Welcome!

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CEP Part 1: Making the Most of Community Eligibility Provision

Wednesday, February 19, 2014
Today’s Moderator

Paula Zdanowicz, MPH
Senior Program Manager
School Nutrition Foundation
Today’s Topics

Participants will:

- Learn ways to improve direct certification data matching,
- Hear how to incorporate foster children into data matching, and
- Provide input for the next webinar on Eliminating School Meal Applications.
Today’s Panelists

Cindy Long
Deputy Administrator, Child Nutrition Programs
USDA Food & Nutrition Service

Madeleine Levin, MPH
Senior Policy Analyst
Food Research and Action Center

Viv Lees, PMP
Chief, Operational Support Branch
Child Nutrition Programs,
USDA Food & Nutrition Service
Today’s Panelists

Brad Blunt, PMP
Project Manager
School and Community Nutrition
Kentucky Department of Education

Zoë Neuberger
Senior Policy Analyst
Center on Budget and Policy Priorities
How Community Eligibility Can Help High-Poverty Schools

Cindy Long
Deputy Administrator, Child Nutrition Programs
USDA Food & Nutrition Service
Benefits

• Increases access to nutritious school meals
  – School meals participation increases in early adopting States
  – Reduces the stigma associated with free and reduced price meals

• Facilitates implementation of creative meal service models
  – Breakfast in the classroom and grab and go kiosks

• Reduces paperwork and administrative costs
  – Reduces household and administrative burden
Making CEP Work

• Department of Education Title I guidance
• Support from local administrators, school nutrition personnel, and others involved in the school community
• Best practices and resources available from early adopting States
• Support from USDA with training and technical assistance
Today’s Panelist

Madeleine Levin, MPH
Senior Policy Analyst
Food Research and Action Center
How Community Eligibility Works

• High-poverty schools provide free breakfasts and lunches to all students without collecting applications.

• Any school district can use this provision if at least one of its schools has 40 percent or more students certified for free meals without application (called “Identified Students”).

• Most schools with a 40 percent Identified Student Percentage have 75 percent or more of their students qualifying for free or reduced-price meals.

• The district may implement community eligibility in one school, a group of schools or district-wide.

• By May 1 of next year, states must publish lists of all schools that are eligible for community eligibility and all schools that are near-eligible.
Who Are “Identified Students”? 

Children certified for free meals without submitting a school meal application

Includes children who are directly certified (through data matching) for free meals because they live in households that participate in the

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families Cash Assistance (TANF)
- Food Distribution Program on Indian Reservations (FDPIR), or
- Medicaid (in districts participating in USDA’s demonstration project)

Includes children who are certified for free meals without application because they are

- in foster care
- in Head Start
- are homeless or
- are migrant
Reimbursements Under Community Eligibility

• % Identified Students x 1.6 = % meals reimbursed at “free” rate; the rest are reimbursed at “paid” rate

• Example: a school with 50 percent Identified Students would be reimbursed at the free rate for 80 percent of the breakfasts and lunches it served (50% x 1.6 = 80%) and the remaining 20 percent would be reimbursed at the paid rate

• Participating schools are guaranteed to receive the same reimbursement rate (or a higher one if the Identified Student Percentage increases) for 4 years
Building on Success of Direct Certification

• Direct Certification is a highly effective and accurate means of certifying children for free school meals
• Families who have already gone through lengthy certification processes for other means tested programs – mainly SNAP and TANF – no longer need to fill out school meals applications
• In SY2012-13 direct certification increased by 6% to reach 12.3 million children as a result of better systems
• Performance Goal for 2012-2013 was 90% of children in households receiving SNAP benefits (actual 89% national average); Performance Goal for 2013-2014 is 95%
• Now improvements help community eligibility schools as well as individual children
Impact of CEP Eligibility & Benefits by Improving Direct Certification Data Matching

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Theory of Direct Certification
What is a “Match”? 
A Match is a “reasonable expectation” that the data contained in the two records describe the same child.
Community Eligibility Provision: The Direct Certification Connection

- Improved data matching = Increased Claiming Percentages
- What can States and LEAs do to help direct certification rates?
Understanding What’s in Play

• SNAP/TANF/FDPIR/ Foster Care/ Other Agency Data
• Student Enrollment Data
• Matching Records
• Importance of Frequency & Timing
• Local Systems
• Priority Impact
Understanding Other Agencies’ Data

• Understand why and how other agencies (SNAP, TANF, FDPIR, foster care, etc.) collect data – what is the quality of the data?

• What data elements are provided? Can you “mirror” these elements in the school enrollment data?

• Are there weaknesses in your Student Information System (SIS) that would result in non-matches? (i.e., old data, no SSN, truncated names, etc.)
Quality Student Data

• Does your data entry staff understand the impact of their work?
• What are the important data elements?
• Where should you spend your energy?
• What is your process to ensure accurate and complete quality student data is entered?
• How does the State Agency extract your student data?
Matching Records

• Identify common errors and correct
• Get staff feedback on issues in process
• Research available technologies
• Work the “unmatched” or “near match” records
• Local procedures can assist and overcome process issues
The Importance of Frequency & Timing

Run matches often and at critical times

• Early in school year so that kids get free meals all year:
  
  July--August--September--October

• Periodically throughout school year

• Immediately for new students and transfers
Local Systems

- Do all staff fully understand your direct certification process?
- Do you have an effective system for entering & counting directly certified students at the POS level?
- Are there processes you could automate for faster, more accurate data handling?
Evaluate and Prioritize Impact

• What efforts will make the greatest positive impact?

