

Nutrition Assistance Program Report Series
The Office of Research and Analysis

Special Nutrition Programs Report No. CN-10-DC

**Direct Certification in the National
School Lunch Program: State
Implementation Progress
School Year 2009-2010**

Report to Congress



October 2010

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

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

USDA is an equal opportunity provider and employer.

**Direct Certification in the National School Lunch Program:
State Implementation Progress School Year 2009–2010**

Report to Congress

Authors:

Dennis Ranalli
Janis Johnston
Edward Harper
Rosemary O’Connell
Jay Hirschman
Quinn Moore
Ira Nichols-Barrer
Nancy Cole

October 2010

Suggested Citation:

Suggested Citation: Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, “Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2009–2010” by Dennis Ranalli, Janis Johnston, Edward Harper, Rosemary O’Connell, Jay Hirschman, Quinn Moore, Ira Nichols-Barrer, and Nancy Cole. Report CN-10-DC. Alexandria, VA: October 2010.

Acknowledgements

The authors wish to express their gratitude to those who contributed to this study and the preparation of the final report. In particular, we appreciate the advice and assistance of Manny Ramirez and Gary Vessels of the Child Nutrition Division of the Food and Nutrition Service, and Robert Dalrymple and Kathryn Law of the Office of Research and Analysis. Additionally, we extend our gratitude to Nancy Cole, Quinn Moore, and Ira Nichols-Barrer of Mathematica[®] Policy Research, who conducted phone interviews with best practice States and prepared the best practices section of this report. USDA also appreciates the cooperation of State officials in Idaho, Illinois, Maryland, Minnesota, North Carolina, and Wyoming who participated in the review of State practices. Their information was essential to the completion of this report.

Abstract

This report responds to the legislative requirement of the Food, Conservation, and Energy Act of 2008 (P.L.110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP). Direct certification is a process conducted by the States and by local educational agencies (LEAs) to certify certain children for free school meals without the need for household applications. The 2004 Child Nutrition and Women, Infants, and Children (WIC) Reauthorization Act 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—formerly the Food Stamp Program) benefits. The mandate was phased in over 3 years. The largest LEAs were required to establish direct certification systems by SY 2006–2007; all were required to directly certify SNAP participants by SY 2008–2009.

Eighty-three percent of all LEAs directly certified some SNAP participants in SY 2009–2010. These LEAs enroll 97 percent of all students in schools that participate in the NSLP. This is an increase from SY 2004–2005, when 56 percent of LEAs, enrolling 77 percent of all students in NSLP schools, directly certified SNAP-participant students.

Nationally, the number of school age SNAP participants was 24 percent higher at the start of SY 2009–2010 than it was at the start of SY 2008–2009, and States and LEAs directly certified 1.6 million more SNAP participants in SY 2009–2010 than in the previous year. States with the most successful systems directly certified more than 80 percent of SNAP-participant children. States with the least effective systems directly certified fewer than 50 percent. The national average direct certification rate, at 72 percent, is little changed from last year's rate of 71 percent.

This page left intentionally blank

Contents

List of Tables	viii
List of Figures.....	viii
Glossary of Acronyms and Abbreviations.....	x
Executive Summary	ES-1
I. Introduction.....	1
II. History of Direct Certification.....	3
III. Current Status of State Direct Certification Systems.....	4
IV. Direct Certification Performance.....	11
V. Direct Certification Best Practices.....	21
A. Description of State Practices.....	23
B. Recent and Planned Strategies for Improving Direct Certification	31
C. Best Practices in Implementation of Direct Certification Systems.....	32
VI. Conclusion	36
VII. References.....	38
Appendix A – Additional Tables.....	40
Appendix B – Verification Summary Report	50
Appendix C – Estimation of Component Statistics	51
Appendix D – Data Limitations.....	55
Appendix E – Corrections.....	57

List of Tables

Table 1 Number and Percent of LEAs that Directly Certified SNAP Participants SY 2004-2005 through SY 2009-2010	6
Table 2 SNAP Participation, Direct Certifications, and SNAP-Participant Students in NonBase Year Provision 2 or Provision 3 Schools, SY 2009-2010 (thousands)	12
Table 3 Categorically Eligible Students, Number Directly Certified, and Number Approved by Application SY 2009-2010 (thousands)	19
Table 4 Characteristics of the Direct Certification Matching Process for Public LEAs in Select States, SY 2009–2010	22
Table 5 Primary Matching Criteria for States That Use Centralized Matching	26
Table 6 Data Available for States in Which Districts Do the Matching	27
Table 7 Direct Certification Methods for Nonpublic Schools	30
Table 8 Implementation Features of Direct Certification Systems in Select States	33
Table A-1 Number and Percent of LEAs Directly Certifying SNAP Participants: Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts SY 2004-2005 through SY 2009-2010	40
Table A-2 Summary State Statistics from Figures 5 and 8	43
Table A-3 Enrollment of NSLP-Participating LEAs, SY 2009-2010	44
Table A-4 States by FNS Administrative Region	49

List of Figures

Figure 1 Percent of LEAs that Directly Certified SNAP Participants and Percent of Students in LEAs that Directly Certified SNAP Participants SY 2004-2005 through SY 2009-2010	5
Figure 2 Percent of LEAs Directly Certifying SNAP Participants, by LEA Size SY 2009-2010	8
Figure 3 Students in LEAs that Directly Certified SNAP Participants, by LEA Size SY 2009-2010	9

Figure 4 Percent of LEAs with 2,000 or Fewer Students Directly Certifying SNAP Participants by LEA Size SY 2009-2010	10
Figure 5 Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals - SY 2009-2010	14
Figure 6 Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals by Region in SY 2009-2010.....	15
Figure 7 Percentage Point Change in the Share of SNAP-Participant Children Directly Certified for Free School Meals SY 2008-2009 to SY 2009-2010.....	17
Figure 8 Percent of Categorically Eligible Children Certified for Free School Meals SY 2009-2010	20
Figure A-1 Percent of LEAs that Directly Certified SNAP Participants by LEA Size: Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts SY 2009-2010..	42
Figure A-2 Percent of SNAP-Participant Children Directly Certified for Free School Meals SY 2009-2010	45
Figure A-3 Percent of SNAP-Participant Children Directly Certified for Free School Meals SY 2008-2009	45
Figure A-4 Percent of SNAP-Participant Children Directly Certified for Free School Meals SY 2007-2008	46
Figure A-5 Percent of Categorically Eligible Children Certified for Free School Meals SY 2009-2010	47
Figure A-6 Percent of Categorically Eligible Children Certified for Free School Meals SY 2008-2009	47
Figure A-7 Percent of Categorically Eligible Children Certified for Free School Meals SY 2007-2008	48
Amended Figure 4 Percentage of School-Age SNAP-Participant Children Directly Certified for NSLP Free School Meals – SY 2008-2009	58

Glossary of Acronyms and Abbreviations

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

Executive Summary

Background

This report responds to a legislative requirement of the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill; P.L. 110-246) to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program. The 2008 Farm Bill requires annual reports to Congress. This is the third report in the series, covering school year (SY) 2009–2010.

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for the cost of providing nutritious meals to children in public and private schools and residential child care institutions. Average daily participation across 102,000 NSLP schools and institutions totaled 32 million children in fiscal year (FY) 2010.

Participating schools and institutions receive cash reimbursements and donated USDA foods 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 poverty level are eligible for reduced-price meals. All NSLP meals are subsidized by USDA, including those served to children with household incomes above 185 percent of the poverty level. The subsidies provided for free and reduced-price meals are substantially larger than the subsidies provided for full-price meals.

Children from households that receive benefits under certain other Federal assistance programs are deemed “categorically eligible” for free meals under the NSLP. Participation in the Supplemental Nutrition Assistance Program (SNA –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.

Effective with the start of SY 2009–2010 if one child in a household is directly certified (see below) or is determined categorically eligible for free school meals by application, then all children in that household are categorically eligible for free meals.

Direct Certification

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

States and LEAs may opt instead to send letters to SNAP, TANF, and FDPIR households with school age children. The letters serve as proof of categorical eligibility for free meals, and must be forwarded by the households to their children's schools.

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

State Performance Measures

This report presents information on the outcomes of direct certification for SY 2009–2010. 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 SNAP, TANF, and FDPIR participants certified for free school meals, either by direct certification or by application. This measure provides a more comprehensive assessment of State efforts to ensure that all categorically eligible children are properly certified for free school meals.

Key Findings

States and LEAs directly certified 1.6 million more children at the start of SY 2009–2010 than they did one year earlier, a 24 percent increase. Over the same period, the total number of school-age children in SNAP households increased by 2.2 million or 22 percent. As a result, the percentage of SNAP participant children certified for free school meals without application increased slightly from 71 percent in SY 2008–2009 to 72 percent in SY 2009–2010.¹

The overall certification rate of categorically eligible children (those participating in the SNAP, TANF, or FDPIR Programs), by direct certification or by application, decreased slightly from 85 percent in SY 2008–2009 to 83 percent in SY 2009–2010.

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

¹ The estimate for SY 2008–2009 has been revised from the figure in the October 2009 report in this series. The revision reflects a correction to State-reported SNAP data, and an update to our methodology for estimating the number of school-age SNAP participants. For additional detail see Appendix D and Appendix E.

State Best Practices

Effective direct certification systems do not follow a single model. Among the States with the most effective systems are some that perform State level matching, others that have decentralized systems, and at least one State with a paper-based letter system. Although the letter method remains effective in some jurisdictions, two of the most improved States in SY 2009–2010 credit their transition from the letter method to computer matching for their success.

States continue to refine their match processes to accommodate unique local or State characteristics. For instance, one State recognized that changing its primary geographic match criterion to one that better coincided with school district boundaries produced better results. Among the successful States interviewed for this year's report, there is large variation in the number of matching criteria: one State used just a handful of student identifiers; another used 29 data elements.

Some States plan to improve direct certification in the long term by requiring or facilitating more frequent matching at the LEA level. Others are developing applications that allow LEAs to look up individual SNAP or TANF participant students by name. Extending direct certification to nonpublic and charter schools remains a challenge. The exchange of student information between the schools and the State education agencies is not universal. Nevertheless, States are working to include these schools in existing matching systems or to provide alternative methods of direct certification.

Conclusion

States and LEAs have made significant progress in complying with the 2004 Reauthorization Act. An estimated 83 percent of LEAs, enrolling 97 percent of all children in NSLP-participating schools, directly certified SNAP participants in SY 2009–2010.

In response to an extraordinary recession-related increase in SNAP caseload, States and LEAs directly certified 1.6 million more SNAP participants in SY 2009–2010 than they did a year earlier. Through that effort, an estimated 72 percent of children from SNAP-participant households were certified without application for free school meals in SY 2009–2010. This is comparable to last year's direct certification rate of 71 percent. States and LEAs certified 83 percent of all categorically eligible students for free school meals, either by direct certification or by application in SY 2009–2010, 2 percentage points lower than the rate achieved in SY 2008–2009.

This page left intentionally blank

Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2009–2010

I. Introduction

Direct Certification in the National School Lunch Program

NSLP reimburses LEAs for the cost of providing nutritious, low cost or free meals to children in public and private schools and residential child care institutions. Participating schools and institutions receive cash reimbursements and USDA food assistance from the Department of Agriculture for each meal served. About 102,000 schools and institutions participate in the program. Average daily student participation totaled 32 million in FY 2010.

In exchange for Federal assistance, participating schools and institutions serve meals that satisfy Federal nutrition and food safety standards. In addition, they must offer school meals at no cost, or at reduced-price, to income eligible children. Children from households with incomes at or below 130 percent of the poverty level (\$28,665 for a family of four during school year SY 2010–2011²) are eligible for free meals. Those with incomes between 130 percent and 185 percent of the poverty level (\$40,793 for a family of four during SY 2010–2011) are eligible for reduced-price meals. Students are determined eligible for free meals through application or direct certification (described below); reduced-price eligibility is determined by application alone.

Eligibility determination through application

All LEAs accept applications from households to establish the eligibility of the children that reside in them for free or reduced-price school meals. Most applicants submit self-declared income and household size information, which is compared to the income thresholds for free and reduced-price benefits. Other applicants provide case numbers that demonstrate household participation in one of several other means-tested Federal assistance programs. Children in households that receive benefits under SNAP,³ TANF, or FDPIR are “categorically eligible” for free school meals.⁴

Categorical eligibility, whether determined by application or by direct certification (see below), extends to all children in the same household.⁵

² The income eligibility thresholds given here apply to households from the 48 contiguous States, the District of Columbia, Guam, and the other U.S. territories. The income thresholds are higher in Alaska and Hawaii. A table of income eligibility thresholds can be found at <http://www.fns.usda.gov/cnd/Governance/notices/iegs/IEGs10-11.htm>.

³ Formerly the Food Stamp Program.

⁴ 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.

⁵ See FNS school meals policy numbers 38-2009 and 25-2010 at <http://www.fns.usda.gov/cnd/governance/policy.htm>.

Eligibility determination through direct certification

Direct certification confirms a child’s categorical eligibility for free school meals through his or her SNAP, TANF, or FDPIR participation without the need for a household application. Direct certification typically involves matching SNAP, TANF, and FDPIR records against student enrollment lists, either at the State or 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 to take no action for their children to be certified. Current program rules provide for an alternate method of direct certification that does not require dataset matching. Under that option, SNAP, TANF, or FDPIR agencies send letters to participant households with school-age children. Those letters, which serve as proof of categorical eligibility for free meals, must be forwarded by the households to their children’s schools. This “letter method” of direct certification requires households to take some positive action (forwarding the letter) before their children are certified for free meals.

The Child Nutrition and WIC Reauthorization Act of 2004 requires each State education agency to enter into an agreement with the State agency responsible for making SNAP eligibility determinations. The agreement must establish procedures to directly certify children from SNAP households for free school meals.⁸ States may also directly certify children from TANF and FDPIR households, but are not required to do so.

Purpose of this Report

This report responds to section 4301 of the Food, Conservation, and Energy Act of 2008⁹, which calls for an assessment of the “effectiveness of each State in enrolling school-aged children in households receiving ... [Supplemental Nutrition Assistance Program] benefits” for free school meals. Specifically the law requires:

1. State-level estimates of the number of school-age children that received SNAP benefits at any time in July, August, or September (just prior to, or at the start of the current school year),
2. Estimates of the number of SNAP-participant children who were directly certified for free school meals as of October 1, and
3. Estimates of the number of SNAP-participant students who were not candidates for direct certification because they attended Provision 2 or Provision 3 schools¹⁰ that were not operating in a base year in the current school year.

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 The Child Nutrition and WIC Reauthorization Act’s direct certification provision was phased in over a 3 year period beginning with school year 2006–2007.

⁹ Also known as the 2008 Farm Bill.

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

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

II. History of Direct Certification

In the mid-1980s, program managers and policy makers recognized a duplication of effort in certifying school children for free meals under the NSLP and the School Breakfast Program (SBP)¹¹, and certifying families for what are now the SNAP and TANF Programs. All of these programs have similar income eligibility limits, and many school children participated in more than one. Further, the application processes for SNAP and TANF were, and remain, more detailed and rigorous than the certification process for free meals under NSLP. Use of eligibility determinations for SNAP and TANF could improve the accuracy of certifications for NSLP.

Legislation taking a first step to link these programs was enacted in 1986. The Richard B. Russell National School Lunch Act (NSLA) was amended to make children who are members of a household receiving assistance under SNAP and TANF automatically eligible for free school meals. This action paved the way for more simplified application and certification procedures for these children. Initially, families could put their case number from these programs on the application in lieu of providing income information.¹² Then, in 1989, Public Law 101-147 (Child Nutrition and WIC Reauthorization Act of 1989) allowed school food authorities (SFAs) to certify children, without further application, by directly communicating with the appropriate State or local agency to obtain documentation that the children were members of either a household receiving SNAP or TANF benefits. This first statutory authorization of direct certification was made optional for SFAs.

The 2004 Reauthorization Act amended the NSLA to mandate direct certification with SNAP for all LEAs. (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.) The 2004 Act retained discretionary authority for TANF direct certification. Mandatory direct certification with SNAP was phased in over 3 years, beginning in SY 2006–2007. All LEAs, including private schools, were required to have direct certification 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. Therefore, by the time direct certification with SNAP was made mandatory, many State agencies had systems in place and were familiar with the process.

¹¹ Children certified for free or reduced-price meals under the NSLP are eligible for free or reduced-price breakfasts under the SBP. The two programs share a single application process. Throughout this report, certification for free or reduced-price benefits under the NSLP should be understood to mean certification for the SBP as well.

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

By SY 2004–2005, 56 percent of LEAs had already adopted some form of direct certification.¹³ Schools in those LEAs enrolled nearly 77 percent of all students in NSLP participating schools.

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

III. Current Status of State Direct Certification Systems

The Child Nutrition and WIC Reauthorization Act of 2004 required all LEAs to begin directly certifying children from SNAP-participant families by SY 2008–2009. The direct certification mandate was phased in over 3 years. LEAs with total enrollments of 25,000 or more students were required to establish direct certification systems no later than SY 2006–2007. LEAs with enrollments of 10,000 or more followed in SY 2007–2008. Phase-in was complete in SY 2008–2009 when all LEAs were subject to the statutory mandate.

Figure 1 and Table 1 illustrate the increases in both the percentage of LEAs that directly certified SNAP participants and in the percentage of students enrolled in those LEAs.¹⁴ For SY 2009–2010, 83 percent of LEAs directly certified some SNAP participants¹⁵ and those LEAs enrolled 97 percent of all students in NSLP-participating schools.

More than half of the LEAs that did not directly certify SNAP participants in SY 2009–2010 are private; many of them are single-school LEAs. The information sharing relationship between private school LEAs and the States' education agencies often differs from the relationship between public LEAs and the States. For this reason, private school LEAs are sometimes excluded from State-level direct certification matching systems. Although small, single-school, and private LEAs may face special challenges in setting up direct certification systems, all are subject to the statutory mandate.

