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KEY STEPS TO IMPROVE ACCESS TO FREE AND REDUCED-PRICE SCHOOL MEALS

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The National School Lunch Program (NSLP) is a well-established federal program that provides school children with a nutritious lunch every school day. In recent years, free and reduced-price school breakfasts and lunches have been especially beneficial for children from low-income families that are struggling to afford nutritious food in the midst of a severe economic downturn. The program is also a reliable source of nutritional support for particularly vulnerable children, such as children in foster care or who are homeless, runaway, or migrant, all of whom are automatically eligible for free meals in school.

The school lunch program has a strong track record of serving eligible children; children in households with income at or below 130 percent of the poverty line are eligible for free meals and children in households at or below 185 percent of the poverty line are eligible for reduced-price meals. But some eligible low-income children still miss out on meals that could foster healthy development and learning. Thanks in part to policy changes in recent years, school meal programs have made gradual progress in simplifying the enrollment process with the goal of reaching more eligible children. Still, some families are unaware of the program or face other barriers to participation such as complex forms or limited English proficiency. Even among children who are eligible for free school meals without having to apply, as many as one in seven fail to receive certification.¹

State and local program administrators can take steps to improve program access for eligible children in several key areas. This paper highlights helpful resources and describes six key opportunities for advocates and program administrators to ensure that all eligible children are certified quickly and easily for free or reduced-price school meals:

1. Reaching more children in households receiving SNAP benefits (Supplemental Nutrition Assistance Program, formerly known as food stamps) by improving direct certification data matching
2. Reaching eligible children who receive other means-tested public benefits by expanding direct certification data matching
3. Reaching children in foster care and homeless, migrant, and runaway children by strengthening processes to directly certify them

¹ *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, Table 3, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>

4. Eliminating access barriers by simplifying applications and subsequent communications
5. Ensuring year-long enrollment by retaining eligible children throughout the school year
6. Providing free meals to *all* children in high-poverty schools by utilizing the new community eligibility option

State and local administrators and advocates can use this paper to identify access barriers in their schools and take steps to eliminate them during the coming school year. By planning ahead, they also can make more substantial changes for future years. A checklist of key steps to consider is followed by more detailed descriptions of each.

Checklist of Steps to Improve Program Access

To Improve Direct Certification for Children in Households Receiving SNAP Benefits

- Regularly assess progress toward reaching all children in households receiving SNAP benefits
- Refine the data matching process
- Use any available data to reach all children in the household
- Conduct matches as often as possible and develop the capacity to look up individual children
- Regularly provide training and guidance for staff

To Expand Direct Certification for Children Receiving Other Means-tested Benefits

- Apply to participate in the Medicaid direct certification demonstration project
- Strengthen direct certification for children in households receiving TANF cash assistance or FDPIR benefits

To Strengthen Direct Certification for Children in Foster Care and Homeless, Migrant, and Runaway Children

- Use data from the state or local child welfare agency to directly certify children in foster care
- Use the automatic notification a school receives when a child enters foster care or changes foster homes as the basis for direct certification
- Strengthen the direct certification process for homeless, migrant, and runaway children who have been identified by appropriate officials
- Complete an application on behalf of an individual child — especially an unaccompanied youth — who is known to be eligible, but whose family has not applied

To Simplify Applications and Encourage Eligible Families to Apply

- Provide materials in a language and at a level that parents can understand
- Ask only for information necessary to determine eligibility
- Reduce the potential for applicants to make calculation errors
- Include school meals information in routine contacts with families and communities throughout the school year to encourage newly eligible families to apply

To Retain Eligible Children Throughout the School Year

- Eliminate temporary approvals
- For children who enroll during the school year, rely on the previous eligibility determination if it can be obtained promptly or conduct a new certification — using direct certification or a new application
- Conduct direct verification
- For applications that cannot be directly verified, accept the least burdensome form of reliable documentation and clearly explain to parents what they must provide

To Utilize the Community Eligibility Option

- Apply to USDA to implement community eligibility during the 2013-2014 school year
- For subsequent school years, implement community eligibility in schools or districts that serve predominantly low-income students

1) Improving Direct Certification for Children in Households Receiving SNAP Benefits

Most children are enrolled for free or reduced-price meals when their parents submit an application at the start of the school year.² To facilitate enrollment and ease paperwork burdens on schools and families, children from households that receive other federal benefits are categorically eligible for free meals and may be automatically enrolled for free school meals without an application — a process known as direct certification. Strengthening existing direct certification mechanisms can make it significantly easier for eligible children to receive free meals.

All school districts are now required to directly certify children in households receiving SNAP benefits (formerly known as food stamps).³ States or school districts must use data matching to identify children in households receiving SNAP benefits, comparing (electronically or manually) a list of students to a list of children in households with at least one member receiving SNAP benefits.⁴ Once a district knows that a child has been identified as a member of such a household, it directly certifies the child for free meals and notifies the household.⁵ This is an important enrollment mechanism to perfect because direct certification improves access for many vulnerable children while reducing paperwork and the potential for errors.

