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## **Regional Office Review of Applications (RORA) for School Meals 2014**

### **Final Report**

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May 2015

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## Regional Office Review of Applications (RORA) For School Meals 2014 Final Report

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Any opinions, findings, conclusions, and recommendations expressed in this report are those of the authors and do not necessarily reflect the views of the U.S. Department of Agriculture.

# Executive Summary

This is the tenth in a series of annual reports to examine administrative errors incurred during the local educational agency's (LEA) approval process of household applications for free and reduced-price meals in the National School Lunch Program (NSLP). Until 2009, the Food and Nutrition Service (FNS) staff reviewed the applications to make an assessment of administrative errors. Starting in 2010, Westat served as an independent reviewer to assess administrative errors in sampled applications.

This report examines administrative error estimates in student certification for free and reduced-price NSLP meals. Due to the unequal probability of selection of LEA and selection of an application, additional analyses were undertaken to assess the effect of applying sample weights on the error estimates.

A total of 2,777 students who submitted applications for free or reduced-price meal benefits from the School Year (SY) 2013-14 were included in the independent review. LEA determinations had administrative errors in 303 of these applications corresponding to an overall administrative error rate of 10.9 percent. More than half of the administrative errors were due to incomplete applications. Of the 303 applications with administrative errors, only 72 applications (or 2.6 percent of all applications reviewed) resulted in incorrect eligibility determination for free or reduced-price meals. Overall, the administrative error rates have stayed within the expected range that has been observed in the last nine years.

Among all income-based applications, 97.4 percent of students were certified for the correct level of meal benefits based on information in the application files. Household size and income were accurately calculated for 97.3 and 97.2 percent, respectively.

The rate of certification and benefit status errors were comparable to previous years with 2.6 percent and 3.4 percent, respectively. Adjusting for sample weights indicate a possible bias in the unweighted error estimates for determination of certification and benefit status. In terms of incomplete applications, we found that 33 applications did not contain the last four digits of the social security number for the adult household member who signed the application. Amount and source of current income was left blank for at least one adult household member in almost six percent of the income-based applications (142 out of 2,432). Almost all applications had the signature of an adult household member on the application.

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The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are federally funded meal programs operating in public and nonprofit private schools and residential child care institutions. There were 30.6 million children in over 100,000 public and non-profit private schools and residential child care institutions receiving meal benefits in SY 2012-13. About two-thirds of these children received free or reduced-price meals (FNS, 2012a).

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) administers the NSLP at the federal level. At the State level, State agencies, typically State departments of education operate the program through agreements with local educational agencies (LEA). Federal law, regulations and policies determine eligibility for meal benefits. Based on the federal regulation 7 CFR Part 210, the LEAs have the legal authority to operate the NSLP as well as to certify and verify student eligibility for free and reduced-price benefits under the NSLP. Section 9 of the Richard B. Russell National School Lunch Act and 7 CFR Part 245 provide the requirements relating to determining free or reduced price meal eligibility including certification and verification requirements and procedures.

FNS is required to report annually on the extent of erroneous payments in its programs under the Improper Payments Elimination and Recovery Act of 2010<sup>1</sup> (IPIA) along with a report on the actions taken or that will be taken to reduce erroneous payments. In the school meal application process, erroneous payments (both under- and over-payments) can occur mainly for two reasons; household misreporting and administrative errors. This report focuses on administrative errors incurred during eligibility determinations. FNS administration has publicly stated the agency's commitment to improving program effectiveness and integrity using the tools provided to them in the Healthy, Hunger-Free Kids Act (HHFKA). Such tools include restructuring the review process to assess LEA operations, strengthening direct certification used to determine eligibility for free school meals by rewarding States for improvement in direct certification rates, and establishing

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<sup>1</sup>On July 22, 2010, the Improper Payments Elimination and Recovery Act of 2010 (IPERA) was enacted. IPERA amended IPIA and expanded requirements for recovering overpayments across a broad range of federal programs. [http://www.whitehouse.gov/sites/default/files/omb/financial/improper/PL\\_111-204.pdf](http://www.whitehouse.gov/sites/default/files/omb/financial/improper/PL_111-204.pdf)

additional review requirements for school districts that demonstrate high levels of administrative error (Rowe, 2013). Consistent with the overall efforts to reduce improper payments, FNS awarded Administrative Reviews and Training (ART) grants to support oversight and training efforts to reduce administrative errors. Some uses of these ART grants include training of LEA administrative personnel in application, certification, verification procedures as well as technology improvements to address administrative errors (USDA, 2013).

FNS routinely collects data through the Regional Office Review of Applications (RORA) to track these types of errors. Previously, USDA has issued nine reports examining annual rates of administrative errors (Karakus, Roeser, 2014); this tenth report presents findings from an independent assessment of applications from the 2013-14 school year. In addition, we will also contextualize the relatively stable error rates with recent FNS policy changes that promote simplified, non-application based NSLP certification methods. Such policy changes include, but are not limited to, direct certification and the Community Eligibility Provision (CEP).

### **Assessment of Administrative Errors**

In accordance with changes made by the Child Nutrition and WIC Reauthorization Act of 2004 and policy clarifications issued since 2001, FNS published a revised manual, the *Eligibility Manual for School Meals: Determining and Verifying Eligibility*, in 2008. The manual is now revised annually to include policy memos and additional policy decisions made during the prior year<sup>2</sup>. As a result, we used the “August 2013” version of the Eligibility Manual in independent assessment of School Year 2013-2014 applications. In addition, only those non-discretionary provisions addressed through policy memorandum from the *Healthy, Hunger-Free Kids Act of 2010* are reflected in this updated manual.

There are two categories of eligibility for meal benefits: (1) household income, (2) categorical eligibility. Eligibility is determined either through direct certification or an application submitted by the household. This study focuses on the application process, not direct certification. Under the “household income” category students may be eligible for free meals (those with a household income at or below 130 percent of the Federal poverty guidelines), or reduced-price meals (those with a household income between 131 and 185 percent of the Federal poverty guidelines).

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<sup>2</sup> <http://www.fns.usda.gov/sites/default/files/EliMan.pdf>

Households must submit an application to the LEA in order for the student(s) to receive free or reduced-price meal benefits under this category. The LEA staff review these household applications and make determinations of eligibility by comparing the self-reported household size and income information with the guidelines published by FNS. During the eligibility determination process, administrative errors can occur in determining gross monthly income, household family size, or assignment of benefit level based on household size and income specific (or relevant) information. Per FNS guidelines (FNS, 2012), approved but incomplete applications (e.g., missing adult signature, missing social security number, etc.) also constitute administrative errors. Inaccurate certifications may result in assignment of higher or lower amounts of benefits than students are entitled to receive. In some instances, administrative errors may not have any impact on the benefit decisions, and therefore do not translate into an error in benefit level.

“Categorical eligibility” refers to automatic eligibility for free meals either through directly obtaining information from the relevant program (“direct certification”) or through the submission of an application with an appropriate case number or documentation pertaining to one of the following status:

- A member of a household is determined by the administering agency as receiving assistance under the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Programs on Indian Reservations (FDPIR), or Temporary Assistance for Needy Families (TANF);
- Enrollment in a Federally funded Head Start program;
- A foster child; or
- A homeless, runaway or a migrant child.

Households participating in Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) may bypass the standard application process and can be “directly certified” for benefits. Direct certification involves matching SNAP, TANF, and FDPIR records against student enrollment lists, either at the State or LEA level. Parents or guardians of children identified through these matching systems are notified of their children’s eligibility for free school meals. They need to take no action for their children to be certified. No application is necessary if eligibility is determined through the direct certification process. This matching may be manual or through a computerized system.

LEAs are required to directly certify children from SNAP households for free school meals. LEAs may also directly certify children from TANF and FDPIR households, but are not required to do so. Also, based on the algorithms used in the matching process and the timing of the direct certification information update, in rare occurrences, it is possible that some students will not be “directly certified” necessitating them to submit an application with their case number to indicate they are “categorically eligible”.

**Administrative Errors in Determining Household Income.** Common administrative errors in determining gross monthly income may involve computation errors. Such errors include:

- Not converting multiple income sources to annual income;
- Incorrectly determining the frequency of receipt of household income, and/or
- Incorrect addition or multiplication.

**Administrative Errors in Determining Household Size.** In determining household size, common errors include:

- Not counting students in the list of all household members; or
- Double counting the student as an adult when the application asks only for the list of adult members of the household.

**Other types of Administrative Errors.** These include:

- Missing signatures;
- Missing last four digits of social security numbers or no indication that the applicant does not have an SSN;
- Incorrect lookup of eligibility status after correctly establishing household size and household income; or
- Other missing information.

Data abstracted from the review of applications will enable FNS to answer the following questions about administrative errors made by LEAs:

- To what extent did LEAs make the correct meal price status determination during certification?
- What types of administrative errors were made? What was the prevalence of each type of administrative error?
- What percent of applications received the correct meal benefit status? What percent of applications received the incorrect meal benefits at each combination of error (free, reduced-price, paid)?
- Has the accuracy of LEA certification and benefit status determinations changed compared with previous years?
- How might have the recent FNS policies that promote simplified, non-application based methods such as *direct certification* and *community eligibility*, impacted the error rates calculated in RORA?