¹³ 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 15 for further explanation.

¹⁴ The numbers in Figure 1 and Table 1 are estimates based on figures provided by LEAs on their annual NSLP Verification Summary Reports (VSRs). A LEA is identified as a direct certification district if the reported number of students not subject to verification exceeds the number who are categorically eligible for free meals but approved by application, or the number not subject to verification is at least 5 percent of all students reported certified for free meals. This methodology, previously used by Cole and Logan (2007), may misclassify a small number of LEAs. Also, as noted in the next footnote, LEAs in which all students attend nonbase-year Provision 2 or Provision 3 schools are included in the direct certification counts for Figure 1 and Table 1.

¹⁵ This percentage, and the corresponding Table 1 figures for all other school years, also includes the relatively small number of LEAs where all students attend Provision 2 or Provision 3 schools that are not operating in a base year. Both Figure 1 and Table 1 attempt to measure the LEAs' progress in implementing direct certification systems. Students in Provision 2 and Provision 3 schools are not subject to either direct certification or certification by application in nonbase years. However, all children, including all SNAP participants, are eligible for free meals in Provision 2 and Provision 3 schools, which is consistent with the policy goal of direct certification. See Appendix A, Table A-1, for an alternate version of Table 1 with Provision 2 and Provision 3 LEAs excluded from both the total count of LEAs and the count of LEAs that are directly certifying SNAP children.

Figure 1
Percent of LEAs that Directly Certified SNAP Participants and
Percent of Students in LEAs that Directly Certified SNAP Participants
SY 2004–2005 through SY 2009–2010

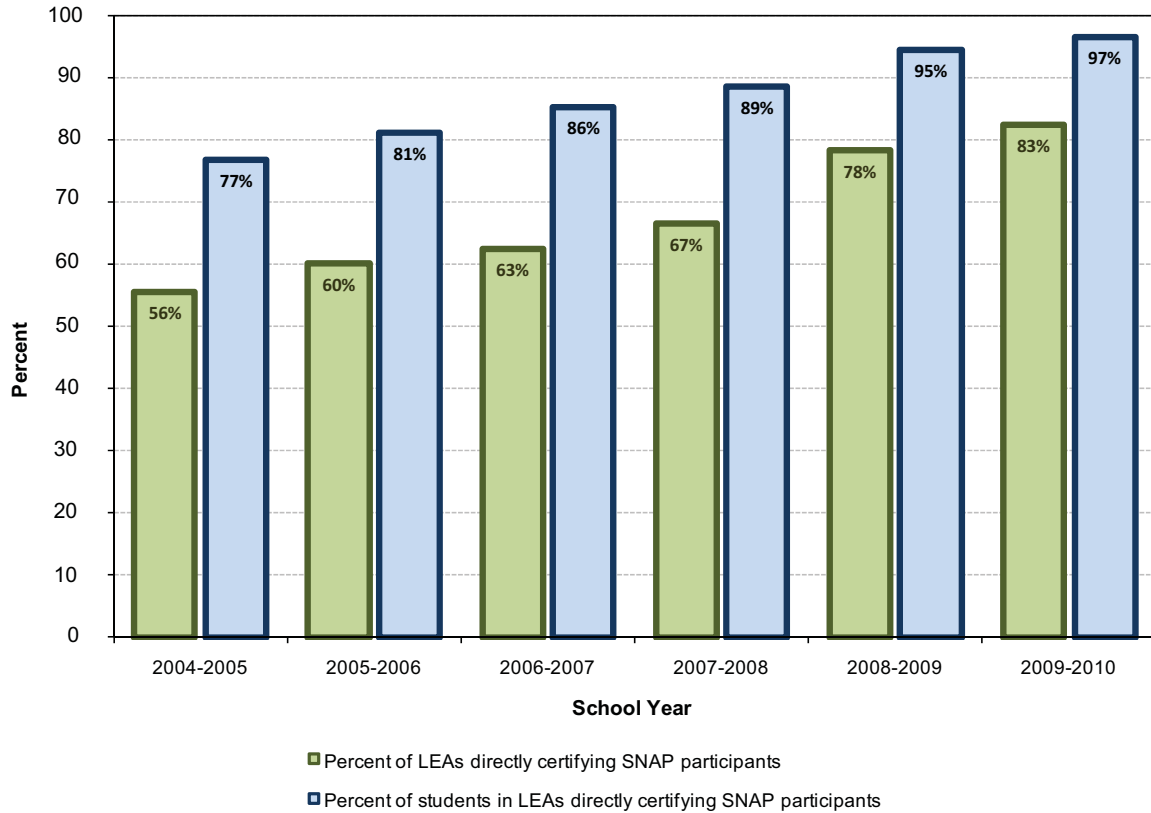


Table 1
Number and Percent of LEAs that Directly Certified SNAP Participants
SY 2004–2005 through SY 2006–2007¹⁶

	SY 2004 2005			SY 2005 2006			SY 2006 2007		
	Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs	
		Number	Percent		Number	Percent		Number	Percent
US Total	16,612	9,239	55.6%	17,397	10,467	60.2%	17,748	11,113	62.6%
AK	54	43	79.6%	35	34	97.1%	47	43	91.5%
AL	163	62	38.0%	148	87	58.8%	145	93	64.1%
AR	251	247	98.4%	258	12	4.7%	281	256	91.1%
AZ	302	251	83.1%	333	243	73.0%	334	256	76.7%
CA	1,004	399	39.7%	1,033	469	45.4%	1,024	518	50.6%
CO	178	44	24.7%	168	68	40.5%	205	78	38.1%
CT	185	146	78.9%	187	148	79.1%	193	161	83.4%
DC	47	1	2.1%	51	4	7.8%	52	2	3.9%
DE	27	22	81.5%	34	28	82.4%	32	28	87.5%
FL	145	74	51.0%	96	62	64.6%	145	88	60.7%
GA	171	155	90.6%	175	158	90.3%	183	166	90.7%
HI	N/A	N/A	N/A	32	18	56.3%	38	20	52.6%
IA	496	339	68.4%	508	372	73.2%	507	383	75.5%
ID	125	97	77.6%	266	218	82.0%	133	106	79.7%
IL	1,036	749	72.3%	1,113	835	75.0%	1,075	839	78.1%
IN	407	73	17.9%	468	106	22.7%	478	143	29.9%
KS	403	314	77.9%	404	333	82.4%	403	335	83.1%
KY	197	128	65.0%	192	145	75.5%	189	154	81.5%
LA	98	57	58.2%	36	34	94.4%	107	92	86.0%
MA	N/A	N/A	N/A	357	216	60.5%	370	232	62.7%
MD	47	29	61.7%	47	29	61.7%	46	31	67.4%
ME	245	199	81.2%	228	194	85.1%	233	201	86.3%
MI	741	331	44.7%	698	349	50.0%	803	449	55.9%
MN	610	392	64.3%	620	387	62.4%	630	413	65.6%
MO	762	453	59.5%	711	476	67.0%	749	490	65.4%
MS	183	93	50.8%	72	47	65.3%	184	134	72.8%
MT	236	130	55.1%	233	159	68.2%	234	177	75.6%
NC	N/A	N/A	N/A	172	117	68.0%	178	133	74.7%
ND	160	126	78.8%	216	170	78.7%	193	142	73.6%
NE	407	241	59.2%	433	313	72.3%	381	290	76.1%
NH	82	57	69.5%	88	65	73.9%	89	60	67.4%
NJ	661	159	24.1%	661	185	28.0%	663	206	31.1%
NM	142	98	69.0%	150	118	78.7%	167	119	71.3%
NV	40	35	87.5%	39	34	87.2%	19	15	79.0%
NY	1,096	797	72.7%	1,054	889	84.4%	1,042	857	82.3%
OH	1,093	178	16.3%	1,196	302	25.3%	1,129	223	19.8%
OK	533	248	46.5%	613	322	52.5%	573	333	58.1%
OR	205	166	81.0%	227	178	78.4%	232	185	79.7%
PA	724	368	50.8%	776	458	59.0%	826	501	60.7%
RI	N/A	N/A	N/A	55	47	85.5%	55	50	90.9%
SC	86	85	98.8%	85	83	97.7%	88	84	95.5%
SD	223	119	53.4%	227	127	56.0%	221	127	57.5%
TN	169	132	78.1%	175	154	88.0%	171	144	84.2%
TX	1,202	741	61.7%	1,026	797	77.7%	1,189	839	70.6%
UT	51	45	88.2%	53	50	94.3%	49	45	91.8%
VA	160	136	85.0%	141	138	97.9%	152	139	91.5%
VT	204	186	91.2%	217	200	92.2%	215	201	93.5%
WA	292	215	73.6%	345	260	75.4%	330	260	78.8%
WI	842	177	21.0%	823	138	16.8%	840	180	21.4%
WV	73	54	74.0%	68	54	79.4%	73	55	75.3%
WY	54	48	88.9%	54	37	68.5%	53	37	69.8%

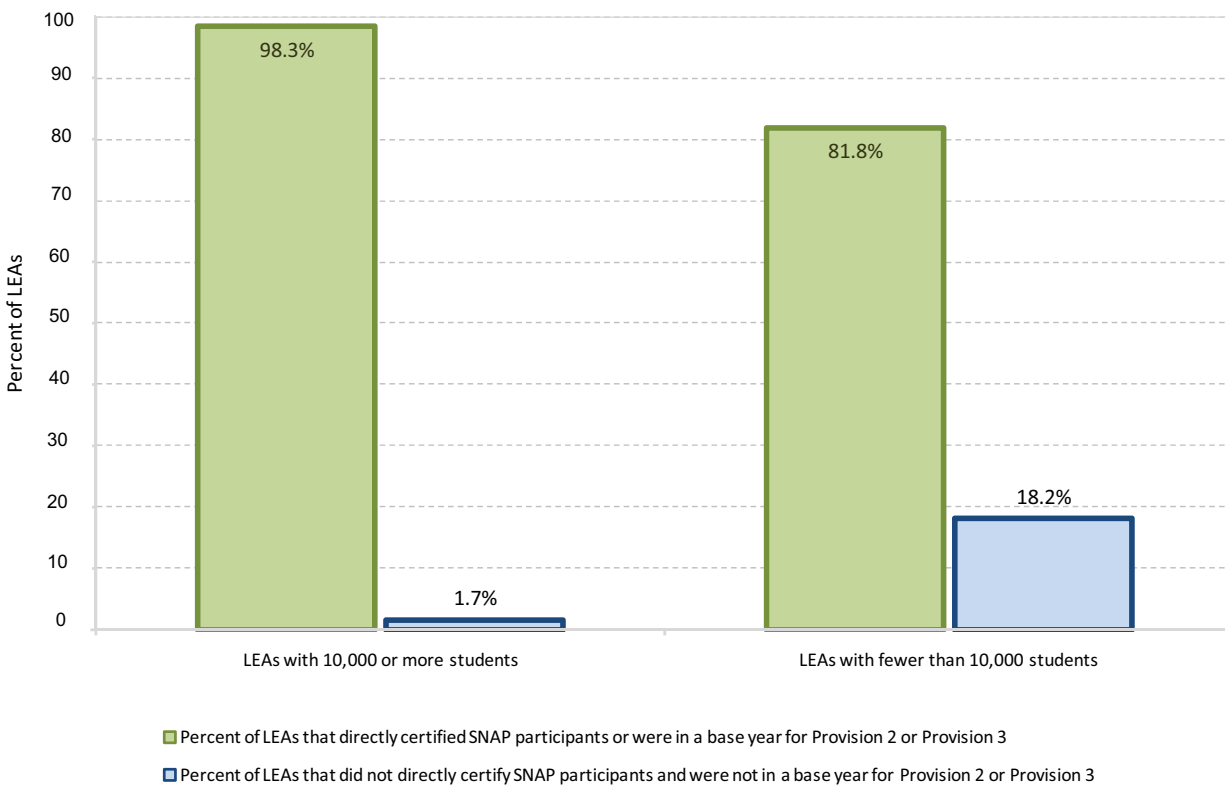
¹⁶ Data for Hawaii, North Carolina, Massachusetts, Rhode Island, and one of two State agencies in both Oklahoma and Arkansas are omitted from the school year 2004–2005 totals; these agencies either did not submit school verification data or submitted unusable data.

Table 1 (cont.)
Number and Percent of LEAs that Directly Certified SNAP Participants
SY 2007–2008 through SY 2009–2010

	SY 2007 2008			SY 2008 2009			SY 2009 2010		
	Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs		Number of LEAs	Direct Certification or Provision 2/3 LEAs	
		Number	Percent		Number	Percent		Number	Percent
US Total	18,141	12,097	66.7%	18,253	14,301	78.3%	18,475	15,256	82.6%
AK	50	46	92.0%	48	47	97.9%	49	48	98.0%
AL	147	110	74.8%	150	134	89.3%	151	137	90.7%
AR	286	252	88.1%	295	280	94.9%	300	265	88.3%
AZ	372	307	82.5%	388	327	84.3%	428	357	83.4%
CA	1,028	555	54.0%	1,029	676	65.7%	1,057	839	79.4%
CO	175	81	46.3%	205	181	88.3%	218	202	92.7%
CT	192	161	83.9%	191	169	88.5%	188	174	92.6%
DC	58	2	3.5%	61	2	3.3%	62	61	98.4%
DE	29	27	93.1%	35	30	85.7%	33	30	90.9%
FL	159	98	61.6%	164	107	65.2%	170	122	71.8%
GA	216	187	86.6%	215	190	88.4%	221	199	90.1%
HI	36	22	61.1%	40	26	65.0%	37	26	70.3%
IA	499	393	78.8%	494	424	85.8%	495	421	85.1%
ID	121	106	87.6%	139	121	87.1%	142	103	72.5%
IL	1,115	904	81.1%	1,114	928	83.3%	1,123	880	78.4%
IN	482	184	38.2%	487	341	70.0%	498	405	81.3%
KS	403	327	81.1%	407	348	85.5%	405	345	85.2%
KY	193	171	88.6%	190	170	89.5%	197	176	89.3%
LA	112	95	84.8%	117	105	89.7%	109	95	87.2%
MA	357	245	68.6%	423	305	72.1%	431	303	70.3%
MD	48	40	83.3%	47	39	83.0%	49	42	85.7%
ME	246	223	90.7%	235	213	90.6%	194	178	91.8%
MI	836	570	68.2%	846	693	81.9%	855	717	83.9%
MN	650	433	66.6%	663	448	67.6%	662	457	69.0%
MO	756	510	67.5%	744	615	82.7%	765	678	88.6%
MS	179	144	80.5%	179	151	84.4%	177	157	88.7%
MT	244	188	77.1%	241	182	75.5%	239	190	79.5%
NC	170	141	82.9%	169	144	85.2%	165	151	91.5%
ND	223	170	76.2%	217	158	72.8%	217	171	78.8%
NE	381	297	78.0%	382	285	74.6%	383	304	79.4%
NH	92	65	70.7%	95	64	67.4%	94	75	79.8%
NJ	660	247	37.4%	662	551	83.2%	677	619	91.4%
NM	189	135	71.4%	171	166	97.1%	176	132	75.0%
NV	20	16	80.0%	19	16	84.2%	18	17	94.4%
NY	1,083	951	87.8%	1,072	935	87.2%	1,113	989	88.9%
OH	1,166	258	22.1%	1,172	745	63.6%	1,188	816	68.7%
OK	568	373	65.7%	565	429	75.9%	566	458	80.9%
OR	235	183	77.9%	237	188	79.3%	245	196	80.0%
PA	837	523	62.5%	855	623	72.9%	852	731	85.8%
RI	53	50	94.3%	32	31	96.9%	54	52	96.3%
SC	87	84	96.6%	96	85	88.5%	93	85	91.4%
SD	222	128	57.7%	215	145	67.4%	216	196	90.7%
TN	168	142	84.5%	167	153	91.6%	165	149	90.3%
TX	1,264	989	78.2%	1,264	1,110	87.8%	1,263	1,119	88.6%
UT	55	51	92.7%	64	56	87.5%	75	72	96.0%
VA	151	139	92.1%	150	138	92.0%	153	141	92.2%
VT	219	194	88.6%	214	189	88.3%	227	206	90.8%
WA	325	266	81.9%	314	272	86.6%	329	286	86.9%
WI	853	218	25.6%	847	474	56.0%	822	584	71.1%
WV	75	55	73.3%	74	55	74.3%	73	55	75.3%
WY	56	41	73.2%	53	37	69.8%	56	45	80.4%

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 2009–2010 is the second year that the smallest LEAs were subject to the statutory mandate, these LEAs continue to lag larger LEAs in adopting direct certification, and it remains useful to track the progress of that group separately. Figure 2 compares the relative fraction of larger and smaller LEAs that directly certified SNAP participants in SY 2009–2010.¹⁷

Figure 2
Percent of LEAs Directly Certifying SNAP Participants, by LEA Size
SY 2009–2010



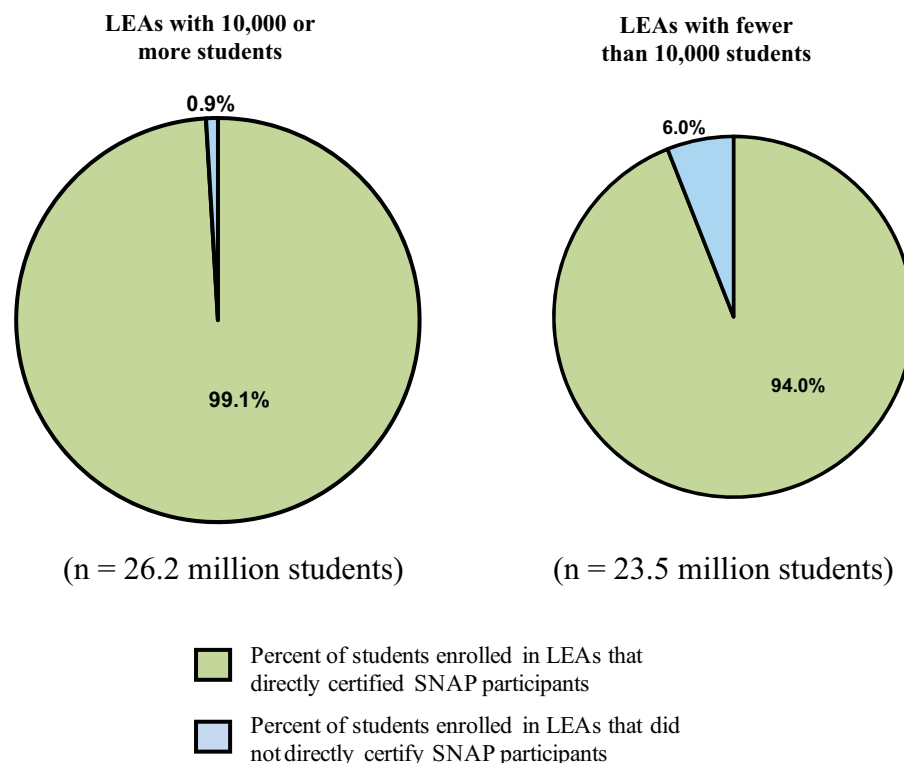
More than 98 percent of LEAs with enrollments of 10,000 or more students directly certified some SNAP participants in SY 2009–2010.¹⁸ This is up from 97 percent in SY 2008–2009. Although the gap between the largest LEAs and those with fewer than 10,000 students remains significant, it is narrowing. Just under 82 percent of LEAs with fewer than 10,000 students directly certified SNAP participants in SY 2009–2010. This is a 4.4 percentage point improvement over the previous year, when LEAs with enrollments under 10,000 were first subject to the statutory direct certification requirement.

