Regional Office Review of Applications (RORA) for School Meals 2011

Final Report

Regional Office Review of Applications (RORA) For School Meals 2011 Final Report

Authors:

Mustafa Karakus
Allison Roeser
William Frey

Submitted By:	**Submitted to:**
Westat	Office of Research and Analysis
1600 Research Boulevard	USDA, Food and Nutrition Service
Rockville, MD 20850-3129	3101 Park Center Drive, Room 1014
301-251-1500	Alexandria, VA 22302-1500

Project Director:	**Project Officer:**
Mustafa Karakus	Dennis Ranalli
	Task Lead:
	John Endahl

Acknowledgements and Disclaimer

Any opinions, findings, conclusions, and recommendations expressed in this report are those of the authors and do not necessarily reflect the views of the U.S. Department of Agriculture.

Westat®

Executive Summary

This is the seventh in a series of annual reports to examine administrative errors incurred during the local educational agency's (LEA) approval process of applications for free and reduced-price meals in the National School Lunch Program (NLSP). Until 2009, the Food and Nutrition Service (FNS) staff reviewed the applications to make assessment of administrative errors; in 2010 and 2011, Westat served as an independent reviewer to assess administrative errors in sampled applications.

This 2011 application review report presents administrative error estimates in certification of free and reduced price NSLP meals. Due to the unequal probability of selection of LEA and selection of an application, additional analyses were undertaken to assess the effect of applying sample weights on the error estimates. Presenting both unweighted and weighted estimates allow for direct comparison with data from the six preceding years.

A total of 2,800 applications from school year 2010/11 were selected for determination of administrative errors. In 2010/11, LEA determinations had administrative errors in 10.7 percent of applications approved or denied for free or reduced price NSLP. This is a 3.2 percentage point increase from 7.5 percent in the previous school year.

Of the 298 applications with administrative errors, only 107 applications (3.8 percent) resulted in incorrect eligibility determination for free or reduced price meals. Among all income-based applications, 96.1 percent of students were certified for the correct level of meal benefits based on information in the application files. Household size and income were accurately calculated for 97.2 and 95.7 percent of the applications, respectively.

Adjusting for sample weights signal an upward bias in the unweighted error estimates. While unweighted estimates indicate 3.82 percent and 4.68 percent error rates in determination of certification and benefit status, the weighted estimates show 3.70 percent and 4.55 percent error rates, respectively. The difference in estimates is a direct result of unequal probability of selection of an LEA and selection of an application.

The current sampling design does not lend itself to conducting subgroup analysis; such analysis may be useful to develop policies and provide targeted regional technical assistance in the form of corrective activities. An updated sampling design which includes a greater number of LEAs from each region and possibly higher number of applications from each LEA would enable FNS to

estimate region specific administrative error rates. Such data will permit the FNS to compare administrate error rates within regions over time as well as across regions. However, this would impose additional burden on the FNS Regional Offices to gather applications from additional SFAs. Alternately, if the data sampling design is consistent across the seven years, a panel data analysis approach can be used to examine pooled data from all six years. Future analysis should continue including sampling weights to derive unbiased population estimates from the survey sample.

Table of Contents

Westat

The National School Lunch Program (NSLP) is a federally funded meal program operating in public and nonprofit private schools and residential child care institutions. There were 31.6 million children in more than 101,000 schools and residential child care institutions receiving meal benefits during the 2009/10 school year. Nearly 20 million of these children received free or reduced-price lunch (FRAC, 2011). The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) administers the NSLP at the federal level. At the State level, State agencies, typically State departments of education operate the program through agreements with local educational agencies (LEA), mostly local school districts. Federal policy determines eligibility for meal benefits. Based on this federal policy, the LEAs have the legal authority to operate the NSLP as well as to certify and verify student eligibility for NSLP.

There is considerable variability across LEAs in the procedure used to certify students for NSLP benefits. FNS implements specific measures for improving NSLP integrity. Hence, FNS monitors the extent of erroneous payments in its programs annually and publishes a report on the actions taken or will be taken to reduce erroneous payments.

In the school meal application process, erroneous payments (both under- and over-payments) can occur mainly for two reasons; household misreporting and administrative errors. This current report focuses on administrative errors incurred during eligibility determinations. FNS routinely collects data through the Regional Office Review of Applications (RORA) to track administrative errors. To date, USDA has issued six annual reports examining the administrative accuracy of LEA's approval and benefit issuance for free or reduced price meals based on household applications (Karakus, Roeser et al., 2011). This seventh report presents findings from an independent assessment of the administrative errors in a sample of LEAs during the 2010-2011 school year.

Assessment of Administrative Errors

In accordance with changes made to the Child Nutrition and WIC Reauthorization Act of 2004 and policy clarifications issued since 2001, FNS published a revised manual, the Eligibility Manual for School Meals: Federal Policy for Determining and Verifying Eligibility, in 2008. The manual has been further revised[1] to reflect changes made since 2008, as a result of final and interim regulations, and policy clarification. In addition, only those non-discretionary provisions addressed through policy memorandum from the *Healthy, Hunger-Free Kids Act of 2010* are reflected in this updated manual. The LEAs work with their State to identify and implement procedures and options applicable within their State.

There are three categories of eligibility for meal benefits: (1) household income, (2) categorical eligibility, and (3) direct certification. Depending on household income, students may be eligible for free meals (household income at or below 130 percent of poverty), or reduced-price meals (household income between 131 and 185 percent of poverty). Households must submit an application to the LEA in order to receive free or reduced price meals. The LEA staff review these household applications and make determinations of eligibility by comparing household size and income information with the guidelines published by the FNS or by checking categorical program eligibility. During the eligibility determination process, administrative errors can occur in determining gross monthly income, household family size, or assignment of benefit level based on household size and income specific (or relevant) information. Per FNS guidelines, approved but incomplete applications (e.g., missing adult signature, missing social security number, etc.) also constitute administrative errors. Inaccurate certifications may result in assignment of higher or lower amount of benefits than students are entitled to receive. In some instances, administrative errors may not have any impact on the benefit decisions, and therefore do not translate into an error in benefit level.

"Categorical eligibility" refers to automatic eligibility for free meals with the submission of an application due to one of the following status:

■   A member of a household is determined by the administering agency as receiving assistance under the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Programs on Indian Reservations (FDPIR), or Temporary Assistance for Needy Families (TANF);

---

[1] http://www.fns.usda.gov/cnd/guidance/EliMan.pdf

- Enrollment in a Head Start or Even Start program; and

- A homeless, runaway or a migrant child.

Households receiving Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) may bypass the standard application process and be "directly certified" for benefits. Direct certification involves matching SNAP, TANF, and FDPIR records against student enrollment lists, either at the State or LEA level. Parents or guardians of children identified through these matching systems are notified of their children's eligibility for free school meals. 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 may 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. However, the use of eligibility letters does not fulfill the direct certification requirement for those households receiving SNAP benefits. No application is necessary if eligibility is determined through the direct certification process.

Just because a household participates in SNAP, TANF or FDPIR doesn't necessarily mean that they will be directly certified. States are required to directly certify children from SNAP households for free school meals. States may also directly certify children from TANF and FDPIR households, but are not required to do so. Also, based on the algorithms used in the matching process and the timing of the Direct Certification information update, it is possible that some households will not be "directly certified" necessitating them to submit an application with their case number to indicate they are "categorically eligible".

Administrative Errors in Determining Household Income. Common administrative errors in determining gross monthly income may involve computation errors. Such errors include:

- Not converting multiple income sources to annual income;

- Incorrectly determining the frequency of receipt of household income, and/or

- Incorrect addition or multiplication.

Administrative Errors in Determining Household Size. In determining household size, common errors include:

- Not counting the student in the list of all household members, or

- Double counting the student as an adult when the application asks only for the list of adult members of the household.

Administrative Errors Due to Certification of Incomplete Applications. These involve:

- Missing signatures;

- Missing social security numbers; or

- Other missing information.

Research Questions   2

Data abstracted from the review of applications will enable FNS to answer the following questions about administrative errors made by LEAs:

- To what extent did LEAs make the correct meal price status determination during certification?

- What types of administrative errors were made? What was the prevalence of each type of administrative error?

- What percent of applications received the correct meal benefit status? What percent of applications received the incorrect meal benefits at each combination of error (free, reduced price, paid)?