FNS regional staff selected the free-and reduced-price meal applications for independent review, using a randomized sampling procedure. Photocopies of the selected applications were forwarded to Westat for an independent assessment of eligibility and document errors in household size, income, and eligibility determinations. This is the fourth year FNS has sought independent assessment – and to ensure consistency in review with previous studies-- Westat reviewed 500 applications and submitted those found to be in error to FNS for verification of the Westat process, and then continued with the review of the remaining applications.

### ***Sampling Design***

FNS uses a stratified two-stage cluster sample design to select applications for review. The first stage selects a sample of districts using 28 strata defined by the seven FNS regions and four size categories within each region. This database includes more than 95 percent of all public and private schools participating in the NSLP. Two LEAs are selected from each stratum using probabilities proportional to size (PPS) methods with replacement (eight LEAs are selected from each of the seven FNS regions). The measure of size for each LEA is the number of students approved for free and reduced-price meals obtained from FNS's School Food Authority Verification Collection Report (FNS-742). This selection process is accomplished in the following steps:

1. Sort the LEAs in each region by the number of students approved for free/reduced-price meals, from the smallest to the largest;
2. In each region, calculate the cumulative number of students approved for free/reduced-price meals for the LEAs sorted in (1);
3. Determine the cutoff values to be  $\frac{1}{4}$ ,  $\frac{1}{2}$ , and  $\frac{3}{4}$  of the total number of students approved for free/reduced-price meals in each region;

4. Examine the cumulative frequencies in each region and use the cutoff values to divide the LEAs into four strata (“small”, “medium”, “large” and “very large” school districts); and
5. Randomly select 2 LEAs within each stratum, using probability proportionate to size sampling with replacement with the number of students approved for free/reduced-price meals as the measure of size.

In stage two, FNS regional staff is asked to select students who had applied for meal benefits from the administrative files of the 56 LEAs selected in the first stage using systematic (randomized) sampling. In each of the 56 selected LEAs, applications from about 50 students were selected for review. If a LEA was selected twice (sampling was done with replacement), applications from about 100 students were sampled, so that the sample size in each stratum remained about 100 in all cases. Both approved and denied applications were included in the sample; students directly certified or students in Provision 2 or 3 SFAs<sup>3</sup> schools not in their base year were not included. **Appendix A** includes strata totals of the number of students certified for free and reduced-price meals and direct certifications in each stratum. **Appendix B** presents the number of school districts within each region by the four strata: “small”, “medium”, “large” and “very large” school districts.

### **Development of Sampling Weights**

Sampling weights are required to produce substantially unbiased estimates from the administrative records data by compensating for the unequal probabilities of application selection. The initial component of the sampling weight, called the *base weight*, corrects for the unequal probabilities of selection and is typically the reciprocal of each unit’s probability of selection into the sample. In mathematical notation, if ‘n’ LEAs are sampled with replacement, with probability  $p_i$ , on each draw then the base weight, denoted by  $w_i$ , is given by:

$$w_i = 1 / np_i.$$

This approach to weighting for sampling with replacement and with unequal probabilities has been widely recognized for some time (Hansen and Hurwitz, 1943; Cochran, 1977, pp. 250-255). In this application,  $n=2$ , and  $p_i$  for each LEA is the ratio of the number of students approved for

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<sup>3</sup> SFA stands for “School Food Authority”, the governing body administering one or more schools and has the legal authority to operate child nutrition programs approved by USDA to operate the Program. SFA and LEA terms are used interchangeably throughout this report.

free/reduced-price meals in the school LEA to the total number of such students in the stratum. Hypothetically, if all students approved for free and reduced-price meals in a sampled LEA were reviewed by Westat, then the LEA base weight could be applied to the student data as well. But in the next stage, about 50 such students were selected from the LEA for review, thereby requiring another weighting component.

For multi-stage designs, the base weights must reflect the probabilities of selection or base weights at each stage. For instance, in the case of a two-stage design in which the base weight for the  $i$ -th LEA is  $w_i = 1/(2 p_j)$ , and the  $j$ -th student is selected within a selected LEA with probability  $p_j(i)$  at the second stage, then an appropriate weight for each student  $j(i)$  in the sample is given by:

$$w_{ij} = w_i/p_j(i)$$

The estimates presented in this report are reported in three different ways:

1. Consistent with the earlier reports prepared by FNS, using no weight adjustment. We note that unweighted estimates are biased since applications were not sampled with equal probabilities. Unweighted estimates describe only the characteristics of the sampled applications.
2. Applying a weight for each application using the same formula that FNS used in earlier years (i.e., LEA base weight/probability of student). The following formula was used to compute this sampling weight (*weight as usual*):

$$\text{Weight as usual} = \frac{\text{Region size}}{2 \times \text{LEA size}} \div \frac{50}{\text{LEA size}}$$

3. After discussions with FNS, we were informed that in the past, while directly certified students were excluded in the selection of students at the sample LEAs, the weighting used for the estimates assumed that the selected applications were randomly selected from all students approved for free and reduced-price meals including those directly certified. However, the weight formula discussed above does not take this information into account. Thus, we compute weights accounting for the exclusion of directly certified students and prepare estimates using these revised weights (*revised weights*):

$$\text{Revised weight} = \frac{\text{Region size}}{2 \times \text{LEA size}} \div \frac{50}{(\text{LEA size} - \text{LEA direct certification size})}$$

In this year's report, we do not adjust for the size of direct certification due to community eligibility option. This is mainly due to information not being available but also close examination of the 56 LEAs sampled for this year's study indicates that there is only one LEA who used community

eligibility option and that was only for students in special education program. While we are not able to measure how the current weights may have been impacted by CEP, we believe that any potential effect is very minimal.

### Data File

Under direction from FNS staff, an EXCEL spreadsheet was created with appropriate data fields (Table 1). Each application was input into the spreadsheet along with the reviewer comments.

**Table 1.** List of variables that will be obtained from application review

Variable name	Variable description	Value labels
<b>Distnum</b>	District Number (Region, Strata, District)	
<b>SFA</b>	SFA Name	
<b>State</b>	State Abbreviation	
<b>Student</b>	Student Number (1-50)	
<b>CBIS</b>	Current Benefit Issuance Status	(1) Free (2) Reduced Price (3) Paid
<b>Napps</b>	Number of Applications on File	
<b>Verify</b>	Was the Student Application Selected for Verification?	(1) Yes (2) No
<b>VerDoc</b>	Was Documentation Provided for Verification Request?	(1) Yes (2) No
<b>EA</b>	Is this an electronic application?	(1) Yes (2) No
<b>CatElig</b>	Application Categorically Eligible?	(1) Yes (2) No (3) Foster Child
<b>MixHH</b>	Is this a mixed household application?	(1) Yes (2) No (3) Foster Child (4) Other Source Categorically Eligible
<b>HHSIZE</b>	Household Size as Determined by Reviewer	
<b>HHIncome</b>	Monthly Household Income as Determined by Reviewer	
<b>Inclnc</b>	Incomplete Income Information	(1) Income frequency missing (2) Income Information left blank (3) Not applicable or No error (4) Both income frequency and income information missing
<b>SSN</b>	Was Parent's/Guardian's Social Security number provided on Application?	(1) Yes (2) Don't Have SSN (3) No (4) N/A
<b>Signature</b>	Was Adult Signature Provided on Application?	(1) Yes (2) No
<b>SFAHHSIZE</b>	Household Size as Determined by SFA	
<b>SFAHHInc</b>	Monthly Household Income as Determined by SFA	
<b>SFAElig</b>	Eligibility Status as Determined by SFA	(1) Free (2) Reduced Price (3) Paid- Income too High (4) Paid-Incomplete Application

**Table 1.** List of variables that will be obtained from application review (cont.)

Variable name	Variable description	Value labels
<b>FNSElig</b>	Eligibility Status as Determined by Reviewer	(1) Free (2) Reduced Price (3) Paid- Income too High (4) Paid-Incomplete Application
<b>SFAVer</b>	Eligibility Status by SFA after Verification	(1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request
<b>FNSVer</b>	Eligibility Status by Reviewer after Verification	(1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request
<b>CompP</b>	Is there a computer printout attached to the application?	(1) Yes, in addition to the completed SFA section on the application (2) Yes, in place of the SFA information on the application (there is no SFA information on the application) (3) No
<b>CatInc</b>	SFA used income based information on a categorically eligible application	(1) Yes (2) No
<b>ProcErr</b>	Was a Processing Error Made in Certification Process?	(1) Yes (2) No
<b>Notes</b>	Comments	

This year, we have added several new variables to provide an appropriate reflection of the rules and guidelines of the FNS eligibility manual. In addition, these new variables help to provide information on the relative frequency of errors particularly for those LEAs that are required to implement a second review<sup>4</sup>. The new variables this year include: *EA* to capture if the application was electronic or not and *Mixhb* to identify mixed household applications. *CompP* was added to capture when there is a computer print-out associated with the application. To quantify how often income based applications are missing income information, the *IncInc* variable captures when income frequency is missing or income information is left blank. In previous years, one common source of processing errors was the SFA using income based information on a categorically eligible application. To quantify this scenario, the variable *CatInc* was added. *Other Source Categorically Eligible* option was added, in conformance with the eligibility manual, to identify children documented under the applicable definition in this section as: Homeless, runaway, migrant, foster child, or enrolled in a Federally-funded Head Start Program or a comparable State-funded Head Start Program or pre-kindergarten programs.