¹⁷ LEAs made up entirely of Provision 2 and Provision 3 schools are included in the count of LEAs that directly certified SNAP participants. See Appendix A, Figure A-1 for the same chart with Provision 2 and Provision 3 LEAs excluded from both the total count of LEAs and the count of LEAs that directly certified SNAP participants.

¹⁸ It is possible that some of the 2 percent of remaining large districts operate direct certification systems, but certify no SNAP participants. It is also possible, given the limitations of the VSR data, that some of these LEAs are misclassified.

The number of students enrolled in LEAs that directly certified SNAP participants in SY 2009–2010 is presented in Figure 3.¹⁹ As in Figure 2, LEAs are separated by size. The area of each circle in the figure is proportional to the total number of students in NSLP-participating LEAs. While 18 percent of LEAs with enrollments below 10,000 did not directly certify any SNAP participants in SY 2009–2010 (from Figure 2), they accounted for just 6 percent of the students in LEAs with enrollments below 10,000.

Figure 3
Students in LEAs that Directly Certified SNAP Participants, by LEA Size
(Pies are Proportional in Size to the Number of Students Enrolled)
SY 2009–2010



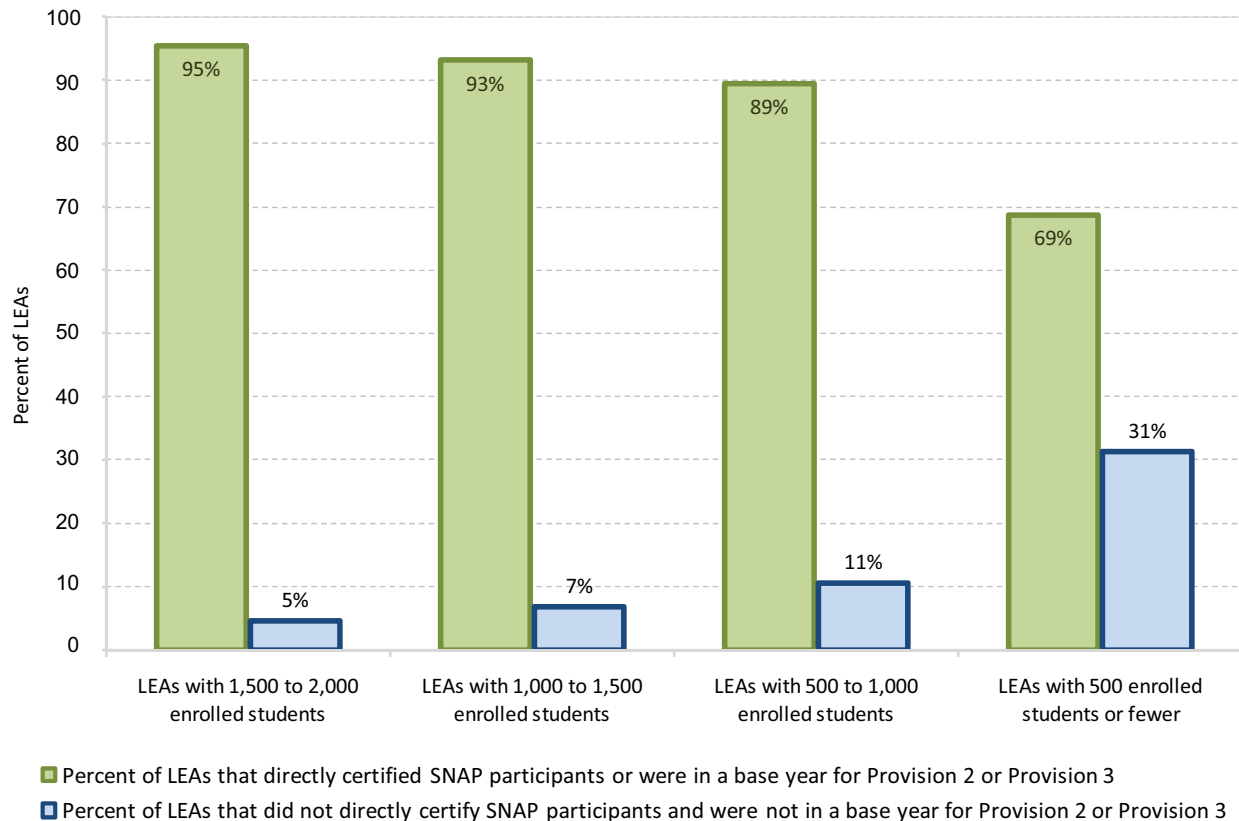
LEAs with enrollments of fewer than 10,000 students were required to directly certify SNAP-participant children for the first time in SY 2008–2009; these LEAs represent 95 percent of the LEAs in the country but enroll a relatively small percentage of all enrolled students. Because LEAs with enrollments of fewer than 10,000 students are newer to the requirement, it is informative to assess direct certification percentages with attention to these smaller LEAs.

Closer examination indicates that among LEAs with enrollments of at least 2,000 students, over 97 percent directly certified at least some SNAP-participant children. Considering LEAs with 2,000 or fewer students, that percentage begins to drop, most noticeably for LEAs with 500 or fewer enrolled students (see Figure 4). Although some of the LEAs may not have

¹⁹ As in Figure 1, Figure 2, and Table 1, LEAs in which all students attend nonbase-year Provision 2 or Provision 3 schools are also included in Figure 3’s direct certification count.

SNAP-participant children among their enrollment, it is also possible that the relative newness of the mandate and technical or administrative challenges are among the reasons that these LEAs did not directly certify any SNAP-participant children.

Figure 4
Percent of LEAs with 2,000 or Fewer Students Directly Certifying
SNAP Participants by LEA Size
SY 2009–2010



Almost 75 percent of all LEAs, approximately 14,000, enroll 2,000 or fewer students. In spite of their great number, these LEAs account for only 15 percent of all enrolled students. Of the 7.5 million students enrolled in these LEAs the vast majority (6.6 million or 88 percent of all students enrolled in LEAs of 2,000 or fewer students) are enrolled in LEAs that directly certified at least some SNAP-eligible children.

Characteristics of LEAs that did not directly certify any SNAP children

Overall, about 3,200 LEAs, approximately 17 percent of the total, are estimated by FNS to have directly certified no SNAP-participant children in SY 2009–2010. Although the NSLA does not exempt small or single-school districts from the direct certification requirement, both groups are overrepresented among nondirect certification LEAs. Because they tend to be small, the 17 percent of LEAs that did not directly certify any SNAP children enroll just 3 percent of students in NSLP-participating schools.

Some additional detail on LEAs that directly certified no SNAP students is given below:

- Four percent of LEAs that directly certified no SNAP students in SY 2009–2010 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 113 LEAs is not in full compliance with the direct certification requirement; these LEAs may enroll very few or no children from SNAP-participant households.
- An additional 18 percent report that no more than 5 percent of their enrolled students are certified for free meals. These LEAs have an unusually low concentration of students certified for free meals. Among the 18,000 LEAs that filed VSR reports for SY 2009–2010, just 6 percent reported having as low a concentration of low-income students. Some of these LEAs may also be in compliance with the direct certification requirement, although their systems failed to identify any SNAP participants.
- More than 99 percent of LEAs that directly certified no SNAP participants enrolled fewer than 10,000 students. Seventy-seven percent are single-school LEAs.
- An estimated 60 percent of LEAs that did not directly certify any SNAP students are private LEAs.

IV. Direct Certification Performance

For each State FNS estimates a direct certification performance measure based on three component statistics²⁰:

- a. The number of school-age children in the State’s SNAP-participant households,
- b. The number of SNAP participants directly certified by the State’s LEAs for free school meals²¹, and
- c. The number of SNAP participants in the State’s nonbase-year Provision 2 or Provision 3 schools.

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

²⁰ The derivation of each of these statistics is detailed in Appendix C.

²¹ This is proxied by the number of students that LEAs report on the FNS-742 as free eligible but not subject to verification. That number includes, but is not limited to, directly certified SNAP participants.

Table 2
SNAP Participation, Direct Certifications, and SNAP-Participant Students in NonBase Year Provision 2 or Provision 3 Schools, SY 2009–2010²² (thousands)

State	School Age SNAP Participants	NSLP Direct Certifications	SNAP Participants in non-Base-Year NSLP Provision 2 or Provision 3 Schools
Alabama	270.8	178.7	3.2
Alaska	23.5	22.4	5.1
Arizona	320.8	147.6	21.3
Arkansas	138.9	91.6	13.2
California	1,249.7	703.5	218.9
Colorado	126.2	86.7	0.9
Connecticut	81.4	38.6	12.0
Delaware	36.6	30.9	0.0
District of Columbia	30.9	25.3	0.0
Florida	685.0	491.0	0.3
Georgia	485.5	305.3	27.8
Hawaii	35.0	31.9	0.0
Idaho	54.6	35.3	0.7
Illinois	515.4	377.5	0.6
Indiana	241.8	171.9	8.8
Iowa	97.8	73.1	0.5
Kansas	75.6	63.5	0.2
Kentucky	232.5	177.5	2.4
Louisiana	261.8	207.8	0.0
Maine	60.6	45.6	0.1
Maryland	162.1	136.9	0.2
Massachusetts	205.0	98.6	10.9
Michigan	474.2	325.0	0.0
Minnesota	120.9	107.5	0.7
Mississippi	187.3	128.7	10.0
Missouri	266.1	175.8	0.0
Montana	30.2	14.1	4.9
Nebraska	49.5	28.5	0.4
Nevada	75.1	60.8	4.0
New Hampshire	24.7	11.5	0.0
New Jersey	175.4	107.9	0.2
New Mexico	120.0	32.9	53.6
New York	748.8	435.1	172.9
North Carolina	415.0	350.4	0.0
North Dakota	15.8	8.9	0.0
Ohio	462.1	280.1	31.8
Oklahoma	173.2	125.6	5.8
Oregon	178.3	115.7	4.0
Pennsylvania	355.0	223.1	10.7
Rhode Island	36.0	24.8	0.0
South Carolina	234.5	163.1	0.0
South Dakota	27.7	9.5	8.3
Tennessee	368.7	333.9	1.1
Texas	1,208.6	760.4	277.9
Utah	75.6	51.6	1.3
Vermont	22.1	14.2	0.0
Virginia	224.1	174.4	0.0
Washington	256.5	182.2	3.4
West Virginia	93.3	73.2	0.0
Wisconsin	210.4	151.5	2.1
Wyoming	8.7	7.6	0.0
US Total	12,029.3	8,019.6	920.2

²² 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. For all States, the SNAP participant figures depend on estimation of a “turnover rate” to convert monthly SNAP caseload into counts of unique individuals who received benefits for part or all of the July to September period of interest to this report. The SNAP participant counts are sensitive to small changes in the turnover rate. Error in estimation of the turnover rate complicates comparison of SNAP participant estimates and State direct certification effectiveness across years. See Appendix C for more detail.

This report’s initial measure of State direct certification effectiveness is computed as follows:²³

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

Figure 5 ranks the States according to this performance measure.²⁴ Because each of the component statistics is estimated with some error, the exact percentage values associated with the States should be viewed with caution.²⁵ For this same reason, this report focuses on the States’ relative positions in the chart. States near the top of the chart are among the most successful at directly certifying SNAP-participant children for free school meals; relatively few SNAP households in those States are burdened with paper applications. Children from SNAP-participant households in those States are also among the least likely to be misclassified as ineligible for free school meals.

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

Measurement and State reporting error minimize the significance of small differences in the percentage point scores of States that fall near each other in Figure 5, but the wide gap between States near the bottom of the chart and those near the top makes clear that some States’ direct certification systems are simply less effective than other States’ systems. Among States and LEAs that rely on computer matching, variation in direct certification effectiveness may be explained in part by differences in matching algorithms, the nature and quality of data used as input into the matching process, procedures for handling nonmatches, and access to a supplemental student-level lookup system.²⁶

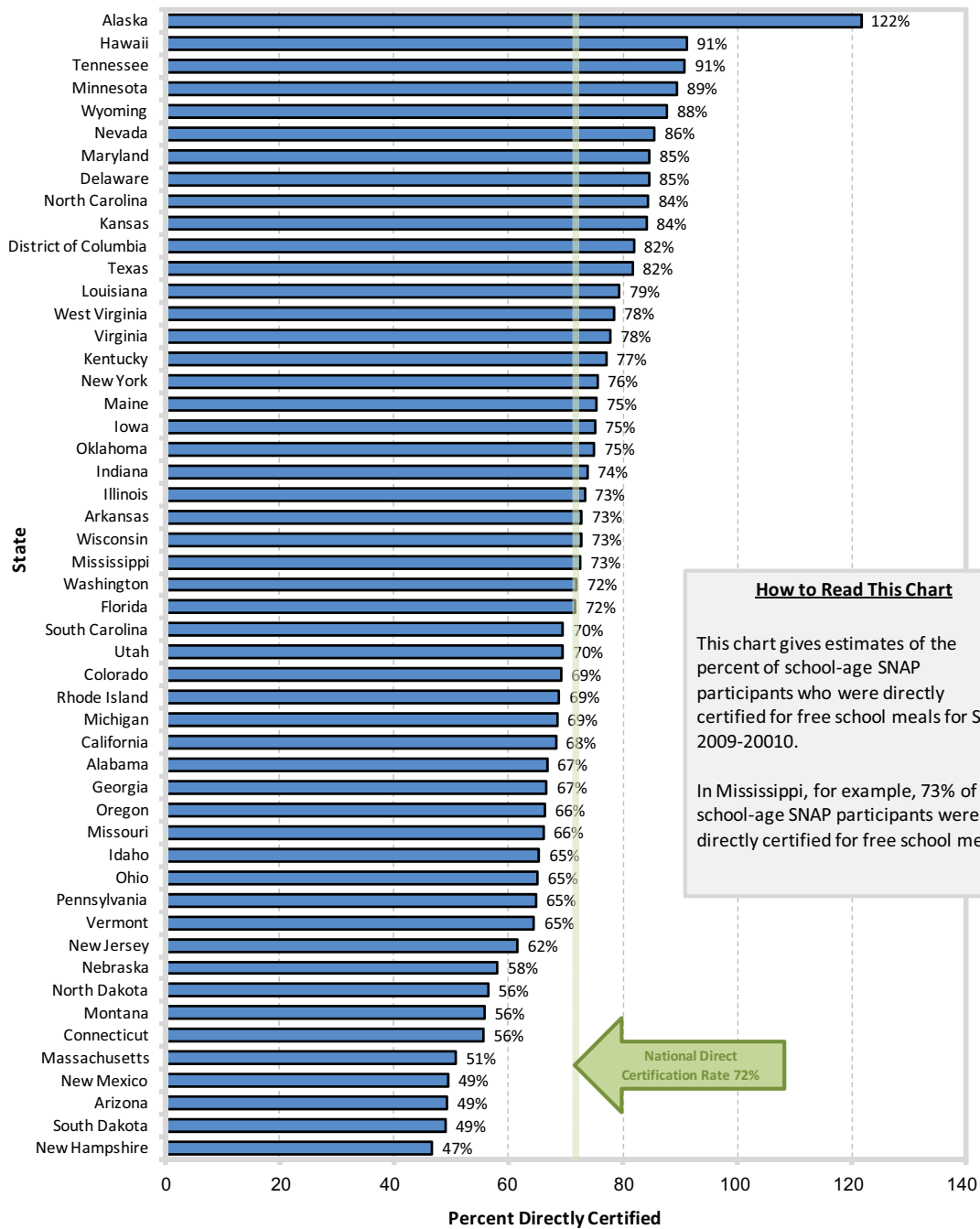
²³ With this edition of the report we modify the methodology used to estimate the number of school-age SNAP participants. See Appendix C for details.

²⁴ See Appendix Figures A-2 through A-7 for U.S. maps providing a geographic view of these State estimates.

