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*The National School Lunch Program Direct  
Certification Improvement Study: Practices  
and Performance Report*

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# *The National School Lunch Program Direct Certification Improvement Study: Practices and Performance Report*

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## **GLOSSARY OF ACRONYMS**

CIP	continuous improvement plan
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service
HHFKA	Healthy, Hunger-Free Kids Act of 2010
NSLP	National School Lunch Program
POS	point-of-sale
SNAP	Supplemental Nutrition Assistance Program
SSIS	statewide student information system
SSN	Social Security number
SY	school year
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture
VSR	verification and summary report



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## I. INTRODUCTION

Direct certification enables students to be certified to receive free school meals without application based on participation in programs that confer categorical eligibility,<sup>1</sup> thereby increasing access to nutritious meals and reducing burden on school districts.<sup>2</sup> The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires States<sup>3</sup> to meet specific performance targets in their direct certification systems, measured as the percentage of school-age children receiving Supplemental Nutrition Assistance Program (SNAP) benefits who were directly certified for National School Lunch Program (NSLP) benefits. For school year (SY) 2012–2013, the target was 90 percent.<sup>4</sup> States with performance rates below that target must develop and implement continuous improvement plans (CIPs), designed to help them improve their performance.

Directly certifying students who are categorically eligible for free meals involves matching lists of enrolled students to lists of program participants. States have used a variety of approaches for direct certification, including diverse practices in the administrative responsibilities of State and school district staff, the timing and frequency of direct certification data matching, the algorithms used to conduct matching, and the data sources and systems used to support the process. The Food and Nutrition Service (FNS) has offered funding through grants to help States improve their systems as well as advice on how to strengthen direct certification processes. In 2013, FNS developed a guide to help States design effective CIPs, recommending best practices across all aspects of direct certification. Knowledge of best practices was largely supported by qualitative studies and periodic discussions between FNS and State staff on States' experiences.

The Direct Certification Improvement Study expands understanding of the variation and potential value of direct certification practices. The study's main report draws on a survey of all States as well as districts in local matching States, in-depth case studies in seven States and selected districts, and provides a comprehensive picture of direct certification methods employed across the country in SY 2012–2013. The second report in the study presents an analysis of children who were not directly certified despite being eligible, identifying the role matching algorithms and specific data elements play in direct certification data matching.<sup>5</sup> This report completes the series, and has two purposes:

1. Examine direct certification practices and State characteristics associated with high direct certification performance rates
2. Give low-performing States additional information to help them develop effective CIPs.

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<sup>1</sup> In States participating in the Direct Certification-Medicaid pilot study, children may also be certified based on information related to participation in Medicaid.

<sup>2</sup> For more details on the history and implementation of direct certification, please refer to the Direct Certification Improvement Study's main report: Moore et al. (2014).

<sup>3</sup> All 50 States, the District of Columbia, and Guam participate in the National School Lunch Program and are subject to the performance targets. For simplicity's sake, in this report, we refer to all 52 entities as States.

<sup>4</sup> In SY 2013–2014 and beyond, the target will increase to 95 percent.

<sup>5</sup> Gothro et al. (2014).

Pursuant with these goals, the report extends our understanding of direct certification best practices by quantifying the relationships between direct certification performance and specific State practices. In addition, the report synthesizes these findings with findings from the study's main report and the unmatched records analysis report, summarizing the ways the study's analysis suggests that direct certification systems can be improved.

## A. Overview of Approach

Two sets of quantitative analysis inform our understanding of how direct certification performance is related to direct certification practices:

1. **Comparisons of direct certification performance by State practices and characteristics.** We examine differences in average direct certification performance rates for subgroups of States defined by direct certification practices, State education characteristics, and State economic characteristics.
2. **Statistical modeling of direct certification performance.** We use statistical modeling techniques to assess the relationship between direct certification performance and specific State practices, adjusting for other factors included in the model. In addition to enabling us to account for the interrelationship between the factors included in the model, this model enables us to simulate changes in average State direct certification performance rates under various scenarios related to universal adoption of certain direct certification practices.

These analytical techniques allow us to observe correlations between State direct certification performance and the direct certification practices currently in use. However, these relationships may be influenced by a number of contextual factors and therefore do not represent the change in direct certification performance that a State would experience if it implemented the practice (that is, the causal impact of the practice). Many factors may affect direct certification performance, some of which are difficult to measure and are not included in our analysis (for example, fidelity of local implementation of direct certification or quality of communication among agencies involved in direct certification). Although findings from this analysis can identify the practices most commonly used by States with strong performance and suggest the practices most likely to improve performance, the impact of implementing a given practice will depend on the direct certification system and policy context in place at the time of implementation.

This report's analysis uses State direct certification performance rates from SY 2012–2013. FNS will use a different performance measure beginning in SY 2013–2014. The results reported here may not reflect the relationships between direct certification and performance using the new performance measure. However, the performance measure in place in SY 2012–2013 was a meaningful indicator of access to school meal benefits provided by direct certification. Therefore, this report's results identify practices with potential for broadening the program's reach.

## B. Organization of Report

In the rest of this report, we present the methods and results for this analysis, as well as the implications for States developing CIPs. In Chapter II, we present the analysis methodology, including the data sources used for the performance rates, State practices, and State education and economic characteristics. Chapter III contains findings from the analysis identifying correlations

between State direct certification practices and SY 2012–2013 State direct certification performance rates. In Chapter IV, we synthesize these findings with those of the two previous reports in the Direct Certification Improvement Study series. The discussions in this chapter provide context for interpreting the correlational results in Chapter III. We discuss the implications the findings from all three reports in this series have for State CIP development, using FNS' CIP development guide as a framework for the discussion.



## II. METHODOLOGY

We conducted descriptive statistics and multivariate modeling to identify the association of State direct certification performance with direct certification practices and other State characteristics. We used these results to simulate changes in the average State direct certification performance rate under various policy scenarios. In this chapter, we describe the data sources and methods we used in these analyses.

### A. Data Sources

We drew on multiple data sources to conduct the analysis in this report. We describe each data source next.

#### 1. Direct Certification Performance Measures

We used the measure of State direct certification performance presented in the “Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013, Report to Congress.” This measure provides estimates of the percentage of school-age SNAP participants who were directly certified in each State as of October 2012 based on information from district Verification Summary Reports (form FNS-742), SNAP quality control data, and several other national sources.<sup>6</sup> FNS has used this measure to determine whether States met direct certification performance targets established by the HHFKA. However, SY 2012–2013 was the last year during which this measure was used to assess direct certification performance, so specific differences in performance rates identified might not correspond to differences we would observe using the new performance measures in place beginning in SY 2013–2014.

Although this measure of direct certification performance is the best one available, it has some important limitations. The measure has a reference period of October, meaning that it does not capture any direct certifications that take place later in the school year. Moreover, the measure draws on statistics from multiple data sources, each of which is subject to estimation error related to reporting error, sampling error, or other methodological limitations. For example, district reports, which might not always be accurate, are the basis of the measure’s estimate of the number of directly certified students. Additionally, although the performance rates attempt to measure the percentage of directly certified school-age SNAP participants, they are not able to account for the fact that some children are directly certified through Temporary Assistance for Needy Families (TANF), foster care, and other programs besides SNAP. Finally, the measure does not account for the fact that it is only possible to directly certify school-age SNAP participants attending schools that participate in the school meals programs, which excludes some groups of school-age children such as home-schooled children, students attending virtual schools, dropouts, and students attending schools that do not participate in the NSLP.

All analyses presented in this report use the direct certification performance measure. Therefore, its limitations should be kept in mind when interpreting the report’s findings. The validity of these findings is directly related to the extent to which the direct certification measure is accurate.

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<sup>6</sup> See Appendix A for more details on the performance measures used in this analysis.

## 2. Direct Certification Practices

We identified State practices in the SY 2012–2013 National Survey of National School Lunch Program (NSLP) Direct Certification Practices. This survey includes information from all 50 States, the District of Columbia, and Guam on how they conducted direct certification in SY 2012–2013.<sup>7</sup> We examined direct certification practices in the following areas:

- Whether matching is conducted centrally or locally
- Program data sources used in matching
- Timing and frequency match
- Matching algorithm
- Use of probabilistic matching
- Other features of direct certification
- Reported barriers to effective direct certification

## 3. State Education System Characteristics

We obtained data on State education characteristics from recent U.S. Department of Education, National Center on Education Statistics reports. We examined the following State statistics:

- The number of public school districts, schools, and students in SY 2010–2011 from the Common Core of Data database<sup>8</sup>
- The number of private school students in SY 2011–2012 from the Private School Universe Survey<sup>9</sup>

## 4. State Economic Characteristics

We obtained data on State economic characteristics from the Census Bureau and Bureau of Labor Statistics. We examined the following State statistics:

- Child poverty rates in 2012 from the U.S. Census Bureau’s Small Area Income and Poverty Estimates<sup>10</sup>

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<sup>7</sup> For more information on the survey, please refer to the Direct Certification Study’s main report: Moore et al. (2014)

<sup>8</sup> Common Core of Data statistics are available from the U.S. Department of Education, Institute of Education Science’s website: <http://nces.ed.gov/ccd/index.asp>.

<sup>9</sup> Private School Universe Survey data are available from the U.S. Department of Education, Institute of Education Science’s website: <https://nces.ed.gov/surveys/pss/tables1112.asp>.

<sup>10</sup> Poverty data are available from the U.S. Census Bureau’s website: <http://www.census.gov/did/www/saipe/index.html>.

- Median household incomes in 2012 from the U.S. Census Bureau’s Current Population Survey, Annual Social and Economic Supplement<sup>11</sup>
- Unemployment rates in December 2013 from the Bureau of Labor Statistics<sup>12</sup>

## B. Analysis Methods

We begin our analysis by comparing direct certification performance by whether States use key direct certification practices and by State characteristics. Next, we use a statistical model to estimate the relationship of direct certification performance with multiple direct certification practices to help identify the relative importance of each practice. We also use this model to simulate changes in average State direct certification rates under various scenarios.

In interpreting findings from this analysis, it is important to keep in mind that they reflect the observed relationships between direct certification performance and direct certification practices. They do not identify the benefit (or detriment) to direct certification performance caused by using a certain practice. A strong positive correlation between direct certification performance and using a practice provides suggestive evidence that the practice is beneficial to direct certification performance. However, correlational analysis cannot identify the change in direct certification performance that States should expect in response to adopting the practice (the causal impact of the practice). Many factors contribute to successful direct certification. Some factors are measurable and included in our analysis. Others—such as the importance staff assign to direct certification, effectiveness of communication strategies, and many others—are not. This study cannot adjust for all of these factors; therefore, the effectiveness of implementing certain practices will likely differ from the observed relationships presented here and will depend on the broader policy and direct certification system context in which the practice is implemented.

### 1. Comparisons of Direct Certification Performance by State Practices and Characteristics

To identify practices associated with strong direct certification performance, we examined differences in performance rates across a range of State direct certification practices, State education characteristics, and State economic characteristics. For each practice, we calculated the mean performance rate for States using the practice and compared it with the mean performance rate for States not using the practice. We tested whether the difference in means between the two groups is statistically significant using *t*-tests.

We conducted this analysis across all States when possible, but for some direct certification practices the analysis is limited to States using central matching. This is because in local matching States, use of the practice is at the discretion of the local matching entity. For example, use of program data sources in addition to SNAP is a practice that is consistent at the State level for all States. However, characteristics of the matching algorithm or use of probabilistic matching will vary

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<sup>11</sup> Income data are available from the U.S. Census Bureau’s website:  
<http://www.census.gov/hhes/www/income/data/statemedian/>.

<sup>12</sup> Unemployment rate data are available from the Bureau of Labor Statistics’ website:  
<http://www.bls.gov/web/laus/laumstrk.htm>.

across districts in local matching States.<sup>13</sup> For these matching practices, we restricted our analysis to central matching States.

## 2. Modeling Direct Certification Performance

A limitation of the comparisons described earlier is that they look at each practice in isolation and do not consider the relationships among different practices. States with successful direct certification programs likely combine many sound practices to create well-functioning systems. Practices associated with strong performance are therefore also likely correlated with one another.

In response to this limitation, we estimated a statistical model of the relationship between direct certification performance and a set of key direct certification practices. The goal of this model is to estimate the differences in direct certification performance that are associated with important direct certification practices while adjusting for the use of other direct certification practices included in the model. These adjusted differences provide a measure of the independent relationship of performance and each practice, controlling for other practices included in the model.

The model we estimated was an ordinary least squares regression model with direct certification performance as the dependent variable and a set of direct certification practices as explanatory variables. The practices included in the model were those identified in the simple comparison analysis as having the strongest relationships with direct certification performance. This model enables us to observe the relationship between direct certification performance and each practice while adjusting for the other practices included in the model. We include only central matching States in the multivariate model because many of the practices that likely affect performance vary across districts within local matching States.

The small sample size—the analysis includes the 38 States using central matching systems—limited the number of variables we could include in the model. Therefore, the model does not include a large number of factors related to direct certification performance. These omitted factors include both variables available in our data but excluded from the model due to sample size constraints and unobservable factors not available in our data. The results should thus be interpreted as the observed relationship between performance and State use of the practices included in the model. The results do not represent the change in direct certification performance States should expect to see if they incorporate these practices.

