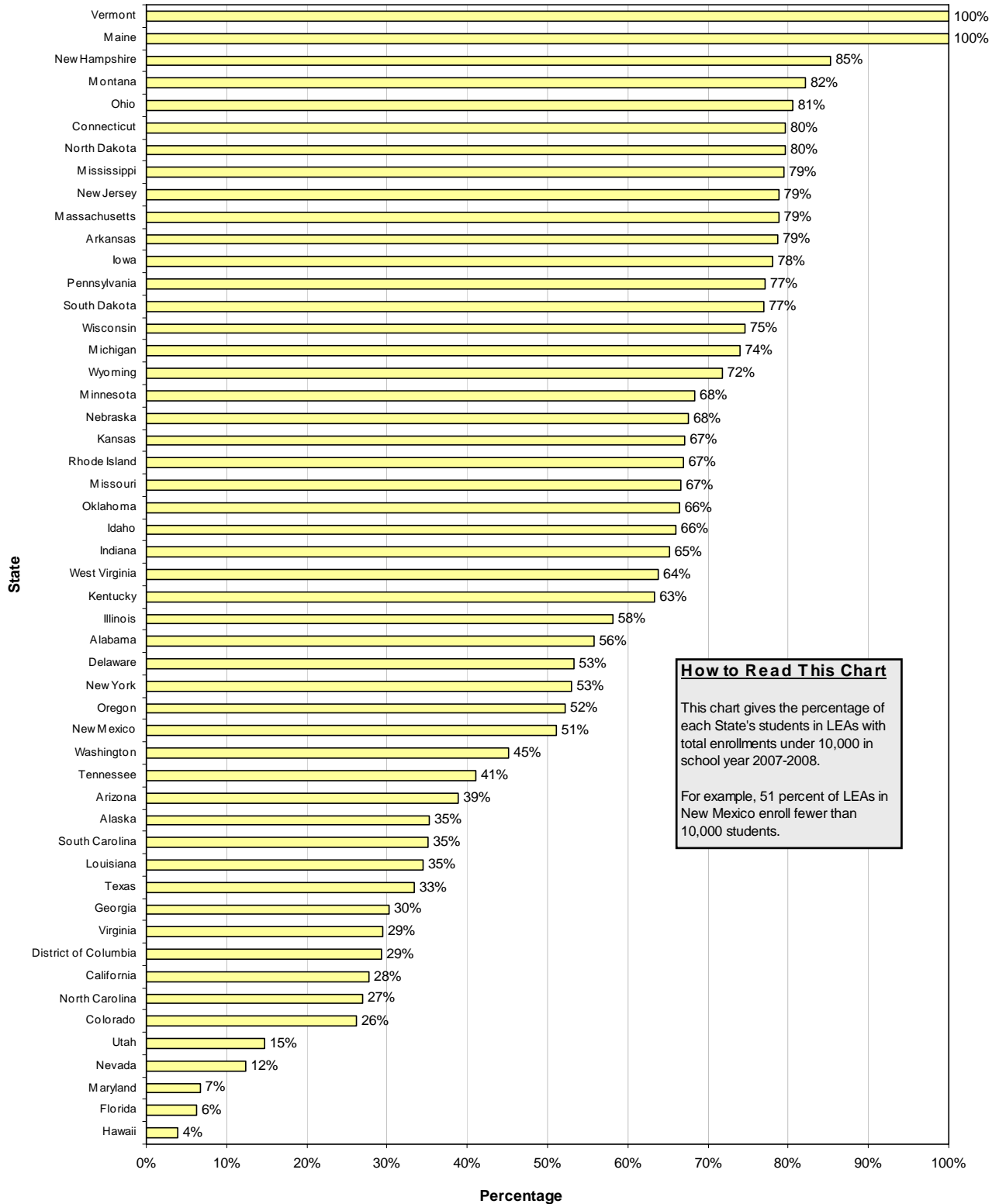
How to Read This Chart

This chart gives estimates of the percentage of school-age SNAP participants who were directly certified for free school meals for school year 2007-2008.

In Mississippi, for example, 72 percent of school-age SNAP participants were directly certified for free school meals.

Note:
 See Appendix C and the text preceding Figure 4 for a discussion of the data sources used to develop these State figures, and the limitations of those sources. These percentages represent the ratio of all directly certified students, plus other free-eligible students whose applications are not subject to verification, to all SNAP participant school-age children. Direct certification percentages above 100 percent can be explained, in part, by the fact that many LEAs use TANF and FDIPIR participation databases, in addition to SNAP databases, in their direct certification systems. These directly certified students are included in the numerator of this computation, although the denominator includes only SNAP participants. States with very low direct certification percentages tend to include many small LEAs which were not required to operate direct certification systems in SY 2007-2008 (see Figure 5).

Figure 5
Percent of Students in LEAs with Fewer than 10,000 Students
SY 2007-2008



A more comprehensive measure of the States' success in certifying all categorically eligible children for free school meals is presented in Figure 6. This measure recognizes that a significant minority of LEAs were not required to operate a direct certification system in SY 2007-2008. It does not, therefore, attempt to assess the effectiveness of the States' direct certification systems. Instead, it measures the States' success at certifying children, directly or by application, based on their participation in, or association with, any of the programs or institutions that confer categorical eligibility for free school meals.

The measure starts with the number of students whose eligibility for free school meals is not subject to verification. This is the same proxy measure of directly certified SNAP participants used above. Added to this figure are the students whose approval for free school meals is based on the households' submission of a SNAP, TANF, or FDPIR case number on an NSLP application.³⁶ The sum of these two numbers is the population of students who are recognized by LEAs as categorically eligible for free school meals.³⁷ This number excludes children who are not identified as categorically eligible, but may nevertheless be found income eligible by application.