²⁵ 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, TANF participation is not an element of all direct certification systems. Because FNS does not know how many States, or what fraction of LEAs within States, directly certify TANF participants, an adjustment for TANF participants has not been made to the denominator of the equation presented at the top of this section. Without such an adjustment, however, Figure 5 percentages are overstated for some States. Figure 7 presents a more comprehensive measure of the States’ success at certifying all categorically eligible children for free school meals. That measure includes the certification of students based on their status as SNAP, TANF, and FDPIR participants.

²⁶ See Section V for a discussion of State and LEA direct certification practices.

Figure 5²⁷
Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals - SY 2009-2010



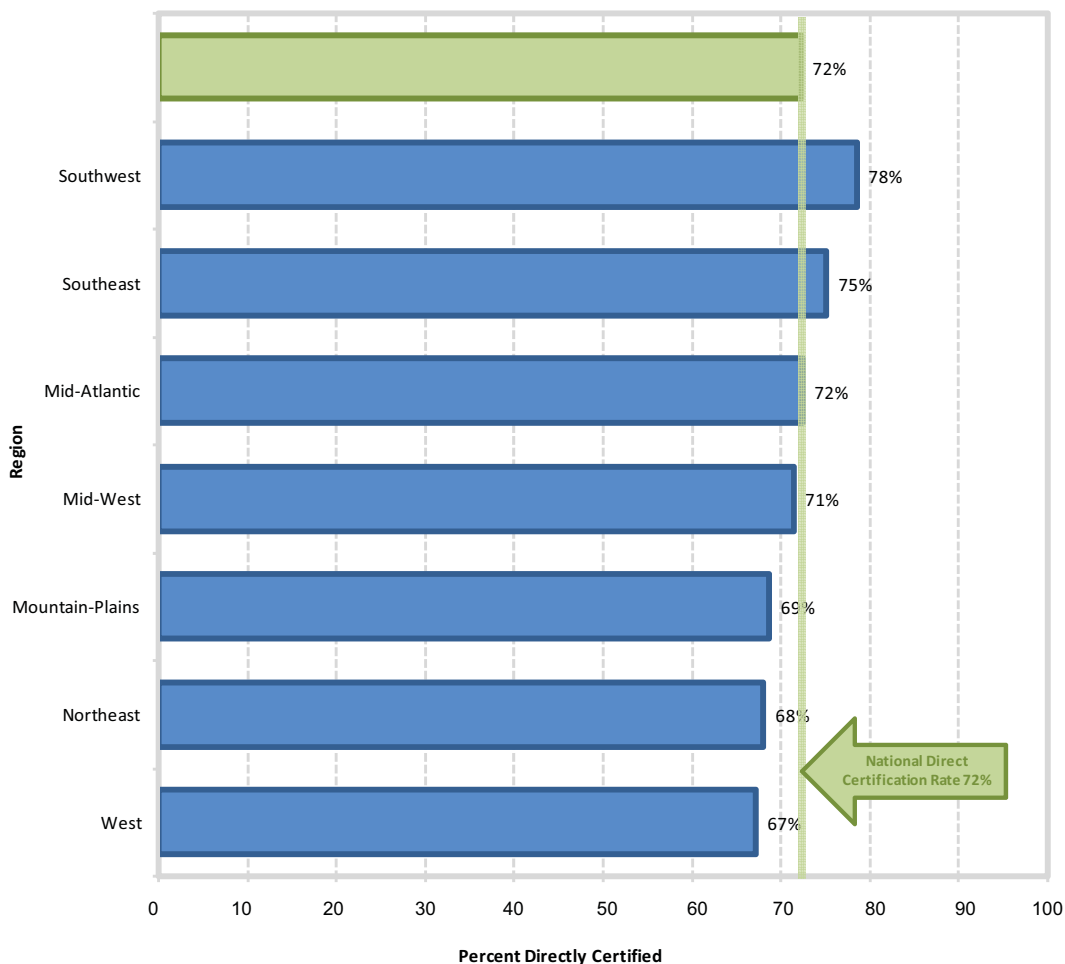
²⁷The percentages in Figure 5 are equal to the ratio of directly certified students, and other free-eligible students whose applications are not subject to verification, to all SNAP-participant school-age children. Figures above 100 percent can be explained, in part, by the fact that many LEAs directly certify TANF and FDPIR participants in addition to SNAP-participant students. TANF and FDPIR students are included in the numerator of this computation, although the denominator includes only SNAP participants. See Appendix C and Appendix D for a discussion of data sources and data limitations.

With this year's report, FNS refined its estimate of SNAP-participant children in nonbase year Provision 2 and Provision 3 schools. That change has had a modest effect on the overall direct certification rate of a handful of States.

Figure 6 uses the same measure as Figure 5 to examine regional differences in direct certification effectiveness. The seven regions shown in Figure 6 are those defined for FNS administrative purposes.²⁸ States and LEAs in the Southwest and Southeast regions tended to outperform those in other parts of the country. Note that the regional measurements in Figure 6 are not simple averages of the State scores from Figure 5. Instead, the regional percentages reflect the relative size of the States in the regions.

A different presentation of regional differences in direct certification performance is given in Appendix A, Figure A-2. Figure A-2 confirms the existence of limited regional differences in State performance, but it also highlights the fact that successful State systems are located in every part of the country.

Figure 6
Percent of School-Age SNAP-Participant Children Directly Certified for Free School Meals
by Region in SY 2009–2010



²⁸ See table A-4 for a listing of States by FNS administrative region.

Figure 7 compares SY 2009–2010 State-level measures of direct certification effectiveness (from Figure 5) to the same measures computed with SY 2008–2009 data. States near the top of Figure 7 achieved the largest percentage point growth in the share of SNAP-participant children who were directly certified for free school meals. Among the top five States in direct certification improvement are two, Illinois and Idaho, that replaced letter-based methods in SY 2009–2010 with computer match systems.²⁹

Like the numeric values in Figure 5, the values in Figure 7 are best viewed as relative measures between States rather than absolute measures of improved direct certification performance across years.³⁰

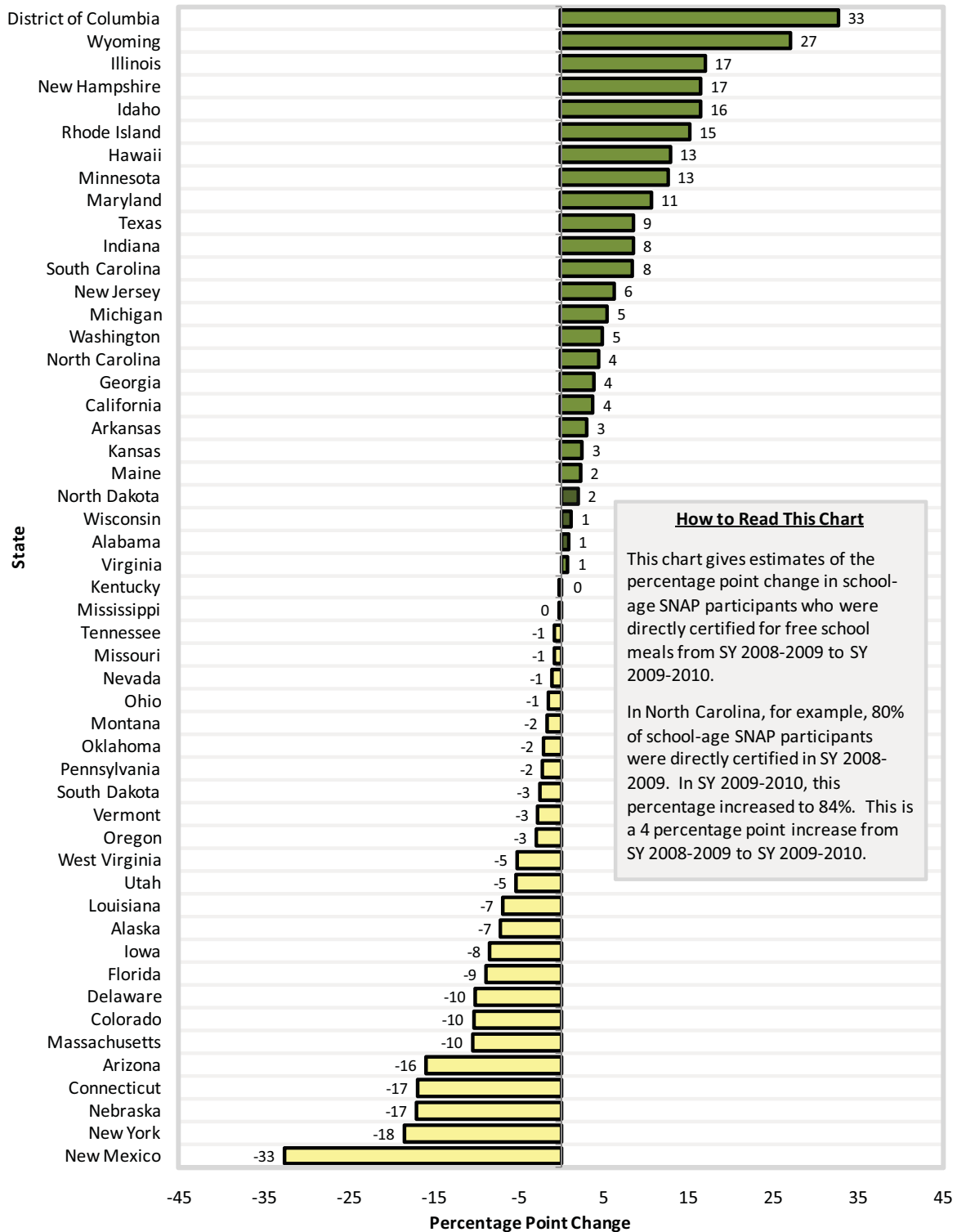
²⁹ Illinois replaced its letter system over a two-year period. In SY 2008–2009, the Illinois Board of Education piloted its computer match system in the State’s largest districts. In SY 2009–2010 the new system was rolled out to the remaining districts. Highlighting the effectiveness of a computer match system relative to the letter method, Illinois ranked among the five most improved States with each partial step in the implementation of its new system.

The improved performance of the District of Columbia is due, in large part, to the late implementation of direct certification by most private schools and public charter schools. Compare the SY 2008–2009 and SY 2009–2010 entries for the District of Columbia in Table 1.

Rhode Island’s growth is due in part to incomplete reporting for SY 2008–2009.

³⁰ See Appendix C for a discussion of the uncertainty surrounding this report’s estimates of SNAP participant counts at the start of the school year.

Figure 7
Percentage Point Change in the Share of SNAP-Participant Children Directly Certified for Free School Meals SY 2008–2009 to SY 2009–2010³¹



³¹Some of the State figures, particularly those at the bottom of Figure 7, are affected by LEA and State reporting error.

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

The measure starts with the number of students whose eligibility for free school meals is not subject to verification. This is the same proxy measure of directly certified SNAP participants used above. Added to this are the students whose approval for free school meals is based on the household's submission of a SNAP, TANF, or FDPIR case number on an NSLP application.³² The sum of these two numbers is the population of students who are recognized by LEAs as categorically eligible for free school meals.³³ This number excludes children who are not identified as categorically eligible, but may nevertheless be found income eligible by application. (These two measures comprise the numerator in the equation below.)

This count of children identified as categorically eligible for free meals is divided by an estimate of the combined SNAP, TANF, and FDPIR populations. The SNAP population estimate used here is the same one used in the performance measure developed above. The number of children in households that receive TANF but not SNAP benefits is estimated from data found in the U.S. Census Bureau's American Community Survey.³⁴ The number of children who receive FDPIR benefits is estimated from FNS program and survey data.³⁵

Details of this computation are summarized in the following equation. The two statistics in the numerator, and the sum of the values in the denominator, are given for each State in Table 3. Figure 8 displays the same data graphically.

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

³² All of this information is taken, as above, from LEA VSRs.

³³ 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.

³⁴ U.S. Census Bureau. See Appendix D for a discussion of data limitations. No adjustment is made for TANF (or FDPIR) participants who are not SNAP participants and who attend nonbase year Provision 2 or Provision 3 schools.

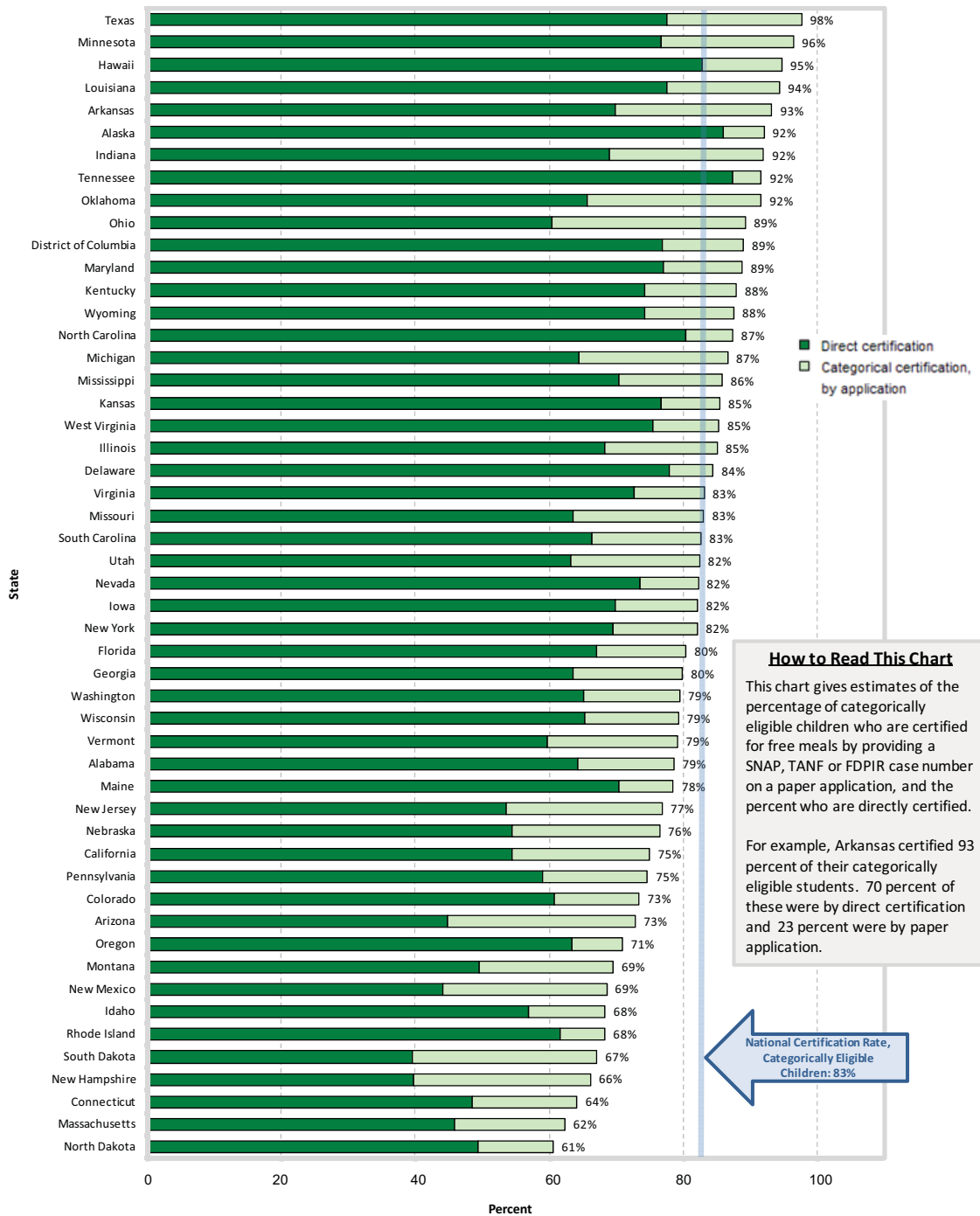
³⁵ The FDPIR population survey is discussed in Usher, et al. (1990). See Appendix D for a discussion of data limitations. Note that FDPIR households may not simultaneously participate in SNAP. No adjustment is made for FDPIR (or TANF) participants who attend nonbase year Provision 2 or Provision 3 schools.

Table 3
Categorically Eligible Students, Number Directly Certified,
and Number Approved by Application SY 2009–2010 (thousands)

State	Categorically Eligible Students	Directly Certified	Approved by Application
Alabama	278.1	178.7	39.9
Alaska	26.0	22.4	1.6
Arizona	329.3	147.6	92.1
Arkansas	131.2	91.6	30.7
California	1,293.5	703.5	265.6
Colorado	142.6	86.7	18.0
Connecticut	79.8	38.6	12.5
Delaware	39.7	30.9	2.6
District of Columbia	33.0	25.3	4.0
Florida	732.5	491.0	97.8
Georgia	480.5	305.3	78.4
Hawaii	38.6	31.9	4.6
Idaho	62.0	35.3	7.1
Illinois	552.9	377.5	92.7
Indiana	249.4	171.9	57.4
Iowa	104.7	73.1	12.9
Kansas	82.9	63.5	7.3
Kentucky	239.1	177.5	32.7
Louisiana	268.1	207.8	45.1
Maine	64.8	45.6	5.3
Maryland	177.8	136.9	20.9
Massachusetts	214.9	98.6	35.2
Michigan	504.3	325.0	111.7
Minnesota	140.2	107.5	27.7
Mississippi	183.1	128.7	28.3
Missouri	277.1	175.8	54.3
Montana	28.4	14.1	5.7
Nebraska	52.5	28.5	11.6
Nevada	82.7	60.8	7.2
New Hampshire	29.0	11.5	7.7
New Jersey	201.6	107.9	46.9
New Mexico	74.7	32.9	18.3
New York	626.5	435.1	79.0
North Carolina	436.4	350.4	30.8
North Dakota	18.1	8.9	2.0
Ohio	463.9	280.1	134.0
Oklahoma	191.2	125.6	49.5
Oregon	182.7	115.7	13.9
Pennsylvania	378.4	223.1	59.2
Rhode Island	40.4	24.8	2.7
South Carolina	245.9	163.1	40.0
South Dakota	24.0	9.5	6.6
Tennessee	382.4	333.9	16.5
Texas	981.3	760.4	197.8
Utah	81.8	51.6	15.7
Vermont	23.8	14.2	4.6
Virginia	240.0	174.4	24.9
Washington	280.1	182.2	40.3
West Virginia	97.2	73.2	9.6
Wisconsin	232.3	151.5	32.5
Wyoming	10.3	7.6	1.4
U.S. Total	12,132	8,020	2,045

The nine States at the top of Figure 8 certified at least 90 percent of students who were categorically eligible for free meals based on their participation in SNAP, TANF, or FDPIR. States at the bottom of Figure 8 are the least successful at identifying and certifying these children.³⁶

Figure 8
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2009–2010



³⁶ See Appendix Figures A-2 through A-5 for U.S. maps providing a geographic view of these State estimates.