## 3. State Practices Simulations

In addition to using the statistical model to estimate the relationships between direct certification performance and practices adjusting for other included factors, we used the model to simulate average State direct certification performance rates under various policy scenarios. The first set of simulations includes only central matching States and simulates hypothetical average performance rates for each practice included in the multivariate model. For example, we simulate the average performance rate assuming all central matching States used probabilistic matching.<sup>14</sup> We do

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<sup>13</sup> Use of these practices varies widely in local matching States. It was not possible to make useful characterizations of local matching States in terms of the prevalence of use of these practices.

<sup>14</sup> These simulated values are estimated by hypothetical performance rates for each State. These imputed values are determined by assigning all States the designated practice, and then applying this revised data to the statistical model.

the same with each practice included in the regression model. We then simulate the average performance rate assuming all central matching States adopted all of the practices from the regression model.

The second set of simulations estimate the average performance rate among all States under scenarios in which all local matching States adopt central matching systems. We produced one version of the simulation in which all local matching States adopt low-quality central matching systems that do not incorporate any of the matching practices included in the model (such as probabilistic matching). We produced a second simulation in which all local matching States adopt higher-quality central matching systems that incorporate all of the matching practices included in the regression model.

Results from these simulations should be interpreted with caution. As described earlier, the model used in the simulation cannot account for all factors that affect direct certification performance and, therefore, does not generate causal estimates of the effect of implementing direct certification practices. Although useful in identifying the practices most commonly associated with strong performance, it is very unlikely that the simulation results reflect the actual average State direct certification performance that would result from the simulated scenarios. In Chapter IV we place these results in the context of other findings and describe the implications for States seeking to improve their direct certification systems.



### III. RESULTS

This chapter presents findings from our analysis of the association of State direct certification performance with direct certification practices and other State characteristics.

#### A. Results of Comparisons of Direct Certification Performance by State Practices and Characteristics

We organized our comparisons of direct certification performance into four sections:

1. **Broad State-level direct certification practices** (all States). The first section contains results pertaining to broad practices that are constant at the State level for both central and local matching States. These include practices such as the matching level, program data sources, and State-reported barriers to effective direct certification.
2. **Matching practices** (central matching States). In the second section, we identify differences in performance associated with different direct certification matching practices. We limited this analysis to central matching States because these practices vary by matching entity; in local matching States, they vary across districts and are not constant at the State level. This section contains many of the practices most likely to affect State performance.
3. **SNAP program data characteristics** (local matching States). Because we could not look at specific matching practices in local matching States, we instead examined characteristics of SNAP program data provided to districts for direct certification in these States. Program data available for matching are a step removed from the actual matching practices, but they are the practices most closely related to matching procedures that exist at the State level in local matching States.
4. **State characteristics** (all States). In the last section, we examine the association of direct certification performance with State education system and economic characteristics.

##### 1. State-Level Direct Certification Practices (all States)

Practices constant at the State level for both central and local matching States include whether the State used central or local matching systems, the program data sources available to use in matching, and State-reported barriers to effective direct certification. We examined each of these practices for all States and then separately by whether States used central or local matching systems.

When interpreting findings in this section, it is important to keep in mind that this analysis does not account for additional direct certification system features or other contextual factors that may affect direct certification performance. States with successful systems use a number of desirable direct certification practices. Therefore, practices associated with strong performance are also likely correlated with one another. Findings from this analysis can identify the practices most commonly used by States with strong performance, but they do not represent the causal impact of a practice. The findings presented in this section provide their greatest value when interpreted alongside other evidence on the effectiveness of direct certification practices. See Chapter IV for this broader discussion.

### Summary of Findings Related to State-Level Direct Certification Practices

#### Entity with Primary Responsibility for Direct Certification Matching

- There was no significant difference in direct certification performance between central and local matching States.

#### Program Data Sources

- States using multiple program data sources had significantly higher performance rates than those that did not. Differences were most pronounced between States that used foster care data for direct certification and those that did not.

#### Reported Barriers to Effective Direct Certification

- States reporting no barriers pertaining to program participation data and those reporting no barriers to resources or other factors had higher average performance rates than States that did report such barriers.
- Local matching States reporting barriers related to enrollment data had lower performance rates than those that did not. These differences are not present in central matching States.

#### a. Entity with Primary Responsibility for Direct Certification Matching

There was no statistically significant difference in the direct certification performance of the 38 States using central matching systems and that of the 14 States using local matching systems, although central matching States had slightly lower performance rates on average (87 versus 89 percent, Table III.1). While the relationship between matching level and performance is unclear, other findings point to advantages of central matching. See Chapter IV for a broader discussion of the role of matching level in direct certification performance.

#### b. Program Data Sources

Using program data sources other than SNAP for direct certification matching was associated with higher performance. There were strong, positive, statistically significant associations between using additional data sources and direct certification performance (Table III.1). Most States used at least one other source in addition to SNAP (89 percent); those that did so had an average performance rate of 89 percent, compared with 76 percent for other States, a difference that is statistically significant. TANF was by far the most common program other than SNAP that States used for data matching; 87 percent of States used data on TANF participation for direct certification. States that used TANF data had average performance rates of 89 percent, compared with 80 percent among States that did not, a difference that is statistically significant. Among the program data sources, the largest positive difference in performance is associated with the use of foster care data. Fewer than a third of States used foster care data; however, those that did so had a much higher average performance rate than States that did not (94 versus 85 percent).

**Table III.1. Average NSLP Direct Certification Performance Rates, by Direct Certification Practices and Barriers for All States, SY 2012–2013**

Direct Certification Characteristic	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>
		States with Characteristic	States without Characteristic	
All States	100.0	87.4	n.a.	n.a.
Uses Central Matching System	73.1	86.8	89.3	-2.5
Program Data Used in Direct Certification				
At least one program in addition to SNAP	88.5	88.9	76.3	12.6***
TANF	86.5	88.6	79.7	9.0**
Foster care	30.8	94.1	84.5	9.6***
FDPIR	7.7	78.0	88.2	-10.2*
Cited Barriers to Effective Direct Certification				
Enrollment data not updated in time for fall direct certification	46.9	88.6	86.4	2.2
State enrollment data do not contain sufficient information to support matching	30.6	87.1	87.7	-0.6
It takes too long to obtain enrollment data files from all districts	24.5	87.3	87.5	-0.2
Barrier related to program participation data	49.9	83.3	91.8	-8.5***
Barrier related to resources or other factors	57.1	84.1	92.4	-8.3***
<b>Sample Size</b>	52			

Sources: SY 2012–2013 National Survey of Direct Certification Practices and FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

<sup>a</sup> Differences were calculated using unrounded values and may differ slightly from the difference of the rounded values presented in the table.

\*/\*\*/\*\* Performance rate for States using practice is significantly different than the rate for States not using practice at the 0.10/0.05/0.01 level.

FDPIR = Food Distribution Program on Indian Reservations; FNS = Food and Nutrition Service; SNAP = Supplemental Nutrition Assistance Program; SY = school year; TANF = Temporary Assistance for Needy Families.

n.a. = not applicable.

The exception to additional program data being associated with higher performance was the Food Distribution Program on Indian Reservations (FDPIR). Fewer than 10 percent of States used data from this program. Their average performance rate was 10 percentage points lower than other States (Table III.1). It is unlikely that use of this data source caused direct certification performance to suffer. Instead, this difference is likely due to other factors associated with both direct certification performance and States' use of FDPIR data.

The relationships between program data sources and States' performance are qualitatively similar for central and local matching States (Table III.2). The results for central matching States closely matched the results for all States, as expected, considering most States use central matching. Among local matching States, the same patterns emerged in most variables, though the differences were not typically statistically significant; the lack of significance is likely due to the much smaller number of local matching States.

**Table III.2. Average NSLP Direct Certification Performance Rates, by Direct Certification Practices, Barriers, and Matching Level for All States, SY 2012–2013**

Direct Certification Characteristic	States Using Central Matching Systems				States Using Local Matching Systems			
	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>
		States with Characteristic	States without Characteristic			States with Characteristic	States without Characteristic	
All States	100.0	86.8	n.a.	n.a.	100.0	n.a.	89.3	n.a.
Program Data Used in Direct Certification								
At least one program in addition to SNAP	86.8	88.4	76.1	12.3**	92.9	90.2	77.3	12.8
TANF	86.8	88.4	76.1	12.3**	85.7	89.4	88.7	0.7
Foster care	31.6	93.3	83.7	9.5***	28.6	96.4	86.4	10.0*
FDPIR	10.5	78.0	87.8	-9.8*	0.0	n.a.	89.3	n.a.
Cited Barriers to Effective Direct Certification								
Enrollment data not updated in time for fall direct certification	51.4	88.4	85.0	3.4	35.7	89.4	89.2	0.3
State enrollment data do not contain sufficient information to support matching	25.7	89.1	85.9	3.2	42.9	84.0	93.2	-9.2*
It takes too long to obtain enrollment data files from all districts	28.6	85.5	87.2	-1.7	14.3	96.1	88.1	8.0
Barrier related to program participation data	45.5	81.5	91.6	-10.2***	57.1	86.9	92.5	-5.6
Barrier related to resources or other factors	51.4	82.9	91.4	-8.5**	71.4	86.2	96.9	-10.6*
<b>Sample Size</b>	38				14			

Sources: SY 2012–2013 National Survey of Direct Certification Practices and FNS' Report to Congress: Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013.

<sup>a</sup>Differences were calculated using unrounded values and may differ slightly from the difference of the rounded values presented in the table.

\*/\*\*/\*\*\* Performance rate for States using practice is significantly different than the rate for States not using practice at the 0.10/0.05/0.01 level.

FDPIR = Food Distribution Program on Indian Reservations; FNS = Food and Nutrition Service; SNAP = Supplemental Nutrition Assistance Program; SY = school year; TANF = Temporary Assistance for Needy Families.

n.a. = not applicable

In interpreting findings in this section, it is important to keep in mind that the direct certification performance measure used in SY 2012–2013 includes all direct certified students, regardless of the program data source upon which the direct certification was based. The performance measure to be used beginning in SY 2013–2014 will only consider students directly certified through SNAP. Although the findings presented in this section do suggest that use of additional program data sources is associated with expanded access to program benefits, these findings may not be representative of the relationship between the use of additional program data sources and the revised direct certification measure.

### **c. Reported Barriers to Effective Direct Certification**

Many States reported barriers to effective direct certification in SY 2012–2013, including challenges related to enrollment data, program participation data, and resources or other factors. Some of these reported barriers were associated with lower average performance rates.

The most commonly cited enrollment data barriers included enrollment data not being updated in time for the fall direct certification match, enrollment data containing insufficient information for effective matching, and the process of collecting enrollment data from districts taking too long. Across all States and for States using central matching, States that reported barriers related to enrollment data did not have significantly different direct certification performance than States that did not cite enrollment data barriers (Tables III.1 and III.2). The pattern differs for States using local matching. Local matching States reporting that enrollment data contained insufficient information to support matching had significantly lower average performance rates than other local matching States (84 versus 93 percent; Table III.2). This barrier could be a larger problem in local matching States than in central matching States because they are more likely to use diverse data systems for housing enrollment data across the State. It might be more difficult to harmonize enrollment data with the program data used for direct certification.

States reporting barriers pertaining to program participation data and those reporting barriers to resources or other factors had lower average performance rates than States that did not report such barriers (Table III.1). This suggests that States are aware of some of the data and resource constraints that impede effective matching. Unfortunately, few States indicated specific barriers in either category offered in the survey questionnaire, so we cannot identify particular data or resource barriers associated with differences in performance.

## **2. Matching Practices (central matching States)**

For central matching States, we examined direct certification performance by States' timing of direct certification matching, the characteristics of their matching algorithms, and their use of other matching procedures.

### Summary of Findings Related to Matching Practices

#### Timing and Frequency of Match

- Among central matching States, direct certification performance increases with increased frequency of direct certification matching.

#### Matching Algorithms

- There are no significant differences in the performance of States based on their use of specific data elements in their matching algorithms or in their use of inexact matching for some data elements.

#### Other Matching System Characteristics

- Several direct certification features designed to broaden matching beyond the primary matching process were associated with stronger direct certification performance. The features most strongly associated with higher performance include probabilistic matching, examination of students not matched in the primary matching process, and extension of eligibility by notifying parents of the eligibility of other children in the household.

#### a. Timing and Frequency of Match

The timing of the initial match relative to the start of school was not associated with significant differences in average performance rates among central matching States (Table III.3). However, official performance rates might not be the best measure for the usefulness of this practice because the rates reflect the proportion of eligible children certified by October. The primary advantages of matching before the start of school are to preempt applications for NSLP benefits and eliminate gaps in benefit delivery in the first weeks of the school year. Performance rates calculated with children directly certified by October do not reflect these advantages.