In recent years, many states have adopted electronic data matching systems for the first time, which has led to new progress in directly certifying eligible children in households receiving SNAP benefits. However, more than one in five such children are still being missed in the direct certification process nationwide, and in some states, more than two in five eligible children are missed.⁶ Every one of these children should be directly certified. States and schools districts can make significant strides toward achieving that goal by taking the following steps. The U.S. Department of Agriculture (USDA) has grant funds available to help states make these kinds of improvements.⁷

- A. *Regularly assess progress.* Regularly measuring the percentage of children in households receiving SNAP benefits who are being directly certified for free school meals helps track progress. Since the 2007-2008 school year, USDA has measured state direct certification rates each year to assess whether states are reaching all children in households receiving SNAP benefits. While there has been steady improvement, more than 2.8 million children in households receiving SNAP benefits could have been directly certified to receive free school

² Any adult in the household may complete an application on behalf of a child in the household. There is no requirement that the adult be a parent or legal guardian of the child. For the sake of brevity, this paper refers to the adult completing the application as the parent.

³ See 7 C.F.R. § 245.6(b)(1).

⁴ This paper uses the term “school district” to refer to a Local Educational Agency or a School Food Authority.

⁵ Households must be given an opportunity to decline to be certified. See 7 C.F.R. § 245.6(c)(6)(ii).

⁶ *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, Figure 4, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>

⁷ USDA is planning to issue a new Request for Applications for “Direct Certification Grants” in the fall of 2012. Additional information will be available at: <http://www.fns.usda.gov/cnd/grants.htm>.

meals during the 2010-2011 school year, but were not. States can use these measures — or their own tailored ones — to assess the strength of their direct certification systems and opportunities for improvement. Recent legislation established performance benchmarks for state direct certification rates.⁸ The benchmarks required states to directly certify 80 percent of children in households receiving SNAP benefits for the 2011-2012 school year, and will require 90 percent for 2012-2013 and 95 percent for each school year thereafter. Data for the 2011-2012 school year has not yet been published, but 15 states did not meet the 80 percent level for the 2010-2011 school year. States that do not meet the benchmarks must develop a direct certification improvement plan, which may include the steps described below.

- B. *Refine the data matching process.* Direct certification can be enhanced by regularly reassessing whether the algorithm used for data matching is successfully identifying children eligible for direct certification. States have implemented several approaches that increase the share of children eligible for direct certification who are matched. Some states, like Iowa, use software that allows for variations in names and spelling when conducting matches.⁹ Some states, like Kansas and Texas, conduct multiple data matches using different data elements in each match. Probabilistic matching offers another promising approach. Probabilistic matching compares multiple data fields from two sources and determines a statistical probability of a match. North Dakota's probabilistic data matching system, for example, provides a score indicating the likelihood of a match. Scores above a certain threshold result in direct certification, while scores that just miss the threshold are considered potential matches subject to further review by childhood nutrition staff.¹⁰ To find the right set of identifiers so that direct certification is neither overinclusive nor underinclusive, states and districts may need to try various alternatives and reassess their matching criteria over time.
- C. *Use any available data to reach all children in the household.* If one person in the household is identified as participating in SNAP, then the school district must, to the extent possible, extend eligibility for free school meals to all children in the household even if each child has not been individually matched.¹¹ Some states have not implemented revisions to their direct certification procedures to incorporate this policy since it was established in 2009.¹²

There are opportunities to do more to directly certify all children in an eligible household. An easy starting point — and a program requirement — is to revise the direct certification

⁸ See P.L. 111-296 § 102 (b) amending 42 U.S.C. § 1758(b) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Direct Certification Benchmarks and Continuous Improvement Plans*, USDA, April 28, 2011, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2011/SP32-2011.pdf>.

⁹ *Direct Certification in the National School Lunch Program: State Implementation Progress*, Food and Nutrition Service, USDA, October 2009, p.24, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>.

¹⁰ *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, p. 26, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>.

¹¹ See 7 C.F.R. § 245.6(b)(7) and Food and Nutrition Service Memorandum, *Extending Categorical Eligibility to Additional Children in a Household*, USDA, August 27, 2009, http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_38-2009_os.pdf.

¹² *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, p. 33, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>.

notification letter to parents to request information about other children in the household, who can then be directly certified. USDA's prototype household materials offer an example of how to incorporate these instructions.¹³

Better yet, states or school districts can take steps to identify additional children in the household so parents do not have to be asked. For example, once the student database has been matched against the SNAP database to identify individually matched children, the student database can be searched to identify additional children in the households of individually matched children.¹⁴ States can improve the identification of additional children in the household by ensuring that records are available to link students by household. For instance, North Dakota requires schools to include address information in the data sent to the state agency that conducts matching.

In lieu of additional matching, the school district may rely on other available data.¹⁵ For example, districts may collect information on school enrollment forms that is not included in the student database, which could be used to identify additional children in the household's of individually matched children. Alternatively, "point-of-sale" software, which is typically used for counting and claiming meals or collecting fees, could be used to identify additional children. The Meriden Public Schools in Connecticut, for example, have had success by using a query function in their point-of-sale system to look up siblings. The school district also manually identifies additional children in matched households by comparing the address or parent's name to student enrollment records.¹⁶

- D. *Conduct matches as often as possible and develop the capacity to look up individual children.* States or districts are now required to conduct matches with SNAP data at least three times each school year to identify children who are eligible for free school meals.¹⁷ Conducting matches more frequently or even developing individual look-up capacity would help prevent children who become eligible after the start of a school year, or who change school districts during the year, from falling through the cracks. In each month of 2010, an average of more than

¹³ USDA's prototype materials are available at <http://www.fns.usda.gov/cnd/frp/frp.process.htm>.

¹⁴ Some student databases have a specific household, or head of household indicator. For student databases that do not have such an indicator, the child's address could be used to identify additional children in the household if the address is unique to a single household (for example, an apartment building would need to include unit numbers). See Food and Nutrition Service Memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, question 13, http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf.