<sup>4</sup> Section 304 of the Healthy, Hunger-Free Kids Act of 2010 requires LEAs that demonstrate high levels of, or a high risk for administrative error associated with certification, verification and other administrative processes to conduct an independent review of the initial eligibility determinations for free and reduced price school meal applications for accuracy prior to notifying households of eligibility.

### **Application Review Process**

**Data Abstraction.** The first stage of data abstraction included data entry onto hard copy spreadsheets. Any inconsistencies or inquiries were discussed at internal weekly meetings and documented on problem sheets. Issues that were not resolved internally were submitted to FNS for final resolution. All inquiries, internal or from FNS, were recorded in a Data Decision Log and serve as an historical record for future data abstraction and analysis (**Appendix D**). The second stage of data entry was transferring the data from the hard copy spreadsheet to an electronic database.

**Quality Control.** A rigorous quality control effort was employed at each stage of data abstraction and entry. Hard copy data abstraction received 100 percent review from a separate abstractor with an additional review of a 10 percent sample performed by project management staff. Electronic data entry also received 100 percent review from alternate data entry staff and a 10 percent sample by project management staff. Each case that was categorically eligible or selected for verification also received 100 percent review from project management staff. Lastly, any application that was considered to be an anomaly or raised any questions was discussed thoroughly among all data abstraction staff and documented accordingly.

### **Eligibility Determinations**

Following the definitions used in the previous FNS reviews, certification status was considered in error in the following situations:

1. If the LEAs certification determination is different than the independent certification determination.
2. For applications selected for verification (e.g., pay stub verification for reported income), if the LEA certification determination after verification was different than the independent certification determination after verification.
3. The computation of household size and income was not recorded on the application for some LEAs. However, regional FNS staff completed a cover page - including information on current benefit issuance status for each applicant selected for this study. For applications with no information on initial certification decision, certification status

was considered in error if LEA certification determination was different than the current benefit issuance status.<sup>5</sup>

In addition, benefit status was considered in error if the current benefit issuance status provided by the LEA was different than the independent certification determination or if the application was selected for verification and the CBIS was different than the eligibility status determined by the reviewer after verification.

Various types of administrative errors can be made by the LEAs in calculating household size and income. Common errors in calculation of household size include:

1. Not counting the student if the applicant inadvertently omitted the child's name in the list of all household members; and
2. Double-counting the student if the application called for a list of all adult household members and the student was included in the list as an adult<sup>6</sup>.

Common errors in the calculation of income include:

1. Incorrect determination of the frequency for receiving income (e.g., biweekly instead of monthly);
2. Not using a standard frequency (i.e., annual) when there are multiple income sources with different frequency;
3. Incorrect addition or multiplication; and,
4. There can be issues related to inconsistent treatment of income received from child support alimony payments and income from irregular employment (e.g., substitute teacher). While income from such sources should be most often correctly computed and included in the gross household income, there may be cases where such income may be inadvertently excluded from the household income computation.

Furthermore, administrative errors can occur when FNS staff fails to lookup correct eligibility status while the income and household size are correctly determined.

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<sup>5</sup> In some instances, the applications were scanned and the certification process was completed using computer software. In some cases the FNS regional staff failed to collect the information from the data files, so we could only assume that the initial certification status matched the current benefit issuance status. To that end, SFAElig should equal CBIS.

<sup>6</sup> Some applications have a separate place for the listing of all adult members of the household. Sometimes households include the children in that list due to misunderstanding and this may cause the reviewer to double count the number of children.

### **Data Security**

In agreement with the Federal Privacy Act and other regulations to protect individual data, hard copy applications were stored in a locked file cabinet secured with a lock bar. This file cabinet was located in a limited access field room controlled by a key pad door lock (with an alarm) and security cameras. All electronic data files were encrypted and password-protected; only staff working on the project had access to these files. All staff signed a confidentiality agreement, in compliance with Westat's *Electronic Data Storage, Transport, and Security Acceptable Use Policy and Guidelines* and *Electronic Mail and Internet Acceptable Use Policy and Guidelines* in addition to the required USDA confidentiality agreement.

## Data Review Key Findings

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A total of 2,777 students who submitted applications for free or reduced-price meal benefits from the SY 2013-14 were selected for review. Of these 2,777 students, 342 (12.3 percent) were categorically eligible applications and 2,432 (87.6 percent) were income-based applications. The applications for three sampled students could not be located; however, LEAs must have documentation that the household of a student receiving benefits has submitted an application or that the student was directly certified for free meals. Of the three students with missing applications, one had a current benefit issuance status of reduced price, resulting in a certification error; one had a status of paid resulting in an administrative error (but not certification error). The third application did not have any information on certification status, so we were only able to assign an administrative error but could not evaluate the certification error.

Categorically eligible students are eligible for free meals. In order to process the application, a household must provide the name of the child, a SNAP, TANF, or the FDPIR case number, or indicate other categorically eligible designation (e.g., homeless, migrant, foster child) and a signature of an adult household member on the application. In order to process an income-based application, a household must provide the number of children and adults in the house, names of the household members, household income and frequency of receipt, an adult signature and the last four digits of the social security number.

In the following section we first present error estimates and then examine the effect of applying sample weights on the error estimates. The samples under examination include: (1) students with categorically eligible applications (n=342), (2) students with income based applications (n=2,432), and (3) all students with approved/denied applications (sample 1+ sample 2+ 3 missing applications with n=2,777).

***Among categorically eligible applications the prevalence of certification error during processing was 0.9 percent.*** All applications were considered categorically eligible if a number was provided in the space for SNAP, TANF, or FDPIR number. The accuracy of the SNAP, TANF, or FDPIR number listed on the application was not verified for this study.

Three of the 342 categorically eligible applications resulted in an LEA eligibility determination of reduced-price or paid status rather than free status which indicates a certification error. Thus, the certification error rate was 0.9 percent (3/342). The remaining applications included the student name, case number and adult signature, and were processed correctly. All of the certification errors for this set of applications resulted from an LEA determining eligibility status based on household size and income information provided on the application even though a SNAP, TANF, or FDPIR number was included on the application. If LEA staff determined that these students were not on an assistance program as indicated on the application, then all three eligibility determinations based on household size and income would have been correct.

***Among income-based applications LEAs made more errors in determining gross monthly income than in determining household size.*** Occasionally the regional staff collecting the information failed to obtain the screen shots from the computer system indicating what information the LEA actually used to make the eligibility determination. It was also possible that the application lacked space for LEA staff to enter their computation of household size and income. Among the 2,432 income based applications, 593 either had no space on the application or did not indicate household size the LEA staff had used when making an eligibility determination. Similarly, 595 (24.5 percent) either had no space on the application or did not indicate gross monthly income levels the LEA staff had used in making its eligibility determination. The majority of such applications did not have the information, most likely because the applications were scanned and computer software output was not clear as to what information LEA actually used to make the determination. Thus, the sample sizes for the household size and household income error rates are 1,839 and 1,837, respectively.

In SY 2013-2014, household size and household gross monthly income were accurately calculated for 97.3 and 97.2 percent of the applications, respectively. Table 2 details the accuracy of household income and household size from income-eligible applications. In terms of household size determination, the under-counts and over-counts of the correct household size were, 1.1 percent and 1.6 percent respectively. In calculating household income, 1.8 percent of applications had gross income under-counted, 1.0 percent of applications had income over-counted.

**Table 2. Accuracy of LEA determination of household income and household size from income-eligible applications (unweighted data for SY 2004-05 to 2013-14)**

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14
	%	%	%	%	%	%	%	%	%	%
<b>Household size</b>										
Correct	97.9	97.1	96.5	98.1	97.8	98.0	97.2	98.3	97.8	97.3
Not correct	2.1	2.9	3.5	1.9	2.2	2.0	2.8	1.7	2.2	2.7
Under-count	0.9	1.9	2.1	0.8	1.1	1.0	1.4	0.8	1.2	1.1
Over-count	1.2	1.0	1.4	1.1	1.0	1.0	1.3	0.9	1.0	1.6
Number of applications	2,222	2,293	2,252	2,315	2,118	2,314	2,384	2,192	1,997	1,839
<b>Household income</b>										
Correct	91.9	92.1	94.0	90.1	96.2	96.3	95.7	96.3	94.6	97.2
Not correct	8.1	7.9	6.0	9.9	3.8	3.7	4.3	3.7	5.4	2.8
Under-count	4.4	3.5	3.5	7.6	2.4	2.3	3.0	2.5	4.0	1.8
Over-count	3.7	4.4	2.5	2.3	1.4	1.4	1.2	1.2	1.4	1.0
Number of applications	2,222	2,293	2,252	2,315	2,118	2,278	2,366	2,192	1,997	1,837

Note: Table presents unweighted percent of cases with information recorded on the application. Household size and household income are considered incorrect only if the household size and income recorded on the application by the LEA are not equal to the value calculated by the independent reviewer from the data provided on the application. Numbers may not exactly sum to total due to rounding.