The frequency with which central matching States conducted matching following the initial match was strongly associated with direct certification performance (Table III.3). Central matching States that matched more frequently than monthly had an average performance rate of 92 percent, compared with 88 percent for States matching monthly and 81 percent for States matching less frequently than monthly. As with the timing of the initial match, the performance rate measure might not fully capture the benefits of matching frequently. Matching frequently likely results in identifying more matches by October, the month the performance rates reflect. However, these results could understate the advantages of this practice, because frequent matching would continue to improve direct certification throughout the school year. Alternatively, these results might overstate the advantages of the practice if the observed relationship is due to a strong correlation between match frequency and other system features that lead to improved direct certification performance, or if States conducting less frequent matching end up directly certifying many children after October.

#### b. Matching Algorithm

The specific data elements used in the matching algorithms of central matching States were not associated with significant differences in performance (Table III.3). Central matching States that included at least 10 data elements in their algorithms had an average performance rate only 1.3

percentages points higher than other central matching States, and the difference was not statistically significant. No single data element was associated with a statistically significant difference in performance.

We also found no significant differences associated with different matching rules (Table III.3). For example, States that required more than three data elements to identify a match had an average performance rate only 2.5 percentage points higher than other States (which was not significant). Likewise, States that allowed inexact or near matches on some elements had similar performance rates compared with States that did not. See Chapter IV for more information about the role of specific matching elements and algorithm characteristics in direct certification.

### **c. Other Matching System Characteristics**

Several other characteristics of direct certification systems were associated with differences in average performance rates among central matching States. Practices associated with stronger performance included probabilistic matching, individual lookup systems, examining records not matched in the primary matching process, using notification letters to extend eligibility to other children in households, and using third-party matching software.

#### **Practices that Expand the Matching Process**

Practices that broaden the matching process by giving students more methods of being directly certified were associated with higher average performance rates. One method of broadening the matching process is the use of probabilistic matching. This practice uses specialized software to provide scores indicating the probability that a given pair of students match. States use this tool to identify matches or possible matches that standard deterministic algorithms might not catch. Central matching States that used probabilistic matching had significantly higher average performance rates than other States (93 percent versus 84 percent; Table III.3).

Another way States broaden direct certification is through individual student lookup functions. Individual lookup options in direct certification systems enable district staff to check direct certification eligibility for individual students when they transfer to a district during the school year. This option enables students who were not present during regular direct certification matches to be certified upon their arrival. Central matching States using this practice had significantly higher average performance rates than other States (92 percent versus 85 percent; Table III.3).

The last method for expanding direct certification options that correlated with strong performance was examining records in the program participation data not matched in the primary matching process. States could do this manually or by using a computer system; it could be done either by State staff or, more commonly, district staff. Half of central matching States reported examining these records. These States had an average performance rate of 92 percent, almost 10 percentage points higher than States not examining these records (Table III.3). Examining potential matches was not significantly related to performance.

**Table III.3. Average NSLP Direct Certification Performance Rates, by Use of Direct Certification Practice for Central Matching States, SY 2012–2013**

Direct Certification Characteristic	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>
		States with Characteristic	States without Characteristic	
All Central Matching States	100.0	86.8	n.a.	n.a.
<b>Timing of Match</b>				
Initial Match Conducted Before Start of School	86.8	86.6	87.9	-1.4
Frequency of Subsequent Matching				
More frequently than monthly	28.9	91.6	84.8	6.8*
Monthly	39.5	87.6	86.2	1.4
Less frequently than monthly or varied <sup>b</sup>	31.6	81.2	89.3	-8.1**
<b>Matching Algorithm</b>				
Data Elements Included in Algorithm				
At least 10 data elements	50.0	87.4	86.1	1.4
SSN	50.0	85.2	88.3	-3.0
Phonetic first name	68.4	88.1	83.7	4.4
Phonetic last name	64.9	88.0	85.3	2.7
Gender	65.8	87.5	85.3	2.3
School name	40.5	84.3	87.8	-3.4
Zip code	45.9	84.8	87.7	-2.9
SNAP or other program ID	43.2	84.5	87.9	-3.4
Parent name	37.8	84.8	87.4	-2.6
Parent SSN	13.5	82.0	87.1	-5.1
Minimum number of data elements required for a match				
Fewer than 3 or no specific number	21.1	86.9	86.7	0.2
3	47.4	85.6	87.8	-2.3
More than 3	31.6	88.5	86.0	2.5
Allows Inexact or Near Matching on Some Elements	76.3	86.3	88.3	-2.0
<b>Other Matching System Characteristics</b>				
Uses SSIS Enrollment Data for Matching	78.4	86.5	86.6	-0.1
Uses Probabilistic Matching	28.9	92.6	84.3	8.3**
Newly Enrolled Students Matched Through Individual Lookup	23.7	92.1	85.1	7.0*
Examines Records Not Matched in Primary Process	50.0	91.7	81.8	10.0***
Examines Potential Matches	65.8	86.4	87.5	-1.1
State examines potential matches	21.1	87.6	86.5	1.0
District examines potential matches	42.1	84.3	88.6	-4.3
Procedures for Extending Eligibility				
Notification letters inform of eligibility of other children	59.5	90.3	81.2	9.2***
Extend eligibility to students with same parent/guardian or address	45.9	86.1	87.0	-0.9
Participation of Private Schools in Direct Certification				
All participate	34.2	85.1	87.6	-2.5
Some participate	47.4	88.0	85.6	2.3
None participate	18.4	86.7	86.8	-0.1
Uses Third Party Software in Matching Process	30.3	92.4	85.8	6.6*
<b>Sample Size</b>	<b>38</b>			

Sources: SY 2012–2013 National Survey of Direct Certification Practices and FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

<sup>a</sup>Differences were calculated using unrounded values and may differ slightly from the difference of the rounded values presented in the table.

<sup>b</sup>This row contains 10 States that matched less frequently than monthly and 2 States where the matching frequency varied by school district.

<sup>\*/\*\*/\*\*</sup> Performance rate for States using practice is significantly different than the rate for States not using practice at the 0.10/0.05/0.01 level.

FNS = Food and Nutrition Service; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; SSIS = statewide student information system; SSN = Social Security number; SY = school year.

n.a. = not applicable

## Other Practices

States are required to extend eligibility to all children in households containing a student categorically eligible for free school meals based on participation in SNAP, TANF, or FDPIR. Some States comply with this requirement by automatically extending eligibility to students with matching addresses or parent/guardian names as certified students. Another strategy is modification of the household direct certification notification letter to inform parents that any children in the household that are not named on the notification letter are also eligible for school benefits. Parents are encouraged to contact the school so that benefits can be extended to any additional children in the household. Extending eligibility using notification letters was strongly associated with higher performance. Central matching States using this method had an average performance rate of 90.3 percent, compared with 81.2 percent for other States (Table III.3). Extending eligibility based on matching addresses or parent/guardian names was not significantly related to performance.

The final practice significantly associated with performance in central matching States was use of third-party matching software. Such software includes programs designed specifically for direct certification, as well as more general matching programs. Slightly more than 30 percent of central matching States used these types of programs. Their average performance rate was 92.4 percent, compared with 85.8 percent for other States (Table III.3).

Some characteristics of direct certification systems were not significantly associated with performance. For example, using enrollment data from a statewide student information system (SSIS)—as opposed to using other electronic files, generally maintained by districts—was not associated with increased performance among central matching States (Table III.3). The extent of private school participation in direct certification also did not correlate with performance. This is likely because private school students make up a small proportion of total school meal benefit recipients. Although direct certification is an important method for ensuring private school students receive benefits, incorporating private schools into direct certification systems might not substantially change overall State performance rates.

### 3. SNAP Program Data Characteristics (local matching States)

#### Summary of Findings Related to SNAP Program Data Characteristics

##### SNAP Program Data Characteristics in Local Matching States

- There is little evidence of a significant relationship between direct certification performance and SNAP program data characteristics in local matching States.

It is more difficult to identify practices associated with performance for local matching States than for those that use central matching, because most direct certification practices occur at the

district level and vary widely within States. The State function most likely to influence direct certification performance in local matching States is providing SNAP data to districts conducting the matching. We examined characteristics of these data and tested for significant differences in State performance rates.

The frequency with which SNAP data were updated was not correlated with statistically significant differences in direct certification performance (Table III.4). About two-thirds of local matching States used SNAP data updated monthly; the rest used data updated less frequently. The States using data updated monthly had a lower average rate, but the difference was not statistically significant. Using more up-to-date SNAP data would boost State performance only if matching is conducted frequently as well. Fewer than one-third of districts in local matching States reported in the survey that they matched at least monthly.<sup>15</sup> This could explain why we did not observe the expected trend with SNAP data updates.

**Table III.4. Average NSLP Direct Certification Performance Rates, by Available SNAP Data Characteristics for Local Matching States, SY 2012–2013**

Direct Certification Characteristic	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>
		States with Characteristic	States without Characteristic	
All Local Matching States	100.0	89.3	n.a.	n.a.
SNAP Data Update Frequency				
Monthly	64.3	87.1	93.1	-6.0
Less frequently than monthly	35.7	93.1	87.1	6.0
SNAP Data Elements Available for Matching				
At least nine elements	57.1	88.2	90.7	-2.4
SSN	76.9	87.6	99.4	-11.7*
Gender	54.5	85.7	94.9	-9.3
Zip code	90.9	90.4	100.0	-9.6
SNAP or other program ID	60.0	88.2	94.4	-6.3
School name	14.3	89.3	92.0	-2.7
Parent name	70.0	87.9	99.4	-11.5*
Parent SSN	11.1	76.6	92.7	-16.1
<b>Sample Size</b>	<b>14</b>			

Sources: SY 2012–2013 National Survey of Direct Certification Practices and FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

<sup>a</sup> Differences were calculated using unrounded values and may differ slightly from the difference of the rounded values presented in the table.

\*/\*\*/\*\* Performance rate for States using practice is significantly different than the rate for States not using practice at the 0.10/0.05/0.01 level.

FNS = Food and Nutrition Service; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; SSIS = statewide student information system; SSN = Social Security number; SY = school year.

n.a. = not applicable

Few aspects of the composition of the SNAP data file provided to districts for direct certification matching were associated with statistically significant differences in performance (Table

<sup>15</sup> See the Direct Certification Study's main report (Moore et al. 2014) for more details on the direct certification activities of districts in local matching States.

III.4). The overall number of SNAP elements included in the file, measured by comparing States including at least nine elements with those including fewer than nine elements, was not correlated with performance. Of the specific matching elements included on the SNAP file, two were associated with statistically significant difference in performance. Surprisingly, States including Social Security numbers (SSNs) and parents' names in their SNAP files had significantly lower performance rates than other States. In both cases, only a small group of States excluded these data elements. Those States had high performance rates, though it is unlikely the rates were higher because certain elements were excluded from the SNAP file. This result should be interpreted cautiously as other findings point to the value of unique identifiers such as SSN. See Chapter IV for a more thorough discussion of the role of specific data elements and algorithms in matching success.

#### 4. State Characteristics (all States)

Factors other than State practices could affect direct certification performance. In this section, we examine broad characteristics of State education systems and State economic characteristics to see whether they are associated with direct certification performance.

##### Summary of Findings Related to State Characteristics

###### State Education System and Economic Characteristics

- There is little evidence of a significant relationship between direct certification performance and State characteristics not related to direct certification systems. It is likely that direct certification practices and system characteristics—and not State education system or economic characteristics—determine performance.

#### a. Education System Characteristics

We compared average direct certification performance rates among subgroups of States based on the number of public school districts, schools, students, and private school students they had. No education characteristic had statistically significant associations with direct certification performance across all States (Table III.5). A few significant differences emerged when we analyzed central and local matching States separately. Central matching States with 100 to 300 school districts had lower performance rates than other central matching States (Table III.6). By contrast, local matching States with 1,000 to 2,000 schools had higher average performance rates than other local matching States. These results do not appear to indicate broad patterns in the relationship between education system characteristics and performance.

**Table III.5. Average NSLP Direct Certification Performance Rates, by State Education System Characteristic and State Economic Condition, for All States, SY 2012–2013**

Direct Certification Characteristic	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>
		States with Characteristic	States without Characteristic	
All States	100.0	87.4	n.a.	n.a.
<b>State Education System Characteristics</b>				
Number of School Districts				
Fewer than 100	27.5	91.4	86.3	5.1
100 to 300	43.1	84.9	89.7	-4.8
More than 300	29.4	88.2	87.4	0.8
Number of Schools				
Fewer than 1,000	35.3	87.5	87.7	-0.3
1,000 to 2,000	39.2	87.0	88.1	-1.0
More than 2,000	25.5	88.9	87.2	1.6
Number of Students				
Fewer than 500,000	41.2	88.4	87.1	1.2
500,000 to 1,000,000	31.4	86.0	88.4	-2.4
More than 1,000,000	27.5	88.5	87.4	1.1
Number of Students in Private School				
Fewer than 50,000	51.0	86.4	89.0	-2.7
50,000 to 150,000	33.3	89.2	86.9	2.3
More than 150,000	15.7	88.6	87.5	1.1
<b>State Economic Conditions</b>				
Poverty Rate Among Children 17 and Under				
Less than 20 percent	45.1	89.3	86.3	3.0
20 percent to 25 percent	25.5	84.7	88.7	-4.0
Greater than 25 percent	29.4	87.7	87.6	0.1
Median Income				
Less than \$50,000	47.1	85.7	89.4	-3.7
\$50,000 to \$55,000	17.6	90.4	87.1	3.3
Greater than \$55,000	35.3	88.9	87.0	1.9
Unemployment Rate				
Less than 6.5 percent	54.9	88.2	86.9	1.3
6.5 percent to 7.4 percent	25.5	85.6	88.3	-2.7
Greater than 7.4 percent	19.6	88.6	87.4	1.2
<b>Sample Size</b>	52			

Sources: Data on the number of school districts, schools, and students come from the SY 2010–2011 Common Core of Data database. Data on the number of private school students come from the SY 2011–2012 Private School Universe Survey. Poverty data come from the Census Bureau's Small Area Income and Poverty Estimates, 2012. Median income data come from the Census Bureau's Current Population Survey, Annual Social and Economic Supplement, 2012. Unemployment rates come from the Bureau of Labor Statistics, December 2012. Direct certification performance rates come from FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

<sup>a</sup>Differences were calculated using unrounded values and may differ slightly from the difference of the rounded values presented in the table.