This count of children identified as categorically eligible for free meals is divided by an estimate of the combined SNAP, TANF, and FDPIR populations. The SNAP population estimate used here is the same one described previously. 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.³⁸ The number of children who receive FDPIR benefits is estimated from FNS program and survey data.³⁹

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

³⁶ All of this information is taken, as above, from LEA VSRs.

³⁷ Some children may not be identified as categorically eligible even if they are current recipients of SNAP, TANF, or FDPIR benefits. These students may be missed by the States' direct certification systems. Others may fail to submit SNAP, TANF, or FDPIR case numbers on paper applications for free meals. Some of these children are nevertheless certified for free meals based on income information submitted by application. Others are misclassified as ineligible for free meals.

³⁸ U.S. Census Bureau. See Appendix C for a discussion of data limitations. No adjustment is made for TANF (or FDPIR) participants who are not SNAP participants and who attend non-base year Provision 2 or Provision 3 schools.

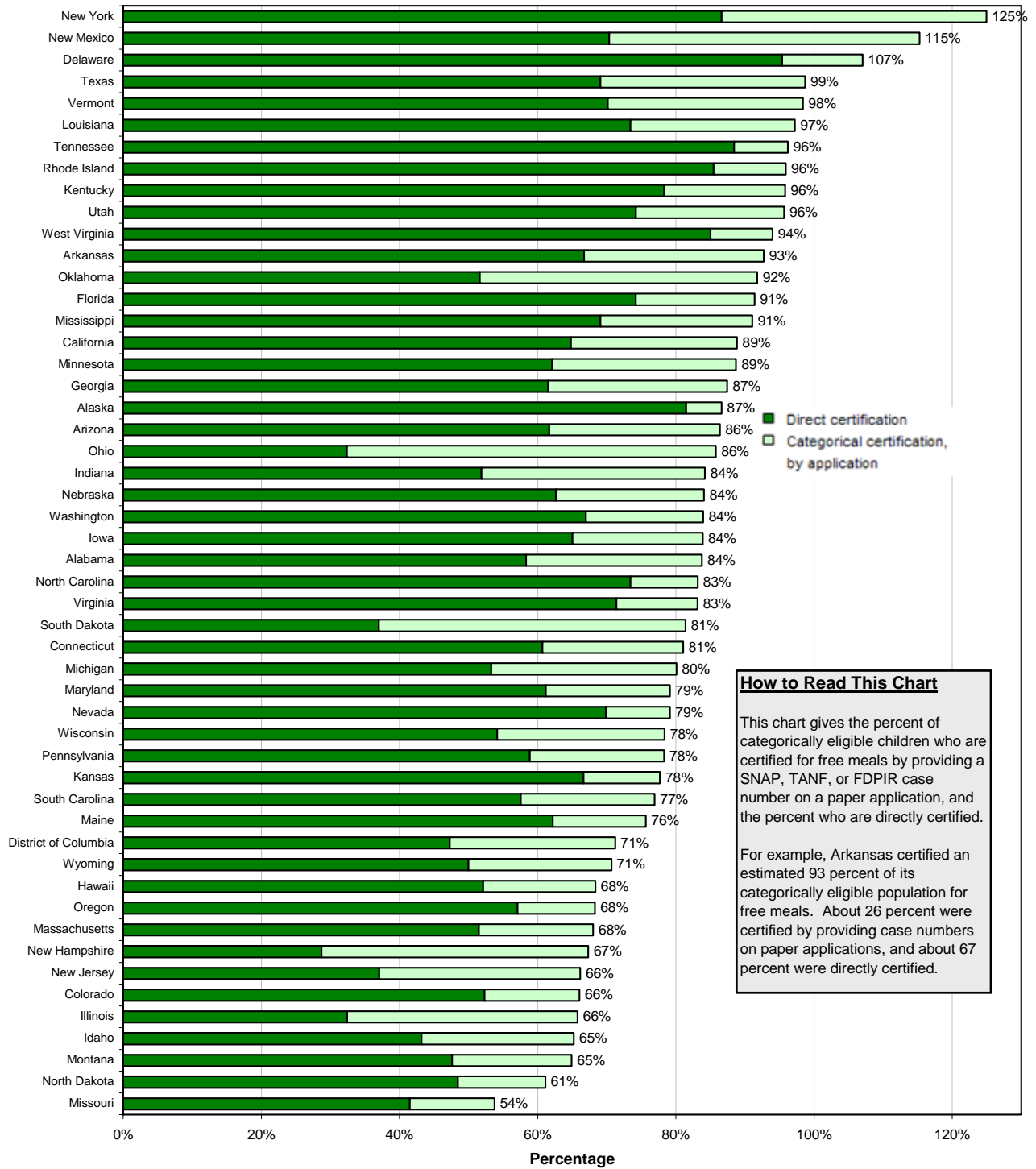
³⁹ The FDPIR population survey is discussed in Usher, Charles L., David S. Shanklin, and Judith B. Wildfire. *Evaluation of the Food Distribution Program on Indian Reservations*, (June 1990). U.S. Department of Agriculture, Food and Nutrition Service. See Appendix C for a discussion of data limitations. Note that FDPIR households may not simultaneously participate in SNAP. No adjustment is made for FDPIR (or TANF) participants who attend non-base year Provision 2 or Provision 3 schools.

States at the bottom of Figure 6 are the least successful at identifying and certifying categorically eligible children for free school meals. Note, however, that five of the ten States at the bottom of Figure 6 (North Dakota, Montana, New Jersey, New Hampshire, and Massachusetts) are among the top ten States in Figure 5. This strongly suggests that the effectiveness of State and local efforts to certify categorically eligible children for free meals is enhanced by the adoption of direct certification systems.

States that fall near the bottom of Figure 6, but are not among the States with a large number of students in small LEAs, have, perhaps, the least effective direct certification systems.⁴⁰

⁴⁰ See Appendix Figure A-3 for a U.S. map providing a geographic display of these State estimates.