• May need both short and long-term strategies

• Look at the whole process end-to-end and involve the whole team (State and Local)
Best Practice: Look at the Whole Picture!

Identify Challenges

Develop Plan

Conduct Testing/Analyze Results

Implement Strategy
Direct Certification Resources

- **Direct Certification Improvement Grant Request for Applications**
  http://www.fns.usda.gov/school-meals/grants

- **Video Training Webcast:** “NSLP/SNAP - Direct Certification and State Performance: Covering the New Process, Data Requirements, and Responsibilities Beginning School Year 2013-2014”
  https://www.youtube.com/watch?v=d47j_giW1xQ

- **FNS Memorandum, SP54-2013:** Transmittal of the Q&As on the Computation of the Direct Certification Performance Rate with the Supplemental Nutrition Assistance Program, 08/16/2013
  http://www.fns.usda.gov/school-meals/policy

- **“Match to Meal” Newsletters** highlighting State & Local Direct Certification practices on USDA CNP PartnerWeb (July 2013 & January 2014)
  https://www.partnerweb.usda.gov

- **2014 Direct Certification Continuous Improvement Plan (CIP) Guidance** on USDA CNP PartnerWeb
  https://www.partnerweb.usda.gov

- **Technical Assistance** available to State agencies via CNP’s Operational Support Branch contracts, contact your FNS regional office
Foster Children – Direct Certification

Brad Blunt, PMP
Project Manager
School and Community Nutrition
Kentucky Department of Education
Foster Children – Direct Certification

Agenda

• Background
• Design
• Challenges
Healthy, Hunger-Free Kids Act of 2010 allows for categorical eligibility of foster children

- **Definition:** A child whose care and placement is the responsibility of the State or who has been placed with a caretaker household by a court.

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1 USDA Memo SP 17-2011– Child Nutrition Reauthorization 2010: Categorical Eligibility of Foster Children
Design

- State Agency will acquire the list of foster children from State Child Welfare Agency that meet the criteria outlined by the USDA

- Process to identify foster children DC will be dependent on DC matching process in your state

  - **State Level** – State Agency matches DC list and informs SFA of DC students

  - **Local Level** – SFA obtains DC list and matches against NSLP student roster

  SFA processes Foster DC students separately from SNAP/TANF since direct certification cannot be extended
Design – Local DC Matching

Since foster DC is not extended to other children – a separate file is created for SFAs.

Example:

<table>
<thead>
<tr>
<th>COUNTY</th>
<th>KTAP - Current Files</th>
<th>Foster - Current Files</th>
<th>KTAP - History Files</th>
<th>Foster - History Files</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADAIR</td>
<td>KTAP/SNAP/Medicaid</td>
<td>Foster</td>
<td>KTAP/SNAP/Medicaid</td>
<td>Foster</td>
</tr>
</tbody>
</table>

Foster children may be processed on a different day than SNAP.

Note: History files contain recipients from July 1 to current month; useful for “catching up”.
Challenges – Local DC Matching

Foster children have unique challenges due to their living situation:

<table>
<thead>
<tr>
<th>Challenge</th>
<th>Solution</th>
</tr>
</thead>
</table>
| **High Mobility** [Frequent changes in foster home situation] | • Search for student in Statewide DC database  
• Request that State Agency search for foster student in statewide list |
| **Educational Delivery** [Group home in different county than LEA] | • Provide group foster home address to State Agency to identify students in same living situation |
| **Personal Identity** [Name changes]           | • May need to manually search for potential foster students after matching on SSN, Name/DOB, etc. |
Today’s Panelist

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How Are Data from School Meal Applications Used?

• Income data from school meals applications is sometimes the most readily available data to assess the poverty level of a school and is commonly used to target federal and state resources to schools
  • Title I of the Elementary and Secondary Education Act, which provides federal funding to support the education of “disadvantaged” students
  • Schools and Libraries Program (E-rate), a federal program that helps schools obtain telecommunications and Internet access at affordable rates
  • State education funding, which in some states is allocated based in part on data from school meals applications
  • Federal Child Nutrition Programs (such as SFSP and CACFP), which rely on data from school meal applications to determine which sites qualify to provide meals at no charge
• Income data from applications is often the only way that a school knows which of its students are low-income, so it is often used to track educational progress or give out fee waivers
What Data Is Available to Community Eligibility Schools?

- USDA and USED no longer require individual income data for any of their programs.

- For Title I purposes, USED allows the use of school meals data that community eligibility schools will have (such as the free claiming percentage or the Identified Student Percentage).

- States can follow USED’s lead or identify alternative data sources (such as Medicaid data or census data).

- States will need to weigh whether to collect individual income data outside the school meals program, taking into account the significant disadvantages.
Homework

• Find out which other state programs rely on data from school meal applications

• Invite colleagues who work on Title I and those state programs to participate with you in the next webinar

• The next webinar will be on Wednesday March 26, 2-3:15pm and will focus on impacts of eliminating school meal applications and approved data alternatives

• You can register here: https://www2.gotomeeting.com/register/638384802
Community Eligibility Resources

Links to Key USDA and State Materials
http://frac.org/community-eligibility/

FRAC/CBPP: A Guide to Implementing Community Eligibility

FRAC Brief: An Amazing New Option for Schools

USDA Report to Congress: Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012-2013
Thank You