¹⁵ See Food and Nutrition Service Memorandum, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household*, USDA, May 3, 2010, question 10, http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf.

¹⁶ For more information about state and local efforts to implement extended categorical eligibility see *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, pp. 33-34, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>.

¹⁷ See 7 C.F.R. § 245.6(b)(3).

200,000 children were in families that newly enrolled for food stamp benefits.¹⁸ Frequent direct certification matching would help ensure that these children would begin receiving free school meals promptly if they were not already certified.

- E. *Regularly provide training and guidance for staff.* Additional training efforts represent a promising opportunity for improving direct certification. In most districts, handling direct certification is only a small part of a local administrator's job. Even the best data matching system will not be effective if staff do not know how to use it. Some steps that have proven successful include adopting a simplified interface for the matching system, ensuring that the process for uploading enrollment data is flexible and can work with all local databases, creating a strong instruction manual, and providing training and technical assistance to staff on an ongoing basis.¹⁹

¹⁸ Center on Budget and Policy Priorities estimate based on Food Stamp Program administrative data and tabulations of the Food Stamp Quality Control Data for fiscal year 2010. Families were considered newly enrolled if they did not receive food stamp benefits during the previous 12 months.

¹⁹ See *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, Section V, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>.

2) Expanding Direct Certification for Children Receiving Other Means-tested Benefits

Although federal law requires school districts only to establish a direct certification data matching for children in households receiving SNAP benefits, they have the opportunity to directly certify children participating in certain other means-tested public benefit programs — Medicaid, Temporary Assistance for Needy Families cash assistance (TANF), and the Food Distribution Program on Indian Reservations (FDPIR).

Medicaid

An important new direct certification demonstration project becomes available for the 2012-2013 school year.²⁰ For the first time, selected states and school districts will be allowed to use *Medicaid* data to directly certify children for free meals if their gross household income is less than 133 percent of the federal poverty line. An estimated 3.6 million school age children living in households with income below this limit receive Medicaid benefits but not SNAP or TANF cash assistance.²¹ Under the new demonstration project, some of these children will be enrolled for free meals for the first time, and others — who have previously been approved based on applications — will benefit from the streamlined enrollment process that direct certification offers.

USDA selected Kentucky and Pennsylvania to implement statewide Medicaid direct certification in the first year.²² An estimated 135,000 children will become eligible for direct certification for the first time in those states. In addition, Alaska, Florida, Illinois, and New York will implement Medicaid direct certification in selected school districts that collectively serve more than half a million children who receive free or reduced price school meals.

Additional states will be selected for the 2013-2014 and 2014-2015 school years. While the use of Medicaid direct certification is being implemented as a demonstration project, the states and districts that are selected will be able to continue conducting Medicaid direct certification permanently. States that wish to substantially increase the share of the children receiving free meals who are directly certified will have an opportunity to apply to USDA for inclusion in the demonstration project.²³ States that have strong direct certification systems but relatively low SNAP participation rates would especially benefit from directly certifying additional children based on Medicaid data.²⁴

²⁰ See 42 U.S.C. § 1758(b)(15).

²¹ Center on Budget and Policy Priorities analysis of March 2011 Current Population Survey data.

²² USDA, “USDA Announces Steps to Streamline Administration and Enhance Program Integrity in the National School Lunch Program,” March 7, 2012, <http://www.usda.gov/wps/portal/usda/usdahome?contentid=2012/03/0086.xml&contentidonly=true>.

²³ USDA’s request for proposals for the 2012-2013 school year is available at <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2011/SP47rfa.pdf>, but new requests for proposals will be issued for future years.

²⁴ For USDA’s most recent data on SNAP state participation rates see *Reaching Those in Need: State Supplemental Nutrition Assistance Program Participation Rates in 2009*, Food and Nutrition Service, USDA, December 2011, <http://www.fns.usda.gov/ora/menu/Published/SNAP/FILES/Participation/Reaching2009.pdf>.

TANF or FDPIR Benefits

Children who are categorically eligible for free meals because their families receive TANF or FDPIR benefits have been eligible for direct certification for many years, but there are still opportunities for states and school districts to expand or improve their direct certification. Nearly two million categorically eligible children still end up filling out applications, which needlessly burdens families with paperwork, creates unnecessary work for school districts, and introduces greater potential for error.²⁵

More than three million children receive TANF benefits, and FDPIR serves children in approximately 276 tribes.²⁶ FDPIR recipients are not eligible for SNAP benefits. While most TANF recipients do receive SNAP benefits, some do not, which makes efforts to directly certify these eligible children valuable. Direct certification using TANF and FDPIR data can often be done through a process similar to certifying members of households receiving SNAP benefits, with state welfare agencies providing the relevant educational agency with information on each recipient, which can then be matched with student records. As with SNAP direct certification, school districts must, to the extent possible, extend eligibility for free school meals to all children in households in which at least one member receives TANF or FDPIR benefits, even if electronic data matching has not resulted in an individual match for each child.

3) Strengthening Direct Certification for Children in Foster Care and Homeless, Migrant, and Runaway Children²⁷

Congress has taken steps to ensure access to free school meals for children facing unique hardships. Children in foster care or who are homeless, migrant, or runaway are “categorically eligible” for free school meals, meaning that they can qualify without providing information about family income. Categorical eligibility is intended to simplify the certification process by eliminating an income assessment for children who would almost always have qualified anyway. All households that are categorically eligible can be directly certified if their status is documented by an appropriate official.

