

This report responds to a requirement of Public Law 110-246 to assess the effectiveness of State and local efforts to conduct direct certification of children for free school meals. Under direct certification, children are determined eligible for free meals without the need for household applications by using data from other means-tested programs. The 2004 Child Nutrition and WIC Reauthorization Act requires local educational agencies (LEAs) to establish, by School Year 2008-2009, a system of direct certification of children from households that receive Supplemental Nutrition Assistance Program (formerly Food Stamp Program) benefits. The mandate is phased in over three years; the largest LEAs were required to establish direct certification systems for School Year 2006-2007. As of School Year 2007-2008, 67 percent of LEAs operated a direct certification system. Across all States, the 2007-2008 median direct certification rate of SNAP-participant children was 69 percent. This number is expected to increase sharply in School Year 2008-2009 as all LEAs become subject to the statutory mandate.

Background

The National School Lunch Program (NSLP) reimburses local educational agencies (LEAs) for providing nutritionally balanced, low cost or free meals to children in public and private schools and residential child care institutions. Participation averaged 31 million children per school day in fiscal year 2008.

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

Eligibility for Program Benefits

Children from households with incomes at or below 130 percent of the federal poverty level are eligible for free school meals. Children from households with incomes no greater than 185 percent of the poverty level are eligible for reduced price meals.

Children from households that receive benefits under the Supplemental Nutrition Assistance Program (SNAP – formerly the Food Stamp Program), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR), 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 eliminate the need to fill out paper applications. Many States and LEAs certify eligible children through computer matching of SNAP, TANF, and FDPIR records against student enrollment lists. Those systems require no action by the children's parents or guardians. In other States and LEAs, letters are sent to SNAP, TANF, and FDPIR households. The letters serve as proof of categorical eligibility for free meals, and must be forwarded by the households to their children's schools.

The Child Nutrition and WIC Reauthorization Act of 2004 requires each State to establish a system of direct certification for SNAP-participant children. That mandate is phased-in over three years. The largest LEAs were required to establish direct certification systems by School Year (SY) 2006-2007. The smallest LEAs (those with fewer than 10,000 students) must begin direct certification of SNAP participant children by SY 2008-2009.

State Performance Measures

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

FNS also estimated the number of all SNAP, TANF, and FDPIR participants certified for free school meals, either by direct certification or by application. This second measure does not specifically assess the effectiveness of State direct certification systems.

However, it provides a more comprehensive measure of State success in certifying categorically eligible children for free school meals, recognizing that some LEAs were not required to operate direct certification systems in SY 2007-2008.

Key Findings

In SY 2004-2005, prior to enactment of the 2004 Reauthorization Act, 56 percent of LEAs operated a direct certification system on a non-mandatory basis. The share of LEAs with direct certification systems grew to 67 percent in SY 2007-2008. Although one third of LEAs had not yet established direct certification systems by SY 2007-2008, virtually all of these were small LEAs not required to launch such systems until SY 2008-2009. About 95 percent of LEAs already subject to the mandate operated direct certification systems in SY 2007-2008.

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

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

State Best Practices

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

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

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

Conclusion

This report is the first in an annual series. Because it measures the effectiveness of State direct certification systems before full implementation of the direct certification mandate, it provides an interim assessment of the States’ progress toward establishing direct certification systems. Future reports will assess direct certification performance after the mandate applies to all LEAs nationwide.

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

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