**LEA determinations had administrative errors in 10.9 percent of applications *approved or denied on the basis of information appearing on an application*. This indicates a slight increase of 2.4 percentage points from the previous year’s administrative error rate of 8.5 percent.** While overall administrative errors seem to be changing over the years, we believe this is mainly due to the changes in rules and clarifications in eligibility manuals over time. Such changes make it hard to compare processing errors from year to year. Thus, we caution readers to make strong inferences from the comparison of processing error rates over time. Furthermore, administrative errors do not always result in incorrect eligibility determination. For example, a household size may be incorrectly assessed as four and the student may qualify for free meal. If the correct household size was three, this would indicate an administrative error, but if the student still qualifies for free meal, it does not affect the eligibility determination. Among the 303 applications with administrative errors, less than one-fourth of the applications (72 applications) resulted in incorrect eligibility determination (three categorically eligible applications<sup>7</sup>, 2 not found, and 67 from income based applications). It is important to note that more than half of the administrative errors were due to incomplete applications. As seen in Table 3, there were 56 applications with more benefits and 16 applications with fewer benefits than were justified.

**Table 3. Administrative errors and incorrect certification determinations on the basis of an approved/denied application (n=2,777), (Unweighted data for SY 2013-14)**

<b>Administrative errors</b>	<b>N</b>	<b>Percent</b>
<b>All administrative errors</b>	<b>303</b>	<b>10.9</b>
<b>Administrative errors that resulted in incorrect certification determination</b>	<b>72</b>	<b>2.6</b>
<b>Higher benefits</b>	<b>56</b>	<b>2.0</b>
<b>Lower benefits</b>	<b>16</b>	<b>0.6</b>

Note: Certification status is considered an administrative error if the LEAs certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification, certification status is considered an administrative error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer).

**The percentage of eligibility determinations in error was 2.8 percent among income based applications.** As seen in Table 4, there were 67 applications (2.8 percent) with incorrect certification out of 2,432 income-based applications. Of these 67 applications with certification error, 52 applications (78 percent) were certified for more benefits, and 15 applications (22 percent), were certified for fewer benefits than justified based on the documentation available.

<sup>7</sup> These three applications had “reduced-price” or “paid” status instead of “free” status.

**Table 4. Certification status determination for income-based applications (n=2,432), (Unweighted data for SY 2013-14)**

<b>Certification status determination</b>	<b>N</b>	<b>Percent</b>
<b>Correct determination</b>	<b>2,365</b>	<b>97.3</b>
<b>Incorrect determination</b>	<b>67</b>	<b>2.8</b>
<b>Higher benefits</b>	<b>52</b>	<b>2.1</b>
<b>Lower benefits</b>	<b>15</b>	<b>0.6</b>

Note: Certification status is considered incorrect if the LEAs certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Numbers may not exactly sum to total due to rounding.

Accuracy of benefit issuance status was a little lower compared to the accuracy of certification determination. As discussed earlier, benefit status was considered in error if the current benefit issuance status was different than the independent certification determination or the eligibility status determined by the independent reviewer after verification<sup>8</sup>. Meal benefits issuance status was correct on about 96.3 percent of the applications approved or denied on the basis of income based assessment. As seen in Table 5, there were 89 students (3.7 percent) out of 2,432 income-based applications approved for the incorrect level of benefits. Of the 89 students with benefit determination error, 70 students (79 percent) were certified for a higher level of benefits, and 19 students (21 percent) were certified for a lower level of benefits than justified based on the documentation available.

**Table 5. Benefit issuance status determination for income-based applications (n=2,432), (Unweighted data for SY 2013-14)**

<b>Benefit issuance determination</b>	<b>N</b>	<b>Percent</b>
<b>Correct determination</b>	<b>2,343</b>	<b>96.3</b>
<b>Incorrect determination</b>	<b>89</b>	<b>3.7</b>
<b>Higher benefits</b>	<b>70</b>	<b>2.9</b>
<b>Lower benefits</b>	<b>19</b>	<b>0.8</b>

Note: Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification.

<sup>8</sup> This approach assumes that any change in household circumstances that would result in a change in eligibility status would have been recorded somewhere in the LEA. For example, if the household submitted an application at the beginning of the school year and was deemed eligible for reduced-price meals but later in the school year, the household became eligible for SNAP and was directly certified for free meals and the benefit issuance status was changed to free but no documentation was found that tied direct certification to that application, we would record that as an incorrect benefit issuance status.

**Table 6. Comparison of certification and benefit status determinations for all applications approved or denied on the basis of an application, (Weighted data for SY 2004-05 to SY 2013-14)**

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14
	%	%	%	%	%	%	%	%	%	%
<b>Certification status determination</b>										
Correct determination	96.5	97.0	96.1	96.1	98.0	97.7	96.3	97.1	96.4	97.4
Incorrect determination	3.5	3.0	3.9	3.9	2.0	2.3	3.7	2.9	3.6	2.6
Higher benefits	2.9	2.5	3.0	3.2	1.3	1.5	2.8	2.1	2.6	2.0
Lower benefits	0.6	0.5	0.9	0.7	0.7	0.9	0.9	0.8	1.0	0.6
<b>Benefit status determination</b>										
Correct determination	95.7	96.2	95.8	95.4	97.0	97.0	95.5	96.5	96.2	96.6
Incorrect determination	4.3	3.8	4.2	4.6	3.0	3.0	4.5	3.5	3.8	3.4
Higher benefits	3.4	2.8	3.3	3.5	1.9	1.5	3.3	2.6	2.8	2.7
Lower benefits	0.9	1.0	0.9	1.1	1.1	1.5	1.2	0.9	1.0	0.7

Note: Certification status is considered in error if the LEAs certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification, certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification. We use "Weights as usual" in weighting. Numbers may not exactly sum to total due to rounding.

Table 6 presents a comparison of error estimates for certification and benefit status determinations for all applications. Consistent with the previous reports, we present weighted estimates because sampling weights are required to produce substantially unbiased estimates from the administrative records data by compensating for the unequal probabilities of application selection

**The percentage of applications incorrectly approved or denied for free or reduced-price meal benefits was similar to the previous years.** The percentage of applications that were incorrectly certified due to administrative errors varied from 2.0 to 3.9 percent during the previous 9-year span. As seen in Table 6, in school year 2013-14, administrative error in certification status determination was at 2.6 percent, down by 1 percent relative to the year before. This change of 1 percent from last year is statistically significant at 5 percent level. The percentage of over-certified was 2.0 percent and the percentage of under-certified was 0.6 percent.

The benefit status determination error varied from 3.0 to 4.6 percent during the previous 9-year span. In SY 2013-14, among all applications, 3.4 percent had incorrect benefit status determination, down by 0.4 percent relative to last year (not statistically significant). The percent of students receiving higher benefits than they were entitled was at 2.7 percent. The percentage of students receiving lower benefits due to benefit issuance error has slightly decreased to 0.7 percent from 1.0 percent in the previous year.

**Adjusting for sample weights indicate a possible bias in the unweighted error estimates for determination of certification and benefit status.** As seen in Table 7, unweighted estimates for certification and benefit status determination are very similar to estimates using weighted as usual and somewhat lower than the estimates using revised weights. While unweighted estimates indicate 2.59 percent and 3.39 percent errors, “weighted as usual” estimates show a 2.61 percent and 3.41 percent and “revised weight” estimates indicate 2.76 percent and 3.60 percent error rates in determination of certification and benefit status, respectively<sup>9</sup>. However, the differences between all these estimates are not statistically significant.

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<sup>9</sup>“Weighted as usual” refers to applying a weight for each application using the same formula that FNS used in earlier years (i.e., LEA base weight/probability of student). “Revised weights” refers to accounting for the exclusion of directly certified students in the LEA listing and prepare estimates using these revised weights (*revised weights*). Mean and standard error estimates of certification and benefit errors under three methods (unweighted, weighted as usual, and revised weights) can be found in **Appendix C**.