\*/\*\*/\*\* Performance rate for States using practice is significantly different than the rate for States not using practice at the 0.10/0.05/0.01 level.

FNS = Food and Nutrition Service; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; SSIS = statewide student information system; SSN = Social Security number; SY = school year.

n.a. = not applicable.

**Table III.6. Average NSLP Direct Certification Performance Rates, by State Education System Characteristic and State Economic Condition and Matching Level for All States, SY 2012–2013**

Direct Certification Characteristic	States Using Central Matching Systems				States Using Local Matching Systems			
	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>	Percentage of States with Characteristic	Direct Certification Performance Rates		Difference in Average Performance <sup>a</sup>
		States with Characteristic	States without Characteristic			States with Characteristic	States without Characteristic	
All States	100.0	86.8	n.a.	n.a.	100.0	89.3	n.a.	n.a.
<b>State Education System Characteristics</b>								
Number of School Districts								
Fewer than 100	24.3	92.1	85.4	6.6	35.7	90.1	88.8	1.3
100 to 300	43.2	82.8	90.3	-7.4**	42.9	90.5	88.3	2.1
More than 300	32.4	88.9	86.1	2.8	21.4	85.4	90.3	-4.9
Number of Schools								
Fewer than 1,000	35.1	88.9	86.1	2.8	35.7	83.9	92.2	-8.3
1,000 to 2,000	40.5	84.0	89.1	-5.2	35.7	96.2	85.4	10.8**
More than 2,000	24.3	89.6	86.2	3.3	28.6	87.3	90.1	-2.8
Number of Students								
Fewer than 500,000	43.2	89.8	85.0	4.8	35.7	83.9	92.2	-8.3
500,000 to 1,000,000	29.7	82.9	88.8	-5.8	35.7	92.7	87.4	5.4
More than 1,000,000	27.0	87.2	87.0	0.2	28.6	91.6	88.3	3.3
Number of Students in Private School								
Fewer than 50,000	56.8	86.9	87.2	-0.3	35.7	83.9	92.2	-8.3
50,000 to 150,000	29.7	86.9	87.1	-0.2	42.9	93.5	86.1	7.3
More than 150,000	13.5	87.8	86.9	0.9	21.4	89.8	89.1	0.7
<b>State Economic Conditions</b>								
Poverty Rate Among Children 17 and Under								
Less than 20 percent	45.9	89.2	85.2	4.0	42.9	89.6	89.0	0.6
20 percent to 25 percent	27.0	83.2	88.5	-5.3	21.4	89.7	89.2	0.5
Greater than 25 percent	27.0	87.3	87.0	0.3	35.7	88.6	89.6	-1.0
Median Income								
Less than \$50,000	40.5	84.7	88.7	-4.0	64.3	87.5	92.5	-5.0
\$50,000 to \$55,000	21.6	92.1	85.6	6.5	7.1	76.6	90.2	-13.7
Greater than \$55,000	37.8	86.7	87.3	-0.6	28.6	96.5	86.4	10.1*
Unemployment Rate								
Less than 6.5 percent	56.8	88.4	85.2	3.2	50.0	87.6	90.9	-3.3
6.5 percent to 7.4 percent	27.0	83.9	88.2	-4.3	21.4	91.6	88.6	2.9
Greater than 7.4 percent	16.2	87.4	87.0	0.5	28.6	90.4	88.8	1.6
<b>Sample Size</b>	<b>38</b>				<b>14</b>			

Sources: Data on the number of school districts, schools, and students come from the SY 2010-2011 Common Core of Data database. Data on the number of private school students come from the SY 2011–2012 Private School Universe Survey. Poverty data come from the Census Bureau’s Small Area Income and Poverty Estimates, 2012. Median income data come from the Census Bureau’s Current Population Survey, Annual Social and Economic Supplement, 2012. Unemployment rates come from the Bureau of Labor Statistics, December 2012. Direct certification performance rates come from FNS’ Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

<sup>a</sup>Differences were calculated using unrounded values and may differ slightly from the difference of the rounded values presented in the table.

\*/\*\*/\*\* Performance rate for States using practice is significantly different than the rate for States not using practice at the 0.10/0.05/0.01 level.

FNS = Food and Nutrition Service; NSLP = National School Lunch Program; SY = school year.

n.a. = not applicable.

## b. Economic Characteristics

We examined direct certification performance rates for States with different economic characteristics, including the child poverty rate, median income, and unemployment rate. As with the education characteristics, there were no statistically significant differences in performance by economic characteristics among all States (Table III.5). We found one statistically significant result when we analyzed local matching States separately. Local matching States with median incomes greater than \$55,000 per year had average performance rates 10 percentage points higher than other local matching States. This result was based on only four States, and the trend did not exist among central matching States.

Overall, the results of our analysis of State characteristics indicate that strong direct certification performance appears in a diverse range of States. It is likely that direct certification practices and system characteristics—and not State education system or economic characteristics—determine performance.

## B. Results of Statistical Modeling of Direct Certification Performance

The multivariate results build on the findings from the performance rate comparisons described earlier by identifying the association between direct certification practices and State performance while adjusting for other factors included in the model. The results support the conclusions from the previous analysis and highlight the notion that successful direct certification systems incorporate an array of practices.

We selected practices for inclusion in the multivariate analysis based on their statistical significance and substantive importance in the analysis described in the previous section. The small sample size, consisting of the 38 central matching States, limited the number of explanatory variables we could include in the model. The model includes the following practices:

- Using at least one program data source other than SNAP for direct certification matching<sup>16</sup>
- Using foster care data for direct certification matching
- Matching more frequently than monthly
- Using probabilistic matching
- Examining records unmatched in primary matching process
- Extending eligibility through notification letters

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<sup>16</sup> We included use of additional program data sources and use of foster care data in the model because these were among the most important statistically significant relationships identified earlier in the simple comparison analysis. As noted earlier, use of additional program data sources will likely not have the same relationship to the direct certification performance measure to be used beginning SY 2013–2014. Including these variables in the model isolates their associations with performance in SY 2012–2013. It also reflects the extent to which use of additional program data sources may be associated with expanded program access through direct certification of additional categorically eligible children.

The regression model results provide the average difference in performance rates for States using each of these practices, adjusting for use of other practices included in the model.<sup>17</sup> These regression-adjusted differences provide a measure of the independent relationship of direct certification performance and each practice, controlling for other practices included in the model.

Adjusting for other system characteristics included in the model, the factors with the strongest associations with higher direct certification performance relate to program data sources and extending eligibility using notification letters (Table III.7). Adjusting for the other practices, central matching States using at least one program data source in addition to SNAP had an average performance rate 8 percentage points higher than other central matching States, which is statistically significant at the 10 percent level. The adjusted difference associated with incorporating foster care data was 5 percentage points, which is statistically significant at the 10 percent level.<sup>18</sup> Extending eligibility through notification letters was associated with a difference of more than 10 percentage points in average adjusted performance rates. That this strong difference persists while controlling for other practices used in successful States strengthens the support for using this practice.

**Table III.7. Regression Adjusted Average NSLP Direct Certification Performance Rates, by Use of Direct Certification Practice for Central Matching States, SY 2012–2013**

Direct Certification Practice	Adjusted Difference
Program Data Used in Direct Certification	
At least one program in addition to SNAP	8.0*
Foster care <sup>a</sup>	5.2*
More Frequent than Monthly Matching	5.5
Use Probabilistic Matching	4.3
Examines Records Unmatched in Primary Process	2.1
Extend Eligibility through Notification Letters	10.6***
<b>Sample Size</b>	<b>38</b>

Sources: SY 2012–2013 National Survey of Direct Certification Practices and FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

Note: Performance rates were adjusted using an ordinary least squares regression. Adjusted means represent the performance rate for a State that either does or does not use a particular practice and that has average characteristics for all other practices included in the model.

<sup>a</sup>Adjusted difference accounts for the fact that States using foster care data would also, by definition, be using a least one program in addition to SNAP.

\*/\*\*/\*\* Adjusted difference in performance is significantly different than 0 at the 0.10/0.05/0.01 level.

FNS = Food and Nutrition Service; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; SY = school year.

Differences in performance associated with other practices lost statistical significance and were smaller than in the analysis examining simple comparisons in direct certification performance (Table

<sup>17</sup> See Appendix B for the coefficient estimates and adjusted r-squared statistics for the regression model.

<sup>18</sup> All States using foster care data would, by definition, also use at least one program in addition to SNAP. The adjusted difference reported here takes this into account.

III.7). The reduction in differences associated with adjusting for other practices suggests that these practices are related to each other. Successful States incorporate multiple sound practices; it is difficult to isolate the role each practice plays in a State's performance.

As noted earlier, practices of successful States are likely also correlated with factors not included in the model, including unobservable factors that contribute to success. As a result, the model analysis highlights characteristics associated with successful systems, but does not identify the practices that cause strong performance.

### **C. Results of Simulations of Average State Direct Certification Performance Rates**

Using results from the multivariate model, we simulated the average State direct certification rate under several different policy scenarios.<sup>19</sup> We conducted two types of simulations. The first simulated changes to direct certification practices among central matching States, using the practices included in the multivariate analysis. The second simulated the national rate among all States if local matching States adopted central matching.

#### **1. Simulations Among Central Matching States**

We simulated scenarios in which all central matching States adopted each of the practices included in the regression model individually and then simulated the average rate if all central matching States adopted all six practices simultaneously. The effect adopting each practice has on the simulated average State direct certification rate depends on two factors: (1) the size of the coefficient associated with that practice in the multivariate regression model and (2) the number of States already incorporating the practice. Only States not currently using a practice will receive the performance bonus represented by the adjusted difference associated with the characteristic under consideration. Therefore, the more common a practice was in SY 2012–2013, the smaller the effect simulating its adoption will have on the simulated average rate. Simulated increases in the average rate were limited somewhat by the prevalence of States with actual rates at or near 100 percent.

The simulated average State performance rate increased under each of the scenarios we modeled (Table III.8). The largest increase for a single policy change was in the simulation of all central matching States extending eligibility through notification letters: the simulated average rate for central matching States increased to 91 percent, which can be compared with 87 percent, the actual average performance rate for central matching States in SY 2012–2013. Using foster care data and matching more frequently than monthly each resulted in the simulated rate increasing to 91 percent. Using probabilistic matching increased the simulated average rate for central matching States to about 90 percent. Simulating all central matching States incorporating all six practices resulted in a simulated average performance rate of 100 percent.

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<sup>19</sup> This statistic is the average of all 52 State direct certification rates. This average is not the same as to the national direct certification rate included in the FNS annual Report to Congress because it weights all States equally, rather than in proportion to their size.

**Table III.8. Simulated NSLP Direct Certification Performance Rates for Central Matching States, by Policy Scenario, SY 2012–2013**

Policy Scenario	National Average of State Direct Certification Performance
Actual Direct Certification Performance	86.8
Simulated Direct Certification Performance	
All States use at least one program in addition to SNAP	87.7
All States use foster care data	90.5
All States Use More Frequent than Monthly Matching	90.5
All States Use Probabilistic Matching	89.6
All States Examines Records Not Matched in Primary Process	87.7
All States Extend Eligibility through Notification Letters	90.8
All States Use All of the Above Practices	100.0
<b>Sample Size</b>	<b>38</b>

Sources: SY 2012–2013 National Survey of Direct Certification Practices and FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

Note: Performance rates were adjusted using an ordinary least squares regression. Simulated national averages correspond to the average imputed State performance determined by assigning all States to have the designated practice and then applying this revised data to the statistical model.

FNS = Food and Nutrition Service; NSLP = National School Lunch Program; SNAP = Supplemental Nutrition Assistance Program; SY = school year.

## 2. Simulations Among All States

In the second set of simulations, we simulated changes in the average State performance rate resulting from a transition of the 14 local matching States to central matching systems. In these simulations we did not change local matching States' status on variables that were available for local matching States. These included using at least one program data source in addition to SNAP and using foster care data for direct certification. The other variables—such as matching more frequently than monthly and using probabilistic matching—existed only for central matching States. We therefore had to impute values for these practices for local matching States—in effect simulating whether they would also adopt these policies when transitioning to central matching. We ran two simulations:<sup>20</sup>

1. **Local matching States switch to simple central matching.** In this scenario, we simulated local matching States adopting centralized matching but not incorporating any of the additional practices included in the model.
2. **Local matching States switch to sophisticated central matching.** In this scenario, we simulated local matching States adopting central matching and incorporating all of the additional practices included in the model.

