

DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM: STATE PROGRESS IN IMPLEMENTATION REPORT TO CONGRESS - SUMMARY

Office of Research and Analysis

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This report responds to the legislative requirement of Public Law 110-246 to assess the effectiveness of State and local efforts to directly certify children for free school meals. Under direct certification, children are determined eligible for free school meals without the need for household applications by using data from other means-tested programs. The 2004 Child Nutrition and WIC Reauthorization Act required local educational agencies (LEAs) to establish a system of direct certification of children from households that receive Supplemental Nutrition Assistance Program (SNAP) benefits by School Year (SY) 2008-2009. In SY 2009-2010, 83 percent of LEAs directly certified participating SNAP students. These LEAs enroll 97 percent of all students in NSLP schools. States and LEAs directly certified 1.6 million more children at the start of SY 2009-2010 than they did a year earlier, a 24-percent increase. 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.

Background

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for providing nutritionally balanced meals to children in public and private schools and residential child care institutions. Average daily participation totaled 32 million children in fiscal year 2010.

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.

Children from households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) are deemed "categorically eligible" for free school 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 eliminate the need to fill out paper applications. State and LEA direct certification systems generally rely on 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 also send letters to SNAP, TANF, and FDPIR households. The letters serve as proof of categorical

eligibility for free meals, and must be forwarded by the households to their children's schools.

The Child Nutrition and WIC Reauthorization Act of 2004 required all LEAs to begin directly certifying SNAP participant children by SY 2008-2009. The smallest LEAs, those given the most time to comply with the direct certification mandate, made the greatest improvement in SY 2009-2010.

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 participating SNAP children.

FNS also estimated the number of all SNAP, TANF, and FDPIR participants certified for free school meals, either by direct certification or by application. This provides a more comprehensive measure of State success in certifying categorically eligible children for free school meals.

Key Findings

States and LEAs directly certified 1.6 million more SNAP children in SY 2009-2010 than they did in SY 2008-2009.

Over the same period, the total number of schoolage 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

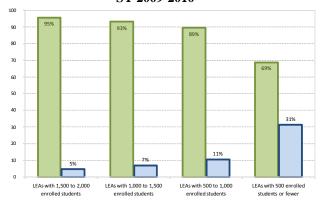
increased slightly from 71 percent in SY 2008-2009 to 72 percent in SY 2009-2010.

 The overall certification rate of categorically eligible children, 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 continued to increase.

- In SY 2004-2005, 56 percent of LEAs operated a direct certification system on a discretionary basis; schools in those LEAs accounted for about 77 percent of all students in NSLP participating schools.
- In SY 2009-2010, 83 percent of LEAs directly certified at least some SNAP participants. These LEAs enrolled 97 percent of all students in NSLP-participating schools.
- In SY 2009-2010, 82 percent of LEAs with 10,000 or fewer students directly certified at least some SNAP-participant students.
 - These smaller LEAs experienced the greatest improvement in direct certification rates.
 - LEAs with fewer than 2,000 students continue to improve but still have lower direct certification rates than LEAs with more students.

Percent of LEAs With 2,000 or Fewer Students Directly Certifying SNAP Participants by LEA Size SY 2009-2010



Percent of LEAs that directly certified SNAP participants or were in a base year for Provision 2 or Provision 3

Percent of LEAs that did not directly certify SNAP participants and were not in a base year for Provision 2 or Provision 3

State direct certification performance was varied.

- States with the most effective systems directly certified more than 80 percent of SNAPparticipant children.
- States with the least effective systems certified no more than 50 percent of SNAP children.
- Over 98 percent of LEAs with 10,000 or more students directly certified students for free meals.

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.

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