Children in Foster Care

As a result of the Healthy, Hunger-Free Kids Act of 2010, children in foster care are categorically eligible for free school meals.^{28,29} Directly certifying children in foster care for free school meals is

²⁵ This figure includes children in households receiving SNAP benefits. See *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, Table 3, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>

²⁶ United States Department of Health and Human Services, TANF Caseload Data, http://www.acf.hhs.gov/programs/ofa/data-reports/caseload/2011/2011_children_tanssp.htm. Food and Nutrition Service, United States Department of Agriculture, “About FDPIR,” revised March 14, 2012, http://www.fns.usda.gov/fdd/programs/fdpir/about_fdpir.htm.

²⁷ Categorical eligibility of children in foster care, Head Start or Even Start, and children with homeless, runaway, or migrant status does not extend to other household members. Only SNAP, TANF, and FDPIR benefits extend categorical eligibility for free school meals to all children in a household.

now much more feasible and has the promise of providing valuable support to this vulnerable group of children and their families.³⁰ States or school districts can routinely enroll all children in foster care using direct certification by obtaining lists of such children from a state or local child welfare agency or court.

An alternative or complementary approach would be for schools to use the notification a school must receive when a child enters foster care or changes foster homes as the basis for direct certification. Typically, this notification is made by the caseworker responsible for the child's foster placement. The foster care caseworker could notify the school meals program about the child's foster status when apprising other school personnel. State child welfare agencies could make the process of sending information about a child's foster status to the school meals program a routine part of the notification process. Alternatively, the individual at the school who already receives notice of children's foster status could inform a school meals administrator, who could then ensure that these children are directly certified.³¹

Children Who Are Homeless, Runaway, or Migrant

Children who are homeless, runaway, or migrant are also categorically eligible for free school meals. Children must meet certain statutory conditions to be considered homeless, runaway, or migrant for purposes of school meal eligibility. Checking a box indicating one of these statuses on an application alone is insufficient; an official familiar with the statutory requirements must make the determination.^{32,33} By finding ways to obtain the information needed for direct certification, school districts and states can avoid administrative challenges and potential confusion for caretakers. Because teachers may be the first to know about a child's change in circumstances, school administrators should establish a policy for teachers to inform the school meals program.

²⁸ The policies discussed in this section apply to foster children whose care and placement are the responsibility of the state, whether they are placed by a foster care agency or by a court. This group includes all children in foster care, regardless of whether the child is "IV-E eligible"; it does not include children placed informally in kinship care.

²⁹ See P.L. 111-296 § 102 amending 42 U.S.C. § 1758(b) and (d) and Food and Nutrition Service memorandum, *Child Nutrition Reauthorization 2010: Categorical Eligibility of Foster Children*, USDA, Revised March 16, 2011, http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2011/SP17_CACFP08_SFSP05-2011_osr.pdf.

³⁰ Alabama, Delaware, Illinois, Indiana, and Washington conduct electronic data matching to directly certify children in foster care. See "Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011," Food and Nutrition Service, USDA, October 2011, p. 35, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>; Nate Frentz and Zoë Neuberger, "Six Ways that States and School Districts Can Make It Easier for Children in Foster Care to Get Free Meals at School," Center on Budget and Policy Priorities, August 2011, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3559>.

³¹ The USDA, which administers the school meals programs, has not specified what documentation is required. Oral notice would likely suffice if the school meals administrator notes the name of the person making the notification and the date.

³² The determination is not made by school food administrators but instead typically is made by the director of a homeless shelter, the local educational liaison for homeless children and youth, a state, regional, or local Migrant Education Program director or coordinator, or another qualified individual approved by USDA or the state.

³³ Although insufficient grounds for certifying a child for free school meals, a checked box on an application can be used to identify homeless or migrant students, connect them to other educational services, and eventually directly certify them if they have not already been approved for free school meals.

It is important for school districts to be aware that school officials are permitted to complete applications on behalf of children known to be eligible for school meals whose family has not applied. An official may complete an application on behalf of the child based on the best available information. For example, if a school meals administrator knows that a child is homeless but is concerned that there may be a delay in obtaining documentation from the local liaison, the administrator may complete an application on behalf of the child so that the child can begin receiving free meals immediately and then follow up with the local liaison to obtain the needed documentation.

This approach is especially important for unaccompanied youth and teens. Applications must contain the signature of an adult household member, unless the applicant is legally emancipated. As a result, unaccompanied youth and teenagers cannot apply for school meals for themselves, even though almost all would qualify for free school meals (either by income criteria or because they meet the definitions of homeless, migrant, or runaway). School officials can form partnerships with organizations that work with this group to try to identify eligible teens and complete an application on their behalf when appropriate.

Additional Resources on Direct Certification

The USDA annual assessments of direct certification provide information on best practices. The latest one is: *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2010-2011*, Food and Nutrition Service, USDA, October 2011, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2011.pdf>

Previous similar USDA reports can be found at: <http://www.fns.usda.gov/ora/MENU/Published/CNP/cnp.htm>.