- Has the accuracy of LEA certification and benefit status determinations changed compared with previous years?

Westat

The FNS regional staff selected the free- and reduced-price meal applications for independent review, using a randomized sampling procedure. Photocopies of the selected applications were forwarded to Westat for an independent assessment of eligibility and document errors in household size, income, and eligibility determinations. This is the second year FNS has sought independent assessment – and to ensure consistency in review with previous studies, Westat reviewed and submitted 500 applications to FNS for verification of the Westat process, and then continued with the review of the remaining applications.

Sampling Design

FNS uses a stratified two-stage cluster sample design to select applications for review. The first stage selects a sample of districts using 28 strata defined by the seven FNS regions and four size categories within each region. This database includes more than 95 percent of all public and private schools participating in the NSLP. Two LEAs are selected from each stratum using probabilities proportional to size (PPS) methods with replacement (eight LEAs are selected from each of the seven FNS regions). The measure of size for each LEA is the number of students approved for free or reduced-price meals obtained from FNS's School Food Authority Verification Summary Report (FNS-742). This selection process is accomplished in the following steps:

1. Sort the LEAs in each region by the number of students approved for free/reduced price meals, from the smallest to the largest;

2. In each region, calculate the cumulative number of students approved for free/reduced price meals for the LEA sorted in (1);

3. Determine the cutoff values to be ¼, ½, and ¾ of the total number of students approved for free/reduced price meals in each region;

4. Examine the cumulative frequencies in each region and use the cutoff values to divide the LEAs into four strata ("small", "medium", "large" and "very large" school districts); and

5. Randomly select 2 LEAs within each stratum, using probability proportionate to size sampling with replacement with the number of students approved for free/reduced price meals as the measure of size.

In stage two, FNS regional staff is asked to select students who had applied for meal benefits from the administrative files of the 56 LEAs selected in the first stage using systematic (randomized) sampling. In each of the 56 selected LEAs, applications from about 50 students were selected for review. If a LEA was selected twice (sampling was done with replacement), applications from about 100 students were sampled, so that the sample size in each stratum remained about 100 in all cases. Both approved and denied applications were included in the sample; students directly certified or students in provision 2 or 3 SFAs schools not in their base year were not included. **Appendix A** includes strata totals of the number of free and reduced price students and direct certifications in each stratum.

Development of Sampling Weights

Sampling weights are required to produce substantially unbiased estimates from the administrative records data by compensating for the unequal probabilities of application selection. The initial component of the sampling weight, called the *base weight,* corrects for the unequal probabilities of selection and is typically the reciprocal of each unit's probability of selection into the sample. In mathematical notation, if 'n' LEAs are sampled with replacement, with probability p_i, on each draw then the base weight, denoted by w_i, is given by

$$wi \ = \ 1/\ npi.$$

This approach to weighting for sampling with replacement and with unequal probabilities has been widely recognized for some time (Hansen and Hurwitz, 1943; Cochran, 1977, pp. 250-255). In this application, n=2, and p_i for each LEA is the ratio of the number of students approved for free/reduced price meals in the school LEA to the total number of such students in the stratum. Hypothetically, if all students in a sampled LEA were reviewed by Westat, then the LEA base weight could be applied to the student data as well. But in the next stage, about 50 students were selected from the LEA for review, thereby requiring another weighting component.

For multi-stage designs, the base weights must reflect the probabilities of selection or base weights at each stage. For instance, in the case of a two-stage design in which the base weight for the i-th LEA is $w_i = 1/(2 p_i)$, and the j-th student is selected within a selected LEA with probability $pj(i)$ at the second stage, then an appropriate weight for each student $j(i)$ in the sample is given by

$$wij = wi/pj(i))$$

The estimates presented in this report are reported in three different ways:[2]

1. Consistent with the earlier reports prepared by FNS, using no weight adjustment. We note that unweighted estimates are biased since applications were not sampled with equal probabilities. Unweighted estimates describe only the characteristics of the sampled applications.

2. Applying a weight for each application using the same formula that FNS used in earlier years (i.e., LEA base weight/probability of student). The following formula was used to compute this sampling weight (*weight as usual*):

$$Weight \ as \ usual = \frac{Region \ size}{2 \ X \ LEA \ size} \div \frac{50}{LEA \ size}$$

3. After discussions with FNS, we were informed that in the past, while directly certified students were excluded in the selection of students at the sample LEAs, the weighting used for the estimates assumed that the selected applications were randomly selected from all free/reduced-price students including those directly certified. However, the weight formula discussed above does not take this information into account. Thus, we compute weights accounting for the exclusion of directly certified students in the LEA listing and prepare estimates using these revised weights (*revised weights*).

$$Revised \ weight = \frac{Region \ size}{2 \ X \ LEA \ size} \div \frac{50}{(LEA \ size - LEA \ direct \ certification \ size)}$$

Data File

Under direction from FNS staff, an EXCEL spreadsheet was created with appropriate data fields (Table 1). Each application was input into the spreadsheet along with the reviewer comments.

---

[2] For comparison purposes, we report estimates on all four types of errors among income based applications and the weight computation does not reflect the process of removing categorically eligible's. This would provide good estimates only if the distribution of the categorically eligible's did not affect weights.

Table 1. List of variables obtained during application review

Variable name	Variable description	Value labels
Distnum	LEA Number (Region, Strata, LEA)	
LEA	LEA Name	
State	State Abbreviation	
Student	Student Number within LEA (1-50)	
CBIS	Current Benefit Issuance Status	(1) Free (2) Reduced Price (3) Paid
Napps	Number of Benefit Applications on File	
Verify	Was the Student Application Selected for Income Document Verification?	(1) Yes (2) No
VerDoc	Was Documentation Provided for Verification Request?	(1) Yes (2) No
CatElig	Application Categorically Eligible?	(1) Yes (2) No (3) Foster Child
HHSize	Household Size as Determined by Reviewer	
HHIncome	Monthly Household Income as Determined by Reviewer	
SSN	Was Parent's Social Security Number provided on Application?	(1) Yes (2) Don't Have SSN (3) No
Signature	Was Adult Signature Provided on Application?	(1) Yes (2) No
SFAHHSize	Household Size as Determined by SFA	
SFAHHInc	Monthly Household Income as Determined by SFA	
SFAElig	Eligibility Status as Determined by SFA	(1) Free (2) Reduced Price (3) Paid- Income too High (4) Paid-Incomplete Application
FNSElig	Eligibility Status as Determined by Reviewer	(1) Free (2) Reduced Price (3) Paid- Income too High (4) Paid-Incomplete Application
SFAVer	Eligibility Status by SFA after Verification	(1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request
FNSVer	Eligibility Status by Reviewer after Verification	(1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request
ProcErr	Was Processing Error Made in Certification Process?	(1) Yes (2) No

Application Review Process

Data Abstraction. The first stage of data abstraction included data entry onto hard copy spreadsheets. Any inconsistencies or inquiries were discussed at internal weekly meetings and

documented on problem sheets. Issues that were not resolved internally were submitted to FNS for final resolution. All inquiries, internal or FNS, were recorded in a Data Decision Log and serve as historical record keeping for future data abstraction and analysis (**Appendix C**). The decisions made during the Regional Office Review of Applications in 2010 can be found in the 2010 report (Karakus, Roeser, et al. 2010).   The second stage of data entry was data transfer from hard copy spreadsheet to an electronic database.

Quality Control. A rigorous quality control effort was employed at each stage of data abstraction and entry. Hard copy data abstraction received 100 percent review from a separate abstractor with an additional review of a 10 percent sample performed by project management staff. Electronic data entry also received 100 percent review from alternate data entry staff and a 10 percent sample by project management staff. Each case that was categorically eligible or selected for verification also received 100 percent review from project management staff. Lastly, any application that was considered to be an anomaly or raised any questions was discussed thoroughly among all data abstraction staff and documented accordingly.

Eligibility Determinations

Following the definitions used in the previous FNS reviews, certification status was considered in error in the following situations:

1.   If the LEA's certification determination is different than the independent certification determination.

2.   For applications selected for verification (e.g., pay stub verification for reported income), if the SFA certification determination after verification was different than the independent certification determination after verification.