<sup>20</sup> For both of these simulations, local matching States retained their actual values for use of at least one program data source in addition to SNAP and use of foster care data.

In both of these scenarios, we simulated no changes to the practices of States using central matching. The results for the first scenario show a simulated average State performance rate of 84 percent, which is lower than the observed national average of 87 percent (Table III.9). This suggests that merely switching to centralized matching without incorporating other sound practices might reduce performance. Under the second scenario, the simulated average State performance rate increased to 90 percent, a 2.5 percentage point increase. This reinforces the importance of incorporating other elements of successful matching systems.

**Table III.9. Simulated NSLP Direct Certification Performance Rates for All States, by Policy Scenario, SY 2012–2013**

Policy Scenario	National Average of State Direct Certification Performance
Actual Direct Certification Performance	87.4
Simulated Direct Certification Performance	
Local matching States switch to simple central matching	84.1
Local matching States switch to sophisticated central matching	89.9
<b>Sample Size</b>	52

Sources: SY 2012–2013 National Survey of Direct Certification Practices and FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012–2013*.

Note: Performance rates were adjusted using an ordinary least squares regression. Simulated national averages correspond to the average imputed State performance determined by assigning all States to have the designated practice and then applying this revised data to the statistical model.

FNS = Food and Nutrition Service; NSLP = National School Lunch Program; SY = school year.



## **IV. IMPLICATIONS OF STUDY FINDINGS FOR CONTINUOUS IMPROVEMENT PLANS**

States not meeting direct certification performance targets are required to develop and implement CIPs designed to improve their performance. FNS offered guidance on how to design effective CIPs in a guide produced in 2013. In this chapter, we synthesize the findings from the analysis in this report with the findings from the two previous reports produced for this study to provide concrete information to assist States developing CIPs.<sup>21</sup> These findings support and expand on many of the suggestions in the FNS CIP development guide.

### **Continuous Improvement Plan Development Guide**

The FNS CIP development guide describes the required components of CIPs and suggests a process for developing them. See Appendix C for the CIP development guide.<sup>22</sup> The document includes a self-assessment tool States can use to identify the strengths and weaknesses of their direct certification systems. Using the tool, States can evaluate their systems in the following areas (called *components* in the guide):

1. Quality student enrollment data
2. Quality SNAP data
3. Strong security of data
4. Strong data sharing partnerships
5. Effective matching algorithms
6. Matching frequency and timing
7. Effective handling of non-matches
8. Effective transfer of match results to local level (central matching systems)/Effective utilization of established system (local matching systems)
9. Effective input into point-of-sale (POS) system in districts and effective use of match processes in schools
10. Effective district reporting on the FNS-742 form
11. Effective monitoring of the process

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<sup>21</sup> See Moore et al. (2014) and Gothro et al. (2014).

<sup>22</sup> The version of the guide presented in Appendix C is a PDF. The actual guide is a Microsoft Word document State staff can edit. States should contact their FNS regional office to obtain a copy.

These components form the basis of suggestions from FNS. Each contains a list of specific practices States can implement to strengthen their direct certification systems. Our analysis in this report bolsters some of these recommendations by identifying practices associated with strong direct certification performance. Findings from the other two reports in this series provide additional context for some of the recommendations. Our findings also support additional recommendations that are not included in the FNS CIP development guide.

### **A. Using Centralized Matching**

It is difficult to isolate the effect that the use of central or local matching has on direct certification performance. Concrete historical data on matching level are unavailable and there is large variation in how direct certification is conducted within both central and local matching States. In SY 2012–2013, there was no statistically significant difference in the direct certification performance rates of central and local matching States, although local matching States had a slightly higher average direct certification performance rate. Despite the similarity of direct certification performance by matching level, other findings suggest there are advantages to central matching not addressed in the previous chapter.

Central matching is likely to offer greater efficiency because it requires development of only one matching system per State, rather than requiring each district to acquire or develop a separate system. With central matching, it might be easier to implement revisions to systems or procedures because the changes would have to be made in one agency, rather than in each school district. Centralized matching also simplifies the process of transmitting program participation data. Data partners deal with only one data recipient—the State-level matching entity—rather than each individual school district. Program participation data can be more easily tailored to the matching entity’s needs when one agency conducts the matching for the entire State.

Central matching also offers greater uniformity in matching procedures. Central systems match all students statewide using the same algorithm. This can lead to more equitable access to NSLP benefits across school districts because students’ eligibility does not depend on particular district algorithms. Using consistent procedures and high quality State-level data does not preclude giving districts flexibility to enhance direct certification—using additional data elements from district-level data to investigate unmatched records, for instance—but it can set a high bar for quality in direct certification procedures.

States can further promote uniformity by conducting central matching using SSIS-based enrollment data or other State-level data sources, and by using consistent matching frequencies statewide. Encouraging districts to use the same POS system statewide might yield more consistent results. One case study State that used a unified statewide POS system cited it as a key strength of its system. Another State blamed the wide diversity of POS systems for divergent direct certification performance across districts.

Conducting direct certification using a centralized system might make it easier to adopt other practices associated with strong performance. According to results in the National Survey of Direct Certification Practices, central matching systems are more likely to match more frequently than monthly and to use probabilistic matching.

## **B. Incorporating TANF and Foster Care Data into Direct Certification**

Incorporating program participation data from TANF and foster care was associated with significantly higher performance in the analysis presented in this report. Based on this evidence, States not currently using data from these programs should consider incorporating them. Most States already use TANF data. Incorporating data from foster care could present additional challenges. In many States, the same agency administers SNAP and TANF, so adding TANF does not require bringing a new agency into the process, whereas including foster care data might. Findings from the Direct Certification Improvement Study Main Report case studies suggest that some foster care agencies require additional data security measures or assurances beyond those required by SNAP or TANF agencies. However, the high average performance rate of States using foster care data suggests incorporating this data source might be worth the effort.

## **C. Match Frequency**

FNS recommends matching at least monthly and preferably more frequently.<sup>23</sup> Our findings support this recommendation. States matching more frequently than monthly had significantly higher average performance rates than other States.<sup>24</sup> States matching less frequently than monthly had significantly lower rates than other States.

States could face some barriers implementing this recommendation. Increasing matching frequency might be easier to do in central matching systems, due to the greater ease of making system changes centrally rather than in each district matching system. Central matching States were more likely than local matching districts to match more frequently than monthly and much more likely to match daily than local matching districts. States could also face system limitations or resource constraints preventing them from increasing matching frequency. However, as resources become available for improving direct certification systems, improving matching frequency might be a worthwhile area for investment.

## **D. Use of Data Elements in Matching Algorithm**

FNS provides guidance on crafting effective matching algorithms, including incorporating unique identifiers such as State student ID numbers.<sup>25</sup> Comparisons of direct certification performance did not reveal statistically significant differences associated with specific matching elements for central matching States; for local matching States, the availability of SSN and parent name for matching was actually associated with lower performance. However, findings from other analysis suggest matching elements are important. In our analysis of unmatched records, we found the number and type of matching variables influenced the match rate.<sup>26</sup> For instance, when they were available, SSNs made it much easier to identify exact matches. For the State that included SSNs for our analysis, over 80 percent of exact matches identified relied on exact matches on SSN (and

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<sup>23</sup> See Component 6 in the FNS CIP Development Guide (Appendix C).

<sup>24</sup> This comparison was possible only among central matching States because matching frequency varies within local matching States.

<sup>25</sup> See Component 5 in the FNS CIP Development Guide (Appendix C).

<sup>26</sup> Gothro et al. (2014)

two additional data elements). Additionally, it was much easier to identify matches when more data elements were available for matching.

### E. Probabilistic Matching

Probabilistic methods can strengthen data matching systems. States using probabilistic matching had higher average performance rates than other States.<sup>27</sup> The difference was no longer statistically significant when adjusting for other factors; however, other findings highlight the useful role probabilistic matching can play in direct certification.<sup>28</sup> By allowing inexact matches on data fields, probabilistic matching can identify matches deterministic techniques might miss. This can alleviate challenges resulting from data inconsistency and inaccuracy. Data inconsistency can arise through erroneous misspellings of names or addresses, or variations such as *St.* versus *Street* in an address or *Joe* versus *Joseph* in names.

In matching analysis related to students who were not directly certified, we found probabilistic matching to be particularly useful in matching students with long, uncommon names. Longer, less common names—with which school or assistance program staff might be less familiar—could be more likely to be spelled inconsistently across data sets. States with substantial diversity in students' names and cultural naming conventions (such as use of compound last names) might derive particular benefit by incorporating probabilistic matching.

For most States, incorporating probabilistic matching will require additional software and staff training, possibly making it more feasible to implement under central matching systems. Though some districts in local matching States (9.1 percent) reported using probabilistic matching in SY 2012–2013, it was much more common among central matching States (28.9 percent).<sup>29</sup>

### F. Individual Lookup Systems

FNS recommends States put in place systems that district staff can use to check whether new students are categorically eligible for free school meals using individual lookup systems.<sup>30</sup> Descriptive findings in this report support this recommendation. States operating such systems had significantly higher average performance than other States.<sup>31</sup> This function can help States bridge gaps in certification between matches or between State-level enrollment data updates.

### G. Examination of Records Not Matched in Primary Process

FNS includes a series of recommendations related to examining records not matched in the primary matching process.<sup>32</sup> States that conducted additional matching on these records by

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<sup>27</sup> This comparison was possible only among central matching States.

<sup>28</sup> Gothro et al. (2014)

<sup>29</sup> Moore et al. (2014)

<sup>30</sup> See Component 7 in the FNS CIP Development Guide (Appendix C).

<sup>31</sup> This comparison was possible only among central matching States and does not adjust for other direct certification practices.

<sup>32</sup> See Component 7 in the FNS CIP Development Guide (Appendix C).

examining additional data elements had stronger performance than other States. Although the performance gap narrowed and was no longer statistically significant when adjusted for other practices, it is intuitive that using additional information to determine the eligibility of children initially not matched can improve matching results. Moreover, other findings suggest the practice is useful. Staff in one case study State stated that a key weakness of their system was the lack of a process for examining unmatched records.

Examining unmatched records is often a district responsibility, even in central matching States. Districts might have access to information about their students not available at the State level that they can use to identify additional matches. Several case study States did not allow districts to examine unmatched records due to concerns about data sensitivity. Protecting students' personal data is critically important; therefore, use of this practice requires establishing secure means of allowing district Staff to examine records of children not matched in the primary process.

## H. Use of Notification Letters to Extend Eligibility to All Children in Households with Directly Certified Students

One strategy for extending eligibility to all children in households with children directly certified based on SNAP, TANF or FDPIR participation is to use direct certification notification letters to inform families that all children in their household are eligible for free school meals. These letters request that families contact the school if there are additional children in the household who were not named in the notification letter. This strategy was associated with a large, statistically significant difference in performance among central matching States. This difference remained when we adjusted for other direct certification practices. Although we cannot conclude that using these notification letters directly resulted in higher performance, the large gap in performance associated with their use and the low cost of this practice make it particularly promising for States seeking to increase performance.

## I. Direct Certification Systems

Direct certification relies heavily on technology. The FNS CIP development guide and the findings from the reports in this series support several recommendations pertaining to acquiring and using direct certification systems:

- **Link matching results to district POS systems effectively.** FNS provides a list of sound practices in Component 9 of its CIP development guide. Our case study findings suggest one particularly useful approach is to have the direct certification results feed automatically into district POS systems.<sup>33</sup> This might require uniform data standards or file layout requirements across the State.
- **Consider purchasing third-party matching software.** States conducting matching with third-party software, whether specifically designed for direct certification or not, had higher performance rates than other States. Some in-house systems perform very well, and States using these systems will likely choose to keep them. However, States seeking to build or acquire a new matching system might consider purchasing one from a vendor.

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<sup>33</sup> Moore et al. (2014)

- **Direct certification systems should be intuitive and user-friendly.** To mitigate data challenges stemming from ineffective use of data systems by district staff, States can implement systems that are intuitive and easy to use. Case study findings suggest in-person training can help district staff use system resources effectively.
- **Web-based systems allow for easier upgrades and modifications.** Staff interviewed in our case study stressed that these systems do not require software installed on users' machines, so system improvements have to be made in only one central location.

## J. Helping Nonpublic Schools Participate Effectively in Direct Certification

Private and charter schools participating in the NSLP are required to participate in direct certification as well. The extent of actual participation of these schools varied across States in SY 2012–2013 and was not correlated with direct certification performance rates. Two factors could explain the lack of an association: (1) private school students represent a small proportion of total eligible students and (2) the measure reflected how many private schools participated in direct certification, but not how successfully they participated.

Survey and case study findings suggest private schools might use less effective direct certification procedures than public schools in some States. Private schools might not participate in the same enrollment data systems as public schools, or they might not have access to the same matching software, leading to less sophisticated matching techniques.