The benefits of direct certification and the operational details of how direct certification works are discussed in: Zoë Neuberger, *Implementing Direct Certification – States and School Districts Can Help Low-Income Children Get the Free School Meals for Which They Are Eligible*, Center on Budget and Policy Priorities, August 2006, <http://www.cbpp.org/cms/?fa=view&id=591>

Best practices for directly certifying all eligible children in a household are described in: Zoë Neuberger and Tina Fritz Namian, *Enrolling All Children in a Household for Free School Meals*, Center on Budget and Policy Priorities, June 2010, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3212>

Best practices for certifying children in foster care are described in: Nate Frenz and Zoë Neuberger, *Six Ways that States and School Districts Can Make it Easier for Children in Foster Care to Get Free Meals at School*, Center on Budget and Policy Priorities, August 2011, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3559>

4) Simplifying Applications and Encouraging Eligible Families to Apply

Even though direct certification offers a critical simplification, most children receiving free or reduced-price school meals enroll through the regular paper application process. Typically school districts send home school meals applications and parents complete them at home without assistance. Approximately 30 million Americans lack basic literacy skills, and more than 25 million Americans are not proficient in English.³⁴ The goal of the school meals program is to be accessible to children regardless of their parents' language abilities and to ensure that parents understand what is asked of them to reduce errors that result from misunderstanding.

Thus, it is particularly important that these applications be easy to use, provide clear directions, and avoid steps that might deter eligible families from applying. USDA's prototype application, translations, and related materials offer a sound starting point for school districts and state agencies that are looking for a model from which to work.³⁵ This section describes four steps that states and school districts can take to streamline the enrollment process.

- A) *Provide materials in a language and at a level that parents can understand.* School districts are required to communicate with parents in a language they can understand.³⁶ USDA recently clarified the kinds of measures that are necessary to ensure that no barrier for participation exists for limited English proficient (LEP) households.³⁷ According to USDA's guidance, school districts "have a responsibility to be aware of the language needs of LEP households and ensure these households have access to the same information other parents have in a manner they can easily understand." USDA has also clarified that *all* households must be offered LEP services and that "simply offering the most common alternative language is not sufficient."³⁸ There are several steps state agencies and schools can take to help ensure compliance with USDA requirements and improve access for those with limited English language proficiency or literacy.
- *Accommodate households with limited literacy.* It is important for states and school districts to ensure that English speakers with limited literacy can understand household materials. USDA's prototype materials are designed to be comprehensible to someone with low literacy, so states and school districts can look to USDA's materials as an example of how applications can be written in clear, simple language. States and districts may wish to field test applications with parents who have limited literacy to make sure the materials are comprehensible and elicit accurate information.

³⁴ See National Center for Education Statistics, *2003 National Assessment of Adult Literacy Key Findings*, U.S. Department of Education, http://nces.ed.gov/naal/kf_demographics.asp#3 and Pandya, C, Batalova, J and McHugh, M., *Limited English Proficient Individuals in the United States: Number, Share, Growth, and Linguistic Diversity*, Migration Policy Institute, December 2011, <http://www.migrationinformation.org/integration/LEPdatabrief.pdf>.

³⁵ USDA's prototype materials are available at <http://www.fns.usda.gov/cnd/frp/frp.process.htm>.

³⁶ See 7 C.F.R. § 245.6(a)(2) using language almost identical to the statutory provision at 42 U.S.C. § 9(b)(8).

³⁷ Food and Nutrition Service, *Applications and Other Household Materials for Limited English Proficient Households*, USDA, December 2011, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

³⁸ Food and Nutrition Service, *Applications and Other Household Materials for Limited English Proficient Households*, USDA, December 2011, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

- *Identify the primary language of each household.* Most schools have a system in place to identify parents' primary language for communications regarding the child's education during the school enrollment process. Many school districts retain this information in a student database. Rather than establishing a separate process for identifying the home language for school meals communications, school districts can rely on the information gathered at enrollment to ensure that school meals communications with households throughout the school year are in an appropriate language.
- *Translate all written information related to school meals eligibility.* State agencies or school districts may choose to develop written translations of their own materials in the languages that are most prevalent locally. In the absence of state or local translations, school districts must provide access to USDA's translated materials, either by including a link on the school district's website or by providing printed copies to parents.³⁹ State agencies are required to include a link to USDA's translations on their websites.⁴⁰ These links are most useful when they are clearly labeled and appear on the school meals homepage or the page where free and reduced-price applications are posted. In addition, some school districts allow families to submit school meals applications electronically; when electronic applications are offered, it is important to provide the online application in languages other than English.
- *Provide oral interpretation.* For parents who speak languages for which USDA translations are not available, or who have limited literacy in their primary language, states and school districts would benefit from identifying oral interpretation services for communications with households about school meal benefits. For example, a school district could contract for a telephone translation service.⁴¹
- *Conduct all communications in the household's primary language.* Providing a translated application is an important starting point, but the goal is to make sure all parents understand all information relating to school meal benefits throughout the school year. Once a household is identified as LEP, the school meals program needs to keep a record of the language they speak, and all subsequent communication must be in this language.

B) *Ask only for information necessary to determine eligibility.* Under program regulations, the information requested on a school meals application "shall be limited to that required to demonstrate that the household does, or does not, meet the eligibility criteria for free or reduced price meals."⁴² The application process is simplified for children who are in foster care or who are in households that receive SNAP, TANF, or FDPIR benefits. Asking families to provide information that is not needed to make an eligibility determination

³⁹ USDA's translated materials are available at <http://www.fns.usda.gov/cnd/frp/frp.process.htm>.

⁴⁰ Food and Nutrition Service, *Applications and Other Household Materials for Limited English Proficient Households*, USDA, December 2011, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP06-2012os.pdf>.

⁴¹ Language Line (http://www.language.com/page/industry_government/) is an example of this type of service.

⁴² 7 C.F.R. § 245.6(a)(1).

creates an unnecessary burden for the household and program administrators and may dissuade some families from finishing or even applying for free or reduced-price school meals.

