

**DIRECT CERTIFICATION IN THE NATIONAL SCHOOL LUNCH PROGRAM
STATE IMPLEMENTATION PROGRESS, SCHOOL YEAR 2010-2011
REPORT TO CONGRESS - SUMMARY**

Office of Research and Analysis

October 2011

This report responds to the 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 systems to directly certify children from households that receive Supplemental Nutrition Assistance Program (SNAP) benefits by School Year (SY) 2008-2009. In SY 2010-2011, 85 percent of LEAs directly certified some children from SNAP-recipient households. These LEAs enroll 97 percent of all students in NSLP schools. States and LEAs directly certified 1.9 million more children at the start of SY 2010-2011 than they did a year earlier. The share of SNAP participant children directly certified for free school meals increased to an estimated 78 percent in SY 2010-2011, up from 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 2011.

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 between 130 and 185 percent of the poverty level are eligible for reduced-price meals.

Certain homeless, runaway, and migrant children, and 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 are designed to eliminate the need for paper applications. States and LEAs generally rely on computer systems to match student enrollment lists against SNAP agency records and the records of other assistance agencies whose participants are categorically eligible for free meals. The matching process, whether automated or manual, requires no action by the children’s parents or guardians.

Through SY 2011-2012, States and LEAs may have SNAP and other assistance agencies send letters to

participant households as an alternative to a match system. 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. Just 56 percent of LEAs directly certified some SNAP participants in SY 2004-2005. By SY 2010-2011, that number had grown to 85 percent.

More recent legislative and regulatory action promises to strengthen direct certification systems and improve direct certification effectiveness:

- The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) phases out use of the letter method as a primary means of direct certification of SNAP participant children.
- HHFKA establishes a multi-State demonstration project to directly certify income-eligible children with data from State Medicaid systems.
- States with successful direct certification systems are made eligible for performance awards under HHFKA; less successful States will work with USDA to improve their performance.
- A 2011 interim USDA rule requires direct certification matching against SNAP records at least three times per school year, effective with SY 2011-2012.

State Performance Measures

This report presents information on the outcomes of direct certification for SY 2010-2011. The report estimates 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.

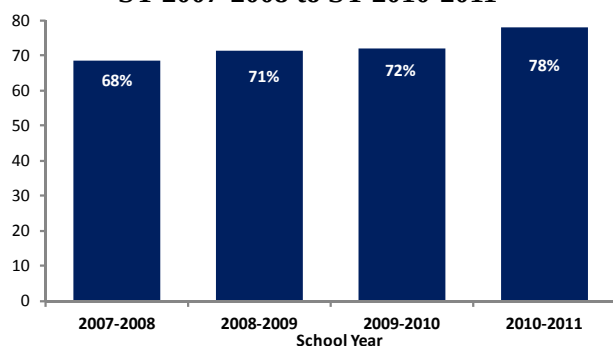
The report also estimates the number of all SNAP, TANF, and FDIPIR participants certified for free school meals, either by direct certification or by application. This provides a more comprehensive measure of State success in certifying categorically eligible children for free school meals.

Key Findings

States and LEAs directly certified 1.9 million more SNAP children in SY 2010-2011 than they did in SY 2009-2010, a 23-percent increase.

- Over the same period, the population of school-age SNAP participant children increased by 16 percent. As a result, the share of SNAP participant children certified for free school meals without application increased to 78 percent in SY 2010-2011, from 72 percent in SY 2009-2010.

**National Average Direct Certification Rate
SY 2007-2008 to SY 2010-2011**



- The overall certification rate of categorically eligible children, by direct certification or by application, increased to 86 percent in SY 2010-2011, from 83 percent in SY 2009-2010.

The number of LEAs directly certifying SNAP-participant children continued to increase.

- The use of direct certification was near universal among the largest LEAs. Ninety-nine percent of LEAs with enrollments of 10,000 or more directly certified some SNAP participants in SY 2010-2011.
- Ninety-six percent of LEAs with enrollments of 1,000 to 9,999, and 92 percent of LEAs with enrollments of 500 to 999 certified some SNAP participants in SY 2010-2011.

- Although just 73 percent of LEAs with enrollments under 500 certified some SNAP participants in SY 2010-2011, that is up from 69 percent in SY 2009-2010.

State-Level Measures of Direct Certification Effectiveness Continue to Improve.

- Forty States directly certified at least as great a percentage of SNAP participant students in SY 2010-2011 as they did in SY 2009-2010, even as the size of the school-age SNAP population grew 16 percent.
- Twenty-three States achieved growth in their direct certification rates of at least 5 percent over SY 2009-2010; 14 States realized growth of more than 10 percent.

State Best Practices

States and LEAs continue to find success with both centralized and district-level matching systems. Among the most successful States there is great variation in the complexity of matching algorithms. Some States use relatively simple systems based on a small number of identifiers; others use more complex systems involving probabilistic matching.

States and LEAs are making investments that have contributed to recent gains in their direct certification rates. One State improved its performance by simplifying its direct certification user interface, improving the flexibility of data upload features, and providing detailed documentation and training manuals for users at the school district level.

Other State and LEA investments promise continued improved performance in coming years. These include preparing for required direct certification matching against SNAP datasets three times per year, and enhancing computer matching procedures.

* WIC is the Special Supplemental Nutrition Program for Women, Infants, and Children

U.S. 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 2010-2011" by Quinn Moore, Kevin Conway, and Brandon Kyler. Project Officer Dennis Ranalli. Report CN-11-DC. Alexandria, VA: October 2011.

Download full report at:

<http://www.fns.usda.gov/ora/MENU/Published/CNP/cnp.htm>

The U.S. 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, Director, Office of Adjudication, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call toll free (866) 632-9992 (Voice). Individuals who are hearing impaired or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish). USDA is an equal opportunity provider and employer.