States should incorporate private and charter schools into their direct certification programs to meet the federal requirement. When possible, they should extend the same data and system access to private schools that are available to public schools, while ensuring data security.

## Conclusion

States are continually seeking to improve their direct certification systems. Findings from the three reports produced for this study, along with the FNS CIP development guide, should help States focus on the changes to their systems that are most likely to lead to improvements in direct certification performance. As these changes are implemented, the efficiency and accuracy of direct certification should continue to improve, reducing burden on both families and districts and helping increase the nutrition of our nation's youth.



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**APPENDIX A**  
**ADDITIONAL INFORMATION ON DIRECT CERTIFICATION PERFORMANCE**  
**RATE CALCULATIONS**



## ADDITIONAL INFORMATION ON DIRECT CERTIFICATION PERFORMANCE RATE CALCULATIONS

In this appendix, we describe the data sources and methods used to create the direct certification performance measures used in this report.<sup>1</sup> The performance measure that serves as the dependent variable in this report is based on State-level estimates of (1) the number of school-age children who received Supplemental Nutrition Assistance Program (SNAP) benefits at any time in July, August, or September of 2012; (2) the number of SNAP-participant children who were directly certified for free school meals as of October 1, 2012; and (3) the number of SNAP-participant students who were not candidates for direct certification because they attended Provision 2 or Provision 3 schools that were not operating in a base year in school year (SY) 2012–2013. We describe the methods and sources used for these estimates next.<sup>2</sup>

### A. Estimate of School-Age Population in SNAP-Participant Households

The performance measure uses two primary sources to estimate the number of school-age SNAP participants at the State level. The first is SNAP data reported to the Food and Nutrition Service (FNS) by State SNAP agencies each month. SNAP data include State agency counts of the number of individual participants in households that are issued SNAP benefits. Although these are the best available monthly estimates of SNAP participation for SY 2012–2013, the data do not separate school-age children from other members of the SNAP household.

The school-age SNAP subpopulations are estimated from the SNAP quality control (QC) data set, which is based on statistically representative samples drawn by the States from participating SNAP households. The number of school-age children in SNAP households can be estimated for each State from the QC data. However, given the size of the State samples, monthly estimates of participation by State and age group are not sufficiently reliable and State estimates of the average monthly school-age population for the entire fiscal year are used instead.

With these two inputs, FNS estimates the number of school-age SNAP participants by State for the target months of July through September. From official SNAP data, FNS computes average monthly participation from July through September as a percentage of average monthly participation for the entire fiscal year. This is multiplied by QC estimates of average monthly school-age SNAP participation for the year. The result is a set of State estimates of average school-age SNAP participation for the months of July through September 2012.

A final adjustment is needed to convert this average monthly figure into an estimate of school-age children who received SNAP benefits at any time in those three months. Across any period, the total number of people served by the SNAP program is higher than the average monthly caseload over the same period. The participant turnover rate is defined as the total number of SNAP participants over a given period divided by the period's average monthly caseload.

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<sup>1</sup> We adapted this appendix from Appendix C in Moore et al. (2013).

<sup>2</sup> For more details, please see Appendix D in Moore et al. (2013).

The turnover rate applied here is a national estimate. The estimate is based on the Survey of Income and Program Participation (SIPP), a U.S. Census Bureau data set that contains information on a representative panel of households over time. The longitudinal nature of the data set allows for estimation of the SNAP turnover rate over the July-through-September period of concern to this report. However, SIPP data are not designed for State-level analysis. Use of a national turnover rate introduces some uncertainty into the estimates of SNAP participation. FNS compensates for this uncertainty by applying a three-year moving average of estimated turnover rates to the SNAP participant counts for each of the years examined in the report. The three-year moving average of the estimated turnover rate is 1.082. The calculation to determine the number of school-age SNAP participants for the school year is summarized as:

$$\text{Unduplicated count of school-age SNAP-participant population, July–September 2012} = \frac{\text{Average monthly SNAP participation, FNS program data, July–September 2012}}{\text{Average monthly SNAP participation, FNS program data, FY 2012}} \times \text{Average monthly school-age SNAP-participant population, QC estimate, FY 2012} \times \text{Estimated SNAP-participant turnover rate, July–September 2012}$$

FY = fiscal year.

## B. Estimate of SNAP Participants Directly Certified for Free School Meals

The performance measure uses data collected by FNS from States and districts to estimate the number of children in SNAP-participant households who are directly certified for free school meals. Districts generate and report these data as part of the annual process of verifying students' eligibility for free and reduced-price school meal benefits. Although these data were not designed specifically to support the performance measures, they remain the most current and best available State estimates of directly certified SNAP participants.<sup>3</sup>

All household applications approved for free and reduced-price school meal benefits are subject to annual verification by local districts. Districts are required to draw a sample from approved applications and review applicant documentation. Districts report the results of the verification process to FNS through their State education agencies. The SY 2012–2013 Verification and Summary Reports (VSRs) include the number of applications and students initially certified for free or reduced-price meals and the corresponding number of applications and students whose status was confirmed or changed as a result of the verification review.

The VSRs are intended primarily to document the results of the verification process. For this reason, most of the information contained in the reports concerns the verification outcomes of applications initially approved for free or reduced-price meals. However, the reports also contain counts of students whose eligibility for free or reduced-price meals was not determined by

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<sup>3</sup> Beginning in SY 2013–2014, the key data elements used to determine the effectiveness of State direct certification efforts will be collected and reported in a different way. Specifically, a revised FNS-742 form will collect the count of *SNAP children directly certified for free school meals*. The new FNS-834 form will collect the counts for the number of *school-age children in SNAP households* and the number of *SNAP children in special provision schools*. These inputs will be used to compute direct certification performance rates using a revised formula.

application and whose certifications are therefore not subject to verification. These counts include, but are not limited to, directly certified SNAP participants. The performance measure uses district counts of students certified for free school meals, but not subject to verification, as a proxy for directly certified SNAP participants.<sup>4</sup>

### C. Estimate of SNAP Participants in Provision 2 and Provision 3 Schools

The population of SNAP-participant children who are candidates for direct certification does not include children who attend Provision 2 or Provision 3 schools that are not operating in a base year. These schools directly certify (and accept applications from) SNAP-participant children only in base years when they establish the percentage of meals served free, at a reduced price, and at the paid rate for NSLP reimbursement. In non-base years, the schools are reimbursed at these previously determined percentages; individual children are not subject to certification or recertification in non-base years.<sup>5</sup>

To remove these children from the estimated population of SNAP participants, FNS used data reported by districts on their SY 2012–2013 VSRs. Districts for which all schools use Provisions 2 or 3 and are not operating in a base year are required to submit VSRs, although compliance with that requirement is imperfect. These districts, and those with both Provision 2 or Provision 3 and non-provision schools, report the number of students eligible for free (and reduced-price) meals in their Provision 2 and Provision 3 schools that are not operating in base years. The information provided by districts does not distinguish SNAP-participant children from other income-eligible or categorically eligible children in Provision 2 or Provision 3 schools.

Children in Provision 2 or Provision 3 schools who were determined eligible for free meals in the schools' base years must have met the income or categorical requirements of the National School Lunch Program (NSLP) in those years. Virtually all of those children were also income-eligible for SNAP benefits. However, not all households that are income-eligible for SNAP benefits participate in SNAP. Some fraction of income-eligible households do not meet SNAP's asset test. An additional fraction of income- and asset-eligible households do not participate in SNAP for other reasons.

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

1. An estimate of the percentage of the population that is income-eligible for SNAP benefits, but not asset-eligible

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<sup>4</sup> Some limitations of this measure are discussed in Appendix D of Moore et al. (2013).

<sup>5</sup> Provision 2 and Provision 3 schools operating in non-base years serve all meals at no charge, although they are reimbursed by USDA at rates consistent with their free, reduced-price, and paid claiming percentages. Provision 2 and Provision 3 are offered to schools as administrative cost-saving options. In exchange for a much-reduced meal counting and claiming burden and no certification costs in non-base years, Provision 2 and Provision 3 schools absorb any difference between their Federal reimbursement and the cost of meals served.

2. A national estimate of the participation rate of school-age children from households that meet both the SNAP income and asset tests<sup>6</sup>

A recent trend has been for States to adopt noncash categorical eligibility (CE) for SNAP benefits. Under CE, households that receive a noncash benefit from a means-tested cash assistance program (such as Temporary Assistance for Needy Families [TANF]) can be held categorically eligible for SNAP benefits. States may choose to maintain a traditional asset test for eligibility or they may adopt broad-based or narrow categorical eligibility requirements. Under broad-based CE (BBCE), if a household receives a noncash TANF or State maintenance of effort (MOE) benefit (for example, information about a service), then the household is considered categorically eligible for SNAP benefits. Under narrow CE, households become categorically eligible for SNAP benefits if they receive a noncash TANF- or MOE-funded service, such as child care or employment assistance, for which a small subset of the SNAP population is eligible.<sup>7</sup>

During SY 2012–2013, 42 States, including the District of Columbia and Guam, had adopted BBCE policies, negating the need to adjust the estimated population of SNAP participants. For these States, FNS therefore applied an asset adjustment factor of 1.0 and a national participation adjustment of 0.918.<sup>8</sup> For the remaining 10 non-BBCE States—Alaska, Arkansas, Indiana, Kansas, Missouri, South Dakota, Tennessee, Utah, Virginia, and Wyoming—FNS applied an asset adjustment factor of 0.829<sup>9</sup> and the national participation adjustment of 0.929.

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<sup>6</sup> Eslami et al. (2012).

<sup>7</sup> Trippe and Gillooly (2010).

<sup>8</sup> Eslami and Cunningham (2014).

<sup>9</sup> The adjustment was calculated for households residing only in States that have not implemented BBCE policies by reestimating the values in Table A.1 of Trippe and Schechter (2010).

## **APPENDIX B**

### **TECHNICAL DETAILS OF QUANTITATIVE ANALYSIS**



**Table B.1. Coefficient Estimates and Adjusted R-Squared Statistics for Model Relating NSLP Direct Certification Performance Rates to Use of Selected Direct Certification Practices for Central Matching States, SY 2012-2013**

Direct Certification Practice	Statistic
<b>Model Coefficients</b>	
Program Data Used in Direct Certification	
At least one program in addition to SNAP	8.0*
Foster care	4.1
More Frequent than Monthly Matching	5.5
Use Probabilistic Matching	4.3
Examines Records Unmatched in Primary Process	2.1
Extend Eligibility through Notification Letters	10.6***
<b>Model Goodness of Fit</b>	
Adjusted R-Squared	0.47
<b>Sample Size</b>	<b>38</b>

Sources: SY 2012-2013 National Survey of Direct Certification Practices and FNS' Report to Congress: *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012-2013*.

Note: The model was estimated using an ordinary least squares regression.

\*/\*\*/\*\* Coefficient is significantly different than 0 at the 0.10/0.05/0.01 level.



## **APPENDIX C**

### **FOOD AND NUTRITION SERVICE CONTINUOUS IMPROVEMENT PLAN GUIDE**



# CIP Development Guide

Fillable Format

Fillable CIP Development Guidance- Guidance for the Development of a Continuous Improvement Plan (CIP) for Direct Certification with SNAP



Child Nutrition Programs, Operational Support Branch  
USDA/FNS

Revised FY 2014

This CIP Development Guide is intended as technical assistance for any National School Lunch Program (NSLP) State agency whose State direct certification rate with the Supplemental Nutrition Assistance Program (SNAP) is below the required benchmarks, beginning with School Year 2011-2012. Such State agencies are required to develop and implement CIPs and to have them approved by the USDA Food and Nutrition Service (FNS).

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## Introduction

**DIRECT CERTIFICATION PERFORMANCE BENCHMARKS: 80% for SY 2011-2012; 90% for SY 2012-2013; and 95% for SY 2013-2014 (and ↑)**

States that do not meet these mandated direct certification performance benchmarks are required to develop Continuous Improvement Plans (CIPs) that contain:

- Specific measures the State will use to identify more children who are eligible for direct certification, including improvements or modifications to technology, information systems, or databases;
- A multiyear timeline for the State to implement these measures;
- Goals for the State to improve direct certification for the following year; and
- Information about the State’s progress toward implementing other direct certification requirements.