Figure 6
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2007-2008



How to Read This Chart

This chart gives the percent of categorically eligible children who are certified for free meals by providing a SNAP, TANF, or FDIPIR case number on a paper application, and the percent who are directly certified.

For example, Arkansas certified an estimated 93 percent of its categorically eligible population for free meals. About 26 percent were certified by providing case numbers on paper applications, and about 67 percent were directly certified.

Note:
 See Appendix C and the text preceding Figure 6 for a discussion of the data sources used to develop these State figures, and the limitations of those sources. Percentages above 100 percent may be explained by these limitations and data estimation error. As in Figure 4, States with very low direct certification percentages tend to include many small LEAs which were not required to operate direct certification systems in SY 2007-2008 (see Figure 5).

V. Direct Certification Best Practices

A. Previous Research on Direct Certification

FNS examined the feasibility of expanding the use of computer matching for certification and verification of children eligible for free school meals in 2007.⁴¹ This study provided a detailed description of how computer matching is done and how it could be used. The study reviewed data for SY 2004-2005 and was conducted prior to mandatory phase-in of direct certification with SNAP. Further, the study assessed that what works well and what does not from the point of view of both the State and local agencies.

The 2007 study indicated that there were three main methods for conducting direct certification:

- State-level computer matching—matches State or district-level student database information with SNAP/TANF benefit information for the entire State;
- District-level (LEA) matching—database files of SNAP/TANF children provided by State agency to each LEA based on county, zip code information;
- Letter method with no matching—letters mailed to parents by the SNAP/TANF office; and parents take the letter to LEA to establish eligibility.

The number of children certified through the direct certification process increased between SY 1996-1997 and SY 2004-2005. These increases were partially attributed to improved procedures, especially with expansion of computer matching. State-level matching has the advantage of being a centralized process, so the match does not depend on geographic identifiers and thus should result in higher match rates than district-level matching. One disadvantage, however, of State-level matching is that the matching process sometimes uses outdated student enrollment records. While district-level matching allows LEAs to control the process and use the most up-to-date student records, it requires that the State parse the SNAP/TANF data among LEAs, and information may be sent to the wrong LEA because of outdated addresses. Also, each LEA must develop procedures for data matching.

The study also used evidence from VSRs submitted by LEAs for SY 2004-2005 to assess the effectiveness of the various direct certification methods at capturing categorically eligible students. Based on the information from these reports, State-level matching, when implemented statewide, was found to be the most effective method of direct certification. In States implementing mandatory statewide State-level matching, 74 percent of categorically certified children were directly certified. In States implementing state-level matching, but not mandating participation of all districts, 51 percent of categorically certified children were directly certified. District-level matching, alone or implemented as a part of a mixed method, resulted in direct certification of 63 percent of categorically certified children. The letter method resulted in direct certification of 52 percent of categorically certified children.

⁴¹ See Cole and Logan (2007).

B. Review of Selected State Practices

Section 4301 of the Food, Conservation and Energy Act of 2008 calls for a discussion of best practices among States with the most successful direct certification programs or programs which are most improved from the previous school year. As this is the first year of the report, there is no basis for a comparison over time. Therefore FNS selected States based on indicators of single-year performance.

States were chosen based on two sources of information: recently submitted VSRs and the 2007 study. The VSRs contain information on enrollment, application, and eligibility, as well as the results of the verification process. FNS used the number of children approved as “free eligibles” who are not subject to verification, as a proxy for the number of students directly certified. The 2007 study contains State-by-State data on the percentages of categorically eligible students who were directly certified.

Utilizing either or both the VSR data and the 2007 study, FNS identified several States that appear to effectively use direct certification to enroll a significant number of children in the NSLP or SBP. Additional selection criteria included ensuring the selected States reflect the different methods of matching students, i.e. a statewide system and/or district-level matching, as well as representing some geographical variation. The selected States reflect four types of direct certification methods and cover five of the seven FNS regions.

States Selected

Based on these criteria, seven States were selected: California, Georgia, Minnesota, New York, Tennessee, Washington, and West Virginia.

Description of State Practices

In these seven States, FNS regional staff worked with State officials administering the school meals programs to obtain information about the details of the direct certification systems used.

The following information was obtained:

1. The level at which the direct certification is conducted—State, LEA, other;
2. The method(s) used—such as direct matches, lists, letters provided by SNAP or TANF agencies;
3. The identifiers used for matches—social security number, zip code, etc;
4. The frequency of direct certification activity—annually, monthly, “real time”;
5. Secondary matches—whether the system shows all school age children in the SNAP or TANF household, rather than only those students in the LEAs’ databases;
6. How information on matched children is provided to LEAs and schools;
7. Notification to families of their children’s eligibility through direct certification;
8. Month in which the direct certification is conducted to determine eligibility at the beginning of the school year;
9. Information about any direct certification grants received;
10. Partnerships between public and private schools to share information;

11. Participation in direct certification prior to mandatory implementation; and
12. If using the letter method, an estimate of number of letters issued that result in free meal benefits.

Overall, State agencies felt direct certification was working as it was intended—to increase participation, simplify the application process for families, and to ease the administrative burden on LEAs. USDA also learned that State agencies supported direct certification by continuous improvements and expansion as well as a commitment to making it as efficient and effective as possible, including potentially developing “real time” ability to check SNAP or TANF eligibility.

The following is a summary of States’ practices on the areas listed above.