3.   The computation of household size and income was not recorded on the application for some LEAs. However, regional FNS staff completed a cover page - including information on current benefit issuance status to each application selected for this study. In applications with no information on initial certification decision, certification status was considered in error if LEA certification determination was different than the current benefit issuance status.[3]

---

[3] In some instances, the applications were scanned and the certification process was completed using computer software. In some cases the FNS Regional staff failed to collect the information from the data files, so we could only assume that the initial certification status matched the current benefit issuance status. To that end, SFAElig should equal CBIS.

In addition, benefit status was considered in error if the current benefit issuance status provided by the LEA was different than the independent certification determination or if the application was selected for verification the CBIS was different than the eligibility status determined by the reviewer after verification.

Various types of administrative errors can be made by the LEAs in calculating household size and income. Common errors in calculation of household size include:

1. Not counting the student if the applicant inadvertently omitted the child's name in the list of all household members; and

2. Double-counting the student if the application called for a list of all adult household members and the student was included in the list as an adult[4].

Common errors in the calculation of gross monthly income include:

1. Incorrect determination of the frequency for receiving income (e.g., biweekly instead of monthly);

2. Not using a standard frequency (i.e., monthly) when there are multiple income sources with different frequency;

3. Incorrect addition or multiplication; and

4. In addition, there can be issues related to inconsistent treatment of income received from child support alimony payments and income from irregular employment (e.g., substitute teacher). While income from such sources should be most often correctly computed and included in the gross household income, there may be cases where such income may be inadvertently excluded from the household income computation.

Data Security

In agreement with the Federal Privacy Act and other regulations to protect individual data, hard copy applications were stored in a locked file cabinet secured with a lock bar in a limited access field room controlled by an alarm locked key pad door lock and security cameras. All electronic data files were encrypted and password-protected; only staff working on the project had access to these files. All staff signed a confidentiality agreement, in compliance with Westat's *Electronic Data Storage,*

---

[4] Some applications have a separate place for the listlisting of all adult members of the household. Sometimes, households include the children in that list due to misunderstanding and this may cause the reviewer to double count the number of children.

Transport, and Security Acceptable Use Policy and Guidelines and Electronic Mail and Internet Acceptable Use Policy and Guidelines in addition to the required USDA confidentiality agreement.

A total of 2,800 applications from 2010/11 school year were selected for review. Of these 2,800 applications, 409 (14.6 percent) were categorically eligible applications and 2,384 (85.1 percent) were income-based applications. The remaining seven applications (0.3 percent) could not be located by the LEA and only cover pages were submitted. However, LEAs must have documentation that a student receiving benefits has submitted an application or was directly certified for free meals. Of the seven missing applications, five had a current benefit issuance status of free meals. With input from FNS, it was decided that an administrative error occurred for these five cases since they were receiving some benefits and had no indication that an application was submitted. The remaining two applications had no information about current benefit issuance status. We were not able to assess eligibility status for these two applications and they were not included in the analysis.

Categorically eligible students are eligible for free meals. In order to process the application, a household must provide the name of the child, a SNAP, TANF, or the FDPIR case number, and a signature of an adult household member on the application. In order to process an income based application, a household must provide the number of children and adults in the house, names of the household members, household income, adult signature and last four digits of the social security number.

In the following section, we first present error estimates and then examine the effect of applying sample weights on the error estimates. The samples under examination include (1) categorically eligible applications (n=409), (2) income based applications (n=2,384), and (3) all approved/denied applications (sample 1+ sample 2+ five missing applications with a free benefit issuance (n=2,798)).

***On categorically eligible applications*, the prevalence of certification error during processing ranged from 0 percent to 2.0 percent.** All applications were considered categorically eligible if a number was provided in the space for SNAP, TANF, or FDPIR number. The accuracy of the SNAP, TANF, or FDPIR number listed on the application was not verified for this study. Eight of the 409 categorically eligible applications resulted in an eligibility determination of reduced-price or paid status rather than free status which indicates a certification error. Thus the certification error rate was 2.0 percent (8/409). The remaining applications included the student name, case number and adult signature, and were processed correctly. All of the certification errors resulted

from LEA proceeding to make an income based assessment of an application when a SNAP, TANF, or FDPIR number was included on the application. If LEA staff determined that these students were not on such public subsidy program, then, all 9 administrative errors may be justified. Moreover, effective with the start of SY 2009-10, if one child in a household is directly certified or is determined categorically eligible, SNAP, TANF, FDPIR for free school meals by application, then all children in that household are categorically eligible for free meals. However, LEA staff may not be knowledgeable about the new policy and may be implementing an income based assessment for a student without a SNAP/TANF/FDPIR case number while there are other students on the application with such case numbers.

***On income-based applications*, LEAs made more errors in determining gross monthly income than in determining household size.** Similar to earlier reports, more than one-fifth (22.7 percent) of the applications had no indication of what household size or income levels the LEA staff had used in making its eligibility determination. Majority of such applications did not have the information, most likely because the applications were scanned and computer software was which made it unclear as to what information LEA actually used to make the determination or possibly the application lacked space on the application form for LEA staff to enter their computation of household size and income. Among other applications with appropriate space for the LEA to note their computation of household size and income, 18 applications with missing information on income (FNSHHinc and HHincome were missing) were excluded from the analysis since administrative error could not be assessed. Thus, the sample size is 2,384 for the household size computations and 2,366 (2,384 minus 18) for the household income computations.

Table 2 details the accuracy of household income and household size from income-eligible applications. In school year 2010-2011, household size and household income were accurately calculated for 97.2 and 95.7 percent of the applications, respectively. In terms of household size determination, there were almost an equal number of under-counts and over-counts, 1.4 percent and 1.3 percent respectively. In calculating household income, there were more under-counts than over-counts. While 3.0 percent of applications had gross income under-counted, only 1.2 percent of applications had income over-counted.

Table 2.   Accuracy of LEA Determination of household income and household size from income-eligible applications, (Unweighted data for SY 2004/05 to 2010/11)

	2004/05 Percent	2005/06 Percent	2006/07 Percent	2007/08 Percent	2008/09 Percent	2009/10 Percent	2010/11 Percent
Household size							
Correct	97.9	97.1	96.5	98.1	97.8	98.0	97.2
Not correct	2.1	2.9	3.5	1.9	2.2	2.0	2.8
Under-count	0.9	1.9	2.1	0.8	1.1	1.0	1.4
Over-count	1.2	1.0	1.4	1.1	1.0	1.0	1.3
Number of applications	2,222	2,293	2,252	2,315	2,118	2,314	2,384
Household income							
Correct	91.9	92.1	94.0	90.1	96.2	96.3	95.7
Not correct	8.1	7.9	6.0	9.9	3.8	3.7	4.3
Under-count	4.4	3.5	3.5	7.6	2.4	2.3	3.0
Over-count	3.7	4.4	2.5	2.3	1.4	1.4	1.2
Number of applications	2,222	2,293	2,252	2,315	2,118	2,278	2,366

Note: Table presents unweighted percent of cases with information recorded on the application. Household size and household income are considered incorrect only if the household size and income recorded on the application by the LEA are not equal to the value calculated by the independent reviewer from the data provided on the application. Numbers may not exactly sum to total due to rounding.

LEA determinations had administrative errors in 10.7 percent of applications *approved or denied on the basis of an application*. This indicates a 3.2 percentage point increase from the previous year's administrative error rate of 7.5 percent. Out of the 298 administrative errors, 202 of them were due to either incorrect household size and/or incorrect household income. Out of the remaining 96 administrative errors, 5 were due to not being able to locate an application and 31 were due to missing social security number on the application. The remaining administrative errors were due to other reasons including some sort of missing information on the application such as, income, or inadvertently using income based application approach in assessment when not needed. Only 35 percent of the administrative errors resulted in incorrect eligibility determination. Administrative errors do not always result in incorrect eligibility determination. For example, a household size may be incorrectly assessed as four and the student may qualify for free meal. If the correct household size was three, this would indicate an administrative error, but if the student still qualifies for free meal, it does not affect the eligibility determination. Some applications were approved for meal benefits although the application was incomplete. As seen in Table 3, there were 107 administrative errors that resulted in incorrect eligibility determination (eight in categorically eligibles[5], five in missing applications, and 94 in income based applications). There were 81 applications with more benefits and 26 applications with fewer benefits than were justified.