As part of FNS’s technical assistance to those States below the benchmarks, this “CIP Development Guide” is provided to help the State agency develop goals, objectives, and performance measures for their CIP. Below are **suggested** steps:

### Step 1 – Perform a State Self-Assessment

- **TO GET STARTED** - Complete the “State Self-Assessment Tool for Direct Certification with SNAP” imbedded in this document, pp. 3-12. *(Column A of the tool lists the 11 components of a strong direct certification system. For each component in Column A, there are “Signs of a strong system” listed in Column B.)*
- **WHERE DOES YOUR STATE STAND?** For each sign in **Column B**, determine whether or not your State exhibits the given sign. If it does, check the “Yes” box. If you decide instead that your State needs work in this area, check the “No” box. *(Feel free to cross out those items that do not apply to your State, to better define the sign listed as “Other” at the end of each section, or to add additional items to this column appropriate to your State in order to customize the tool before you begin to check the “Yes” or “No” boxes in Column B.)*
- **IS THIS A COMPONENT WHERE YOUR STATE NEEDS WORK?** Look over your answers in **Column B** and determine whether you feel your State is “OK” for that component, or whether your State’s system “Needs Work” in that component, and mark the appropriate box in the **Column A**. *(This determination is up to you as to whether or not a series of “No” responses means that your State needs work in that component area, as it may be that certain items in Column B would be inappropriate for your State or out of your control. Conversely, if you are able to check “Yes” for each of the “Signs of a strong system” for a given component, it is likely that this is an area where your State has adequate development, and it may be that you can concentrate your efforts elsewhere.)*
- **IS THE IMPACT SUFFICIENT?** For those “Needs Work”-designated components in Column A, decide whether or not work in this component area would have a major impact in increasing the number of eligible children from SNAP households that are directly certified for free school meals. If it would, check the “Major Impact” box. *(If your State is required to develop a Continuous Improvement Plan (CIP) for not meeting the direct certification benchmark, you will want to focus on improving those areas that would have the largest impact.)*

## State Self-Assessment Tool for Direct Certification with SNAP

**Develop Goals**  
from this Column

**Develop Objectives**  
from this Column

**Develop Performance Measures**

Column A Components	Column B Signs of a strong system	Column C How to attain Goals and Objectives
<div style="font-size: 2em; font-weight: bold; margin-bottom: 10px;">1</div> <div style="font-weight: bold; margin-bottom: 10px;">Quality Student Enrollment Data</div> <div style="border: 1px solid gray; padding: 5px; width: fit-content; margin: 0 auto;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> There is a State-level student enrollment database.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data is readily available at the level the match is made (i.e. centrally, if State-level, or locally if district-level).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data is accurate, up-to-date, and complete (i.e. does not rely on old enrollment data— data is updated before the initial match and either on an ongoing (dynamic) basis or prior to subsequent matches).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data elements exist that allow for a strong matching algorithm.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Student is tracked; there is no lapse in services if student transfers to another school within the LEA or within the State.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Unique student identifier exists and stays with the child for his school career.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data is available from all public NSLP schools in the State.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data is available from all non-public NSLP schools in the State (including Private, Tribal, Charter, if applicable), even if it means using a different methodology for collecting it.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> All NSLP schools fully utilize the established direct certification system.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> There is an effective “back-up plan” for key individuals involved in maintaining quality student enrollment data at the State and local level.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

<div style="background-color: #0056b3; color: white; padding: 5px; font-weight: bold;">Develop Goals</div> <small>from this Column</small>	<div style="background-color: #4f8127; color: white; padding: 5px; font-weight: bold;">Develop Objectives</div> <small>from this Column</small>	<div style="background-color: #ffd700; color: black; padding: 5px; font-weight: bold;">Develop Performance Measures</div>
Column A Components	Column B Signs of a strong system	Column C How to attain Goals and Objectives
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">2</div> <div style="text-align: center; font-weight: bold;">Quality SNAP data</div> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> Data is accurate, up-to-date, and complete.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data elements exist that allow for a strong matching algorithm.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data covers the age range of every child that might attend an NSLP school in the State.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The data can be de-duplicated, that is, it can compare the list from month-to-month to see who is newly added.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The data is available on a routine basis for the matches.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> There is an effective “back-up plan” for key individuals involved in maintaining quality SNAP data for the matching process at the State and local level.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">3</div> <div style="text-align: center; font-weight: bold;">Strong security of data</div> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> There is a strong data system, particularly a data warehouse for efficient processing.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Data is collected, captured, stored, transferred, and maintained in such a way as to limit error, misuse, and fraud at the State level, local level, and school level.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Process for obtaining or resetting passwords is streamlined.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

<div style="background-color: #0056b3; color: white; padding: 5px; font-weight: bold;">Develop Goals</div> <small>from this Column</small>	<div style="background-color: #4f81bd; color: white; padding: 5px; font-weight: bold;">Develop Objectives</div> <small>from this Column</small>	<div style="background-color: #ffcc00; color: black; padding: 5px; font-weight: bold;">Develop Performance Measures</div>
Column A Components	Column B Signs of a strong system	Column C How to attain Goals and Objectives
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">4</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">Strong data sharing partnerships</div> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> Cooperation with and shared responsibility for match results with all partners at the State level and at the local level (internal and external).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Early and continued involvement with IT department(s) exists for all IT changes/issues.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Strong user acceptance process is in place.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Strong testing process is in place.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> No obstacles exist that negatively impact partnerships.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> There is a designated point of contact and good working relationship at all levels (State, SNAP, IT, local).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Ongoing communications/routine meetings have been established to focus on direct certification issues and ways to improve rates and meet benchmarks.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Striving to reach and maintain a direct certification rate at or above the benchmarks is a priority at all levels (State, SNAP, local).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The data sharing agreement with the SNAP agency reflects the current needs of the State.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

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Column A Components	Column B Signs of a strong system	Column C How to attain Goals and Objectives
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">5</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">Effective matching algorithms</div> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> Key identifiers are incorporated into data files (i.e. State student ID number linked to a SNAP data file) so that future matches are facilitated.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Datasets have been analyzed, and limitations have been corrected or accounted for (i.e. if last name in one file is truncated to a set number of characters, the other data file is prepared in like fashion to allow for a match).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Matches in the target age range yield relatively few questionable or unmatched results.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Matches are sensitive to variations in spelling or transpositions.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Few false negatives (doesn't find a match when there is one). Match criteria is not overly restrictive.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Few false positives (finds a match when there isn't a match). Match criteria is not too loose.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> False positives, once identified, are reported appropriately and studied for implementing appropriate safeguards.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Procedures are in place to assist in identifying siblings/other students in the same household as an eligible student, even if the siblings/others themselves do not match.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>for completing the measure (month/year).</p> <p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

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<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">6</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">Match frequency and timing</div> <div style="border: 1px solid gray; padding: 5px; width: fit-content;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact         </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> The first match is made as early in the school year as possible (July, if applicable)</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> There are no impediments to the timing of this first match (key State and/or local personnel are available, procedures in place, system developed)</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The first match uses data that is current – kindergarteners have been added to the student enrollment database, graduates have been removed.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> At a minimum - matches comply with the requirement that matches be made at least 3x/year: at or around the beginning of the school year; three months after the beginning of the school year; and six months after the beginning of the school year.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Better - Matches are made more frequently (in increasing order: monthly, weekly, daily, or in real time), the data used is up-to-date, and the matching efforts are properly timed for greater efficiencies.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> SFA/School has look-up capability to easily process newly enrolled students.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

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<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">7</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">Effective handling of non-matches</div> <div style="border: 1px solid gray; padding: 5px; width: fit-content; margin-left: auto; margin-right: auto;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> Non-matches are ranked according to degree of possible “matchability.”</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Non-matches are effectively “worked,” using human involvement where necessary.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> If LEAs are asked to “work” the non-matches, guidance or recommended rules are provided.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> LEAs have look-up capability (with appropriate confidentiality) to use as a tool to resolve non-matches.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Non-matches are analyzed to determine causes, with an eye toward improving the process.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Information gleaned from resolving non-matches is used to update, correct, or tweak all systems to ensure a future match.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Non-match list is getting progressively smaller as reasons for non-matching are resolved and datasets/systems are corrected.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

<div style="background-color: #0056b3; color: white; padding: 5px; font-weight: bold;">Develop Goals</div> <small>from this Column</small> <b>Column A</b> <b>Components</b>	<div style="background-color: #4f8127; color: white; padding: 5px; font-weight: bold;">Develop Objectives</div> <small>from this Column</small> <b>Column B</b> <b>Signs of a strong system</b>	<div style="background-color: #ffcc00; color: black; padding: 5px; font-weight: bold;">Develop Performance Measures</div> <b>Column C</b> <b>How to attain Goals and Objectives</b>
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">8</div> <p style="text-align: center; font-weight: bold; margin: 0;">Effective transfer of match results to local level</p> <p style="text-align: center; font-size: 0.8em; margin: 0;">(for State/Central-level Matching Systems)</p> <p style="text-align: center; font-weight: bold; margin: 10px 0 10px 0;">—or—</p> <p style="text-align: center; font-weight: bold; margin: 0;">Effective Utilization of Established System</p> <p style="text-align: center; font-size: 0.8em; margin: 0;">(for Local-level Matching Systems)</p> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px; width: fit-content;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact         </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> There exists a secure and easy means to access data through an online portal.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> There is a history file that contains a unique list of all matches from July 1 to the current month so that LEAs can “catch up” if they miss downloading a file.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Local level staff (including office personnel) know how to receive/retrieve/process match results, if State uses a central-level matching system.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Local level staff (including office personnel) know how to access/retrieve/process data to implement the matching process, if using local level matching.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Procedures/system is in place at the local level to identify siblings/other students in the household of the matched student, even if the siblings/others do not show up in the match (i.e. “household coding” that extends eligibility) and to count them all as directly certified.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Procedures/systems are in place at the local level to designate as directly certified those students who are matched (even if initially certified by application).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> State can determine if LEA has accessed the match results (or whether LEA is accessing data to implement the match, if local-level matching) and with what frequency.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Strong local-level buy-in and support of direct certification.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

**Develop Goals**  
from this Column

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**Develop Performance Measures**

Column A Components	Column B Signs of a strong system	Column C How to attain Goals and Objectives
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">9</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">Effective input into POS system at LEA and effective use of match processes at the school level</div> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> LEAs are notified when new matched data is available, if applicable.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The State agency requires LEAs to process direct certification data into their POS system in a timely manner, and the State can determine that the matches have been processed.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Alternatively, the matched data is “pushed” directly into the POS, without need for LEA or school-level input/action.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The LEA has look-up capability, particularly to process new students and to “work” the non-matched files, with appropriate confidentiality.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The source of the match is retained in a data field with the student record, with appropriate confidentiality.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The household is notified if the student is direct certified, and they are given the opportunity to opt-out (as opposed to opting-in).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Key-personnel are available to handle the match processes during the summer months/early in the school year/during the school year, as needed, even in smaller LEAs.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Communication channels/procedures have been established so school/LEA staff can report immediately any questions/false positives in data.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> There is contact and good cooperation between the State and the vendor community that develops and manages POS systems in the State, and data sharing file formats are available and used by these vendors.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

<div style="background-color: #0056b3; color: white; padding: 2px; font-weight: bold; font-size: 0.8em;">Develop Goals</div> <div style="font-size: 0.7em; color: white; margin-top: 2px;">from this Column</div>	<div style="background-color: #0056b3; color: white; padding: 2px; font-weight: bold; font-size: 0.8em;">Develop Objectives</div> <div style="font-size: 0.7em; color: white; margin-top: 2px;">from this Column</div>	<div style="background-color: #ffcc00; color: white; padding: 2px; font-weight: bold; font-size: 0.8em;">Develop Performance Measures</div>
Column A Components	Column B Signs of a strong system	Column C How to attain Goals and Objectives
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">10</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">Effective LEA</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">Reporting on the</div> <div style="text-align: center; font-weight: bold; margin-bottom: 10px;">FNS-742</div> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact         </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> A distinction is made between SNAP and non-SNAP direct certifications so that the SNAP direct certification counts can be reported separately on the FNS-742.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The separate reporting of direct certifications with SNAP is accurate and complete. It includes only direct certifications with SNAP and those in the household extended eligibility because someone in the household was directly certified with SNAP.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> There is a procedure to accurately count cases as direct certifications in the event that the match with SNAP (or extended eligibility based on direct certification with SNAP) comes through subsequent to certification by other means.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> It excludes “letter method” SNAP cases in the separate direct certification with SNAP counts, as “letter method” certifications cannot be counted as direct certifications.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> The State has communicated to the vendor community any new requirements or changes in policy that might affect the reporting process, or the State has ensured that the LEA has communicated with the vendor community to institute any needed changes in the POS system to capture the data/properly report the data.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## State Self-Assessment Tool for Direct Certification with SNAP

**Develop Goals**  
from this Column

**Develop Objectives**  
from this Column

**Develop Performance Measures**

Column A Components	Column B Signs of a strong system	Column C How to attain Goals and Objectives
<div style="text-align: center; font-size: 2em; font-weight: bold; margin-bottom: 10px;">11</div> <div style="text-align: center; font-weight: bold;">Effective monitoring of the process</div> <div style="border: 1px solid gray; padding: 5px; margin-top: 10px;"> <input type="checkbox"/> OK  <input type="checkbox"/> Needs Work  <input type="checkbox"/> Major Impact                 </div>	<p>Y <input type="checkbox"/> N <input type="checkbox"/> The system has a log file by LEA, including user ID information and last date accessed, so follow-up can be provided for users who have not recently accessed/downloaded a file.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> State agency is aware of 742 data as it is coming in, knows if it is within the usual range for LEA, and follows up.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> State agency knows the approximate number of school-aged children in SNAP households.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> State agency tracks data elements and estimates their direct certification rates.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> State agency/LEA has mechanisms in place to track and report the number of homeschooled children within each LEA, any children attending a non-NSLP school, or any children attending schools that do not fully participate in the direct certification matching system (i.e. private school not sharing enrollment data with a statewide match system).</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> State agency reaches out to/stays abreast of developments in other States to gather best practices that could have a positive impact on its own direct certification system.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Provides on-going training and technical assistance to local level in the direct certification process.</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> Other</p>	<p>The <b>Performance Measures</b> can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the <b>Objective</b>, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide outreach, training, or technical assistance to partners at the local level, or steps to monitor performance.</p> <p>Will need to give substance to each <b>Performance Measure</b> to provide (see Steps 4 and 5):</p> <ul style="list-style-type: none"> <li>A short description of the activity/measure.</li> <li>The method for measuring the progress of the measure, the measurable outcome.</li> <li>The estimated timeframe for completing the measure (month/year).</li> </ul>

## Step 2 – Develop your CIP Goals

- **NAME THE GOALS** - When you have identified in Column A of the “State Self-Assessment Tool for Direct Certification with SNAP” (customized for your State) those components that would provide the greatest impact on increasing your direct certification rate, turn these components into **Goals** by adding such words as “Improve,” “Promote,” “Develop,” “Provide,” or “Implement” before the component, or otherwise changing/creating wording to indicate the goal you would like to achieve. So, a **Goal** involving Component 8 (Effective transfer of match results to local level) could be “Promote the effective transfer of match results to the local level,” or “Establish an effective transfer of match results to the local level,” etc.
- **NUMBER THE GOALS** - Label the **Goals** and number them, starting with **Goal 1**.
- **INCLUDE THEM IN YOUR CIP** - Later, you will be recording these enumerated CIP Goals in a format similar to that shown in the sample “Continuous Improvement Plan Document” (see Step 6, below).