1. The level at which the direct certification is conducted
 - State level for each of the selected States
 - Two States also had additional local level activities
2. The method(s) used for direct certification
 - Direct data matches are used in 5 States and in two of these States, lists are also generated at State-level and provided to LEAs
 - Letter method is used exclusively in one State and is an option in one State
3. The identifiers used for matches
 - Along with the children’s names, States used one or more of these identifiers:

Table 3
Student and Household Identifiers Used in State Direct Certification Systems

Identifier	Number of Selected States Using this Identifier	Identifier	Number of Selected States Using this Identifier
Address	4	Gender	2
Date of birth	5	School	1
Zip code	1	Child’s Social Security Number	3
County code	1	Parent name	2
Age	1	Phone number	1

4. The frequency of direct certification activity
 - In all States, direct certification was conducted at least annually
 - Four States conducted direct certification more frequently including two States with the ability for LEAs to access data at any time

5. Availability of secondary matches
 - Three States conduct secondary matches using software that identified variations in names/spellings of names or adding supplementary identifiers
6. How information on matched children is provided to LEAs and schools
 - In five States, LEAs had direct access to the State's database
 - Two States also provided lists of students if the LEA did not have resources to use a computer system
 - The State that used only the letter method did not need to disseminate information to the local level as the family provided the letter to the LEA or school
7. How families are notified of eligibility through direct certification
 - In all but one State using electronic data matching and dissemination, notification is completed at the local level
 - In one State, the SNAP/TANF agency notifies the family
 - In the State using the letter method, the household is notified of their children's eligibility through the letter from the SNAP/TANF agency that is taken to the LEA or school to activate school meal benefits
8. Month in which the direct certification is conducted to determine eligibility at the beginning of the school year
 - Five States use July
 - One State issues letters in August
 - One State uses June
9. Information about any direct certification grants received
 - Two States received direct certification grants
 - California received grants in FY 2006 and FY 2008; the first grant was used to add direct certification and direct verification indicators to the State's Web-based system with student information which was already accessible to LEAs. Adding this information to the data base facilitated direct certification and direct verification at the LEA level. The FY 2008 grant will be used to run matches every month for the two years of the grant.
 - Tennessee received a grant in FY 2006 to set up a training lab at the State agency primarily for training of staff in smaller schools. The grant was also used to hold training sessions around the State with a mini-computer lab showing LEA staff how to access the direct certification data.
10. Partnerships between public and private schools to share information
 - One State indicated that there were joint agreements between public and charter schools and that the State expanded the data provided to those public LEAs to include those schools
 - Two States indicated that data was shared at the local level among some LEAs
11. Participation in direct certification prior to mandatory implementation

- Five States said all LEAs participated in direct certification prior to final phase-in of mandatory direct certification with SNAP
 - One State indicated about 72 percent of schools were doing direct certification prior to final phase-in
 - One State indicated all LEAs with more than 10,000 students were doing direct certification and about 30 percent of smaller LEAs
12. If using the letter method, an estimate of number of letters issued that result in free meal benefits
- Only one State uses the letter method exclusively and estimated that about 37 percent of children in families receiving letters were directly certified
13. Changes to methods and systems used for direct certification since initial implementation in the State
- Two States switched from local level matches to state-level matches
 - Two States expanded ages searched
 - One State added identifiers to increase accuracy of matches
 - Two States switched from the letter method
 - One State originally generated lists of students distributed to LEAs; now LEAs may access data via computer
14. Use of direct verification.
- Six States are doing a form of direct verification; of these six States, three are only doing direct verification at the local level
 - Only one State is not doing any form of direct verification
15. Barriers to best results from direct certification
- Three States indicated that the inability to obtain the most recent data misses students, such as those entering kindergarten and other new students enrolled prior to new school year
 - One State indicated that the costs of programming, operating, and maintaining the system, as well as training costs, are barriers
 - One State indicated that reaching smaller LEAs to ensure compliance with the mandate is difficult
 - One State indicated that inability to use social security numbers as identifiers hindered matches
 - One State indicated that errors, such as incorrect spellings, hinder matches

States' Views on Best Practices

FNS also obtained information on what States considered to be best practices that improved the direct certification process. The following is a summary of their comments, divided into the general categories they discussed.

Use of State-wide matches

- One State indicated that state-level data matches improved efficiency, reduced the cost at the local level and increased the number of matches
- One State indicated that use of two statewide databases from different assistance agencies improved efficiency and that collaboration to maintain information is important

More precise matching techniques

- One State indicated that expanding age groups and adding identifiers increased the number of matches
- One State indicated that these additions increased the number of matches and allowed for secondary matches
- One State indicated that up-to-date student enrollment is necessary for maximum efficiency
- Two States indicated that allowing for variations on names increased the number of matches

More frequent updates of data/more frequent matches improve accuracy and number of matches

- Two States update information at least twice a year
- Two States update monthly
- Four States systems always have data available for LEAs

Training and communications

- One State reported that extensive training and technical assistance on the system was vital to making direct certification work
- One State used grant funds to offer additional training and establish a hands-on training system; this was especially valuable for smaller LEAs

Different methods of distributing information

- One State indicated that, even with direct data matching available, some LEAs still need to generate lists to do matches
- One State indicated that the letter method minimizes the burden on LEAs while allowing for expedited certification for families.
- One State generates unmatched list of students in SNAP/TANF households which are used to do a manual match

VI. Conclusion

This report is the first in an annual series. It is the only report in the series that will measure the effectiveness of State direct certification systems before full implementation of the 2004 Reauthorization Act's direct certification mandate. For this reason, the results presented here provide an interim assessment of the States' progress toward establishing direct certification systems.

States and LEAs have increased their use of direct certification as the mandate of the 2004 Act has been phased in. In SY 2004-2005, fewer than 56 percent of LEAs operated a direct certification system. By SY 2007-2008, that number had grown to 67 percent. Although one third of LEAs had not adopted direct certification as of SY 2007-2008, virtually all of those LEAs (99 percent) have enrollments under 10,000 and are not required to begin direct certification until SY 2008-2009. Ninety-five percent of LEAs with student enrollments above 10,000 were successfully operating direct certification systems in SY 2007-2008.