---

[5] These eight applications had "reduced price" or "paid" status instead of "free" status.

Westat

Table 3.   Administrative errors and incorrect certification determinations on the basis of an approved/denied application (n=2,798), (Unweighted data for SY 2010/11)

Administrative errors	N	Percent
All administrative errors	298	10.7
Administrative errors that resulted in incorrect determination	107	3.8
More benefits	81	2.9
Fewer benefits	26	0.9

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer).

The percentage of eligibility determinations in error was 3.9 percent for students approved or denied *on the basis of income based assessment*. As seen in Table 4, there were 94 applications (3.9 percent) with incorrect certification out of 2,384 income-based applications. Of these 94 applications with certification error, 81 percent (76 applications), were certified for more benefits, and about 19 percent (18 applications), were certified for fewer benefits than justified based on the documentation available.

Table 4.   Certification status determination for income-based applications (n=2,384), (Unweighted data for SY 2010/11)

Certification status determination	N	Percent
Correct determination	2,290	96.1
Incorrect determination	94	3.9
More benefits	76	3.2
Fewer benefits	18	0.8

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Numbers may not exactly sum to total due to rounding.

Accuracy of benefit issuance status was a little lower compared with the accuracy of certification determination. Meal benefits issuance status was correct for about 95.1 percent of the applications approved or denied on the basis of income based assessment. As seen in Table 5, there were 118 students (5.0 percent) out of 2,384 income-based applications with incorrect level of benefits. Of the 118 students with benefit determination error, 77 percent (91 students) were certified for more benefits, and 23 percent (27 students) were certified for fewer benefits than justified based on the documentation available.

Table 5.   Benefit issuance status determination for income-based applications (n=2,384),
                (Unweighted data for SY 2010/11)

Benefit issuance determination	N	Percent
Correct determination	2,266	95.1
Incorrect determination	118	5.0
More benefits	91	3.8
Fewer benefits	27	1.1

Note: Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification. Numbers may not exactly sum to total due to rounding.

The percentage of applications incorrectly approved or denied for NLSP free or reduced-price meal benefits was a little higher but was still comparable to the previous years among all applications approved or denied on the basis of an application. Data from school year 2010/11 compared to data from school years 2004/05 through 2009/10 show a small increase in overall certification error due to administrative errors. All the series compared in the table are weighted using FNS's current weighting method. The percentage of students applying for meal benefits who were incorrectly certified due to administrative errors varied from 2.0 to 3.9 percent during the previous 6-year span. As seen in Table 6, in school year 2010/11 administrative error in certification status determination was at 3.7 percent. The percentage of over-certified was 2.8 percent and the percentage of under-certified was 0.9 percent.

Table 6.   Comparison of Certification and Benefit Status Determinations for all applications
                approved or denied on the basis of an application, (Weighted data for SY 2004/05-
                SY 2010/11, n=2,798)

	2004/05 Percent	2005/06 Percent	2006/07 Percent	2007/08 Percent	2008/09 Percent	2009/10 Percent	2010/11 Percent
Certification status determination							
Correct determination	96.5	97.0	96.1	96.1	98.0	97.7	96.3
Incorrect determination	3.5	3.0	3.9	3.9	2.0	2.3	3.7
More benefits	2.9	2.5	3.0	3.2	1.3	1.5	2.8
Fewer benefits	0.6	0.5	0.9	0.7	0.7	0.9	0.9
Benefit status determination							
Correct determination	95.7	96.2	95.8	95.4	97.0	97.0	95.5
Incorrect determination	4.3	3.8	4.2	4.6	3.0	3.0	4.5
More benefits	3.4	2.8	3.3	3.5	1.9	1.5	3.3
Fewer benefits	0.9	1.0	0.9	1.1	1.1	1.5	1.2

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification. We use "Weights as usual" in weighting. Numbers may not exactly sum to total due to rounding.

Westat®

The overall percentage of students with incorrect meal benefits issuance status was a little higher compared with the reports from previous 6 years. The benefit status determination error varied from 3.0 to 4.6 percent during the previous 6-year span. In school year 2010/11, among the 2,798 applications, 4.5 percent had incorrect benefit status determination. The percent of students receiving more benefits than they were entitled increased to 3.3 percent and the percentage of students receiving fewer benefits due to benefit issuance error has increased to 1.2 percent.

Adjusting for sample weights indicate an upward bias in the unweighted error estimates for determination of certification and benefit status. As seen in Table 7, unweighted estimates for certification and benefit status determination are both higher than any of the weighted estimates. While unweighted estimates indicate 3.82 percent and 4.68 percent errors, "weighted as usual" estimates show a 3.70 percent and 4.55 percent and "revised weight" estimates indicate 3.62 percent and 4.46 percent error rates in determination of certification and benefit status, respectively.

Table 7.   Comparison of weighted and unweighted estimates: administrative errors in determination of certification and benefit status among all applications approved or denied on the basis of an application (n=2,798), SY 2010/11

	Incorrect determination		Fewer-Benefits		More-Benefits	
	N	Percent	N	Percent	N	Percent
Certification status determination						
Unweighted	107.0	3.82	26.0	0.93	81.0	2.89
Weighted as usual	103.5	3.70	24.3	0.87	78.9	2.82
Revised weights	101.3	3.62	24.6	0.88	76.7	2.74
Benefit status determination						
Unweighted	131.0	4.68	35.0	1.25	96.0	3.43
Weighted as usual	127.3	4.55	34.7	1.24	92.3	3.30
Revised weights	124.8	4.46	37.5	1.34	87.0	3.11

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification.Numbers may not exactly sum to total due to rounding.

The difference in estimates is a direct result of the variable weights resulting from the unequal probability of selection of a LEA and selection of a fixed number of applications per LEA. If the measure of size used to select the LEAs had been perfectly correlated with the actual counts of eligible applications from which the sample was drawn, the resulting sample would have been self-weighting (i.e., an equal weighted sample), in which case the weighted and unweighted results would

be identical. The fact that the weighted and unweighted estimates differ indicates there is a negative correlation between sampling weight and probability of error (i.e., an application with a large weight corresponding to lower probability of selection tends to have a lower error rate, or, vice versa).

FNS implemented regional office review of applications between 2005 and 2009. In 2010 and 2011, Westat served as an independent reviewer to examine administrative errors incurred by the Local Educational Agencies in their approval process of applications for free and reduced price meals.

In school year 2010/11, LEA determinations had administrative errors in 10.7 percent of applications. This indicates a 3.2 percentage point increase from the previous year's administrative error rate of 7.5 percent. The percentage of applications that had incorrect level of benefit issuance due to administrative errors was also slightly higher compared to last year (certification error of 3.7 percent in SY 2010/11 compared with 2.3 percent in SY 2009/10). Using weighted estimates, we found that for all applications approved or denied on the basis of application, 2.8 percent received more benefits and 0.9 percent received fewer benefits than justified. Errors in household size and income determination were also relatively higher. The rate of error in computing household size was 2.8 percent this year and 2.0 percent in the previous year. Similarly, the rate of error in computing household income was 4.3 percent this year and 3.7 percent in the previous year.

There were several circumstances that may have contributed to the increase in error rates for RORA 2011. The primary reason may be the characteristics of the sample pool may have changed. More households are being directly certified, reducing the pool of applicants from which to draw the sample. Among those who apply for benefits, it is very possible that a higher percentage of households have incomes close to the thresholds for free and reduced price meals and perhaps the likelihood of making an administrative error that leads to certification error is greater. In addition, some of the errors may have occurred due to lack of supporting documentation necessary to validate changes in benefit status during the initial application review and current CBIS determination. For example, the beginning of the school year application and end of year eligibility status would be different with little to no information on how the change occurred. In the best-case scenario, Westat reviewers would find electronic entries to support the benefit status change. However, in situations with no documentation to explain the benefit status change, a processing error or application note "CBIS different from FNSElig" would occur. Similarly, during verification of applications either lack of documentation or conflicting documentation contributed to further processing errors.

Processing errors also occurred when the SFA would use database screen print out forms in lieu of providing information on the hardcopy or electronic forms. In a few situations, the SFA provided print outs of 2 different reports from their database. In these situations, Westat is unaware of the software used on the districts' websites including any instructions or key for active data fields for applicant data entry. To this end, Westat is unaware as to how that information gets translated or entered into the SFA databases.