For children in foster care, a foster parent's indication on a signed application that the child is in foster care is a sufficient basis for certification for free meals. The school district may *not* request any further documentation from the foster family as a condition of certification, such as a case number, letter from the foster care agency, or signature of a caseworker. Households that receive SNAP, TANF, or FDPIR benefits must provide a case number on their applications, but they do *not* have to provide more than one case number, nor do they have to provide the names of the adults in the household, income information, or information about a Social Security number.⁴³

Applications must reflect these facts clearly and prominently. Online applications can be simplified by first asking for a relevant SNAP, TANF, or FDPIR case number, or a signed statement that indicates that all children on the application are in foster care. If one of the former is provided, the application can automatically skip the request for income or Social Security number information. For printed applications, a helpful practice is to put the fields for Social Security number information in the income section, as only applicants who provide income information must provide Social Security number information.

- C) *Reduce the potential for applicants to make calculation errors.* Households often have multiple sources of income that arrive at different frequencies — weekly or bi-weekly wages combined with monthly Social Security benefits, for example. Asking families to convert all of these sources into an annual income level can be confusing. School districts can improve program access and accuracy by doing the conversion calculations themselves rather than asking households to do them.⁴⁴ The USDA prototype application for school year 2010-2011 provides spaces for households to fill in the income amount and how often the income was received, a helpful technique adopted by many states and districts.
- D) *Encourage eligible families to apply.* The USDA, states, and school districts share the goal of certifying all eligible low-income children for free or reduced-price meals. The first weeks of the school year provide an early opportunity to make an important impact. But providing information about the school meals programs should be a regular part of communication with households. Because family situations change and some children will become newly eligible later in the year, schools should include school meals information in routine contacts with families and communities. Moreover, using inviting language on the application materials and providing information that families need will help parents successfully apply.

Applications and school meals websites are most welcoming when they state clearly that:

⁴³ For children without categorical eligibility, the application must state that a Social Security number is not required to apply and that an indication that the signing adult does not have one will suffice.

⁴⁴ For an explanation of the appropriate methodology for making conversion calculations, see Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, August 2012, pp. 19-20, <http://www.fns.usda.gov/cnd/guidance/EliMan.pdf> and Food and Nutrition Service memorandum, *Statutory Changes in the Free and Reduced Price Eligibility Determination Process and Revised Prototype Application Implementation Memo*, USDA March 7, 2005, <http://www.fns.usda.gov/cnd/Application/2005-03-07.pdf>.

- A household may apply for benefits at any time during the school year.
- Children of parents who become unemployed may become eligible for free or reduced-price meals.
- A single application will be accepted for all children in the household attending schools in the same district.
- Household members do not have to be U.S. citizens for children to qualify for free or reduced-price meals.
- Including a child in foster care on a household application increases the household's size and thus may help the foster family's *non*-foster children qualify for free or reduced-price meals, without affecting the eligibility of the child in foster care.⁴⁵

Applications and websites must also include the required non-discrimination statement and the income eligibility limit for reduced-price meals.^{46 47}

Some parents who are struggling to feed their families may not realize they are eligible. Highlighting this information will provide parents with the information they need and reassure all applicants that they will be treated fairly.

Additional Resources on Applications and Outreach

USDA's prototype materials provide a good starting point for application design and content, and are available at:

<http://www.fns.usda.gov/cnd/frp/frp.process.htm>.

Detailed recommendation on ways to improve application materials based on a review of materials available from the 50 states and the 100 largest school districts are described in:

Zoë Neuberger and David V. Sanchez, *How To Improve School Meals Applications*, Center on Budget and Policy Priorities, August 2012, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3824>.

Additional outreach suggestions are described in:

Back to School Strategies: Improving Access to Healthy Meals, Food Research and Action Center, Fall 2011, http://frac.org/wp-content/uploads/2009/09/back_to_school_strategies_2010.pdf

⁴⁵ If a child in foster care is listed on an application with non-foster children, the school district can determine whether including or not including the foster child in the eligibility determination would result in a higher benefit level for the non-foster children, and then provide the higher benefit level. It is important to note, however, that the presence of a child in foster care in the household does not confer categorical eligibility for free meals on non-foster children.

⁴⁶ It is important that families know that they will be treated fairly if they apply for free or reduced-price meals. The letter mailed to parents is required to include a nondiscrimination statement with an explanation of how to file a discrimination complaint. See Food and Nutrition Service, *Eligibility Manual for School Meals*, USDA, August 2012, p. 11, <http://www.fns.usda.gov/cnd/guidance/EliMan.pdf>.

⁴⁷ The parent letter is required to include the eligibility criteria for reduced-price school meals with an explanation that households with incomes less than or equal to the reduced-price limit would be eligible for either free or reduced-price meals. See 42 U.S.C. § 1758(b)(2)(B)(i) and 7 C.F.R. § 245.5(a)(1).

5) Retaining Eligible Children Throughout the School Year

When a child is certified to receive free or reduced-price school meals, that certification remains in effect for the remainder of the school year and for up to 30 operating days into the next school year.⁴⁸ However, some eligible children lose meal benefits during the school year even while they remain eligible. These disruptions tend to occur when a temporary approval period ends, when a child changes schools, or as a result of the verification process. To make sure that children at risk of food insecurity do not have spells without the free or reduced-price meals for which they are eligible, school districts can take several steps.