**Table 7. Comparison of weighted and unweighted estimates: administrative errors in determination of certification and benefit status among all applications approved or denied on the basis of an application (n=2,776), SY 2013-14**

	Incorrect determination		Fewer-Benefits		More-Benefits	
	N	Percent	N	Percent	N	Percent
<b>Certification status determination</b>						
Unweighted	72.00	2.59	16.00	0.58	56.00	2.02
Weighted as usual	72.45	2.61	15.27	0.55	56.91	2.05
Revised weights	76.62	2.76	17.49	0.63	58.85	2.12
<b>Benefit status determination</b>						
Unweighted	94.00	3.39	21.00	0.76	73.00	2.63
Weighted as usual	94.66	3.41	20.26	0.73	74.40	2.68
Revised weights	99.94	3.60	23.04	0.83	76.90	2.77

Note: Certification status is considered in error if the LEAs certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification.

### ***Rate of Incomplete Applications***

As part of an effort to decrease certification error during the eligibility determination process, section 304 of the HHFKA requires that certain local education agencies (LEAs) conduct a second, independent review of applications for free and reduced price meal benefits before eligibility determinations are made. Beginning in SY 2014-2015, LEAs that demonstrate high levels of, or a high risk for administrative error associated with certification and benefit issuance are required to conduct a second review of applications to determine whether the application is complete by a third party entity. The second review must also confirm the applications were correctly approved based on current income eligibility guidelines or categorical eligibility information, as applicable, and the master list or roster of student names correctly records the student's eligibility<sup>10</sup>.

<sup>10</sup> Memo to Regional Directors: Questions and Answers Related to the Independent Review of Applications. Available at: <http://www.fns.usda.gov/sites/default/files/SP44-2014os.pdf>

A complete income-based application must provide: names of all household members; amount and source of current income as well as the frequency of income for each adult member of the household; signature of an adult household member, and the last four digits of the social security number of the adult household who signs the applications or an indication that the household member does not have one. There were a total of 172 income based applications that were incomplete.

As shown in Table 8, of the 2,432 income based applications, 33 applications did not contain the last four digits of the social security number for the adult household member who signed the application or did not have an indication that the adult household did not have a social security number. Further analyses of these 33 applications indicate that, besides missing last four digits of SSN, there were 9 applications with household size and/or income errors: 5 with household size, 2 with household income, and 2 with both household size and household income errors. Out of these 9 applications, only 3 resulted in certification and benefit issuance errors. For the remaining 24 applications, there were no additional errors besides missing last 4 digits of SSN. Amount and source of current income was left blank for at least one adult household member in 5.84 percent of the income-based applications (142 out of 2,432). There were four applications in which the frequency of income was missing and both frequency and income information was left blank for a household member. Only one application was missing the signature of an adult household member. Among income based applications, 75 applicants had reported no income and wrote “0” for income<sup>11</sup>.

**Table 8. Rate of processing error due to incomplete applications among income based applications (n=2,432), SY 2013-14**

	<b>N</b>	<b>%</b>
<b>4-digit SSN Missing</b>	<b>33/2,432</b>	<b>1.36</b>
<b>Signature Missing</b>	<b>1/2,432</b>	<b>0.04</b>
<b>Income Incomplete - Income Left Blank</b>	<b>142/2,432</b>	<b>5.84</b>
<b>Income Incomplete - Frequency Missing</b>	<b>4/2,432</b>	<b>0.16</b>
<b>Income Incomplete - Both Frequency &amp; Income Information Left Blank</b>	<b>4/2,432</b>	<b>0.16</b>

<sup>11</sup> Applications noting zero income are not considered incomplete.

LEAs may use paper, computer or web-based systems for their application processes. While the majority of applications reviewed were paper-based (86.5 percent), electronic applications comprised 13.5 percent (375/2,777) of all applications. As shown in Table 9, among the electronic applications submitted, the processing error rate was almost half (5.33%) compared to error rates among non-electronic applications (11.78 percent). Electronic applications also had lower rates of certification and benefit status errors compared to paper-based applications. There seems to be more income, household size and certification related errors among paper-based applications. Electronic applications are more likely to report lack of documentation to explain the change from initial certification (i.e. 8 out of 20 with CBIS different from SFAelig and FNSelig). Mixed household applications include at least one child that is Other Source Categorically Eligible (e.g., homeless, migrant, runaway, enrolled in Head Start) along with non-categorically eligible children. There were a total of 19 mixed household applications. Among mixed household applications, the frequency of processing error seems to be higher (15.79 percent) than non-mixed household applications (10.88 percent).

As mentioned in the previous RORA reports, LEAs are moving more and more towards a computerized application management system. In some instances when providing data for this study, LEAs submitted a computer screen shot with the applicant's information. These computer printouts are either submitted in addition to a paper or electronic application or in place of an application. The figures in Table 9 shows that of the 2,777 applications, 603 computer print outs were submitted in place of paper or electronic applications. Of these 603 cases, there was a processing error rate of 11.11 percent which is similar to the processing error rate of 11.68 percent among applications that did not provide a computer printout. In addition, there were 257 applications that had a computer printout data submitted by LEAs in addition to paper application. Of those 257 applications, 4.67 percent had processing errors (12/257) (not shown in table).

**Table 9. Rate of errors by certain characteristics of applications (N=2,777), SY 2013-14**

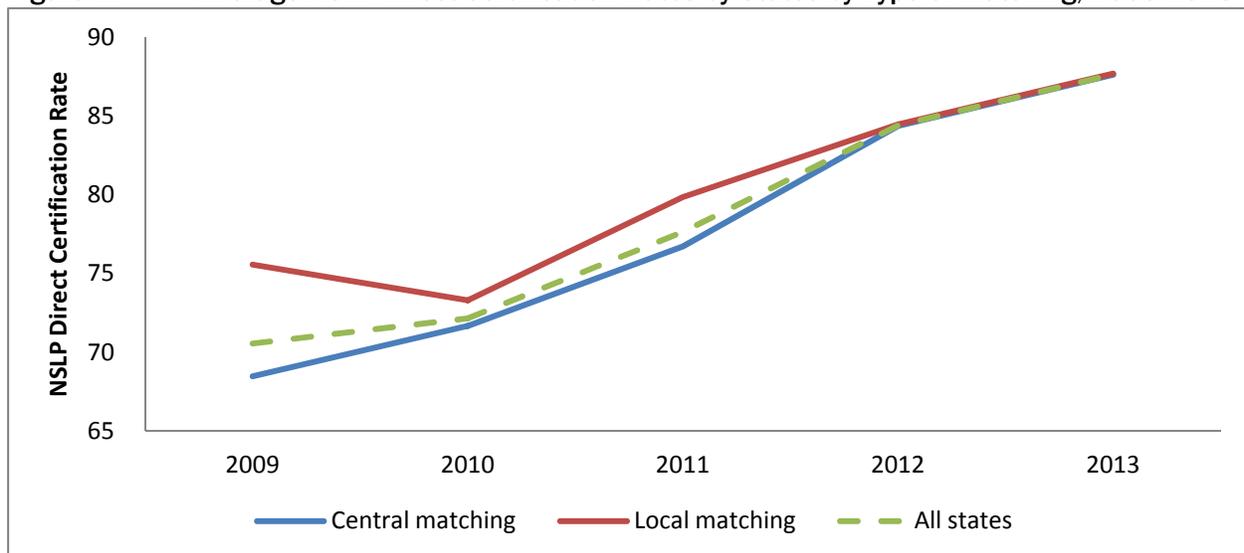
	Electronic application submitted		Mixed household with foster child		Computer printout submitted*	
	YES	NO	YES	NO	YES	NO
Processing error	5.33%	11.78%	15.79%	10.88%	11.11%	11.68%
	20/375	283/2,402	3/19	300/2,758	67/603	224/1,917
Certification status error	0.80%	2.87%	5.26%	2.58%	2.99%	2.51%
	3/375	69/2,401	1/19	71/2,757	18/603	48/1,916
Benefit status error	3.20%	3.42%	5.26%	3.37%	3.98%	3.13%
	12/375	82/2,401	1/19	93/2,757	24/603	60/1,916

\* This number is computer printout in place of LEA information (not in addition to)

### ***Discussion of Administrative Errors in light of Alternate Certification Provisions***

For over two decades, FNS has been implementing policies to promote a more simplified, non-application based certification method such as, direct certification and, more recently, the Community Eligibility Provision (CEP). Under direct certification, States and LEAs can use information provided by SNAP, TANF, and FDPIR agencies or other sources to establish that a student is a member of a household participating in one of these programs and is thus automatically eligible to receive free meals. These children can therefore be certified to receive free meal benefits without the household having to submit an application. Direct certification was first authorized in 1989, as a method of increasing certification of categorically eligible households, reducing burden on households and LEA staff, and improving program integrity. States use one of two methods to directly certify students: (1) central matching by a State agency, and (2) local matching by LEAs. Figure 1 shows that both types of direct certification rates have been increasing in the last years (Moore, Gothro, et al. 2014). Between SY 2009 and SY 2013, average rate of direct certification has gone up from 70.6 percent to 87.7 percent among all states (68.4 percent to 87.6 percent for central matching states, and 75.6 percent to 87.7 percent among local matching states. This increase in the direct certification rates reduces the number of categorically eligible students who have to fill out an application for NSLP.