V. Direct Certification Best Practices

The 2008 Farm Bill requires a discussion of best practices among States with the most successful direct certification programs or programs that are most improved from the previous school year. To fulfill this requirement, the Food and Nutrition Service (FNS) contracted with Mathematica Policy Research to conduct interviews with child nutrition administrators and direct certification experts, and host a roundtable discussion among FNS, Mathematica, and child nutrition officials from several States with successful direct certification programs.

Successful direct certification programs were identified as those with either (1) the highest percentage of eligible children directly certified during school year (SY) 2009–2010 or (2) the largest improvement in the percentage of eligible children directly certified compared with the previous school year. Rates of direct certification were based on data from Verification Summary Reports which contain information on enrollment, application, and eligibility as well as the results of the verification process. FNS used the number of children approved as “free eligibles” who are not subject to verification as a proxy for the number of students directly certified. From among the States with successful direct certification programs, those selected for this review met two additional criteria: they were not included in the review published last year and they provided geographic variation.

Six States participated in interviews for this review: Idaho, Illinois, Maryland, Minnesota, North Carolina, and Wyoming. Five of these States participated in the roundtable discussion. Maryland, Minnesota, North Carolina, and Wyoming are among the top States in direct certification effectiveness; of these, Minnesota, Maryland, and Wyoming are also among the most improved States for SY 2009–2010. Respectively, Illinois and Idaho showed the third- and fourth-highest improvement in direct certification effectiveness in SY 2009–2010 compared with the prior school year, though both States are close to the national average in the percentage of eligible children directly certified.

Two experts on direct certification information technology provided their perspectives on best practices. One is an operations manager at PCS, a point-of-sale food service software vendor that has implemented a new software tool to help LEAs identify children who might be eligible for extended categorical eligibility. The other expert we interviewed is a contractor who helped to design and develop Idaho’s electronic direct certification system.

The remainder of this chapter includes: a description of State practices in Section A; recent and planned strategies for improving direct certification in Section B; best practices in implementing direct certification systems in Section C; and best practices in extending categorical eligibility to additional children in a household in Section D.

**Table 4
Characteristics of the Direct Certification Matching Process for Public LEAs in Select States, SY 2009–2010**

State	Who Performs the Direct Certification Match?	How Does Direct Certification Work?	Approach for Unmatched Students?	Frequency of Direct Certification	Web-Based Lookup?
Idaho	State	The State matches statewide SNAP/TANF data to LEA student enrollment databases and distributes match results to LEAs via its Web site through data files and/or PDF files.	Yes	SNAP/TANF data updated nightly; LEAs select match frequency (some match annually, others match biweekly)	Yes
Illinois	State	The State matches statewide SNAP/TANF data to the State student enrollment database and distributes match results to LEAs via its Web site through data files and/or PDF files.	Yes	Annually; implemented monthly matching in SY 2010–2011	Yes
Minnesota	State	The State matches statewide SNAP/TANF data to the State student enrollment database and distributes match results to LEAs via its Web site through data files and/or PDF files.	No	Four times per year (July, October, November, and February)	No
Maryland	Districts	LEAs obtain SNAP/TANF data for their county from the State Web site and match these data to their enrollment database.	No	Twice per year; implemented bimonthly matches for SY 2010–2011	No
North Carolina	State	The State matches statewide SNAP/TANF data to the State student enrollment database and distributes match results to LEAs via FTP transfer.	Yes	Monthly; implemented daily matching in SY 2010–2011; LEAs select frequency of downloads	Yes
Wyoming	Districts	LEAs obtained direct certification letters directly from the State and matched these data to their enrollment databases. In SY 2010–2011, LEAs receive direct certification letters electronically through a secure Web site and can search for individual students.	No	Annually	No (Implemented in SY 2010–2011)

LEA = Local education agency; SNAP = Supplemental Nutrition Assistance Program; TANF = Temporary Assistance for Needy Families.

A. Description of State Practices

The primary goal of direct certification is to identify children in SNAP-participant households and certify them as eligible for free school meals without application. States may also use information about children enrolled in qualifying Temporary Assistance for Needy Families (TANF) programs, where available.³⁷ Methods for direct certification have evolved over time. Prior research has documented the prevalence of three main methods for direct certification: (1) centralized, State-level matching, whereby a State agency uses computer matching to link SNAP records with student enrollment records and distributes match results to LEAs; (2) district-level matching, whereby a State agency distributes SNAP data to LEAs and LEAs match these data with student enrollment; and (3) letter method, whereby a State agency or LEA sends letters to SNAP-participant households, and households take the letter to their school in lieu of a school meal benefit application.³⁸

There is considerable variation in methods of direct certification, even among States with successful programs. Our review of State systems is similar to the review conducted last year, focusing on six key questions about direct certification:

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

This year we also asked surveyed States about two additional issues: (1) methods to extend categorical eligibility to additional children in a household (see footnote 5) and (2) challenges, if any, from increases in SNAP caseloads.

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

Centralized or District-Level Matching

Four of the States included in this review use a centralized matching process: Idaho, Illinois, Minnesota, and North Carolina. The remaining two States, Maryland and Wyoming, use district-level matching. The key distinctions between centralized and district-level matching are:

³⁷ TANF information can be used for direct certification of children for free school meals only in States with TANF income eligibility criteria comparable with or more restrictive than those in effect on June 1, 1995, (P.L. 104-193) when the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) replaced AFDC with TANF.

³⁸ Cole and Logan (2007).

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

One important difference between these methods is that a centralized match uses statewide SNAP/TANF data, whereas a district-level match is limited to SNAP/TANF data for a single county or district. District-level matching with SNAP/TANF data for a single jurisdiction is more limiting in a State with small school districts in which student mobility is more likely to be across rather than within district boundaries.

The four States that use centralized matching each have numerous, relatively small school districts that do not coincide with county boundaries. Illinois has more than 800 public LEAs, Minnesota has more than 400, and both Idaho and North Carolina have more than 100. In these States it would be difficult to divide the statewide file of SNAP/TANF children into files that correspond to individual LEAs. It would also be burdensome for all LEAs to develop and implement a matching process due to staffing or other resource constraints. These States cited the gains in efficiency and accuracy of a centralized match.

The electronic matching and online data distribution systems in Idaho and Illinois were introduced for the first time in SY 2009–2010, and the large improvements in direct certification in these States were attributed to the new systems. North Carolina introduced a centralized matching system in SY 2008–2009 and improved it in SY 2009–2010 by implementing a file transfer protocol (FTP) system for distributing match results (replacing physical distribution of CD-ROMs). The Minnesota system has been in place since the late 1990s. In SY 2007–2008 Minnesota augmented the single annual match with a second match in October, and in SY 2009–2010, two additional matches were added in November and February.

District-level matching is used in Maryland and Wyoming. Maryland has only 24 large school districts, all of which have the technological capabilities to implement electronic data matching using district-specific SNAP data provided to them by the State. Wyoming has 45 public LEAs and used a manual (nonelectronic) district-level matching protocol. In SY 2009–2010, Wyoming State officials manually sorted direct certification letters addressed to SNAP households and distributed the letters to LEAs. Wyoming improved the sorting protocol in SY 2009–2010 and subsequently introduced a new electronic system for distributing SNAP data to LEAs in SY 2010–2011.

The Matching Process: Algorithms and Identifiers

In SY 2009–2010, five of the six States in this review used electronic matching algorithms; Wyoming used a paper-based method for district-level matching. All five States with electronic systems used students' names (first and last) and dates of birth as identifiers in the

direct certification matching process. Three of the five States reported using Social Security numbers (SSNs) for matching when available on student records. In the remainder of this section we describe, separately for centralized and district-level approaches, the matching process, identifiers, and geographic level of data used to form the match.

a. Matching Process for States with Centralized Matching

In Idaho, Illinois, North Carolina, and Minnesota, the centralized match of SNAP/TANF data to student records is conducted by the respective State departments of education using software developed, at least in part, with internal department resources. Three States—Illinois, Minnesota, and North Carolina—use statewide SNAP/TANF data and statewide student enrollment data files for the matching process.³⁹ In Idaho, each LEA is responsible for uploading a separate, district-level student enrollment file that is then matched on the statewide SNAP/TANF data file.

All four States using centralized matching emphasized the importance of strong, in-house programming and information technology resources in developing their matching system. States vary considerably in the criteria used in assigning matches, as shown in Table 5. Minnesota requires an exact match on a student’s date of birth (DOB) and gender, but allows approximate matches on names using the first characters of the last name and the first three characters of the first name; SSN was used in the matching algorithm until 3 years ago when it was no longer included in student enrollment files.

Illinois’ match process uses only DOB, first name, last name, and gender. The direct certification results provided to LEAs include the data elements used for the match, an indicator of exact versus close matches, the SNAP/TANF case number, and complete address information. LEAs are responsible for reviewing all matches to determine if students on the list are enrolled in their district.

In North Carolina, the matching algorithm is based on DOB, SSN (if available), a unique statewide student identification number, last name, first three letters of the first name, and zip code. The matching algorithm is sequential: the first round of matching requires exact matches on date of birth and SSN; later runs incorporate the remaining data fields for only the students who were not matched on earlier runs.

Of the interviewed States, Idaho uses the most data elements and the most sophisticated matching algorithm. LEAs may provide up to 29 data elements, including those shown in Table 5. Additional data elements are student nickname; parent/guardian SSN, address, and telephone; and information about a second caregiver. The State identifies four types of matches:

1. SSN match: exact match on SSN, confirmed by an exact match on student first name or DOB
2. Case number match: exact match on SNAP/TANF case number, student first name, and DOB (confirming that middle names are nonconflicting)

³⁹ LEAs in Illinois have the option to upload district enrollment files for a match.

3. Name and DOB: exact match on student first name, last name, and date of birth, plus exact match of one of the following: city, zip code, caregiver first name, or caregiver SSN
4. Significant data match: all records not matched by the previously described methods 1 through 3 receive a weighted score based on the quality of the match, with some data fields, such as SSN, receiving higher weights than others; students with very high matching scores are identified as significant data matches; those with lower scores are classified as potential matches and flagged for further LEA investigation.

Table 5
Primary Matching Criteria for States That Use Centralized Matching

	Minnesota ^a	Idaho ^b	Illinois ^c	North Carolina ^d
First Name	○	○	○	○
Last Name	○	○	○	○
Middle Initial		○		
Date of Birth	●	○	○	●
Gender	●	○	○	
Social Security Number		○		●
Address		○		
Zip Code		○		○
Telephone Number		○		
Parents' Names		○		
SNAP Case Number		○		○

Notes: ○Indicates an exact match is not required for the given field.
 ●Indicates an exact match is required for the given field.
 Absence of symbol indicates that criterion is not used or not available.

^aMinnesota uses a two-step match process, with the majority of matches occurring on the first iteration: (1) full first name, full last name, DOB, and gender; and (2) first three letters of first name, first four letters of last name, DOB, and gender.

^bIdaho LEAs upload district student enrollment data which the State matches against a centralized SNAP data file. LEAs may include up to 29 data elements for the match, including information on up to two caregivers. Inexact matches receive a weighted score based on the completeness of the match on the included data items; certain data fields, such as SSN, receive higher weights than others. Inexact matches above a certain score threshold are sent to LEAs for further investigation.

^cIllinois sends close, but inexact, matches to LEAs for further investigation.

^dNorth Carolina uses a sequential procedure: the first set of matches requires an exact match on date of birth and SSN; subsequent iterations incorporate the remaining data fields. Close, but inexact, matches are sent to LEAs for further investigation.

b. Matching Process for States with District-level Matching

Maryland and Wyoming provide SNAP enrollment information to LEAs, who are then responsible for conducting direct certification matching. The direct certification data available to LEAs in these States is summarized in Table 6. Maryland provides LEAs with an electronic file of children enrolled in both SNAP and TANF. In SY 2009–2010, Wyoming provided LEAs with printed letters to households enrolled in SNAP to be used in manual matching.

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

	Maryland	Wyoming
File allows for computerized matching?	√	—
TANF participation provided?	√	—
Social Security number	√	—
First name	√	√
Last name	√	√
Date of birth	√	√
Address	√	√

TANF = Temporary Assistance for Needy Families.

√ = yes; — = no.

One of the challenges of district-level matching is the distribution of SNAP/TANF data to the correct LEA. This is a challenge because a child enrolled in SNAP cannot be directly certified if his or her SNAP record is distributed to the wrong LEA. Maryland’s school districts are contiguous with county boundaries, enabling the State to distribute SNAP/TANF data based on the county indicated in the SNAP/TANF file. In SY 2009–2010, Wyoming distributed SNAP letters to districts based on the city or town of residence.⁴⁰

Maryland provides LEAs with a data file containing the following identifiers for SNAP/TANF children: first and last name, DOB, address, and SSN. Although each LEA uses its own software in the matching process, the State requires all LEAs to match on at least three data fields. In Wyoming, in SY 2009–2010, LEAs received a printed list of district SNAP beneficiaries in the form of printed direct certification letters for SNAP beneficiary households. After receiving the printed letters, LEAs have discretion over which information to use in verifying eligibility and mailing the direct certification letters to households.

⁴⁰ Wyoming indicated that before SY 2009–2010, letters were distributed to districts based on zip code. This created potential problems because some zip code areas cover multiple school districts.

Methods to Directly Certify Unmatched SNAP/TANF Children

Idaho, Illinois, and North Carolina have procedures designed to improve direct certification rates above their initial match rates. All three States distribute additional data to LEAs regarding students who did not receive perfect matches, but whose records were sufficiently close to matching to be classified as potential matches. LEAs are then responsible for investigating the potential matches to determine if those students are eligible for direct certification. In these cases LEAs have final discretion over how to verify eligibility and determine which potential matches will be directly certified.

None of the States interviewed for this review have measures in place to attempt direct certification of children listed on SNAP or TANF files, but not matched (exact or potential) to student enrollment lists.

Frequency of Match

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

A single direct certification match performed near the beginning of a new school year only enables States to directly certify children who are eligible before the beginning of the school year. By providing updates of new SNAP or TANF recipients, States can identify and directly certify students who become eligible at other points during the school year, making direct certification a more continuous and dynamic process.

In States with district-level matching, SNAP/TANF data are provided to districts biannually in Maryland (although the system will switch to bimonthly matching in SY 2010–2011), and annually in Wyoming. Following the initial distribution of full SNAP/TANF enrollment data to LEAs prior to the beginning of the school year, Maryland's updates to the SNAP/TANF data include only newly enrolled SNAP/TANF children who were not in the initial files.

In States with centralized matching, the frequency of direct certification matching varies. In SY 2009–2010 Idaho, Minnesota, and North Carolina provided multiple matches and Illinois provided one annual match. For SY 2010–2011 all four States provide additional matches after the first match before the start of the school year, using records for newly enrolled SNAP/TANF children. Thus, LEAs receive updates that include only new direct certifications. In Idaho, SNAP/TANF data is updated on a nightly basis and LEAs are given discretion about how often to upload district data for matching (some LEAs do so biweekly). Illinois plans to conduct monthly matches in SY2010–2011. Minnesota provides updates four times per year. North Carolina provided monthly updates in SY 2009–2010 and plans to make daily match results available to LEAs in SY 2010–2011.

Individual Student Lookup

The centralized and district-level matching described in this review are generally based on certifying batch-files of student data. LEAs receive and locally match files containing records of children enrolled in SNAP/TANF (Maryland and Wyoming); receive results of a state-level match of SNAP/TANF records with student enrollment records (Minnesota); or receive a mix of exact state-level match results and potential but inexact matches (Idaho, Illinois, and North Carolina).

Three States (Idaho, Illinois, and North Carolina) also developed a centralized web-based direct certification lookup tool for individual students to complement their file-based direct certification procedures. The lookup tool enables LEAs to search for a single student (or several students) in the SNAP/TANF data file by entering the student's name and other identifiers in a web-based form. All three States make the lookup tool available to private and charter schools, and the tool can be used by public LEAs to directly certify transfer students or to obtain information on children who could not initially be matched.

Direct Certification Process for Nonpublic and Charter Schools

Nonpublic and charter schools present special challenges for the direct certification process. Both private and charter schools are schools of choice, often without defined enrollment areas for prospective students. They are also generally smaller entities, compared with public school districts. In addition, nonpublic schools do not receive public funding and are not subject to the same reporting requirements applicable to public schools. Charter schools may either establish themselves as an independent reporting agency or be affiliated with an LEA, which acts as an authorizing agency for reporting purposes.

In States with centralized matching systems using statewide enrollment data (Illinois, Minnesota, and North Carolina) charter school students are included in the match but private school students are not. In Idaho, where district-level enrollment files are matched on statewide SNAP/TANF data, charter schools must submit their student enrollment data separately into the centralized system for matching.

Across all four interviewed States with centralized systems, nonpublic school students are not included in the statewide match because the States do not have those student records. Three of these States have developed alternative methods of direct certification for nonpublic schools (see Table 7). As described earlier, Idaho, Illinois, and North Carolina provide a web-based lookup system that nonpublic schools can use to search the statewide SNAP/TANF database for individual students. In addition to the lookup, these three States also provide nonpublic schools with the option of uploading their enrollment data into the centralized system and receiving a matched student report in the same format as the reports provided to LEAs. Minnesota does not provide nonpublic schools with access to its electronic matching system at this time, although it plans to do so in future years.