- A. *Eliminate temporary approvals.* Until recently, USDA permitted school districts to certify children for free or reduced-price meals for a limited period of time (such as 45 days), if there was reason to believe that the household's circumstances might change. Such certifications were known as "temporary approvals." But temporary approvals are inconsistent with full-year eligibility, which was established by Congress in 2004 because it did not make sense for schools to devote resources to tracking income fluctuations or changes in family composition throughout the school year. Moreover, temporary approvals sometimes resulted in children losing meal benefits even when they remained eligible. In October 2011, USDA updated the school meals program regulations to eliminate temporary approvals, consistent with the law.⁴⁹ School districts are no longer permitted to issue temporary approvals and districts that were not aware of this change must stop issuing temporary approvals.
- B. *Rely on the previous certification.* If a child changes schools and the new school is under the jurisdiction of the same school district, the new school must honor the child's free or reduced-price meal status.⁵⁰ If a child changes to a school in another school district, the new district may honor the eligibility determination of the prior school without incurring liability for the accuracy of that determination.⁵¹ Rather than insist that parents complete a new application, school districts can establish a process for obtaining and relying upon new enrollees' certification status from their prior district.
- C. *Promptly conduct a new certification.* When a school cannot promptly obtain certification status from a child's previous school, the new school can minimize disruption by attempting to directly certify the child immediately upon enrollment. Direct certification systems that allow school administrators to look up whether an individual child can be directly certified are especially helpful in such instances.

⁴⁸ See 7 C.F.R. § 245.6(c)(1).

⁴⁹ See *Applying for Free or Reduced Price Meals in the National School Lunch Program and School Breakfast Program, or the Benefits in the Special Milk Program, and Technical Amendments*, Federal Register, Vol. 76, No. 209, October 28, 2011, p. 66851, <http://www.fns.usda.gov/cnd/governance/final/2011-10-28.pdf>. If a school district is concerned about the accuracy of information on an application, it may conduct verification for cause.

⁵⁰ See 7. C.F.R. § 245.3(c).

⁵¹ See 7. C.F.R. § 245.6(a)(4).

Children who move frequently, such as children in foster care and homeless or migrant children, are particularly vulnerable to disruptions in meal benefits. It is important for school districts to ensure that they continue to receive free meals when they change schools. Several different approaches might have to be combined to ensure prompt certification. If the school district can immediately obtain the certification status from the prior school, that will minimize the burden on parents and staff. School districts can also use the mandatory notification from the foster care case worker as the basis for direct certification. In addition, they can establish a process for checking with the homeless or migrant education liaison whenever a new student enrolls. Families can always be asked to complete an application, and that may be the quickest way to certify a child for free or reduced-price meals, but when an equally expedient method exists, it is best to avoid imposing an unnecessary burden on the parents at a time of transition.⁵²

- D. *Simplify verification.* Each school district must select a small sample of applications to ensure the accuracy and integrity of their enrollment process. Districts verify the eligibility of the children in the selected sample either by obtaining documentation from an appropriate third party □ “direct verification” — or by contacting the household to request documentation of eligibility. When households are contacted, as many as one-third of parents do not respond to the verification notice, which results in the loss of free or reduced-price meals for their children.⁵³ Research shows, however, that a substantial share of children who lose benefits when their parents fail to respond are eligible.⁵⁴

Attempting to use direct verification for the entire verification sample can be a more reliable means of verification, relieves families of additional paperwork, and reduces gaps in meal benefits for eligible children. Applications approved for free meals on the basis of a case number or an indication of foster status can be directly *verified* through the same means as direct *certification* — by obtaining the relevant information from a welfare agency. It is also a good idea to check with an appropriate homeless or migrant education liaison in case any of the children approved based on income have subsequently been identified as homeless or migrant. In addition, applications approved for free or reduced-price meals on the basis of income can be directly verified using Medicaid or SCHIP information. States and school districts that have implemented direct *verification* using Medicaid data will be well-positioned to apply to be included in the Medicaid direct *certification* demonstration project described above.⁵⁵

⁵² Moreover, a new application will not always result in the child continuing to receive the free meals for which he or she is eligible. A child leaving foster care remains eligible for free school meals for the remainder of the school year and for up to 30 operating days into the next school year. Because such children can no longer automatically qualify based on their current foster status, it is all the more important that the new school obtain the eligibility status from the prior school directly.

⁵³ Food and Nutrition Service, *Analysis of Verification Summary Data School Year 2008-2009*, USDA, March 2011, Figure 5, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/VerificationSummaryReport.pdf>.

⁵⁴ Zoë Neuberger and Robert Greenstein, *What Have We Learned From FNS' New Research Findings About Overcertification in the School Meals Programs?*, Center on Budget and Policy Priorities, November 13, 2003, <http://www.cbpp.org/archiveSite/11-11-03fa.pdf>.

⁵⁵ In states where eligibility for these programs does not exceed 185 percent of the federal poverty level, all children enrolled in Medicaid or SCHIP may be directly verified. In the states with higher eligibility limits, Medicaid or SCHIP data may be used to directly verify children whose household income (as measured by Medicaid or SCHIP) is below 185 percent of the federal poverty level.

If the school district cannot directly verify an application and must therefore contact the family, it is important to accept the least burdensome forms of reliable documentation and clearly explain to parents what they must provide. Parents do not have to document the information they provided on the application if they can document eligibility another way. For example, if a parent provided income information on the application, but the family since has been approved for SNAP benefits, the parent can provide documentation of the SNAP benefits in lieu of a pay stub to verify eligibility. Schools can encourage eligible families selected for verification to respond by including in the verification notice:

- A toll-free number for assistance and an explanation that families will not be charged;
- Clarification that documentation may be provided for any point in time between the month prior to application and the time of verification;
- Instructions about how households with children in foster care, or homeless, runaway, or migrant children can verify their eligibility; and
- Instructions about how households with no income can verify their eligibility.