**Figure 1. Average NSLP Direct Certification Rates by States by Type of Matching, 2009-2013**



Source: Moore, Q., Gothro, A., Conway, K., Kyler B., (2014). National School Lunch Program Direct Certification Improvement Study. Contract No. AG-3198-D-10-0074. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support.

Other alternate certifications include claiming reimbursement under Provision 2 and Provision 3 (P2/3) and CEP. In an effort to reduce paperwork and other administrative burdens at the local level, Congress incorporated into Section 11(a)(1) of the Richard B. Russell National School Lunch Act (42 USC 1759a) alternative Provisions to the traditional requirements for annual determinations of eligibility for free and reduced price school meals. Under P2/3, schools may use their base year percentages of free, reduced price, and paid students for purposes of applying for funding throughout subsequent years on a 4-year cycle. The 2007 Access, Participation, Eligibility and Certification (APEC) Study found that the erroneous payments are more common in P2/3 base-year schools than in schools not using these provisions (Ponza, Gleason, et al, 2007). In the study sample, a large proportion of students certified for free meals in the base year of P2/3 schools were overcertified (eligible for a lower level of benefits), and because the claiming percentages in these schools are fixed for at least three years (students are not certified annually at P2/3 schools during non-base years), there was no mechanism for correcting the erroneous claiming percentages unless the schools reestablish them in a new base year.

Similarly, Section 104(a) of the Healthy Hunger Free Kids Act made the CEP available to LEAs and schools in high poverty areas. Under the CEP, families do not submit applications for free or reduced price meals, and schools must provide free lunch and breakfast to all students. CEP has been phased-in by FNS over the last 3 school years and it is now available to LEAs that qualify<sup>12</sup> nationwide beginning in SY 2014-15. A recent study evaluating the CEP found that it reduced the overall rate of certification errors and claiming meals for reimbursement (Logan, Connor, et al. 2014). The CEP eliminated application processing errors that, in the comparison schools, resulted in approximately 6.6 percent of applicants having the wrong certification level (too high or too low). The CEP also eliminated procedural errors in application processing that, in the comparison schools, affected 20.2 percent of approved applicants and 16.9 percent of denied applications.

The RORA study is not designed to measure the relationship between administrative errors and alternate certification procedures. The dataset also does not avail itself to identify the relationship between the trend in direct certification rates and changes in error rates. With this caveat in mind, in Table 10, we present unadjusted simple correlations between the direct certification rate at the sampled LEAs and the three types of error rates. Although, in most years, the correlations have a negative sign for processing error, they are not statistically significant. This finding is consistent with

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<sup>12</sup> Available to schools where 40 percent or more of the students are Identified Students (those automatically eligible for free schools meals, without a paper application – students in households on SNAP, TEFAP, FDPIR, homeless, migrant, in foster care or Head Start, etc..).

earlier studies. For example, in 2012 RORA report, we presented findings from a multivariate analysis looking at the determinants of processing error rates. The results suggested that, controlling for other districts characteristics, the percentage of students who were not subject to verification (majority of them are directly certified students) was unrelated to all five types of administrative errors (Karakus, Gasper, Roeser, 2012). Furthermore, in an earlier study using an econometric approach for updating estimates of erroneous payments in NSLP and SBP, the estimated model showed that the relationship between the percentage of certified students who are certified without an application (mainly through direct certification) and the certification error rates is small and is not statistically significant in both the NSLP and the SBP (Moore, Gleason, Ponza, 2008). The alternate certification processes reduce the number of paper applications and LEA staff is left with a smaller but more homogenous pool of applicants. If the remaining income-based applications present more challenging cases during benefit determination, one can expect that the reduction of the size of applicant pool may increase the probability of administrative errors in the remaining pool of income-based applications. In other words, the administrative error rate (number of errors/number of applications) may not decrease if the percentage change in number of errors is not more than the percentage decrease in the numerator. In addition, any change in resources dedicated to application review would affect the error rate. A recent study surveying LEAs showed that, in terms of system development process, districts in local matching states are using more of district level resources in direct certification matching (Moore, Gothro, et al., 2014). Therefore, given the limited budget of LEAs, the resources left for the income-based applications (staff hours per application review) may have been reduced which can negatively affect the rate of administrative errors.

**Table 10. Unadjusted simple correlations of direct certification rate with error rates<sup>a</sup>**

Year	Correlations with		
	Processing Error	Certification Error	Benefit Status Error
2006	-0.0071	-0.0369	0.0239
2007	-0.2579	0.2856	0.2342
2008	-0.0498	0.0239	0.1024
2009	0.3057	-0.1287	-0.1738
2010	-0.0942	0.1450	0.0212
2011	0.2185	-0.2101	-0.1864
2012	-0.2335	0.3541	0.2320
2013	-0.1860	0.1878	0.2232
2014	0.1971	-0.0850	-0.1478
All years	-0.0180	-0.0287	-0.0147

<sup>a</sup> The RORA sample for each year had 8 LEAs from each region, resulting in a total of 56 LEAs for each year.

For the SY 2013-14, a total of 2,777 applications went through an independent assessment to identify the extent of administrative errors. In general, results are consistent with findings from earlier years. Almost 11 percent of all applications (n=303) had administrative error but a majority did not result in incorrect eligibility level. Among those with administrative errors only one in four (n=72) applications were found to have a certification error. Overall, rates of administrative error and certification error have stayed within the expected range that has been observed in the last nine years.

Among all income-based applications, more than 97 percent of students were certified for the correct level of meal benefits based on information in the application files. Of those students incorrectly certified, about three quarters were certified for more benefits than were justified based on the documentation available while about one fourth of the students certified in error were certified for a lesser benefit level than was justified. Similarly, household size and income were accurately calculated for more than 97 percent of the applications. Adjusting for sample weights indicate a possible bias in the unweighted error estimates for determination of certification and benefit status. Unweighted estimates for certification and benefit status determination are lower than the weighted estimates but the differences are not statistically significant.

Of the 172 income based applications that were incomplete, we found that 33 applications did not contain the last four digits of the social security number for the adult household member who signed the application or an indication that the adult household did not have a social security number. Amount and source of current income was left blank for at least one adult household member in almost six percent of the income-based applications (142 out of 2,432). In addition, for 75 of the income-based applications, applicants wrote down “0” to indicate they had no income and these are not considered as incomplete application. Almost all applications had the signature of an adult household member on the application (only one missing).

## Recommendations for Future Studies

# 6

This report presents findings of the tenth annual RORA review. Westat reviewed the applications selected by FNS, entered data, implemented quality control procedures, and conducted data analyses. More LEAs are moving towards a computerized application management system. Most often, when the LEA enters information electronically they may not keep the original application and/or they may prefer to send only the electronic print out for review. A proper review of such applications may not be possible because of the inability to see the information that would be included in the original applications submitted by families. As much as possible, we would recommend including copies of the original application along with the information from the computerized application management system.

On some applications it was hard to make an assessment because of the unclear time lag or lack of notation when the LEA updates information after hard copy submission. While some of the paperwork issues may be due to electronic applications themselves, we noticed that there were discrepancies between what was written or typed on some applications and the LEA documentation provided as backup. For example, sometimes CBIS would be different and we would not quite determine how things changed from the screen shot that would be attached to the hard copy. It is hard to make an assessment with no clear linking path through a paper trail as to why there were differences. We believe better documentation including all relevant information should be provided for reviewing the application.

Finally, the community eligibility provision was available in only 7 states during the time of sampling for this year's study. We did not make any adjustment to the sampling weights since the data was not available this year. However, in the next years as community eligibility becomes available nationwide for eligible LEAs, we expect the direct certification through this mechanism to increase. The new version of the form FNS 742 requires LEAs to submit the required information to adjust the sampling weights. Thus, in future years, we suggest that the sampling weights should account for the size of direct certification due to alternate direct certification methods including community eligibility option.