States using district-level matching (Maryland and Wyoming) vary in their approaches to nonpublic and charter schools. Wyoming provides SNAP enrollment information to public LEAs and encourages them to coordinate with nonpublic schools located in the district to obtain enrollment rosters for manual matching. Maryland provides direct certification data to private and charter schools through a centralized procedure that does not involve LEAs. The State requires nonpublic schools to submit enrollment data electronically to the State Department of Education. That data is then forwarded to Maryland’s State Department of Human Resources where the State’s SNAP Program office matches the nonpublic school data against statewide SNAP/TANF data and prepares match results files for nonpublic schools. State officials report that implementing this separate, state-level process for nonpublic schools is administratively burdensome. However, all Maryland private schools completed direct certification using these procedures in SY 2009–2010.

Table 7
Direct Certification Methods for Nonpublic Schools

State	Direct Certification Process for Nonpublic Schools (NPS)
Idaho	NPS have access to the statewide online data system and participate in direct certification in the same manner as LEAs. NPS are required to upload enrollment data into the statewide system for matching at least once per year.
Illinois	NPS have access to the statewide online data system and can either use the individual student lookup feature or upload a spreadsheet with data fields filled out for all enrolled students and receive a direct certification match report.
Maryland	NPS prepare and submit a spreadsheet with data fields filled out for all enrolled students and submit the data to the State Department of Education. The file is then forwarded to the State Department of Human Resources where SNAP staff complete the direct certification match list sent back to NPS.
Minnesota	NPS do not have access to the statewide data system currently and as a result they do not participate in direct certification. In future years, the State plans to incorporate NPS data in the statewide system for direct certification.
North Carolina	NPS have access to the statewide FTP data system and can use it to upload a spreadsheet with data fields filled out for all enrolled students. The system matches the enrollment data against SNAP/TANF data and prepares a file of matched students.
Wyoming	LEAs request student rosters from NPS located in the district and match NPS students to the list of district SNAP enrollees who were not matched in public schools.

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

B. Recent and Planned Strategies for Improving Direct Certification

Effective and/or improved direct certification systems characterize the States selected for this review. Five of the six States interviewed for this review (Idaho, Illinois, Maryland, Minnesota, and Wyoming) were among the top seven States nationwide in terms of improvements in the percentages of children directly certified. These States indicated that improvements can be linked to the following changes in the direct certification process:

- Both Idaho and Illinois introduced a new electronic centralized match system in SY 2009–2010. In previous years both States had used the letter method.
- Maryland attributes much of its improved match rate to a statewide anti-hunger initiative led by the Governor. State officials believe this initiative might have led LEA staff to apply more attention and resources to direct certification. School districts in Maryland were also given the opportunity to implement a second round of matching, although this additional round of matching was conducted too late in the year to affect the direct certification performance measure used in this report.
- Minnesota acted quickly to incorporate a new mandate extending categorical eligibility to all members of a SNAP/TANF household, which might have improved its direct certification rate. The new mandate was incorporated into the State's forms and procedures in time for SY 2009–2010. Among these changes was a revision to the direct certification notification letter that provides instructions on how to report additional household members to the district. Minnesota also added an additional round of matching for SY 2009–2010, although this additional matching was conducted too late in the year to affect the direct certification performance measure used in this report.
- Wyoming experienced a change in the staff responsible for direct certification at the State level. This corresponded with an increased emphasis on improving the direct certification process. One key change was to match SNAP children to districts based on town rather than zip code. This was done because town boundaries are more likely to fall entirely within district boundaries than are zip codes. The State also distributed direct certification information to LEAs earlier than in prior years and included Team Nutrition information in the mailing to ensure its delivery to the school foodservice staff.

Future Improvements

Most States included in this review have made or are planning changes to the direct certification systems used in SY 2009–2010. As a result, they anticipate additional improvement in direct certification rates documented in this report:

- Illinois has implemented a monthly match for SY 2010–2011.
- Maryland plans to provide districts with records of newly enrolled SNAP and TANF beneficiaries every other month during SY 2010–2011.
- Minnesota plans to make changes that incorporate nonpublic schools more fully into its direct certification system.
- North Carolina has implemented a daily match for SY 2010–2011.
- Wyoming has introduced a new electronic system for organizing and distributing SNAP data to LEAs for district-level matching in SY 2010–2011.

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

C. Best Practices in Implementation of Direct Certification Systems

Each of the States selected for this review has demonstrated a successful direct certification system. Although earlier sections of the review described key features of these systems, it is also useful to examine the implementation of these systems and the resources required for their development. Table 8 describes some of the key implementation and development features for the systems used by States included in this review.

A key feature of successful direct certification may be the presence of an electronic system for matching (in the case of States using centralized matching) or an electronic system for distributing SNAP/TANF files (in the case of States using district-level matching). Five of the six States interviewed for this review had electronic systems in place for SY 2009–2010 and all six had them in place for SY 2010–2011 (Table 8). At the direct certification roundtable held as a part of this review, several States remarked that their electronic systems allowed them to respond effectively to the large increases in SNAP caseloads that have accompanied the recent economic downturn. Moreover, as noted in the previous section, two of the interviewed States that were among the most improved States nationwide in terms of direct certification rate (Idaho and Illinois) had implemented new electronic centralized matching systems for SY 2009–2010 after having used the letter method in previous years. Officials in both States readily attributed their improvements in direct certification to the implementation of the new electronic systems.

Table 8
Implementation Features of Direct Certification Systems in Select States

State	First Use of Electronic System	Method for System Development	Implementation Features
Idaho	SY 2009–2010	Contractor	System improvements were partially funded with a FNS grant and took advantage of a new system developed to track TANF caseloads simultaneously.
Illinois	SY 2009–2010	Department staff	Illinois closely modeled its system on the direct certification matching system used in Indiana. State officials in Illinois spoke with Indiana officials on multiple occasions and modeled almost all of their system features on the functionality of the Indiana electronic matching system.
Maryland	Late 1990s	Department staff	The system was designed to accommodate the fact that districts employ different methods in conducting district-level matching.
Minnesota	Late 1990s	Department staff	The State was among the first to develop an electronic centralized matching system. This system has changed little over time.
North Carolina	SY 2008–2009	Combination of department staff and contractors	The State estimates that the system cost \$500,000 to develop and \$40,000 to maintain annually.
Wyoming	SY 2010–2011	Contractor	The system, developed with partial funding from an FNS grant, allows for electronic distribution and individual student lookup, but not electronic merging.

Although presence of an electronic system might be a common element of the direct certification systems used by the States interviewed for this report, the manner in which these systems were developed varies a great deal. For example, Illinois based its electronic centralized matching system largely on the system used by Indiana. Illinois program staff developed their system in house, but made use of close consultation with Indiana officials. Idaho also consulted with nearby States about their direct certification procedures, but decided that these other systems did

not closely match its needs. As a result, Idaho elected to develop a new system using an independent contractor.

To develop more insight into the process of developing a direct certification matching system, we interviewed a contractor hired to help design and develop Idaho's electronic direct certification system. He cited the importance of the clear set of requirements provided by the Idaho nutrition staff as contributing to the success of the project. These requirements included:

- Ability to accommodate nightly downloads of SNAP and TANF data,
- Ability to accommodate a set of districts with diverse technological and data reporting capabilities,
- A system for providing districts with a set of potential, but not exact, matches to examine more closely, and
- Batch-file and individual lookup capabilities.

A high degree of customization was built into Idaho's system in order to meet these requirements and to be responsive to the characteristics of Idaho's LEAs and student population. For example, LEAs must upload data for matching, and the upload specifications include a rich set of optional data fields that can be used in establishing matches. This feature makes use of the more comprehensive set of data available for students in large districts, while accommodating more limited information systems in smaller districts.

Idaho's direct certification system was also highly customized to maximize the number of matches and accuracy of matches. As previously described, LEAs can include up to 29 data elements in the student enrollment file that they upload for matching. The State matching system implements three types of matches that each relies on an exact match of primary identifiers and additional confirming information: SSN match, case number match, and name and date of birth match. A fourth type of match (significant data match) evaluates matches using multiple data elements, phonetic representations of names, and allowance for transposed date fields.

Although many other States incorporate phonetic matches and transposed date fields in their matching algorithms, Idaho's system is unique in two respects. First, it includes a scoring system for evaluating match results so that matches for different students can be made on the basis of different data elements. Second, Idaho built a custom algorithm for phonetic representation of names to account for the characteristics of its specific student population and addressed the inconsistent recording of cultural names, such as Hispanic paternal and maternal surnames. These types of customization underscore the degree to which States might wish to consider their unique needs and the characteristics of their student population when developing direct certification systems.

The design and development of Idaho's new electronic matching system revealed several challenges for direct certification. First, the State had to accommodate a wide variety of districts, in terms of size and capabilities. Idaho met this challenge by building flexibility into the system, particularly with regard to the data used for matching. Second, developers must face the reality

that data entered in two places (SNAP and districts) will often be entered differently, making exact matching prone to missed matches. This challenge was met with algorithms for “similar” matches, and a scoring system to identify possible matches. Third, invalid data might be present in one or more data files (for example, SSNs filled with nines or zeroes) so that developers must understand the data and anticipate problems that can lead to false positive matches.

D. Best Practices in Extending Eligibility to Additional Children in a Household

An issue discussed in detail with States was the set of challenges involved in implementing the new FNS policy “Extending Categorical Eligibility to Additional Children in a Household.” This policy, which was released in August 2009 effective for SY 2009–2010, extends categorical eligibility for free meals to all children in a household receiving assistance from the SNAP, TANF, or the Food Distribution Program on Indian Reservations (FDPIR). Because this policy was released near the beginning of SY 2009–2010, most States interviewed for this review were not able to implement revisions to their direct certification procedures beyond notifying districts of the policy change and providing the districts with technical assistance in interpreting the policy. Several States commented on the large number of questions they received from districts regarding this policy, particularly regarding eligibility in situations in which children change households.

Minnesota was an exception among interviewed States in that it was able to incorporate the new policy into many of its forms and procedures in time for SY 2009–2010. As discussed earlier, among the changes the State considered most important was a revision to the household direct certification notification letter template provided to districts. The new template informed households of the new categorical eligibility rule and provided a means for households to respond immediately to districts with information regarding additional household members who could be directly certified under the new policy.

For SY 2010–2011, all interviewed States have revised their household direct certification notification letter templates in a way similar to Minnesota. In addition, many States have implemented documentation systems that allow direct certification decisions based on the new household eligibility rule to be tracked for recordkeeping and auditing purposes. North Carolina is unique among interviewed States in that it has incorporated the new policy into its centralized matching system. This system flags all students sharing the same address as a child who is directly certified, with flagged children considered as potential direct certification matches. LEAs must contact these households (by letter or telephone) to verify the presence of additional children who can be directly certified under the new rule. This system should increase direct certification rates; however the State is concerned about the additional costs and verification burden that districts might face in correctly interpreting and implementing the new policy.

Although no other interviewed State directly incorporated the new policy into its centralized matching procedures, some States indicated that some districts have enlisted the help of contracted software vendors in complying with the new policy. In order to learn more about this process we interviewed an operations manager at PCS and a food service software vendor

serving LEAs in Minnesota and several other States. PCS developed a software tool to help LEAs identify members of the same household who might be categorically eligible for direct certification.⁴¹ This tool presents districts with lists of potential matches based on students with shared addresses, guardian names, or addresses and guardian names. The results are filtered so that only groupings that contain at least one student who has been directly certified already and at least one student who has not been directly certified are displayed. Districts can then manually check the status of each household member and verify whether members of a household grouping can receive extended certification under the new categorical eligibility policy. The tool enables districts to track students certified under the new policy for recordkeeping and auditing purposes. The PCS operations manager reported that districts using the tool feel that it simplifies compliance with the new policy.

VI. Conclusion

States and LEAs directly certified 1.6 million more children at the start of SY 2009–2010 than they did a year earlier, an increase of 24 percent. That growth was driven in part by a historic increase in SNAP participation.

States and LEAs directly certified an estimated 72 percent of school-age children from SNAP-participant households in SY 2009–2010, a figure roughly comparable to the 71 percent figure estimated for the previous year. With both direct certification and paper applications, States and LEAs certified 83 percent of all categorically eligible SNAP, TANF, and FDPIR children for free school meals in SY 2009–2010; this is down slightly from the 85 percent figure computed for SY 2008–2009.

Despite the challenges of a difficult economy, States and LEAs continued to expand or strengthen their direct certification systems. Eighty-three percent of LEAs directly certified some SNAP-participant children in SY 2009–2010. This is up from just 78 percent in SY 2008–2009. Other States invested in system improvements. Illinois and Idaho, for example, replaced letter-based systems with computer matching; both States were rewarded with double digit gains in their direct certification rates.

States and LEAs continue to find success with different direct certification models. States with the most effective or most improved direct certification systems for SY 2009–2010 include ones that operate centralized matching systems, district-level systems, and the letter method. States and LEAs are making investments in their direct certification systems that promise improved performance in the coming years. These include mandating or facilitating computer matching of student enrollment and SNAP participation lists more frequently than once per year and providing LEAs with web-based lookup systems that allow real-time direct certification of individual students. Finally, SY 2009–2010 was the first year that categorical eligibility was extended to all children in a household if any child in the household received benefits under the SNAP, TANF, or FDPIR Programs. LEA implementation of that policy may prompt some

⁴¹ Minnesota State nutrition officials identified PCS as a software vendor that had developed utilities related to the new eligibility policy.

changes to current direct certification procedures, and may impact direct certification and free certification rates in coming years.

VII. References

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

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

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

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

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

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

Leftin, Joshua (June 2010). Trends in Food Stamp Program Participation Rates: 2000 to 2008, Table A-1. Mathematica Policy Research, Inc. for the Department of Agriculture, Food and Nutrition Service.

<http://www.fns.usda.gov/ora/menu/Published/SNAP/FILES/Participation/Trends2001-2008.pdf>

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

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

<http://www.fns.usda.gov/ORA/MENU/published/CNP/FILES/apecv011.pdf>

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

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

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

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

Trippe, Carole and Jessica Gillooly, (July 2010). *NonCash Categorical Eligibility for SNAP: State Policies and the Number and Characteristics of SNAP Households Categorically Eligible Through Those Policies: Final Memo*. Mathematica Policy Research, Inc. for the Department of Agriculture, Food and Nutrition Service.

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

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

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

Executive Summary and Chapter 1:

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

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

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

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

Wolkwitz, Kari, (September 2007). *Characteristics of Food Stamp Households: Fiscal Year 2006*. Mathematica Policy Research, Inc. for the Department of Agriculture, Food and Nutrition Service,

<http://www.fns.usda.gov/ora/MENU/Published/snap/FILES/Participation/2006Characteristics.pdf>

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

Appendix A – Additional Tables

Table A-1
Number and Percent of LEAs Directly Certifying SNAP Participants:
Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts⁴²
SY 2004–2005 through SY 2006–2007