The States' success at identifying and certifying categorically eligible SNAP participant children through direct certification varies considerably. Although implementation of direct certification is not required until SY 2008-2009, some States directly certified all or nearly all SNAP participant children in SY 2007-2008. Other States directly certified fewer than 40 percent of SNAP children. However, much of this variation can be explained by the fact that LEAs with fewer than 10,000 students are not distributed uniformly across the States. The performance of all States is expected to improve significantly in SY 2008-2009, when all LEAs are subject to the direct certification mandate.

The States are working to improve and expand direct certification systems that are already in place. At least some States are considering the creation of continuous "real time" direct certification systems. Other States are working to improve the effectiveness of existing systems through improved matching programs and increased training of local school officials.

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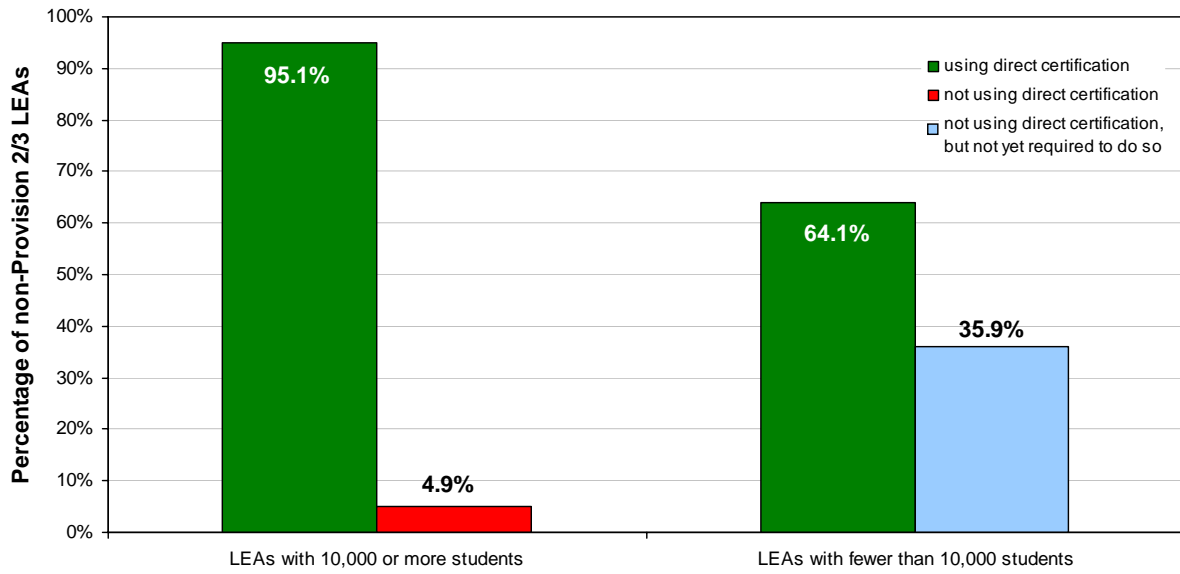
Appendix A – Additional Tables

Table A-1
Number and Percent of LEAs with Direct Certification Systems:
Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts⁴²
SY 2004-2005 through SY 2007-2008