In certain situations, the SFA did not properly document the status of foster children. Such SFA errors included: making the entire household categorically eligible, including the foster child in the household count, or not including the income of the foster child when making a determination. Often times without a student roster, Westat was unable to determine which student on the application is chosen for review. This situation is challenging when an application has multiple students, some of which have been identified as foster children.

The process of obtaining applications for this study does not ensure equal probability of selection, mainly, in order to expand the number of cases available with less effort. However, the fact that the weighted and unweighted estimates differ suggests that sampling weights are needed to derive substantially unbiased population estimates from the survey sample.

Recommendations for Future Studies 6

This report presents findings of the seventh annual RORA review. Westat reviewed the applications selected by FNS, entered data, implemented quality control procedures, and conducted data analyses. We recommend that future RORA studies will benefit from the following two recommendations.

RORA Cover sheet to require documentation of additional relevant information

This year we observed a slight increase in the use of computer printouts as supporting documents. However, in some cases, Westat staff was not able to validate changes in benefit status during the initial application review and current CBIS determination due to lack and clarity of supporting information in these printouts. On the cover sheet, we recommend including a line requesting explanation of reasons from LEAs when there is a change in benefit status without supporting documentation. This can be a multiple choice of most common reasons with an "other" option for the LEAs to use for clarification.

Some LEAs would use database screen print out forms in lieu of providing information on the hardcopy or electronic forms. In some cases, the LEA provided print outs of 2 different reports from their database. In these situations, we recommend requesting clarification from LEAs in terms of what data to use for review purposes. In addition, sometimes, it is important to have information regarding which student on the application is chosen for review. It may be desirable to have the Regional Office Staff highlight the sampled student on the application. The review becomes particularly challenging when an application has multiple students, some of which have been identified as foster children.

Sampling Design and Expanding Analyses

The current sampling design is sufficient to determine annual rates of administrative errors and track changes overtime. However, as indicated in this report, sampling weight adjustment is needed to develop population level unbiased estimates. In order to examine changes in population level error estimates, data for earlier years have to be reexamined by using respective sampling weights. In

addition, the current sampling design does not enable researchers to make subgroup analysis. For example, FNS may be interested in examining regional differences in administrative errors to provide tailored technical assistance for corrective activities.

A new sampling design to include more LEAs from each region and possibly higher number of applications from each LEA would permit examination of administrative error rate within and across regions. In general, increasing the number of LEAs in the sample along with a corresponding reduction in the number of sampled applications per LEA will improve sampling precision (i.e., reduce the standard errors of estimates) for overall and subgroup estimates. The extent of the improvement will depend on the degree of the within-LEA intraclass correlation of the characteristics being measured. For example, if application errors tend to be clustered in certain LEAs, the intraclass correlation will be relatively high. If application errors tend to be more or less uniformly distributed across all LEAs, the intraclass correlation will be relatively low. Even where the intraclass correlation is fairly small, there will be benefits to increasing the number of sampled LEAs and reducing the within-LEA sample size. For example, with an intraclass correlation of 0.05 or higher, the standard error of an estimate based on 8 LEAs per stratum and 25 applications per LEA will be reduced by 20-25 percent compared with the current design.

It may also be possible to examine and compare estimates across regions if analysis can be implemented by using the RORA data from all seven years. If data sampling designs across years are comparable and allow for such pooling, data for each region will be increased to 7 X 8 data points instead of only 8. Initial analysis can be implemented on the pooled data to assess and control for any time trends in the data. Panel data analysis can produce more precise and efficient estimates in terms of the rate and nature of region level administrative errors. This would enable FNS to provide broader policy guidance at the national level but targeted technical assistance at the regional level.

References

Cochran W.G. 1977. Sampling Techniques. Wiley; 3rd edition. New York.

Endahl, John. "Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2005." USDA, Food and Nutrition Service, Alexandria, VA: 2005.

Endahl, John. "Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2006." USDA, Food and Nutrition Service, Alexandria, VA: 2007.

Endahl, John. "Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2007." USDA, Food and Nutrition Service, Alexandria, VA: 2008.

Endahl, John. "Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2008." USDA, Food and Nutrition Service, Alexandria, VA: 2010.

Endahl, John. "Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2009." USDA, Food and Nutrition Service, Alexandria, VA: 2010.

Karakus M.C., Roeser A., Dixit-Joshi S., Eaker E. "Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2010." A report prepared under contract to USDA, Food and Nutrition Service, Alexandria, VA: 2011.

FRAC (Food Research and Action Center). "National School Lunch Program: 2009-2010 Participation". Available at http://frac.org/: 2011

Hansen, M.M. and Hurwitz, W.N. (1943). On the theory of sampling from finite populations. *Annals of Mathematical Statistics:* 14; 333-362.

Ponza, M., Gleason, P., Hulsey, L., and Moore, Q. "NSLP/SBP Access, Participation, Eligibility, and Certification Study: Erroneous Payments in the NSLP and SBP." *Special Nutrition Program Report Series,* No. CN-07-APEC. USDA, Food and Nutrition Service, Alexandria, VA: 2007.

U.S. Department of Agriculture, Food and Nutrition Service, "Eligibility Manual for School Meals – Federal Policy for Determining and Verifying Eligibility." Alexandria, VA: USDA, Food and Nutrition Service, Child Nutrition Programs, October 2011.

Appendix A

The Strata Totals of the Number of Free and Reduced Price Students and Direct Certifications in Each Stratum

LEA number	LEA size	LEA direct certification size	Region size that the LEA is selected from
111	240	15	431,367
112	1,093	640	431,367
121	6,350	3,848	430,899
122	2,515	1,634	430,899
131	22,674	4,198	407,777
132	16,664	7,060	407,777
141	268,042	145,055	457,978
142	383,066	236,738	457,978
211	214	36	491,276
212	1,094	279	491,276
221	5,563	2,849	492,843
222	7,654	5,915	492,843
231	12,404	5,363	482,972
232	18,092	8,443	482,972
241	28,632	11,765	501,584
242	176,323	137,627	501,584
311	3,165	1,215	1,266,096
312	176	36	1,266,096
321	16,202	7,076	1,261,779
322	6,392	1,971	1,261,779
331	24,192	185	1,272,720
332	70,045	43,756	1,272,720
341	109,807	17,458	1,272,910
342	109,635	57,266	1,272,910
411	265	127	912,664
412	418	260	912,664
421	2,521	1,654	913,022
422	1,384	589	913,022
431	5,113	1,750	903,841
432	16,922	13,253	903,841
441	21,235	9,296	923,739
442	82,820	18,992	923,739
511	796	363	1,009,629
512	81	17	1,009,629
521	13,126	10,269	1,010,510
522	6,075	3,402	1,010,510
531	34,883	14,723	988,844
532	15,605	5,075	988,844

LEA number	LEA size	LEA direct certification size	Region size that the LEA is selected from
541	90,029	38,935	1,035,840
542	45,158	8,527	1,035,840
611	480	418	405,083
612	1,326	1,093	405,083
621	4,287	1,775	403,805
622	4,029	2,134	403,805
631	10,319	6,280	406,001
632	28,285	20,440	406,001
641	22,347	5,173	407,143
642	25,850	10,635	407,143
711	3,626	2,285	1,258,477
712	4,117	3,202	1,258,477
721	9,135	0	1,256,480
722	14,680	6,237	1,256,480
731	28,480	2,728	1,238,125
732	23,504	10,025	1,238,125
741	39,817	9,906	1,286,950
742	77,028	14,553	1,286,950

Appendix B

**The Number of School Districts Within
Each Region by the Four Strata**

The Number Of School Districts Within Each Region By The Four Strata

Strata	FNS REGION							
	NERO	MARO	SERO	MWRO	SWRO	MPRO	WRO	TOTAL
1	1,991	1,614	1,045	4,220	2,114	2,732	2,048	15,764
2	270	232	218	703	219	305	197	2,144
3	44	69	64	212	61	76	79	605
4	4	17	16	26	21	21	20	125
Total	2,309	1,932	1,343	5,161	2,415	3,134	2,344	18,638

Appendix C

Mean and Standard Errors Estimates
for Certification and Benefit Issuance Errors
for All Applications Approved or Denied on
the Basis of an Application