## Step 3 – Develop your CIP Objectives and Designate Potential Impact

- **DETERMINE THE OBJECTIVES** - For each of the **Goals** that you have identified for your State, you will need to develop CIP **Objectives**. To determine the **Objectives** that fit under those **Goals**, you might find that you can:
  - Take some of the items under **Column B** (Signs of a strong system) related to the component and change these into **Objectives** by adding such words as “Ensure,” “Develop,” “Promote,” “Establish,” “Minimize,” “Improve,” or “Increase” and rewording a bit.
  - Use unique, State-specific **Objectives** that are not covered in the guide, or were added to **Column B** during your self-assessment, that you will want to include/define.
- **HOW MANY OBJECTIVES?** Develop as many **Objectives** as necessary for each **Goal**. You may end up with only one **Objective** for a particular **Goal** or five **Objectives** for that **Goal**.
- **NUMBER THE OBJECTIVES** - Number your **Objectives** based on the associated **Goal**. For instance, if you were to have three **Objectives** associated with **Goal 1**, they would be numbered: **Objective 1.1**, **Objective 1.2**, and **Objective 1.3**. Two **Objectives** associated with **Goal 3** would be numbered **Objective 3.1** and **Objective 3.2**.
- **DESIGNATE IMPACT FOR EACH OBJECTIVE** - Designate each **Objective** according to its potential impact on raising the direct certification rate in your State. Objectives with greater potential impact should be designated with the #3. Those with a lower potential impact should be designated with the #1 (use #2 for those in between).
- **INCLUDE THEM IN YOUR CIP** - Later, you will be recording these CIP Objectives and Potential Impact Designations in a format similar to that shown in the sample “Continuous Improvement Plan Document” (see Step 6, below).



## Step 4 – Begin to Develop your CIP Performance Measures

- **LIST THE PERFORMANCE MEASURES (STEPS)** - For each of the CIP **Objectives** that you have identified, you will need to develop CIP **Performance Measures**—measurable steps (or actions) your State will take to achieve that particular **Objective** (and, ultimately, **Goal**).
  - Develop as many **Performance Measures** as necessary to attain each CIP **Objective**. It is these designated CIP **Performance Measures** that will make up the bulk of your plan, traced back through the CIP **Objectives** to the CIP **Goals**.
  - The **Performance Measures** can be steps to set in place, modify, or make improvements to technology, information systems, databases, or procedures, or, depending on the **Objective**, may include steps to improve relationships or strengthen agreements with stakeholders, steps to provide training or technical assistance to partners at the local level, or steps to monitor performance.
- **NUMBER THE PERFORMANCE MEASURES** - Number your **Performance Measures** based on the associated **Objective and Goal**. For instance, if you were to have four **Performance Measures** associated with **Objective 1.1**, they would be numbered: **Performance Measure 1.1.1**, **Performance Measure 1.1.2**, **Performance Measure 1.1.3**, and **Performance Measure 1.1.4**. Two **Performance Measures** associated with **Objective 1.2** would be numbered **Performance Measure 1.2.1** and **Performance Measure 1.2.2**. The first part of the numbering traces back to the **Goal**, the second part to the **Objective**, and the third to this designated **Performance Measure**.
- **INCLUDE THEM IN YOUR CIP** - The **Performance Measures** will need to be further developed in the next step.



## Step 5 – Give Substance to the CIP Performance Measures

- **PROVIDE EXTRA INFORMATION FOR EACH PERFORMANCE MEASURE** - For each of your identified CIP **Performance Measures**, you will need to provide the following information, in a format similar to the sample “Continuous Improvement Plan Document” (see Step 6, below):
  1. A short description/title of the activity/measure.
  2. The measurable outcome (i.e. “step completed,” “meeting occurred,” “agreements finalized,” specific report/survey completed,” “criteria developed,” “training modules developed/delivered,” “hardware secured,” “process developed/approved/documented,” “system improvement complete,” “reporting mechanism established and baseline report submitted to leadership,” “reporting tool developed/in use/effectiveness analyzed,” “action plan developed/approved/implemented,” “measurement methodology developed/documented,” “standard operating procedures and timeline developed/implemented,” “staff hired/trained,” “needs assessment completed,” “data accessible by stakeholders,” “certification data incorporated into reprogramming process,” “attendance increased to certain level,” “trending system in place,” “gap analysis completed,” “roles and responsibilities documented,” “numbers increase to certain level,” etc.)
  3. The estimated timeframe for completing the measure (month/year).

- **THE EXTRA INFORMATION IS ALSO INCLUDED IN YOUR CIP** - This can best be presented in table format of the CIP Plan Document, see the example that follows in Step 6.

## Step 6 – Prepare the CIP Plan Document

- **COMPLETE THE CIP PLAN** - After you have further developed the CIP **Performance Measures** in Step 5, complete a CIP Plan Document, an example of which is included here. Although you do not have to use this format, please make sure that your Plan Document includes all of this information:
  - **Goals** (using numbering convention outlined in Step 2),
  - **Objectives** (using numbering conventions outlined in Step 3) and the expected potential impact of the Objective on increasing your State’s direct certification rate, and
  - **Performance Measures** (using numbering convention outlined in Step 4).
  - In addition, provide information for each **Performance Measure** as outlined in Step 5.
- **PROTOTYPE** - The following is a prototype for your Plan Document, where we have provided 2 Goals and a total of 13 Performance Measures. Note that in this fictitious plan, planned completion dates cover more than a one-year period. Your State most likely will have more Goals, more Objectives, and more or fewer Performance Measures per Objective than is shown here.

The “Sample Continuous Improvement Plan Document” begins on the next page

## Sample CIP Plan Document

State _____		<b>Direct Certification FY 2014 CIP Plan Document from SY 2012-2013 Benchmarks</b>	
<b>GOAL 1: Improve the Quality of Student Enrollment Data</b>			
<b>OBJECTIVE 1.1</b> Establish a Unique Statewide Student Identifier that stays with the child throughout his school career			<b>Expected Impact of Objective</b> <div style="border: 1px solid black; display: inline-block; padding: 2px;">3</div> Major = 3 Mid = 2 Minor = 1
<i>Performance Measures</i>			
#	Title/Description	Measurable Outcome	Planned Completion (Month/Year)
1.1.1	Analyze the current system and identify needs	Analysis complete and needs identified	July 2014
1.1.2	Work with partners to establish standards	Standards established	October 2014
1.1.3	Agreements with partners	Signed agreements in place	November 2014
1.1.4	System changes made and data available for LEAs	Each student has assigned identifier and the LEA has this new data element in its POS system	February 2015
1.1.5	Monitor to be sure data element retained	Selected LEAs in the State are monitored to ensure that the new data element retained to next school year	October 2015
1.1.6	Retest	Random sample is tracked to see if the data element retained	October 2016

## Sample CIP Plan Document

OBJECTIVE 1.2 Ensure data is available from all NSLP schools in the State			<b>Expected Impact of Objective</b> <div style="border: 1px solid black; display: inline-block; padding: 2px 5px; margin-right: 5px;">2</div> Major = 3 Mid = 2 Minor = 1
<i>Performance Measures</i>			
#	Title/Description	Measurable Outcome	Planned Completion (Month/Year)
1.2.1	Identify schools not in the State student database	Identification complete	June 2014
1.2.2	Analyze and identify obstacles for inclusion	Report on findings	October 2014
1.2.3	Correct situation	All NSLP schools represented in the statewide database	March 2015
<b>GOAL 2:</b> <b>Ensure effective input of matched data into LEA POS system</b>			
OBJECTIVE 2.1 Ensure that local level personnel know how to retrieve and process match results by instituting an online training system			<b>Expected Impact of Objective</b> <div style="border: 1px solid black; display: inline-block; padding: 2px 5px; margin-right: 5px;">3</div> Major = 3 Mid = 2 Minor = 1
<i>Performance Measures</i>			
#	Title/Description	Measurable Outcome	Planned Completion (Month/Year)
2.1.1	Develop online training materials	Materials developed and tested	September 2014
2.1.2	Be able to track whether targeted personnel have completed training	System in place to alert targeted personnel of need to take training and to track training completion	November 2014
2.1.3	Test for learning outcomes	Targeted personnel have taken training and successfully passed end-of-training test	January 2015
2.1.4	Monitor for usage/ test for retention	Selected LEAs have been monitored for usage, and all targeted personnel have been retested.	May 2015

## **Step 7 – Prepare the Multiyear Timeline**

You are required to submit a multiyear timeline with your CIP. If you have utilized the above suggested format, your timeline should easily come from your plan. For the CIP Multiyear Timeline, organize each entry in ascending date order, and track it to the Performance Measure Number using the numbering conventions described in Steps 2, 3, and 4 (see above) and used in the sample plan in Step 6. You can also use this timeline to track your own progress, which will be useful when you need to report your progress to FNS. Below is a sample timeline, which ties in with the Performance Measures and Planned Completion Dates in the sample CIP Plan Document, shown above:

**The “Sample Multiyear Timeline” is on the next page**

### Sample Multiyear Timeline

State _____				Direct Certification FY 2014 CIP Multiyear Timeline from SY 2012-2013 Benchmarks
Performance Measure #	Description	Planned Completion (Month/Year)	Actual Completion (Month/Year)	Status Report
1.2.1	Identify schools not in the State student database	Jun-14		
1.2.2	Analyze and identify obstacles for inclusion	Jul-14		
1.2.3	Correct database issues	Sep-14		
2.1.1	Develop online training materials	Oct-14		
2.1.2	Be able to track whether targeted personnel have completed training	Oct-14		
2.1.3	Test for learning outcomes	Nov-14		
2.1.4	Monitor for usage/ test for retention	Nov-14		

Fillable CIP Development Guidance- Guidance for the Development of a Continuous Improvement Plan (CIP) for Direct Certification with SNAP

## Step 8 – Submit the CIP

There will be four parts to your CIP submission which will be submitted to FNS by email to [CNStatesystems@fns.usda.gov](mailto:CNStatesystems@fns.usda.gov). Please designate the SUBJECT line of your email as: “[Your State Name] FY 2014 CIP from SY 2012-2013 Benchmarks” (or for future years, whatever FY and related SY is appropriate). If you choose to separate any of the required parts into attachments, please similarly name the files to include “[Your State Name]” and “FY 2014 CIP” and another identifier, such as “Coversheet” or “Plan Document” or “Timeline” or “DC Initiatives,” as appropriate.

1. A submission coversheet with contact information and a signature from your NSLP State Director.
2. Your State’s CIP Plan Document (see Step 6)
3. Your State’s CIP Multiyear Timeline (see Step 7)
4. Your State’s status with other direct certification (DC) initiatives. (Since the particular information that FNS will be asking for regarding your State’s status with other DC Initiatives is likely to change from year to year, the exact questions you will need to answer on your State’s progress toward implementing DC initiatives will be sent to you as an attachment to that year’s notification of the need to develop and implement a Continuous Improvement Plan.)

## Step 9 – Get FNS Approval

Your State’s CIP submission is due **BY THE DUE DATE POSTED IN YOUR NOTIFICATION LETTER**. Your CIP will be reviewed by a panel comprised of FNS Headquarters and FNS Regional Office team members, with input from technical advisors, as needed. The review panel may need to contact you with questions about your submission. You will be advised as to whether your submission needs revision, and you will also be advised when your CIP has been approved.

If you need assistance in developing your CIP or have questions, please contact us at [cnstatesystems@fns.usda.gov](mailto:cnstatesystems@fns.usda.gov).







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