	SY 2004 2005			SY 2005 2006			SY 2006 2007			SY 2007 2008		
	Number of non-Provision 2/3 LEAs	Direct Certification LEAs		Number of non-Provision 2/3 LEAs	Direct Certification LEAs		Number of non-Provision 2/3 LEAs	Direct Certification LEAs		Number of non-Provision 2/3 LEAs	Direct Certification LEAs	
		Number	Percent		Number	Percent		Number	Percent		Number	Percent
US Total	16,389	9,016	55.0%	17,048	10,118	59.4%	17,382	10,747	61.8%	17,560	11,516	65.6%
AK	44	33	75.0%	35	34	97.1%	44	40	90.9%	43	39	90.7%
AL	163	62	38.0%	148	87	58.8%	145	93	64.1%	142	105	73.9%
AR	242	238	98.3%	247	1	0.4%	270	245	90.7%	271	237	87.5%
AZ	302	251	83.1%	333	243	73.0%	334	256	76.6%	338	273	80.8%
CA	991	386	39.0%	1,005	441	43.9%	976	470	48.2%	980	507	51.7%
CO	173	39	22.5%	168	68	40.5%	205	78	38.0%	175	81	46.3%
CT	185	146	78.9%	187	148	79.1%	193	161	83.4%	192	161	83.9%
DC	47	1	2.1%	51	4	7.8%	52	2	3.8%	58	2	3.4%
DE	27	22	81.5%	34	28	82.4%	32	28	87.5%	29	27	93.1%
FL	145	74	51.0%	96	62	64.6%	145	88	60.7%	159	98	61.6%
GA	170	154	90.6%	174	157	90.2%	181	164	90.6%	189	160	84.7%
HI				32	18	56.3%	38	20	52.6%	36	22	61.1%
IA	495	338	68.3%	507	371	73.2%	506	382	75.5%	499	393	78.8%
ID	125	97	77.6%	266	218	82.0%	133	106	79.7%	120	105	87.5%
IL	1,035	748	72.3%	1,112	834	75.0%	1,074	838	78.0%	1,114	903	81.1%
IN	407	73	17.9%	467	105	22.5%	478	143	29.9%	482	184	38.2%
KS	403	314	77.9%	404	333	82.4%	403	335	83.1%	403	327	81.1%
KY	194	125	64.4%	188	141	75.0%	183	148	80.9%	190	168	88.4%
LA	97	56	57.7%	36	34	94.4%	107	92	86.0%	111	94	84.7%
MA				357	216	60.5%	370	232	62.7%	356	244	68.5%
MD	47	29	61.7%	47	29	61.7%	45	30	66.7%	47	39	83.0%
ME	239	193	80.8%	228	194	85.1%	233	201	86.3%	239	216	90.4%
MI	741	331	44.7%	698	349	50.0%	803	449	55.9%	836	570	68.2%
MN	610	392	64.3%	620	387	62.4%	630	413	65.6%	642	425	66.2%
MO	759	450	59.3%	711	476	66.9%	749	490	65.4%	756	510	67.5%
MS	163	73	44.8%	60	35	58.3%	168	118	70.2%	167	132	79.0%
MT	236	130	55.1%	233	159	68.2%	234	177	75.6%	227	171	75.3%
NC				172	117	68.0%	178	133	74.7%	170	141	82.9%
ND	160	126	78.8%	199	153	76.9%	193	142	73.6%	202	149	73.8%
NE	405	239	59.0%	433	313	72.3%	381	290	76.1%	381	297	78.0%
NH	82	57	69.5%	88	65	73.9%	89	60	67.4%	92	65	70.7%
NJ	653	151	23.1%	654	178	27.2%	656	199	30.3%	658	245	37.2%
NM	93	49	52.7%	88	56	63.6%	104	56	53.8%	106	52	49.1%
NV	39	34	87.2%	39	34	87.2%	19	15	78.9%	20	16	80.0%
NY	1,090	791	72.6%	945	780	82.5%	937	752	80.3%	963	831	86.3%
OH	1,090	175	16.1%	1,189	295	24.8%	1,125	219	19.5%	1,161	253	21.8%
OK	499	214	42.9%	579	288	49.7%	539	299	55.5%	540	345	63.9%
OR	203	164	80.8%	217	168	77.4%	222	175	78.8%	232	180	77.6%
PA	723	367	50.8%	773	455	58.9%	823	498	60.5%	834	520	62.4%
RI				55	47	85.5%	55	50	90.9%	53	50	94.3%
SC	86	85	98.8%	85	83	97.6%	88	84	95.5%	87	84	96.6%
SD	194	90	46.4%	188	88	46.8%	187	93	49.7%	184	90	48.9%
TN	169	132	78.1%	175	154	88.0%	171	144	84.2%	168	142	84.5%
TX	1,198	737	61.5%	1,026	797	77.7%	1,189	839	70.6%	1,184	909	76.8%
UT	50	44	88.0%	51	48	94.1%	49	45	91.8%	55	51	92.7%
VA	160	136	85.0%	141	138	97.9%	151	138	91.4%	151	139	92.1%
VT	204	186	91.2%	217	200	92.2%	215	201	93.5%	219	194	88.6%
WA	291	214	73.5%	345	260	75.4%	322	252	78.3%	323	264	81.7%
WI	833	168	20.2%	823	138	16.8%	832	172	20.7%	845	210	24.9%
WV	73	54	74.0%	68	54	79.4%	73	55	75.3%	75	55	73.3%
WY	54	48	88.9%	54	37	68.5%	53	37	69.8%	56	41	73.2%

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

Figure A-1
Percent of LEAs with Direct Certification Systems, by LEA Size
Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts⁴³
SY 2007-2008



⁴³ LEAs are excluded if every school in the LEA is a Provision 2 or Provision 3 school.

Table A-2
Summary State Statistics from Figures 4, 5, and 6

State	Percent of SNAP Children Directly Certified for Free School Meals	Percent of Students in LEAs with Fewer than 10,000 Students	Percent of All Categorically Eligible Children Certified for Free School Meals
Alabama	61%	56%	84%
Alaska	125%	35%	87%
Arizona	69%	39%	86%
Arkansas	69%	79%	93%
California	85%	28%	89%
Colorado	61%	26%	66%
Connecticut	73%	80%	81%
Delaware	106%	53%	107%
District of Columbia	54%	29%	71%
Florida	80%	6%	91%
Georgia	65%	30%	87%
Hawaii	60%	4%	68%
Idaho	49%	66%	65%
Illinois	35%	58%	66%
Indiana	56%	65%	84%
Iowa	71%	78%	84%
Kansas	73%	67%	78%
Kentucky	82%	63%	96%
Louisiana	76%	35%	97%
Maine	67%	100%	76%
Maryland	70%	7%	79%
Massachusetts	59%	79%	68%
Michigan	58%	74%	80%
Minnesota	74%	68%	89%
Mississippi	72%	79%	91%
Missouri	44%	67%	54%
Montana	55%	82%	65%
Nebraska	68%	68%	84%
Nevada	86%	12%	79%
New Hampshire	35%	85%	67%
New Jersey	44%	79%	66%
New Mexico	86%	51%	115%
New York	95%	53%	125%
North Carolina	78%	27%	83%
North Dakota	57%	80%	61%
Ohio	35%	81%	86%
Oklahoma	60%	66%	92%
Oregon	61%	52%	68%
Pennsylvania	65%	77%	78%
Rhode Island	94%	67%	96%
South Carolina	60%	35%	77%
South Dakota	55%	77%	81%
Tennessee	92%	41%	96%
Texas	73%	33%	99%
Utah	82%	15%	96%
Vermont	74%	100%	98%
Virginia	79%	29%	83%
Washington	76%	45%	84%
West Virginia	89%	64%	94%
Wisconsin	61%	75%	78%
Wyoming	65%	72%	71%

**Table A-3
Enrollment of NSLP-Participating LEAs,
SY 2007-2008**

LEA Size	Total Enrollment (millions)		
	Direct Certification LEAs*	Non-Direct Certification LEAs	All NSLP - Participating LEAs
10,000 students or more	25.2	0.7	25.9
Fewer than 10,000 students	18.5	4.8	23.3
All SFAs	43.7	5.5	49.2

* - Includes LEAs where all students attend Provision 2 or Provision 3 schools operating in non-base years.