6) Utilizing the Community Eligibility Option

The Healthy, Hunger-Free Kids Act of 2010 created a new option for high-poverty schools, known as community eligibility, under which schools serve breakfasts and lunches free to *all* students.⁵⁶ In lieu of collecting and processing applications, schools are reimbursed based on an estimate of how many children would qualify for free or reduced-price meals if they took applications under the standard rules. The reimbursement formula is based on the share of students who are in households receiving SNAP benefits.⁵⁷ The option is designed to eliminate the administrative costs associated with applications and tracking eligibility categories in the lunch line, freeing up resources to focus on reducing hunger and improving the nutritional quality of the meals served.

In 16 percent of schools nationwide, 80 percent or more of the children qualify for free or reduced-price meals.⁵⁸ When the option is fully phased in, many of these 15,000 schools will qualify. For the 2011-2012 school year, the option was available to Illinois, Kentucky, and Michigan. USDA will add states to the program each year until the 2014-2015 school year, when the option will be available to any school district that meets the criteria; it's adding the District of Columbia, New York, Ohio, and West Virginia for the 2012-2013 year.⁵⁹

Across Illinois, Kentucky, and Michigan, 665 schools were community eligibility schools last year, serving more than 280,000 students, with additional schools expected to join in the coming year.⁶⁰ More than three-quarters of students at these schools were approved for free or reduced-price meals for the 2010-2011 school year, prior to community eligibility's start. Across all three states, these schools served roughly one in ten of the children who were approved for a free or reduced-price meal during the 2010-2011 school year. In Michigan, nearly one in five children who was approved for a free or reduced-price meal last year attended a school that is now participating in community eligibility.

Unsurprisingly, more children ate at school once the meals were free for all students. In community eligibility schools, average daily lunch participation rose from 72 percent in October 2010 to 78 percent in October 2011, while average daily breakfast participation rose from 48 percent to 57 percent over the same period. Kentucky particularly stands out for an increase in breakfast

⁵⁶ See 42 U.S.C. § 1759a(a)(1)(F).

⁵⁷ Specifically, the percentage of students certified without an application (based on receipt of SNAP, TANF, FDPIR, or Medicaid benefits or based on status as homeless, migrant, runaway, or in foster care) is multiplied by 1.6 and the resulting percentage of meals is reimbursed at the free rate, with the remainder of meals reimbursed at the paid rate. For example, a school in which 50 percent of all students are certified without an application, would be reimbursed at the free rate for 80 percent ($0.5 * 1.6 = 0.8$) of the breakfasts and lunches served.

⁵⁸ Center on Budget and Policy Priorities analysis of U.S. Department of Education data for the 2009-2010 school year.

(and the 2008-2009 school year for New York).

⁵⁹ USDA's press release announcing the new states is available at: <http://www.fns.usda.gov/cga/PressReleases/2012/FNS-2.htm>.

⁶⁰ The data in this paragraph and the next are derived from a Center on Budget and Policy Priorities analysis of administrative data collected from the Illinois State Board of Education, the Kentucky Department of Education, and the Michigan Department of Education.

participation, jumping from 49 percent in October 2010 to 70 percent in October 2011, reflecting more widespread availability of breakfast in the classroom.

Although participating schools receive the federal free meal subsidy for only a portion of meals, school districts report that administrative savings make up for the meal charges they must forgo, and parents and staff have reacted positively to the program. States that want to reduce paperwork and increase school meals participation can apply to implement the community eligibility option for the 2013-2014 school year. After that, applications will not be necessary; school districts will simply elect the option for one or more schools and notify their state. States, school administrators, and parents can improve access to the school meal programs by encouraging school districts in areas with concentration of poverty to adopt the community eligibility option for schools that predominantly serve low-income children.

Additional Resources on the Community Eligibility Option

USDA's last request for proposals to implement community eligibility, which includes questions and answers on the option, is available here:

<http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2012/SP12-2012%20os.pdf>

A range of materials for school food administrators and other stakeholders are collected on the Food Research and Action Center's community eligibility resource web site:

<http://frac.org/community-eligibility/>

Conclusion

School meals are a critical support to struggling families, ensuring that children receive the nutrition they need to be successful at school. The school meal programs are widely available and reach many of the children eligible for free or reduced-price meals. But states and school districts can do more to ensure that eligible children are certified quickly and easily.

States and school districts can directly certify more categorically eligible children by establishing strong relationships with public benefits agencies, child welfare agencies, and administrators of other educational programs. By developing simple procedures for regularly sharing information and making sure that relevant staff at all levels understand them, many vulnerable families can be spared the hassle of completing a paper application or responding to a verification notice.

For children who cannot be directly certified, a simple, clear application that asks only for necessary information is critical to ensuring access and accurate responses. School districts that are beginning to use online applications have an opportunity to make sure that these features are built in from the start. States and school districts can also take steps to ensure that once children are certified, they do not lose benefits during the school year.

High-poverty schools can eliminate applications altogether by implementing the new community eligibility option. Participating schools serve free breakfasts and lunches to all students and get reimbursed based on their direct certification results. Improvements to direct certification result in higher reimbursements under the community eligibility option.

Using the strategies described in this paper, school meals administrators can reach more children eligible for free or reduced-price meals while reducing paperwork for families and schools.