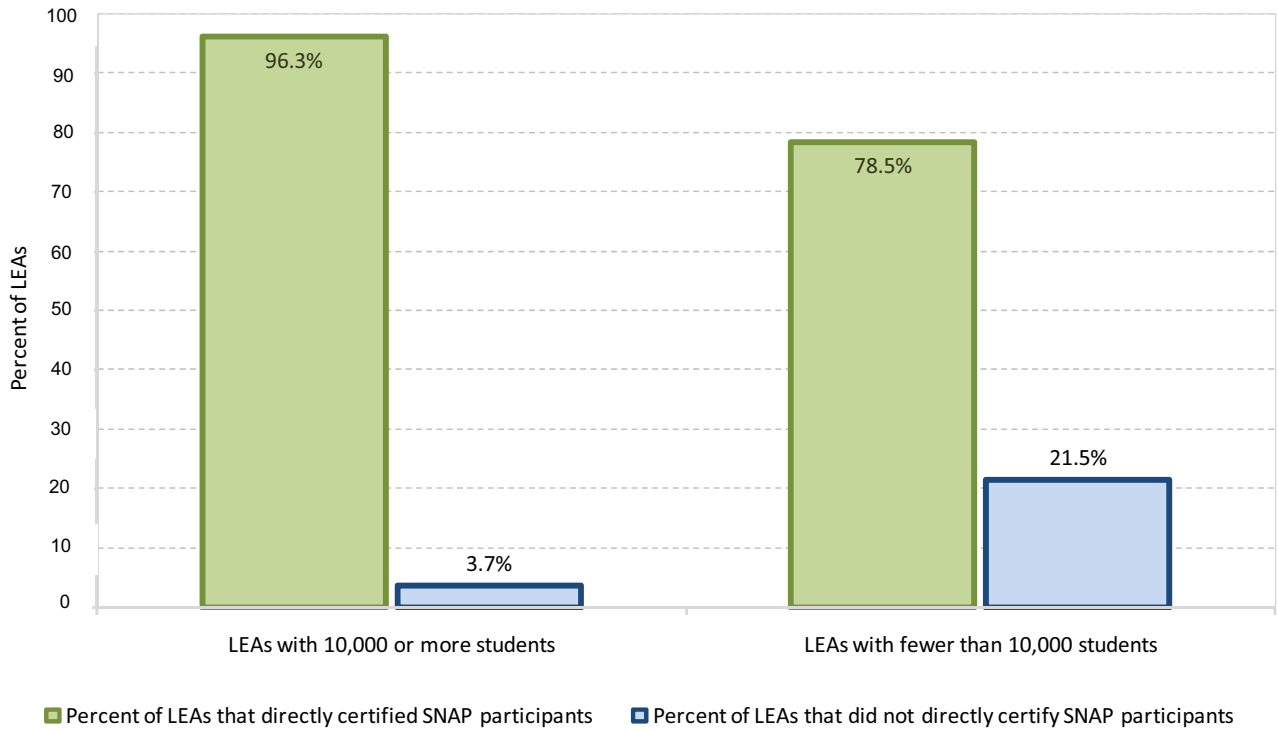
	SY 2004 2005			SY 2005 2006			SY 2006 2007		
	Number of non-Provision 2/3 LEAs	Direct Certification		Number of non-Provision 2/3 LEAs	Direct Certification		Number of non-Provision 2/3 LEAs	Direct Certification	
		Number	Percent		Number	Percent		Number	Percent
US Total	16,389	9,016	55.0%	17,048	10,118	59.4%	17,382	10,747	61.8%
AK	44	33	75.0%	35	34	97.1%	44	40	90.9%
AL	163	62	38.0%	148	87	58.8%	145	93	64.1%
AR	242	238	98.4%	247	1	0.4%	270	245	90.7%
AZ	302	251	83.1%	333	243	73.0%	334	256	76.7%
CA	991	386	39.0%	1,005	441	43.9%	976	470	48.2%
CO	173	39	22.5%	168	68	40.5%	205	78	38.1%
CT	185	146	78.9%	187	148	79.1%	193	161	83.4%
DC	47	1	2.1%	51	4	7.8%	52	2	3.9%
DE	27	22	81.5%	34	28	82.4%	32	28	87.5%
FL	145	74	51.0%	96	62	64.6%	145	88	60.7%
GA	170	154	90.6%	174	157	90.2%	181	164	90.6%
HI	N/A	N/A	N/A	32	18	56.3%	38	20	52.6%
IA	495	338	68.3%	507	371	73.2%	506	382	75.5%
ID	125	97	77.6%	266	218	82.0%	133	106	79.7%
IL	1,035	748	72.3%	1,112	834	75.0%	1,074	838	78.0%
IN	407	73	17.9%	467	105	22.5%	478	143	29.9%
KS	403	314	77.9%	404	333	82.4%	403	335	83.1%
KY	194	125	64.4%	188	141	75.0%	183	148	80.9%
LA	97	56	57.7%	36	34	94.4%	107	92	86.0%
MA	N/A	N/A	N/A	357	216	60.5%	370	232	62.7%
MD	47	29	61.7%	47	29	61.7%	45	30	66.7%
ME	239	193	80.8%	228	194	85.1%	233	201	86.3%
MI	741	331	44.7%	698	349	50.0%	803	449	55.9%
MN	610	392	64.3%	620	387	62.4%	630	413	65.6%
MO	759	450	59.3%	711	476	67.0%	749	490	65.4%
MS	163	73	44.8%	60	35	58.3%	168	118	70.2%
MT	236	130	55.1%	233	159	68.2%	234	177	75.6%
NC	N/A	N/A	N/A	172	117	68.0%	178	133	74.7%
ND	160	126	78.8%	199	153	76.9%	193	142	73.6%
NE	405	239	59.0%	433	313	72.3%	381	290	76.1%
NH	82	57	69.5%	88	65	73.9%	89	60	67.4%
NJ	653	151	23.1%	654	178	27.2%	656	199	30.3%
NM	93	49	52.7%	88	56	63.6%	104	56	53.9%
NV	39	34	87.2%	39	34	87.2%	19	15	79.0%
NY	1,090	791	72.6%	945	780	82.5%	937	752	80.3%
OH	1,090	175	16.1%	1,189	295	24.8%	1,125	219	19.5%
OK	499	214	42.9%	579	288	49.7%	539	299	55.5%
OR	203	164	80.8%	217	168	77.4%	222	175	78.8%
PA	723	367	50.8%	773	455	58.9%	823	498	60.5%
RI	N/A	N/A	N/A	55	47	85.5%	55	50	90.9%
SC	86	85	98.8%	85	83	97.7%	88	84	95.5%
SD	194	90	46.4%	188	88	46.8%	187	93	49.7%
TN	169	132	78.1%	175	154	88.0%	171	144	84.2%
TX	1,198	737	61.5%	1,026	797	77.7%	1,189	839	70.6%
UT	50	44	88.0%	51	48	94.1%	49	45	91.8%
VA	160	136	85.0%	141	138	97.9%	151	138	91.4%
VT	204	186	91.2%	217	200	92.2%	215	201	93.5%
WA	291	214	73.5%	345	260	75.4%	322	252	78.3%
WI	833	168	20.2%	823	138	16.8%	832	172	20.7%
WV	73	54	74.0%	68	54	79.4%	73	55	75.3%
WY	54	48	88.9%	54	37	68.5%	53	37	69.8%

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

Table A-1 (cont.)
Number and Percent of LEAs Directly Certifying SNAP Participants:
Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts
SY 2007-2008 through SY 2009-2010

	SY 2007 2008			SY 2008 2009			SY 2009 2010		
	Number of non-Provision 2/3 LEAs	Direct Certification		Number of non-Provision 2/3 LEAs	Direct Certification		Number of non-Provision 2/3 LEAs	Direct Certification	
		Number	Percent		Number	Percent		Number	Percent
US Total	17,560	11,516	65.6%	17,644	13,692	77.6%	17,886	14,667	82.0%
AK	43	39	90.7%	38	37	97.4%	41	40	97.6%
AL	142	105	73.9%	145	129	89.0%	148	134	90.5%
AR	271	237	87.5%	279	264	94.6%	284	249	87.7%
AZ	338	273	80.8%	359	298	83.0%	406	335	82.5%
CA	980	507	51.7%	982	629	64.1%	1,004	786	78.3%
CO	175	81	46.3%	204	180	88.2%	208	192	92.3%
CT	192	161	83.9%	191	169	88.5%	188	174	92.6%
DC	58	2	3.5%	61	2	3.3%	62	61	98.4%
DE	29	27	93.1%	35	30	85.7%	33	30	90.9%
FL	159	98	61.6%	164	107	65.2%	170	122	71.8%
GA	189	160	84.7%	191	166	86.9%	200	178	89.0%
HI	36	22	61.1%	40	26	65.0%	37	26	70.3%
IA	499	393	78.8%	493	423	85.8%	495	421	85.1%
ID	120	105	87.5%	135	117	86.7%	138	99	71.7%
IL	1,114	903	81.1%	1,112	926	83.3%	1,121	878	78.3%
IN	482	184	38.2%	487	341	70.0%	498	405	81.3%
KS	403	327	81.1%	407	348	85.5%	405	345	85.2%
KY	190	168	88.4%	186	166	89.3%	194	173	89.2%
LA	111	94	84.7%	117	105	89.7%	109	95	87.2%
MA	356	244	68.5%	423	305	72.1%	431	303	70.3%
MD	47	39	83.0%	47	39	83.0%	49	42	85.7%
ME	239	216	90.4%	229	207	90.4%	188	172	91.5%
MI	836	570	68.2%	846	693	81.9%	855	717	83.9%
MN	642	425	66.2%	653	438	67.1%	656	451	68.8%
MO	756	510	67.5%	744	615	82.7%	765	678	88.6%
MS	167	132	79.0%	167	139	83.2%	164	144	87.8%
MT	227	171	75.3%	223	164	73.5%	220	171	77.7%
NC	170	141	82.9%	169	144	85.2%	165	151	91.5%
ND	202	149	73.8%	196	137	69.9%	196	150	76.5%
NE	381	297	78.0%	382	285	74.6%	381	302	79.3%
NH	92	65	70.7%	95	64	67.4%	94	75	79.8%
NJ	658	245	37.2%	661	550	83.2%	677	619	91.4%
NM	106	52	49.1%	67	62	92.5%	104	60	57.7%
NV	20	16	80.0%	19	16	84.2%	18	17	94.4%
NY	963	831	86.3%	950	813	85.6%	987	863	87.4%
OH	1,161	253	21.8%	1,166	739	63.4%	1,181	809	68.5%
OK	540	345	63.9%	530	394	74.3%	538	430	79.9%
OR	232	180	77.6%	229	180	78.6%	238	189	79.4%
PA	834	520	62.4%	852	620	72.8%	850	729	85.8%
RI	53	50	94.3%	32	31	96.9%	54	52	96.3%
SC	87	84	96.6%	96	85	88.5%	93	85	91.4%
SD	184	90	48.9%	179	109	60.9%	173	153	88.4%
TN	168	142	84.5%	167	153	91.6%	165	149	90.3%
TX	1,184	909	76.8%	1,194	1,040	87.1%	1,187	1,043	87.9%
UT	55	51	92.7%	64	56	87.5%	75	72	96.0%
VA	151	139	92.1%	150	138	92.0%	153	141	92.2%
VT	219	194	88.6%	214	189	88.3%	227	206	90.8%
WA	323	264	81.7%	309	267	86.4%	323	280	86.7%
WI	845	210	24.9%	838	465	55.5%	809	571	70.6%
WV	75	55	73.3%	74	55	74.3%	73	55	75.3%
WY	56	41	73.2%	53	37	69.8%	56	45	80.4%

Figure A-1
Percent of LEAs that Directly Certified SNAP Participants by LEA Size:
Provision 2 and Provision 3 LEAs Excluded from Direct Certification Counts⁴³
SY 2009–2010



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

Table A-2⁴⁴
Summary State Statistics from Figures 5 and 8

State	Percent of SNAP Children Directly Certified for Free School Meals (see Figure A-2 and A-3 maps)			Percent of All Categorically Eligible Children Certified for Free School Meals (see Figure A-4 and A-5 maps)		
	SY 2009-2010	SY 2008-2009	Percentage Point Change	SY 2009-2010	SY 2008-2009	Percentage Point Change
	Alabama	67%	66%	1	79%	60%
Alaska	122%	129%	-7	92%	81%	11
Arizona	49%	65%	-16	73%	58%	14
Arkansas	73%	70%	3	93%	67%	26
California	68%	64%	4	75%	49%	26
Colorado	69%	79%	-10	73%	67%	6
Connecticut	56%	73%	-17	64%	61%	3
Delaware	85%	95%	-10	84%	86%	-1
District of Columbia	82%	49%	33	89%	43%	46
Florida	72%	81%	-9	80%	75%	6
Georgia	67%	63%	4	80%	59%	21
Hawaii	91%	78%	13	95%	68%	26
Idaho	65%	49%	16	68%	43%	25
Illinois	73%	56%	17	85%	52%	33
Indiana	74%	65%	8	92%	61%	31
Iowa	75%	84%	-8	82%	77%	5
Kansas	84%	82%	3	85%	74%	11
Kentucky	77%	77%	0	88%	74%	14
Louisiana	79%	86%	-7	94%	101%	-7
Maine	75%	73%	2	78%	67%	11
Maryland	85%	74%	11	89%	65%	24
Massachusetts	51%	61%	-10	62%	53%	9
Michigan	69%	63%	5	87%	58%	28
Minnesota	89%	77%	13	96%	64%	32
Mississippi	73%	73%	0	86%	70%	16
Missouri	66%	67%	-1	83%	63%	20
Montana	56%	57%	-2	69%	50%	20
Nebraska	58%	75%	-17	76%	69%	7
Nevada	86%	87%	-1	82%	71%	11
New Hampshire	47%	30%	17	66%	25%	41
New Jersey	62%	55%	6	77%	47%	30
New Mexico	49%	82%	-33	69%	69%	0
New York	76%	94%	-18	82%	85%	-3
North Carolina	84%	80%	4	87%	75%	12
North Dakota	56%	54%	2	61%	47%	13
Ohio	65%	67%	-1	89%	62%	28
Oklahoma	75%	77%	-2	92%	66%	26
Oregon	66%	69%	-3	71%	65%	6
Pennsylvania	65%	67%	-2	75%	79%	-4
Rhode Island	69%	54%	15	68%	49%	19
South Carolina	70%	61%	8	83%	58%	24
South Dakota	49%	52%	-3	67%	37%	30
Tennessee	91%	92%	-1	92%	88%	4
Texas	82%	73%	9	98%	69%	28
Utah	70%	75%	-5	82%	68%	14
Vermont	65%	67%	-3	79%	64%	15
Virginia	78%	77%	1	83%	70%	13
Washington	72%	67%	5	79%	59%	20
West Virginia	78%	84%	-5	85%	80%	5
Wisconsin	73%	72%	1	79%	64%	15
Wyoming	88%	61%	27	88%	47%	41

⁴⁴ Percentages above 100 percent in the left half of Figure A-2 can be explained, in part, by limitations of the component figures used to estimate them. See the footnote to Figure 5 and the discussions of data sources and methodology in Appendix C and Appendix D. Figures above 100 percent in the right half of the table are due to data limitations and data estimation error.

Table A-3
Enrollment of NSLP-Participating LEAs,
SY 2009–2010

LEA Size	Total Enrollment (millions)			
	LEAs that Directly Certified SNAP Participants	LEAs in which all Schools are Non-Base Year Provision 2 or Provision 3	All Other LEAs	All NSLP-Participating LEAs
25,000 students or more	16.7	0.2	0.1	17.0
10,000 to 25,000 students	8.9	0.2	0.1	9.2
Fewer than 10,000 students	21.6	0.5	1.4	23.5
All LEAs	47.2	0.9	1.6	49.7

Figure A-2⁴⁵
Percent of SNAP-Participant Children Directly Certified for Free School Meals
SY 2009–2010

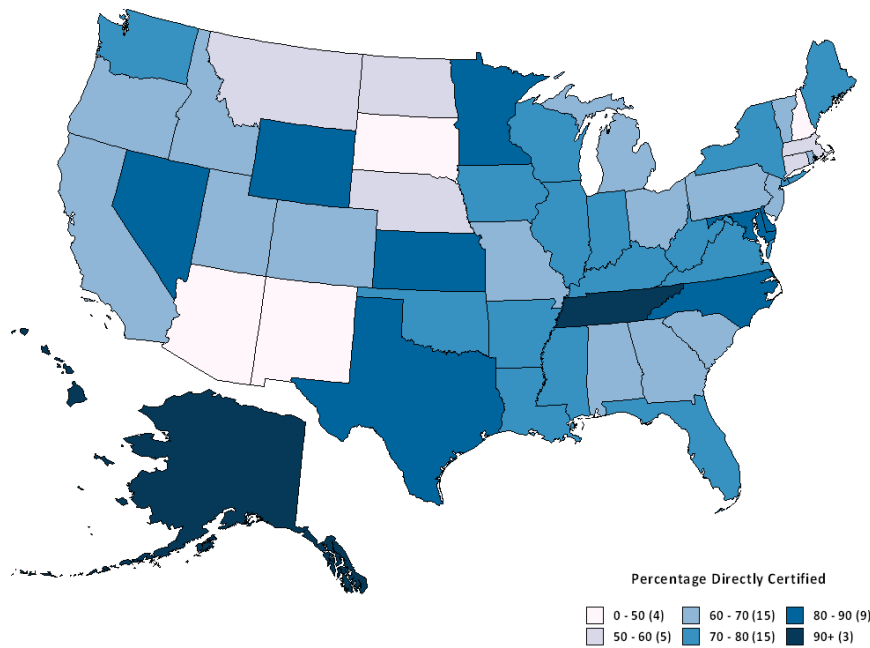
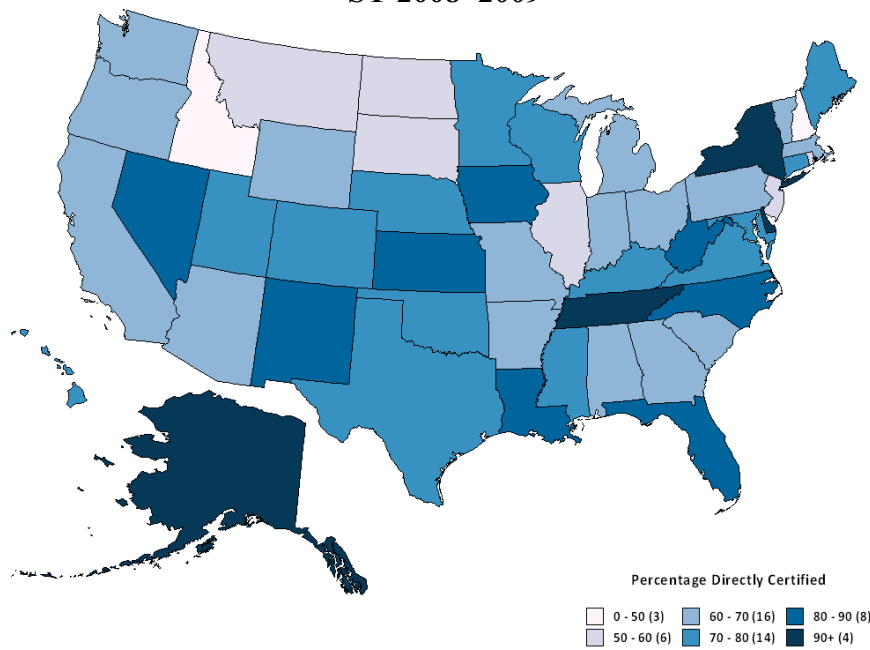


Figure A-3⁴⁶
Percent of SNAP-Participant Children Directly Certified for Free School Meals
SY 2008–2009



⁴⁵ State values for Figures A-2 and A-3 are in Table A-2. Data for Figure A-4 is provided in the Direct Certification Report for 2009.

⁴⁶ Figure A-3 is based on updated data. The revised data appear in Table A-2.