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

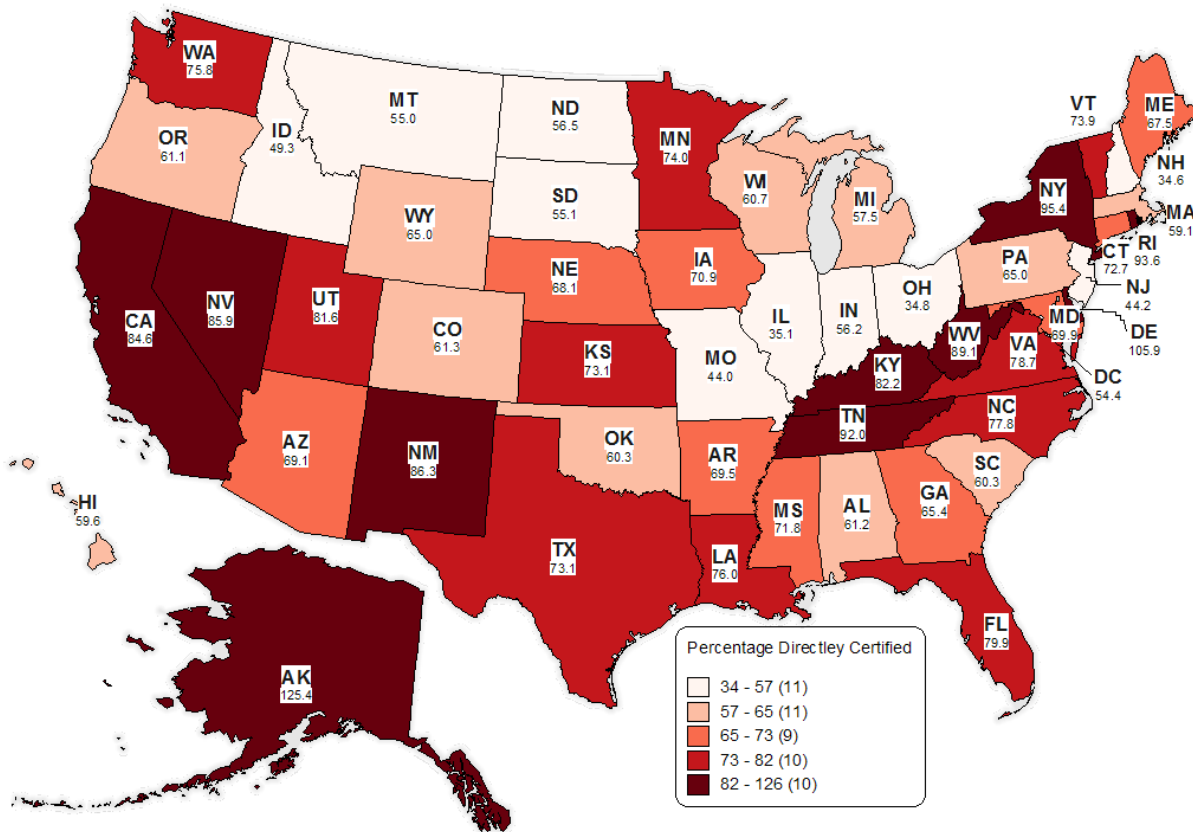
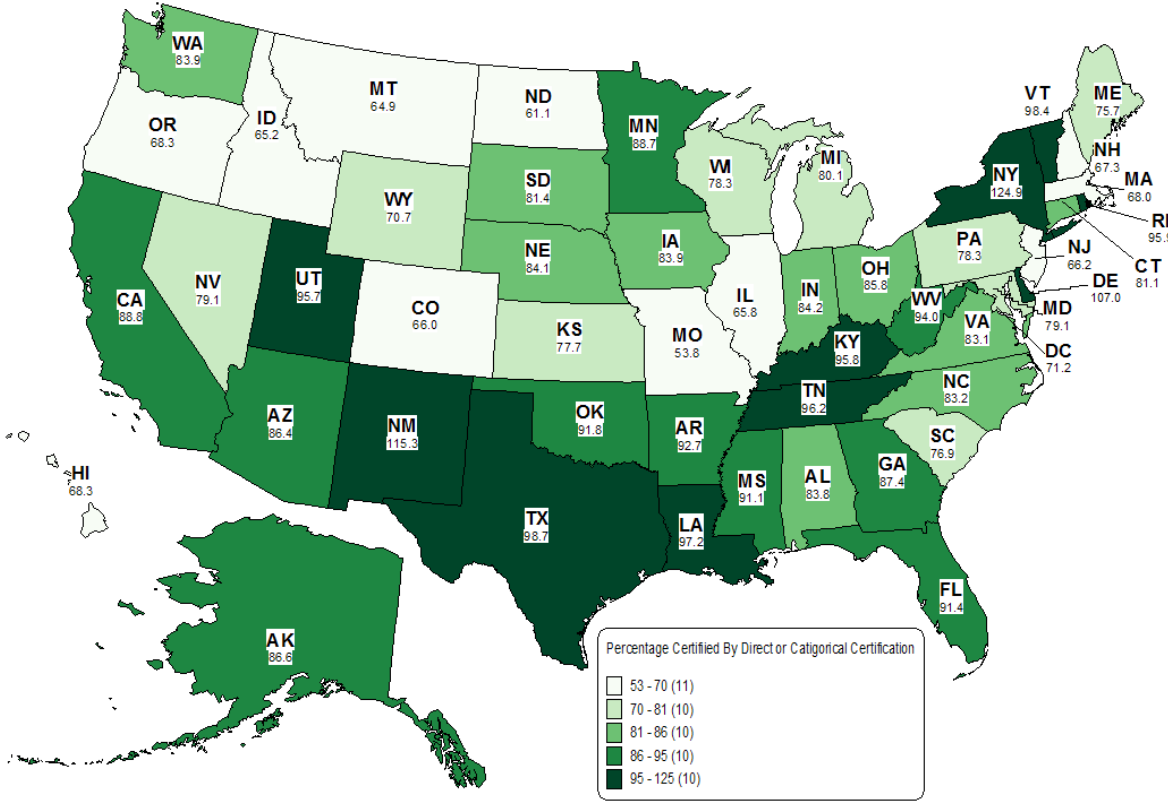