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## **Appendix A**

# **The Strata Totals of the Number Students Approved for Free and Reduced-price Meals and Direct Certifications in Each Stratum**

LEA number	LEA size	LEA direct certification size	Strata size	Strata direct certification size
111	1,429	36	478,615	199,103
112	2,961	595	478,615	199,103
121	5,401	1,447	476,062	243,265
122	6,431	602	476,062	243,265
131	28,671	18,101	469,331	375,631
132	23,668	1,697	469,331	375,631
141	296,594	69,204	492,171	355,351
142	296,594	69,204	492,171	355,351
211	1,893	620	541,696	274,288
212	1,166	422	541,696	274,288
221	6,117	2,051	538,808	304,957
222	3,535	2,186	538,808	304,957
231	9,307	4,000	536,193	325,390
232	23,059	1,916	536,193	325,390
241	24,729	14,168	551,492	292,092
242	83,959	10,313	551,492	292,092
311	4,243	1,422	1,393,695	781,367
312	2,065	1,415	1,393,695	781,367
321	7,652	2,412	1,393,360	773,416
322	10,527	3,773	1,393,360	773,416
331	65,258	31,056	1,388,949	807,988
332	46,660	13,476	1,388,949	807,988
341	187,344	69,076	1,405,380	850,097
342	305,166	126,152	1,405,380	850,097
411	1,285	543	943,701	490,981
412	1,709	257	943,701	490,981
421	3,944	783	941,983	525,069
422	7,637	800	941,983	525,069
431	8,287	2,276	945,039	548,813
432	1,203	129	945,039	548,813
441	29,635	3,628	944,941	587,986
442	13,395	6,234	944,941	587,986
511	488	105	1,098,506	419,866
512	605	161	1,098,506	419,866
521	9,184	1,098	1,100,500	454,928
522	3,628	1,503	1,100,500	454,928
531	29,590	7,082	1,076,951	407,493
532	15,258	8,068	1,076,951	407,493

<b>LEA number</b>	<b>LEA size</b>	<b>LEA direct certification size</b>	<b>Strata size</b>	<b>Strata direct certification size</b>
541	41,696	16,245	1,123,609	533,116
542	203,020	82,920	1,123,609	533,116
611	261	36	442,705	175,549
612	83	2	442,705	175,549
621	1,799	657	443,488	212,760
622	5,494	557	443,488	212,760
631	15,033	1,953	435,766	197,509
632	5,954	2,881	435,766	197,509
641	79,612	9,961	451,172	215,913
642	68,330	12,407	451,172	215,913
711	235	74	1,308,824	496,805
712	2,526	326	1,308,824	496,805
721	10,384	4,150	1,308,666	463,650
722	17,117	4,026	1,308,666	463,650
731	15,499	6,484	1,294,151	478,902
732	22,662	3,618	1,294,151	478,902
741	57,283	21,507	1,335,062	479,634
742	612,906	101,648	1,335,062	479,634

## **Appendix B**

### **The Number of School Districts Within Each Region by the Four Strata**



The Number of School Districts Within Each Region by the Four Strata<sup>13</sup>

Strata	FNS REGIONS							TOTAL
	NERO	MARO	SERO	MWRO	SWRO	MPRO	WRO	
Small	1,794	1,653	1,190	4,217	2,147	2,696	2,089	15,788
Medium	256	244	212	722	214	289	201	2138
Large	41	74	59	230	61	72	81	618
Very Large	4	18	15	31	21	22	22	133
Total	2,095	1,989	1,476	5,200	2,443	3,081	2,393	18,677

NERO: Northeast Regional Office  
 MARO: Mid-Atlantic Regional Office  
 SERO: Southeast Regional Office  
 MWRO: Midwest Regional Office  
 SWRO: Southwest Regional Office  
 MPRO: Mountain Plains Regional Office  
 WRO: Western Regional Office

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<sup>13</sup> LEAs are divided into four strata (“small”, “medium”, “large” and “very large” school districts) based on the cumulative frequencies in each region.

## **Appendix C**

### **Mean and Standard Errors Estimates for Certification and Benefit Issuance Errors for All Applications Approved or Denied on the Basis of an Application**

### Mean and Standard Errors Estimates for Certification and Benefit Issuance Errors for all applications approved or denied on the basis of an application

Unweighted statistics, n=2,776

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0259	0.003017
CERTMOREB	Certification error – receiving more benefits?	0.0202	0.002669
CERTLESSB	Certification error – receiving less benefits?	0.0058	0.001437
BENERROR	Is there a benefit issuance error?	0.0339	0.003434
BENMOREB	Benefit issuance error – receiving more benefits?	0.0263	0.003038
BENLESSB	Benefit issuance error – receiving less benefits?	0.0076	0.001645

Statistics using weights as usual, n=2,776

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0261	0.003025
CERTMOREB	Certification error – receiving more benefits?	0.0205	0.002693
CERTLESSB	Certification error – receiving less benefits?	0.0055	0.001407
BENERROR	Is there a benefit issuance error?	0.0341	0.003448
BENMOREB	Benefit issuance error – receiving more benefits?	0.0268	0.003068
BENLESSB	Benefit issuance error – receiving less benefits?	0.0073	0.001617

Statistics using adjusted weights, n=2,776

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0276	0.003109
CERTMOREB	Certification error – receiving more benefits?	0.0212	0.002737
CERTLESSB	Certification error – receiving less benefits?	0.0063	0.001508
BENERROR	Is there a benefit issuance error?	0.0360	0.003536
BENMOREB	Benefit issuance error – receiving more benefits?	0.0277	0.003116
BENLESSB	Benefit issuance error – receiving less benefits?	0.0083	0.001721



**Appendix D**  
**Data Management Decision Log**

<b>1 Student Number</b>	<b>TOPIC:</b> What to use for Student Number Variable	<b>PROBLEM:</b> Can you clarify where we should be pulling the "Student" number variable from? Is it the number listed as item #3 on the cover sheet? We originally thought that each district would have assigned student number of 1 to 50.	<b>RESOLUTION:</b>  1. Student number is not pulled from any place. For your purposes the numbering system should simply go from 1 to 50. <i>There may be some SFAs with fewer than 50 students.</i> The SFAs typically are including the random numbers associated with the selected student. However it would be nice to record 1- 50 on the applications to match up with the database in case one wants to go back and locate a specific application for a given SFA.  2. <b>ADDENDUM:</b> We will add 1-50 on the applications (upper right hand corner).
	<b>DATE INITIATED:</b> 08/24/2010		
	<b>DATE DECIDED:</b> 8/24//2010 <b>ADDENDUM:</b> 8/24/2010		
	<b>REFERENCE:</b> Dist 111 and 112 All applications		
	<b>Decided by:</b> John Endahl <b>ADDENDUM:</b> Margaret Pacious		

<b>2 Application</b>	<b>TOPIC:</b> Duplicated applications	<b>PROBLEM:</b> There have been a few instances where the same application (with sibling students) will have a cover sheet for each individual student. Would you like the single application reviewed twice and documented under each separate student number?	<b>RESOLUTION:</b> Because student applications are selected at random, it is entirely possible that two students from the same household may be selected into the sample. The application should be reviewed as many times as necessary to match the selected students.
	<b>DATE INITIATED:</b> 08/24/2010		
	<b>DATE DECIDED:</b> 08/24/2010		
	<b>REFERENCE:</b> Multiple districts		
	<b>DECIDED BY:</b> Westat Team		

<b>3 Application</b>	<b>TOPIC:</b> No application submitted. NAPPS =0	<b>PROBLEM:</b>  1. There have been several cases when there is a cover sheet indicating Current Benefits Issuance is "Paid" and that no applications were submitted. Is this included in the total number of reviewed applications?  2. ADDENDUM 1a or 1b: Coding structure  3. ADDENDUM 2: In addendum 1 CBIS = 3. Would the variable for ProcErr = 1, X or 2?	<b>RESOLUTION:</b>  1. When you find a Current Benefits Status as paid, these are typically cases when the regional staffer did not get a correct listing of students to randomly select students from. These lists should only include students that had submitted applications and subsequently approved for free or reduced price meals or were denied such benefits. For these cases, I would indicate in the Notes section that "No application submitted" and not include these in the analysis of certification error.  2. ADDENDUM 1a: We will give the student ID and code CBIS = 3 and NAPPS = 0, X's in the remaining fields and a note "No application Submitted".  3. ADDENDUM 2: These are not included in the analysis for certification of error so I would say X and not 2. 2 would indicate that no mistake was made when in actuality we can't make an assessment.  If on the other hand, a student has a current benefits issuance of free or reduced price and there is no indication that an application was submitted or no application could be found, then this is a certification error because the SFA must have documentation that a student receiving benefits submitted an application or was directly certified for free meals.  4. ADDENDUM 1b: Coding in this case would be CBIS = 1 or 2 and NAPPS =0 then ProcErr = 1.
	<b>DATE INITIATED:</b> 08/24/2010 ADDENDUM 2 : MP 08/25/2010		
	<b>DATE DECIDED</b> 08/24/2010 ADDENDUM 1: 08/25/2010 ADDENDUM 2: 08/25/2010		
	<b>REFERENCE:</b> Dist 112 St 6, 10,16, 17, 18		
	<b>DECIDED BY:</b> John Endahl ADDENDUM 1a and 1b: Margaret Pacious and Allison Roeser ADDENDUM 2: Allison Roeser		

<b>4</b> <b>HHIncome</b>	<b>TOPIC:</b> No frequency for income	<b>PROBLEM:</b> If the family does not give a unit for their income (i.e. weekly, monthly, etc.) do we assume the calculation by the SFA is correct?	<b>RESOLUTION:</b> If the family does not give a frequency of receipted income, I generally try to get a feel for the typical income levels of the other households. If the application asks for monthly income then assume that it is monthly income. If the application doesn't ask for monthly income and no frequency is identified, one could assume it is the most frequent occurrence (weekly).
	<b>DATE INITIATED:</b> 08/24/2010		
	<b>DATE DECIDED:</b> 08/24/2010		
	<b>REFERENCE:</b> Dist 111 St 50		
	<b>DECIDED BY:</b> John Endahl		