Mean and Standard Errors Estimates for Certification and Benefit Issuance Errors for all applications approved or denied on the basis of an application

Unweighted statistics, n=2,798

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0382	0.0036
CERTMOREB	Certification error – receiving more benefits?	0.0289	0.0032
CERTLESSB	Certification error – receiving less benefits?	0.0093	0.0018
BENERROR	Is there a benefit issuance error?	0.0468	0.0040
BENMOREB	Benefit issuance error – receiving more benefits?	0.0343	0.0034
BENLESSB	Benefit issuance error – receiving less benefits?	0.0125	0.0021

Statistics using weights as usual, n=2,798

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0370	0.0036
CERTMOREB	Certification error – receiving more benefits?	0.0282	0.0031
CERTLESSB	Certification error – receiving less benefits?	0.0087	0.0018
BENERROR	Is there a benefit issuance error?	0.0455	0.0039
BENMOREB	Benefit issuance error – receiving more benefits?	0.0330	0.0034
BENLESSB	Benefit issuance error – receiving less benefits?	0.0124	0.0021

Statistics using adjusted weights, n=2,798

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0362	0.0035
CERTMOREB	Certification error – receiving more benefits?	0.0274	0.0031
CERTLESSB	Certification error – receiving less benefits?	0.0088	0.0018
BENERROR	Is there a benefit issuance error?	0.0446	0.0039
BENMOREB	Benefit issuance error – receiving more benefits?	0.0311	0.0033
BENLESSB	Benefit issuance error – receiving less benefits?	0.0134	0.0022

Westat®

Appendix D

Data Management Decision Log

1 HHIncome	TOPIC: SFA used average income to calculate SFAHHInc	PROBLEM: The Applicant gave an income range of $1200 to $1500 and then an average of $1350. The SFA used the average to calculate SFAHHINC. Is this an appropriate method?	RESOLUTION: Yes, using the average income is appropriate.
	DATE INITIATED: 09/13/2011		
	DATE DECIDED: 9/14//2011		
	REFERENCE: Dist 121 ST 44		
	Decided by: Westat Team		

2 HHIncome	**TOPIC:** No income provided by Applicant **DATE INITIATED:** 09/13/2011 **DATE DECIDED:** 09/14/2011 **REFERENCE:** Dist 111 ST 42 **DECIDED BY:** Westat Team	**PROBLEM:** No income was provided by the applicant. FNS reviewer noted on the coversheet that the paid status was a denial based on income. How was this determined?	**RESOLUTION:** The paid status is correct because the household didn't provide an income (and as a result is processed as an incomplete application and does not receive benefits). Pg.40 of the eligibility manual states: "households must report current income on a free and reduced price application."

3 **SFAElig**	**TOPIC:** No place for SFA calculations and FNSElig & CBIS are different	**PROBLEM:** There is no space for SFA determinations on the application. As a result, we defer to the CBIS status on the cover sheet for a proxy SFAElig. CBIS = 1(free) but my calculation for FNSElig = 2 (reduced).	**RESOLUTION:** This is a processing error. Proc Err = 1. Note: "CBIS different than FNSElig" and SFAElig = 99 (which means that there is no space provided on the application form for SFA determinations.
	DATE INITIATED: 09/14/2011		
	DATE DECIDED 09/14/2011		
	REFERENCE: Dist 212 St 21		
	DECIDED BY: Westat Team		

4 HHInc	**TOPIC:** HHINC frequency in semesters	**PROBLEM:** It appears that the adult receives $2500.00 for a semester of teaching. The $1600.00 is for one semester of extra teaching. Should the SFA assume 2 semesters per year instead of 1? If so, then FNSElig = 3 not 2.	**RESOLUTION:** The $2500.00 refers to a one time amount based on the additional class taught during one semester. The SFA determination is correct. FNSElig = 2.
	DATE INITIATED: 09/13/2011		
	DATE DECIDED: 09/14/2011		
	REFERENCE: Dist 112 St 20		
	DECIDED BY: Westat Team		

5	**TOPIC:**	**PROBLEM:**	**RESOLUTION:**
CatElig	No CatElig, income , or SSN provided. Residential institution (School)	Applicant wrote: child resides at a residential institution and gives a Medicaid number. There are no income amounts. Nor are there numbers provided for SNAP, TANF, FDPIR but the SFA marked that box and indicated "free" status. Would the application as written be deemed incomplete? FNSElig =4, ProcErr = 1?	Pg. 38 Eligibility Manual states that children in residential institutions are considered a "special situation" and a household of 1 with no income. FNSElig = 1 but ProcErr =1 (administrative error that doesn't lead to a benefit status change).
	DATE INITIATED: 09/13/11		
	DATE DECIDED: 09/14/2011		
	REFERENCE: Dist 121 ST 49		
	DECIDED BY: Westat Team		

| 6

HHIncome | **TOPIC:**
HHINC Calculation formula for seasonal income.

DATE INITIATED:
09/13/2011

DATE DECIDED:
09/14/2011
ADDENDUM:
01/27/2012

REFERENCE:
Dist 122 St 04

DECIDED BY:
Westat Team
John Endahl | **PROBLEM:**

1. Would we use $40/ week just during summer entry? (1/4 of the year ...13 weeks). | **RESOLUTION:**

1. Yes, use 13 weeks for your calculation.

Addendum per JE; weekly figures are inappropriate to calculate monthly figures. Income section is to be considered incomplete. |

7 CatElig	**TOPIC:** CatElig with missing information	**PROBLEM:** SFA Reviewer notes that the child's name was not on either application. Even though the household is categorically eligible, should this be considered an error because the name was absent?	**RESOLUTION:** ProcErr = 1 but FNSElig =1. This is an administrative error that does not result in a benefit issuance status error.
	DATE INITIATED: 09/14/2011		
	DATE DECIDED: 09/14/2011		
	REFERENCE: Dist 122 St 48		
	DECIDED BY: Westat Team		

8 HHIncome, HHSize & SFAElig	**TOPIC:** Multiple variable differences between FNS and SFA	**PROBLEM:** SFAHHInc , SFAHHSize and SFAElig are all different from my calculations.	**RESOLUTION:** We agree with the income calculations of the SFA. Use $13,000.00 as an annual amount. Household Size is 6. ProcErr = 1 HHsize and SFAHHSize different.
	DATE INITIATED: 09/20/2011		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 232 St 33		
	DECIDED BY: Westat Team		

9	TOPIC:	PROBLEM:	RESOLUTION:
Foster Child	Foster Child Income	The applicant did not check the Foster Child Box but did enter an amount in the personal use income box. The amount is the same as the parent's monthly Income. SFA made an income based status determination but did not include this amount.	Do not include this as a Foster child. There is no processing error. ProcErr = 2.
	DATE INITIATED: 09/21/2011 Meeting		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 241 St 41		
	DECIDED BY: Westat Team		

10 **Foster Child Income**	**TOPIC:** Application instructions and income in foster child section	**PROBLEM:** Instructions are: separate applications for each school, listing only students attending that school in Section 2. List all others in Section 4 (household) and do not include students in Section 2. No place for income of child in section 2. An income is listed in foster child section and not included in SFA income based calculations.	**RESOLUTION:** The applicant is not a foster child therefore, the income should be included. Refer to pg. 6 of the Eligibility Manual
	DATE INITIATED: 09/19/2011		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 142 St 05 and several others		
	DECIDED BY: Westat Team		

11	TOPIC:	PROBLEM:	RESOLUTION:
HHIncome	Two applications with income changes	There are 2 applications: the latest application dated 10/19/10 reduced income from $1154.40 BW (on application signed 10/05/2010) to $954.00 BW. This change was entered into the computer on Oct 29, 2010. Without changing the eligibility, someone changed the income back to $1154.40 on 04/19/2011 without furnishing a new application. Should I change my income or leave the ProcErr =1 for HHIncome and SFAHHInc different?	This is a ProcErr =1 that doesn't affect the eligibility status.
	DATE INITIATED: 09/19/2011		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 142 St 20		
	DECIDED BY: Westat Team		