Figure A-3
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2007-2008



Appendix B – Verification Summary Report

FORM APPROVED OMB # 0584-0026

[INSERT STATE AGENCY NAME] SCHOOL FOOD AUTHORITY VERIFICATION SUMMARY REPORT			SFA ID #			
			SFA NAME			
			TYPE OF SFA	<input type="checkbox"/> Public <input type="checkbox"/> Private		
			SCHOOL YEAR	-		
According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB control number for this collection is 0584-0026. The time required to complete this information collection is 6 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.						
I. Enrollment, Application, and Eligibility Information (Pre Verification)			II. Results of Verification, by Application Type			
1. Type of Free/Reduced Price Application Used <input type="checkbox"/> Household			6. Type of Verification Used <input type="checkbox"/> Basic <input type="checkbox"/> Alternate-Random <input type="checkbox"/> Alternate-Focused <input type="checkbox"/> No Verifications Performed			
	A. All Schools	B. Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR	<i>Items 7 through 11 are required and are reported as of the date of completion of the verification process (see instructions). Item 12 is optional and is reported as of February 15.</i>	A. FREE ELIGIBLE based on FS/TANF/FDPIR Application (Categorically Eligible)	B. FREE ELIGIBLE based on Income/Household Size Application (Income Eligible)	C. REDUCED PRICE ELIGIBLE
2. Number of schools and RCCs operating the NSLP and/or SBP						
3. Number of enrolled students with access to the NSLP (or SBP for SBP only schools)						
	A. # of Students	B. # of Approved Applications	7. No Change	# applications		
4. Total FREE ELIGIBLE reported				# students		
4-1. # approved as FREE ELIGIBLE who are not subject to verification (directly certified, homeless liaison list, income-eligible Head start, pre-K Even start, residential students in RCCs, non-applicants approved by local officials)			8. Responded, Changed to Free	# applications		
4-2. # approved as FREE ELIGIBLE based on FS/TANF/FDPIR case number submitted on an application (Categorically Eligible)				# students		
4-3. # approved as FREE ELIGIBLE based on income/household size information submitted on an application			9. Responded, Changed to Reduced Price	# applications		
4-4. # FREE ELIGIBLES reported for Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR			10. Responded, Changed to Paid	# applications		
				# students		
5. Total REDUCED PRICE ELIGIBLE reported			11. Did Not Respond	# applications		
5-1. # reduced price eligibles reported for Provision 2/3 schools WHICH ARE NOT OPERATING A BASE YEAR				# students		
			12. Reapplied and Reapproved on or Before Feb. 15	# applications		
				# students		

Form FNS - 742 (February 2004)

Appendix C – Data Limitations

1. Local educational agency Verification Summary Reports

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

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

This data element is used in this report as a proxy for directly certified children from SNAP-participant households. In many States, however, free-eligible students whose status is not subject to verification also include directly certified TANF or FDPIR participants, income-eligible children enrolled in Head Start or Even Start, and children in certain residential child care institutions.

A 2005 survey found that 15 of the 18 States that conducted State level direct certification matches included both SNAP and TANF databases in their matching systems. In 18 of the 22 States that relied on district level matching, the States provided both SNAP and TANF databases to the LEAs for use in the matching process.⁴⁴ Since 2005, many additional LEAs have established direct certification systems.⁴⁵ To the extent that those LEAs adopted already established State or district level matching procedures for their new direct certification systems, it is likely that they too are certifying both TANF and SNAP participants.

For these reasons, the number of free-eligible students not subject to verification is an imperfect proxy for directly certified SNAP participants. Although the proxy tends to overstate the number of directly certified SNAP participants, the overstatement is not constant across States or LEAs. The proxy count tends to be smallest for States and LEAs that include only SNAP participant databases in their direct certification systems, even though those States and LEAs may be in full compliance with the statutory direct certification mandate. As a result, the estimates of direct certification performance developed in this report may exaggerate the differences between the States.

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

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

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

⁴⁵ See Table 1

estimate of SNAP participants who attend Provision 2 or Provision 3 schools that is based on this data element will be inaccurate.

2. SNAP Quality Control System dataset

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

3. American Community Survey (ACS)

This report's alternate measure of the States' success at certifying categorically eligible children for free school meals relies in part on a factor developed with ACS data from the U.S. Census Bureau. The ACS offers estimates of households that receive SNAP benefits, and households that receive both SNAP benefits and "public assistance." ACS documentation defines public assistance as "general assistance and Temporary Assistance to Needy Families."⁴⁶ For this report, the ACS count of households that receive "public assistance" is used as a proxy for households that receive TANF benefits. This proxy will overstate the TANF population by an unknown amount that varies according to the size of the States' general assistance programs.

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

4. Survey of FDPIR participants

The estimated count of school-age FDPIR participants used to develop the performance measure presented in Figure 6 is based in part on a survey conducted for a 1990 study.⁴⁷ The study found that 37 percent of FDPIR participants were under age 18. FNS multiplied this figure by a factor of 13/18 (the expected number of 5-17 year old children among those age 0-17) and applied it to the average monthly FDPIR caseload,⁴⁸ by State, for FY 2007. The primary weakness of this estimate is clear: the share of children in households that currently receive FDPIR benefits may have changed significantly, at least in some States, since 1990.

⁴⁶ U.S. Census Bureau, *American Community Survey, Puerto Rico Community Survey, 2007 Subject Definitions*, <http://www.census.gov/acs/www/UseData/Def.htm>

⁴⁷ Usher, et. al., 1990

⁴⁸ FNS FDPIR program data