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

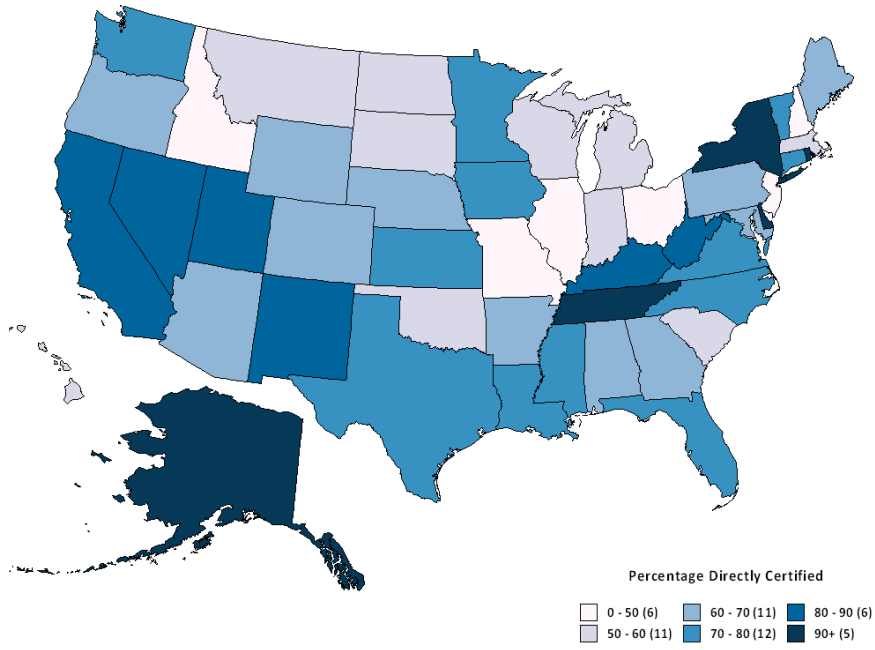


Figure A-5⁴⁷
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2009–2010

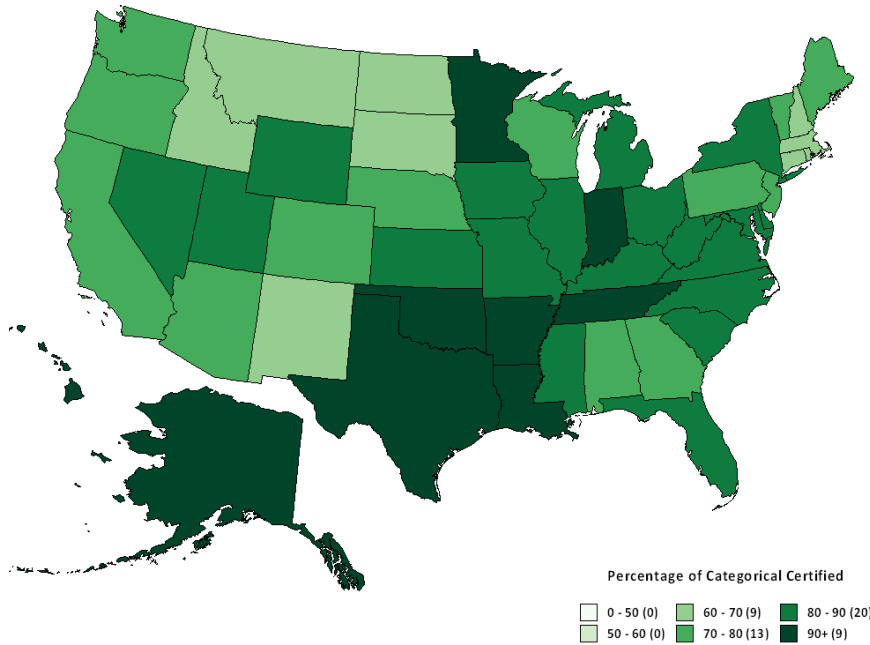
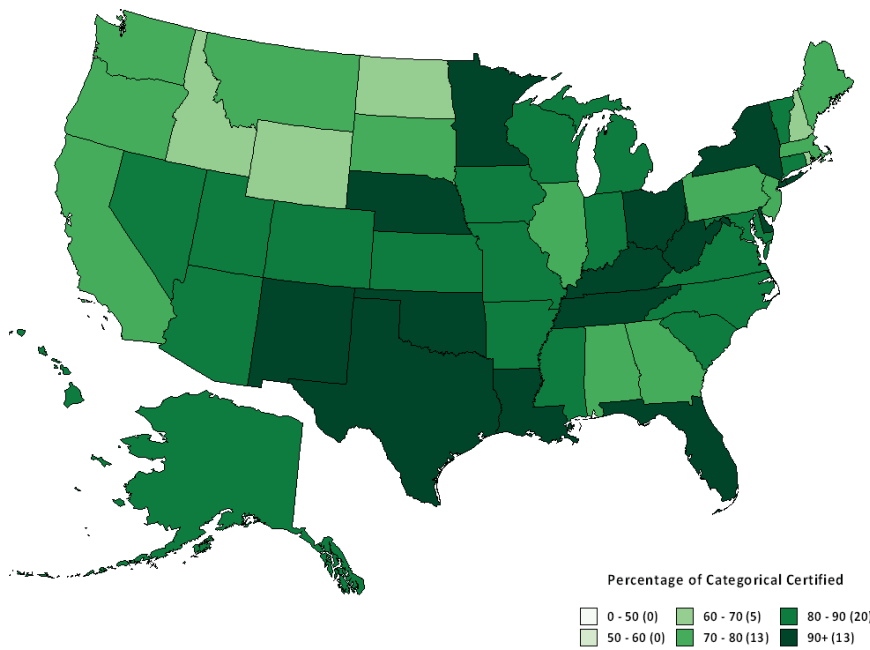


Figure A-6
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2008–2009



⁴⁷ State values for Figures A-5 and A-6 are in Table A-2. Data for Figure A-7 is provided in the Direct Certification Report for 2009.

Figure A-7
Percent of Categorically Eligible Children Certified for Free School Meals
SY 2007-2008

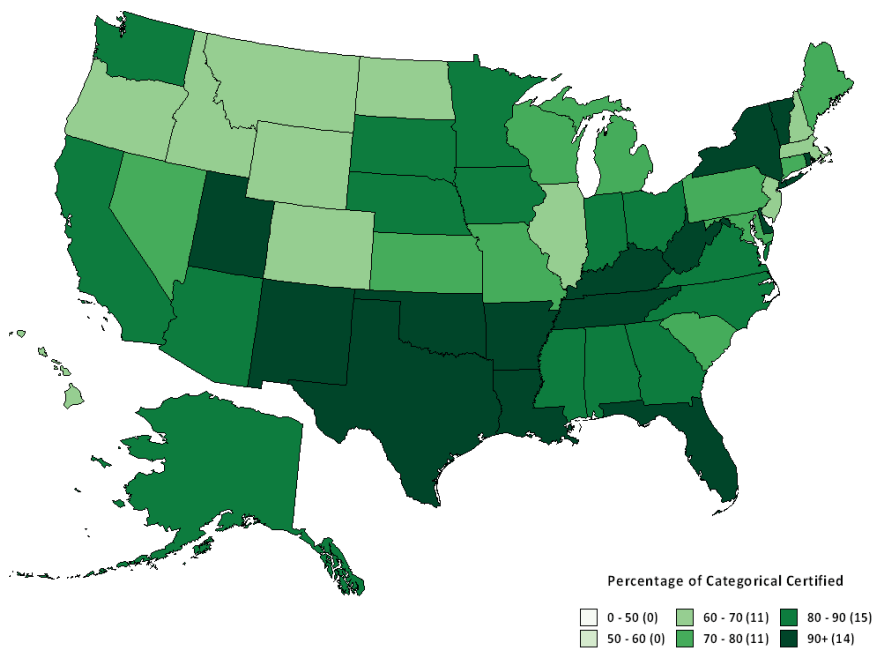


Table A-4
States by FNS Administrative Region

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

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

Appendix B – Verification Summary Report

FORM APPROVED OMB # 0184-0026

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

Form FNS - 742 (February 2004)

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

Appendix C – Estimation of Component Statistics

The direct certification performance measures presented here are based on State-level estimates of (1) the number of school-age children that received SNAP benefits at any time in July, August, or September of 2009; (2) the number of SNAP-participant children who were directly certified for free school meals as of October 1, 2009; 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 2009-2010. The methods and sources used for these estimates are described below.⁴⁸

Estimate of school-age population in SNAP-participant households

The report uses two primary sources to estimate the number of school-age SNAP participants at the State level. The first is SNAP Program data reported to FNS by State SNAP agencies each month. SNAP Program data include State agency counts of the number of individual participants in households that are issued SNAP benefits. The figures used in this report are the final participant counts for July through September 2009. 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 subpopulations are estimated from the SNAP Quality Control (QC) dataset, which is based on statistically representative samples drawn by the States from participating SNAP households.⁴⁹ The number of school-age children in SNAP households can be estimated for each State from the QC data. However, given the size of the State samples, monthly estimates of participation by State and age group are not sufficiently reliable and State estimates of the average monthly school-age population for the entire fiscal year are used instead.

With these two inputs, FNS is able to estimate the number of school-age SNAP participants by State for the target months of July through September. From official SNAP Program data, FNS computes average monthly participation from July through September as a percent of average monthly participation for the entire fiscal year. This is multiplied by QC estimates of average monthly school-age SNAP participation for the year. The result is a set of State estimates of average school-age SNAP participation for the months of July through September 2009.

A final adjustment is needed to convert this average monthly figure into an estimate of school-age children who received SNAP benefits at any time in those three months. Across any period of time, the total number of individuals served by the SNAP program is higher than the average monthly caseload over the same period. The participant “turnover rate” is defined as the total number of SNAP participants over a given period divided by the period’s average monthly caseload. FNS estimates that the turnover rate across an entire year is about 1.4.⁵⁰ That is, if the average monthly caseload for the year is 100, the unduplicated number of individuals who participated for any part of the year is 140.

⁴⁸ See Appendix D for a discussion of data limitations.

⁴⁹ USDA, 2003

⁵⁰ Cody, 2007

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 allows for estimation of the SNAP turnover rate over the July through September period of concern to this report. However, SIPP data are not designed for State-level analysis. Use of a national turnover rate introduces some uncertainty into the estimates of SNAP participation developed here.

In previous reports in this series, we used single year point estimates of the turnover rate for July through September based on the most current SIPP data available. That approach generated estimates that varied significantly from year to year. Given the error inherent in a turnover rate estimated over such a short (three month) period, we are concerned that much of the variation observed over time may be largely random. Beginning this year, we attempt to compensate for the uncertainty in single-year point estimates by applying a 3 year moving average of estimated turnover rates to the SNAP participant counts for each of the years examined in the report. With this change, the direct certification percentages for school years 2007–2008 and 2008–2009 are revised slightly from the figures reported in the previous editions of this report.⁵¹

$$\begin{array}{l} \text{Unduplicated count} \\ \text{of school-age} \\ \text{SNAP-participant} \\ \text{population, July-} \\ \text{September 2009} \end{array} = \frac{\begin{array}{l} \text{Average monthly SNAP} \\ \text{participation, FNS} \\ \text{program data, July-} \\ \text{September 2009} \end{array}}{\begin{array}{l} \text{Average monthly SNAP} \\ \text{participation, FNS} \\ \text{program data, FY 2009} \end{array}} \times \begin{array}{l} \text{Average monthly} \\ \text{school-age SNAP-} \\ \text{participant} \\ \text{population, QC} \\ \text{estimate, FY 2009} \end{array} \times \begin{array}{l} \text{Estimated July-} \\ \text{September} \\ \text{SNAP-} \\ \text{participant} \\ \text{“turnover rate”} \end{array}$$

Estimate of SNAP participants directly certified for free school meals

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

All household applications approved for free and reduced-price benefits are subject to annual verification by local LEAs. LEAs are required to draw a sample from approved applications and review applicant documentation. LEAs report the results of the verification process to FNS through their State education agencies. These Verification Summary Reports include the number of applications and students initially certified for free or reduced-price benefits, and the corresponding number of applications and students whose status was confirmed or changed as a result of the verification review.⁵²

⁵¹ The national direct certification rate for SY 2007–2008 is revised downward from 69 percent to 68 percent. For SY 2008–2009, the national rate is unchanged at 71 percent.

⁵² 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.

The VSRs are intended primarily to document the results of the verification process. For this reason most of the information contained in the reports concerns the verification outcomes of applications initially approved for free or reduced-price meals. However, the reports also contain counts of students whose eligibility for free or reduced-price meals was not determined by application and whose certifications are therefore not subject to verification. These counts include, but are not limited to, directly certified SNAP participants. This report uses LEA counts of students certified for free school meals, but not subject to verification, as a proxy for directly certified SNAP participants.⁵³

Estimate of SNAP participants in Provision 2 and Provision 3 schools

The population of SNAP-participant children who are candidates for direct certification does not include children who attend Provision 2 or Provision 3 schools that are not operating in a base year. These schools directly certify (and accept applications from) SNAP-participant children only in base years when they establish the percentage of meals served free, at reduced-price, and at the paid rate for NSLP reimbursement. In nonbase years, the schools are reimbursed at these previously determined percentages; individual children are not subject to certification or re-certification in nonbase years.⁵⁴

In order to remove these children from the estimated population of SNAP participants, FNS used data reported by LEAs on their SY 2009–2010 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.⁵⁵

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

⁵³ Some limitations of this measure are discussed in Appendix D.

⁵⁴ Provision 2 and Provision 3 schools operating in nonbase years serve all meals at no charge, although they are reimbursed by USDA at rates consistent with their free, reduced-price, and paid claiming percentages. Provision 2 and Provision 3 are offered to schools as administrative cost-saving options. In exchange for a much reduced meal counting and claiming burden and no certification costs in nonbase years, Provision 2 and Provision 3 schools absorb any difference between their Federal reimbursement and the cost of meals served.

⁵⁵ Reasons for nonparticipation in SNAP by fully eligible households include real or perceived access barriers and personal preference. For additional discussion of reasons for SNAP nonparticipation, see Bartlett and Burstein, 2003.

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

A recent trend has been for States to adopt Expanded Categorical Eligibility (ECE) for SNAP benefits. Under ECE, households that receive a noncash benefit from a means-tested cash assistance program (such as TANF) may be held categorically eligible for SNAP benefits. ECE States may choose to maintain a traditional asset test for eligibility or they may adopt broad-based or narrow categorical eligibility requirements. Under broad-based categorical eligibility, if a household receives a noncash TANF/MOE (state Maintenance of Effort) benefit (e.g., information on a service) the household is considered categorically eligible for SNAP benefits. Under narrow categorical eligibility, households become categorically eligible for SNAP benefits if they receive a noncash service such as child care or employment assistance⁵⁶.

The policy that provides for ECE has been in use since 2001, when eight States used broad-based criteria for determining eligibility. Its use has grown considerably, with large numbers of States adopting ECE in FY 2008 and FY 2009. Currently, 40 States have an ECE system; 24 broad-based, 15 narrow, and 1 State that utilizes both broad-based and narrow designations. In recognition of this expansion of ECE we make the following change:

In States with broad-based ECE policies we apply an asset adjustment factor of 1 (no asset test) and a national participation adjustment of 0.851⁵⁷ to the count of NSLP income-eligible nonbase year Provision 2 and Provision 3 students. In all other States we apply an asset adjustment factor of 0.823⁵⁸ and the national participation adjustment of 0.851. For all but six States, this change had a negligible effect on our estimates of direct certification effectiveness.

⁵⁶ See Trippe and Gillooly, 2010, for more detail regarding Expanded Categorical Eligibility

⁵⁷ Leftin, 2010

⁵⁸ This is an asset adjustment factor estimated for 2002, prior to widespread adoption of ECE. (See Trippe and Schechter, 2007). This serves as a rough estimate of the percent of SNAP income-eligible individuals who are also asset eligible in States that have retained a traditional asset test.

Appendix D – Data Limitations

1. Local educational agency Verification Summary Reports

LEAs that participate in the NSLP are required each school year to review a sample of applications that were approved for free or reduced-price benefits. LEAs record the results of this review on 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.⁵⁹ Since 2005, many additional LEAs have established direct certification systems.⁶⁰ 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 estimate of SNAP participants who attend Provision 2 or Provision 3 schools that is based on this data element will be inaccurate.

⁵⁹ LEAs in the remaining States relied solely on the letter method of direct certification. See Cole and Logan (2007), pp. ix, 34-36.

⁶⁰ See Table 1.

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."⁶¹ For this report, the ACS count of households that receive "public assistance" is used as a proxy for households that receive TANF benefits. This proxy will overstate the TANF population by an unknown amount that varies according to the size of the States' general assistance programs.

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

4. Survey of FDPIR participants

The estimated count of school-age FDPIR participants used to develop the performance measure presented in Figure 7 is based in part on a survey conducted for a 1990 study.⁶² 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,⁶³ by State, for FY 2008. 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.

⁶¹ U.S. Census Bureau, 2007

⁶² Usher, et. al., 1990

⁶³ FNS FDPIR Program data

Appendix E – Corrections

Several States submitted corrections to FNS for previous year SNAP QC and VSR data submissions. Among those corrections, two States submitted corrections significant enough to alter the SY 2008–2009 estimates of those States' direct certification effectiveness.

Corrections submitted by Missouri and Alabama resulted in the most significant changes. Missouri corrected previously overstated counts of SNAP participation. With the corrected data, Missouri's estimated direct certification rate for SY 2008–2009 increases from 45 percent (as displayed in Figure 4 of the October 2009 edition of this report) to 67 percent. Revised VSR data submitted by Alabama results in an increase in its SY 2008–2009 direct certification rate from 64 percent to 66 percent.

The revised estimates are reflected in the amended version of the October 2009 report's Figure 4, shown below.⁶⁴

⁶⁴ Corrected SNAP QC data increases Missouri's SY 2007–2008 direct certification effectiveness measure from 44 percent (shown in Figure 4 of the December 2008 version of this report) to 63 percent. A change in SNAP QC figures for Texas decreases its SY 2007–2008 direct certification measure from 71 percent (as previously published) to 67 percent.

In all cases, the revised figures also include the methodological changes introduced with this year's version of the report.

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