12 **SFAHHSize,** **SFAHHInc,** **SFAElig &** **Signature**	**TOPIC:** SFA calculations Status missing. Signature is printed name of a student.	**PROBLEM:** 1. SFA left SFA section of the application blank. In addition, there is no income in the income section. 2. There is only one name in the household section and all the rest are in the student section. The signature is the printed name of one of the students.	**RESOLUTION:** 1. With no evidence of categorical eligibility, the income is not listed on this application so it should be considered incomplete. FNSElig = 4. 2. The signature needs to be of an adult household member. In special cases of an emancipated children how lives alone or as a member of a household with no adult members, an emancipated child must sign the application.
	DATE INITIATED: 09/19/2011		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 142 St 50		
	DECIDED BY: Westat Team John Endahl		

| 13 Verification | **TOPIC:** "Denial \ V =NR" notation on an application, no supporting documentation for verification selection **DATE INITIATED:** 09/15/2011 **DATE DECIDED:** 09/21/2011 ADDENDUM: 11/10/2011 **REFERENCE:** Dist 132 St 24 **DECIDED BY:** Westat Team John Endahl | **PROBLEM:** My calculations match SFA calculations and status as of 09/2/2010. Someone wrote "Denial\ V = NR and a denial date of 11/15. This application was not selected for verification per coversheet. How should I populate the variables, including ProcErr and notes? Addendum: The cover sheet states that the child's application was not selected for verification. Question number 8, "If this application was selected for verification…" was left blank. Is the note "Denied V=NR" sufficient evidence that a verification request occurred? For future applications, do notes such as this suffice? | **RESOLUTION:** This is an administrative error – no documentation of verification. FNSElig = 2, SFAElig = 3, ProcErr = 1, notes: No verification documentation. Addendum: Per JE: This application appears to have been selected for verification, regardless of what the cover sheet indicates….The Regional Office staffer may have not found any documentation in the file suggesting it was selected for verification. However, the Nov. date and denial because there was no response to the verification request seems logical…..I would have coded this FNSElig=2, SFAElig=2 if the original Sept. application indicated that the household should be RP, and then code SFAVer =7 and FNSVer=7 indicating that there was no response to verification. If SFAElig=2 and CBIS=3 there would be no processing error because SFAVer=7. Addendum: Per JE; I would prefer to review these on a case by case basis |

14	**TOPIC:**	**PROBLEM:**	**RESOLUTION:**
FNSElig	Spanish applications with Foster child box marked	First application dated 09/21/2010, second dated 04/02/2011 . The second and more recent application was used. This is one of several Spanish applications that have the Foster child box marked with no income listed. SFA continued with household and income based variables to calculate status.	Mark as a foster child. ProcErr = 1 – administrative error that doesn't affect status.
	DATE INITIATED: 09/15/2011		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 132 St 32		
	DECIDED BY: Westat Team		

| 15

HHIncome | TOPIC:
Applicant pre-calculates all divisions of income frequency, SFA uses for status.

DATE INITIATED:
09/15/2011

DATE DECIDED:
09/21/2011
ADDENDUM:
01/27/2012

REFERENCE:
Dist 132 St 14

DECIDED BY:
Westat Team
John Endahl | PROBLEM:

Applicant has attempted to calculate all income frequencies starting with weekly and doubling amounts until the annual calculation. SFA used the erroneously calculated annual figure to calculate status.

Using the lowest amount (weekly) I come up with a different monthly figure.
In this case, is it correct to use the lowest amount (weekly) for FNS calculations? | RESOLUTION:

Use weekly amount for FNS calculation.

Addendum per JE; weekly figures are inappropriate to calculate monthly figures. Income section is to be considered incomplete. |

16 HHIncome &FNSElig	TOPIC: No space in Part 2 Student list to enter child's income.	PROBLEM: (Applies to several applications) Application instructions for part 4, is not to list students from Part 2. Part 2 has no space for child's income and instructions to only include students attending the same school and make separate applications for other students. This application has only 1 student and there is an income of $60.00 in the Foster Child section. Computer sheet shows SFA making an income based status (including the $60). Should we assume the applicant had no other way of indicating the child's income and make an income based status or should we treat this as a "Foster Child" application?	RESOLUTION: Treat this as an income based application not a foster child application. It is correct to include the $60.
	DATE INITIATED: 09/15/2011		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 132 St 01		
	DECIDED BY: Westat Team		

17	**TOPIC:** Application Status VS CBIS	**PROBLEM:**	**RESOLUTION:**
Incomplete Application, Missing data		Several applications note"Scanned" on the cover sheet. The actual application(s) are incomplete because of missing income information (also without a TANF or a SNAP number) but the computer printout has income information. Do we consider the application incomplete because of missing income information or do we use the amount listed on the computer print out?	1. Brooklyn application 11: Looking at the Student Tracking Record, it appears that the system classified this application as incomplete initially (10/20/2010) with the approval code correctly being DENIED, that the approval code was changed (03/07/2011) from DENIED to FREE, the household income went from none reported to $300 per week, and the adult SSN was changed to N/A (perhaps indicating that the district at that time was informed that the adult did not have a SSN.
	DATE INITIATED: 09/21/2011		
	DATE DECIDED: 10/05/2011		Yes, it is unclear what information was obtained from the household to change the eligibility status, *but it does appear that the correct eligibility decision was made at the start of the school year.* It may be a situation where they only scan the initial application and if a second application is provided, they only edit the specific variables that were changed in the system.
	REFERENCE: Dist 142 St 11		
		Also there are no SSN numbers on the applications or an indication from the applicant that they don't have one.	**I would not consider this to be in error.**
	DECIDED BY: John Endahl Westat Team		2. AR: Populate the abstraction sheet with the data from the original application and the original data and status from the Tracking Records for the SFA variables.
		Should there be any ProcErr other than HHIncome and SFAHHInc different? Would we assume that the applicant doesn't have a SSN based on the change of 03/07/2011?	In this situation SFAElig AND FNSElig = 4. ProcErr = 2. NOTES: CBIS and FNSElig different. NO ProcErr per Email from JE.
			Addendum per JE; Use the latest info from the computer system as the information coded into the HHIncome and not SSN=2...In this case CBIS and FNSElig would not be different. Thus no processing error.

18	TOPIC:	PROBLEM:	RESOLUTION:
SSN missing on Income based status application	Free Income based Status but no SSN	The application for an income based status does not have the required SSN. The computer print-out will acknowledge this by marking "No SSN" but the SFA decision is 'free'. This would generally be a processing error based on the missing SSN. We do not know why the SFA decided on the "free" status recognizing that the SSN is missing.	1. Brooklyn application 12: Looking at the Student Tracking Record, it appears that the system classified this application as incomplete initially (10/20/2010) with the approval code correctly being DENIED and that it wasn't until 04/07/2011 that the approval code was changed from DENIED to FREE, and the adult SSN was changed to N/A (perhaps indicating that the district at that time was informed that the adult did not have a SSN.

Yes, it is unclear what information was obtained from the household to change the eligibility status, *but it does appear that the correct eligibility decision was made at the start of the school year.*

I would not consider this to be in error.

2. AR: Populate the abstraction sheet with the data from the original application and the original data and status from the Tracking Records for the SFA variables.

In this situation SFAElig AND FNSElig = 4. ProcErr = 2.
NOTES: CBIS and FNSElig different. NO ProcErr per Email from JE. |
	DATE INITIATED: 09/21/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 142 St 12		
	DECIDED BY: John Endahl		

19 SFAElig	**TOPIC:** No SFA section but computer print out	**PROBLEM:** We have some districts that do not have space for an SFA decision but they do provide a computer print out. Do we use the decision on the computer printout as SFAElig OR is the "status" variable what we should use as SFAElig? We have reviewed a Status = 4 (on the print out). Do you know what that stands for?	**RESOLUTION:** Public Schools for Robeson County, applications 19, 12 and 6. Yes, you should use the "Status" variable as the SFAElig. (DL 32). For Robeson County, the status codes are: 1=Free directly certified; 2 = Free through application; 3 = Reduced Price; 4 = Denied.
	DATE INITIATED: 09/22/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 331 and others		
	DECIDED BY: John Endahl		

20 CatElig	TOPIC: SSN in SNAP TANF Section of application.	PROBLEM:	RESOLUTION:
		Historically, we have assumed that if there is a number in the location for TANF or SNAP case numbers that the number is legitimate (decision log 19). However, in this case, 45 of the 50 applications in this district have what seems to be SSN#s in this box. Please see Alabama 2, 3, 26, 28 for multiple variations of this scenario. Please advise.	I would agree that, for this school district, the numbers that appear in the SNAP/TANF case numbers do appear to be SSNs. Given, that in all instances, the household didn't skip section 4 and provided household income and that the district has processed these applications on the basis of household income, I would review these applications as if they were income-based applications, NOT categorically eligible applications.
	DATE INITIATED: 09/22/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 322		
	DECIDED BY: John Endahl		

21 **Homeless**	**TOPIC:** No SFA Information Marked Homeless	**PROBLEM:** This application is marked as Homeless. There is no SFA documentation presented by this district and we cannot verify how the SFA Reviewer Status was =1.	**RESOLUTION:** Use income based determination. Note: Homeless. Pg. 53 of the Eligibility Manual states that acceptable documentation that the children are homeless is obtained from the LEA homeless liaison or directors of homeless shelters where the children reside. Documentation to substantiate free meal eligibility must consist of the child's name or a list of names; effective date (s), and signature of the local educational liaison or the director of the homeless shelter.
	DATE INITIATED: 09/28/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 212 St 42		
	DECIDED BY: Westat Team		

22 **SSN redacted**	**TOPIC:** Redaction of SSN on applications: full or partial	**PROBLEM:** The boxes or lines used for SSN are partially or fully redacted. Should we assume that the SSN is present on the application?	**RESOLUTION:** Consider any type of redaction (full or partial) as a complete SSN. Please include a note for these applications that says: "SSN redacted"
	DATE INITIATED: 10/05/2011		
	DATE DECIDED 10/05/2011		
	REFERENCE: Dist 221 all Dist 332 all		
	DECIDED BY: Westat Team		

| 23

SSN | **TOPIC:**
Electronic applications Full and Partial SSN

DATE INITIATED:
09/26/2011

DATE DECIDED
10/05/2011

REFERENCE:
Dist 222
St 07, 08

DECIDED BY:
Westat Team | **PROBLEM:**

This district has some electronic applications. For Students 08 and 50 only have partial numbers present. For students 07, 15, 35 & 38 there is a full SSN present. At the meeting o f 09/29/2011 we only discussed the last four digit scenarios and assumed the program auto-redacted leaving only the last 4 digits. Since this district has examples of both, would we consider 08 as an incomplete application? | **RESOLUTION:**

There is no error; the last four digits of SSN are suffice. The Healthy, Hunger Free Kids Act (HHFKA) of 2010 requires applicants to provide only the last 4 digits of their SSN. |

24	**TOPIC:**	**PROBLEM:**	**RESOLUTION:**
Application	Blank Applications	CBIS = 1. Comment by SFA reviewer on coversheet "Nothing on Application. No explanation". Student name and number but the rest of the application is blank.	X's for missing variables. NOTES: CBIS different that FNSElig. Application incomplete.
	DATE INITIATED: 9/26/2011		
	DATE DECIDED: 10/05/2011	Variation St 39 CBIS = 2 with the same note and the application is blank except Student name and number, ethnicity and SFA Status and signature in SFA section.	
	REFERENCE: Dist 312 St 28,29,30 & 39 variation	Should we treat these as "No Application Submitted", or X's for all variables except the cover sheet , FNSElig and ProcErr?	
	DECIDED BY: Westat Team		

25 CatElig	TOPIC: Zeros in the middle of Case numbers.	PROBLEM: Seven applications with 00 in the middle of the case numbers. SFA processed App s 20, 25, 45, 49 as Income based Status = 2 . SFA processed Apps 4 , 5, 21 as income based Status = 1. On App 20 SFA circled the 2 zeros then proceeded to make an income based status. Do we assume SFA knows #'s are incomplete?	RESOLUTION: All should be considered categorically eligible. ProcErr = 1. Per DL#19 decided by John Endahl: Assume that if there is number in the location for TANF or SNAP case numbers that the number is legitimate. As independent reviewers, we have no knowledge of what the format of a legitimate case number might look like for a specific locale. To that end, we assume that SFA has done due diligence and made sure that the number conforms to the format of a legitimate case number.
	DATE INITIATED: 09/29/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 412 St 20, 45, 25, 49 Variant St 4, 5, 21		
	DECIDED BY: Westat Team John Endahl		

| 26

Duplicated Applications | **TOPIC:**

Duplicate applications with differing SFA Status determinations

DATE INITIATED: 09/29/2011

DATE DECIDED: 10/05/2011 11/10/2011 JE

REFERENCE: Dist 412 St 34

DECIDED BY: Westat Team JE 11/10/2011 | **PROBLEM:**

SFA sent duplicate applications with entire HH information. On one application SFAElig based on Income and full HH. On the other application SFAElig based on Foster child and Foster Inc.

Please review cover sheet note and advise which application to use.

Additional Question: Foster child income of $1596.00 makes income based status = 2 for HHSize = 1. | **RESOLUTION:**

Consider Foster Child. Decision remains free and no error.

JE: I would have processed this based on household income, not that of a Foster child. Regardless of how it was processed, the district reached the correct decision in terms of eligibility (free).

It is unclear why some of the information is typed while the name and address is hand-written. It appears that the district may have preloaded some information from somewhere. While it is OK to preload student names, school names, grade, etc., it is not OK to load income information. To that end, I would indicate that a processing error had occurred. |

27	TOPIC:	PROBLEM:	RESOLUTION:
Expired Application	Expired application	Application shows students and adult signature and SSN. Computer print-out shows free then "Expired" notations.	It looks as though the applicant didn't provide the necessary income information. As a result, their application expired. FNSElig = 4 with a note "Incomplete application"
	DATE INITIATED: 10/05/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 541 St 44		
	DECIDED BY: Westat Team		

28 SFAHHInc & SFAHHSize	**TOPIC:** Electronically filled/ produced applications with no SFA section	**PROBLEM:** A copy of an electronically filled or produced application is supplied with no SFA section. SFA Status and possibly SFA name are in a line superimposed over the top of the application. We have no indication of how SFA calculated status unless we use the information from the application. We have an SFA Status so we can't use SFAElig= 99. Should we use the information from the application or just put X's for the missing SFAHHSize and SFAHHInc variables?	**RESOLUTION:** Assume SFA presented document as SFA information. Use data on application to fill in SFAHHInc, SFAElig and use Household count as SFAHHSize.
	DATE INITIATED: 10/06/2011		
	DATE DECIDED: 10/06/2011 631 10/26/2011 741		
	REFERENCE: Dist 631 and 741 majority of applications		
	DECIDED BY: Westat Team		

| 29

FNS variables | **TOPIC:**

Multiple Online applications with missing or redacted information

DATE INITIATED:
09/30/2011

DATE DECIDED:
10/19/2011

REFERENCE:
Dist 342
St 28, 31, 36, 41

DECIDED BY:
Westat Team | **PROBLEM:**

1. Some online applications show indications that names, incomes and frequencies have been covered over with correction tape or white out. This inhibits our ability to gather FNS variable information from the applications

Do you think that this is a redaction of some sort by the SFA?

2. Some of these also have 2 applications, however they have not carried over names, income from the other application (i. e., a frequency correction for a child's income is all that is on the second application).

In all cases the SFA computer activity printout shows the information needed to fill in FNS variables to allow FNS status determinations.
Should we use both applications and the printout to populate the missing FSN variables? | **RESOLUTION:**

1. Yes, redaction must have occurred.

2. Use both information on the applications then printout to populate the variables. |

30	TOPIC:	PROBLEM:	RESOLUTION:
SFA Computer information	Use of SFA Application Activity tracking list.	Along with screen shots of the SFA Data Base interface that has data that usually doesn't match the application, we sometimes receive an application activity tracking log.	Yes, it is appropriate to use the earlier SFA variable data for the SFA Status calculations. There should be no ProcErr.
	DATE INITIATED: 10/06/2011		ProcErr= 2 and note " SFAElig and FNSElig different that CBIS"
	DATE DECIDED: 10/14/2011	Using the data from the activity tracking log gives a more accurate set of SFA variables for calculations at the time of the application.	
	REFERENCE: Several Districts	This would make a different status finding from CBIS.	
	DECIDED BY: Westat Team	May we use the activity log to make our comparisons for the time of application? Should we make it a ProcErr =1 Note: "SFAElig and FNSElig different that CBIS?	