5 <b>HHIncome &amp; HHSIZE</b>	<b>TOPIC:</b> Error in HHIncome or HHSIZE	<b>PROBLEM:</b> If there is an error in the income amount or number of household members but the eligibility is the same, this discrepancy is still documented as an error, correct?	<b>RESOLUTION:</b> If there is an error in the calculation of the household income or household size, but the eligibility status is unaffected, you should still indicate that a processing error occurred. This is an administrative error that did not lead to a certification error.
	<b>DATE INITIATED:</b> 08/24/2010		
	<b>DATE DECIDED:</b> 08/24/2010		
	<b>REFERENCE:</b> Dist 111 ST 20 Dist 112 ST 1,2,23		
	<b>DECIDED BY:</b> John Endahl		

<b>6 HHIncome &amp; SFAHHSIZE &amp; SFAHHinc</b>	<b>TOPIC:</b> No SFA variables available.	<b>PROBLEM:</b> One district so far has not provided an SFA worksheet. We have been pulling the SFA information from the "For School Use Only" at the bottom of the application.  <b>1.</b> This section does not include total number in household—should SFAHHSIZE be left blank on the spreadsheet? How to verify eligibility?  <b>2.</b> In one instance, the income was not provided by the family but the SFA listed a total monthly income amount  <b>3.</b> Similarly, one district didn't seem to ever answer yes or no to if the household was categorically eligible (in some instances they were). Would you like us to note that the SFA portion of the application was not answered in full?	<b>RESOLUTION:</b>  <b>1 &amp; 3.</b> In instances where there is no information about how the SFA calculated household size or income, leave the SFAHHinc and SFAHHSIZE variables blank (X) and assume that the current benefit status from the cover sheet reflects the SFAs determination of eligibility at the time of certification (SFAElig).  <b>2.</b> For the instance that no household income was reported on the application but in the section reserved for the SFA there is a household income amount, this probably suggests that the SFA contacted the household and obtained additional information. The SFA should have noted on the application that such a contact was made, but often times this is not noted on the application. I would assume that the SFA has the correct household income in that case.
	<b>DATE INITIATED:</b> 08/24/2010		
	<b>DATE DECIDED:</b> 08/24/2010 <b>ADDENDUM:</b> 08/24/2010 meeting		
	<b>REFERENCE:</b> Dist 111 ST 25 for #3. Dist 111 ST 4 Dist 112 ST 28,2, 23		
	<b>DECIDED BY:</b> John Endahl		

7 CatElig	<b>TOPIC:</b> Category eligible variables	<b>PROBLEM:</b> 1. What variables are required for categorically eligible students? 2. If the Social Security number is missing, is this an error?	<b>RESOLUTION:</b> 1. Including the cover sheet variables, the required variables are CATELIG = 1, Signature = 1, SFAELIG and FNSELIG both = 1 and PROCERR = 2.  2. NO. On page 16 of the Eligibility Manual for School Meals, for categorically eligible students only the names of the children, a Food stamp, FDPIR, or TANF case number or other FDPIR identifier and the signature of an adult household member are required for a complete application.
	<b>DATE INITIATED:</b> 08/23/2010 meeting		
	<b>DATE DECIDED:</b> 08/30/2010		
	<b>REFERENCE:</b> Eligibility Manual Pg 16.		
	<b>DECIDED BY:</b> Allison Roeser		

8 CatElig	<b>TOPIC:</b> Category eligible variables	<b>PROBLEM:</b> If the applicant is categorically eligible, which variables should we populate? For example, sometimes the applicant will also provide income information, however it will take us time to do the calculations if we want to include this additional information. Apart from income, should we also be documenting HHSize, etc.?	<b>RESOLUTION:</b> Populate all variables for which we have data. This will include income information.
	<b>DATE INITIATED:</b> 08/30/2010		
	<b>DATE DECIDED:</b> 09/10/2010		
	<b>REFERENCE:</b> None.		
	<b>DECIDED BY:</b> John Endahl		

9 SSN	<b>TOPIC:</b> SSN variable for categorically eligible students.	<b>PROBLEM:</b> Currently, the value labels for the SSN variable are 1= yes 2 =) Don't Have SSN and 3= No. However, one district seems to only require a social security number if the household income portion of the application was completed (i.e., not categorically eligible, income eligible only).  So, an SSN may not be provided and using "3=No" may not be appropriate by our current definition. Would you like to add a 4th value such as: 4= Not Required or still use "3= No" with a comment in the notes section?	<b>RESOLUTION:</b> MK -For the categorically eligible ones, you do not need SSN for any of the districts. All you need is an adult signature. If not, I like your idea of assigning value of 4 for not required. 1. For applications that are categorically eligible, using 3= No when the applicant does not provide an SSN number is sufficient. (We may also have 1 = yes because some may still provide it). 2. And 3 = No" can then either indicate "not applicable" in situations of categorical eligibility or "an incomplete application" in cases of income eligibility.
	<b>DATE INITIATED:</b> 08/30/2010		
	<b>DATE DECIDED:</b> 08/30/2010		
	<b>REFERENCE:</b> Decision 7 Q 2.		
	<b>DECIDED BY:</b> Allison Roeser Margaret Pacious & Mustafa Karakus (agreed 8/30/2010)		

10 SFA data	<b>TOPIC:</b> Blank or missing SFA data. Or no SFA section.	<b>PROBLEM:</b> Are SFA Blank areas processing errors?  Addendum: Change for applications where no SFA documentation is available, either on the application or in the form of computer documentation.	<b>RESOLUTION:</b> No. We will put Xs in all fields SFA left blank.  Addendum: If a district uses an application that does not have a section for SFA to mark their income, SFA HHSIZE, or eligibility assessment (or they do not attach a computer printout with the same information), we will continue to use an "X" for the SFAHHInc and SFAHHSIZE but will use "99" for the SFAElig.
	<b>DATE INITIATED:</b> 09/02/2010 Meeting Addendum 1: 11/05/2010		
	<b>DATE DECIDED:</b> 09/02/2010 Addendum 1: 11/05/2010		
	<b>REFERENCE:</b> General Addendum Dist 722 , 741, 742 ALL		
	<b>DECIDED BY:</b> Allison Roeser & Margaret Pacious Addendum: Mustafa Karakus		

<b>11</b> <b>SFAHHInc</b>	<b>TOPIC:</b> SFA HHInc calculation error.	<b>PROBLEM:</b> SFA recalculated monthly income to a weekly figure by dividing by 4, then recalculated annual income and monthly from that level. This process created an error in the SFA income.	<b>RESOLUTION:</b> Documented monthly income should not be recalculated, just add it to the recalculated weekly, bi-weekly, annual etc. incomes. This is a SFAHHInc error and ProcErr = 1.
	<b>DATE INITIATED:</b> 09/02/2010		
	<b>DATE DECIDED:</b> 09/02/2010		
	<b>REFERENCE:</b> Multiple cases		
	<b>DECIDED BY:</b> Allison Roeser & Margaret Pacious		

12 SSN & Signature	<b>TOPIC:</b> Missing SSN or signature on application.	<b>PROBLEM:</b> If an applicant has received a current benefit issuance of "paid" based on income being too high (correct decision), and the SSN# and/or signature of an adult was not provided, would that be considered an error since the application should have not been reviewed due to missing SSN#?	<b>RESOLUTION:</b> If the SFA has determined that the household is not eligible for free or reduced price meal benefits based on income, then not providing a social security number should not be considered an error.  Not including a SSN# should only be considered an administrative error if the household has been approved for free or reduced-price meal benefits based on income.  A household approved for free meals based on categorical eligibility need not have a SSN# on the application.  Similarly, if the application is not signed by an adult, this would only be considered an administrative error if the household was approved for free or reduced-price meals.
	<b>DATE INITIATED:</b> 09/08/2010		
	<b>DATE DECIDED:</b> 09/14/2010		
	<b>REFERENCE:</b> Dist 112 ST 3		
	<b>DECIDED BY:</b> John Endahl		

13 SSN	<b>TOPIC:</b> Acceptable indication of "No SSN"	<b>PROBLEM:</b> When the applicant doesn't have a SSN and there is no box to check or instructions to write "none", would either a dash or "N/A" in the SSN section be interpreted as "don't have" or "no" (meaning it would not be considered an incomplete application)?	<b>RESOLUTION:</b> If there is no place to check or instructions to write "none", I would consider a dash or N/A as an adequate indication that the individual did not have a social security number and therefore the application should not be considered incomplete.
	<b>DATE INITIATED:</b> 09/08/2010		
	<b>DATE DECIDED:</b> 09/14/2010		
	<b>REFERENCE:</b> Dist 112 ST 3		
	<b>DECIDED BY:</b> John Endahl		

<b>14 SSN</b>	<b>TOPIC:</b> Partial SSN	<b>PROBLEM:</b> Some applicants only provided the last four numbers of their SSN - is this considered complete?  <b>Addendum:</b> Is there a policy change now requiring only the last four digits of the social security number for a complete application?	<b>RESOLUTION:</b> The entire social security number, not just the last four digits, need to be included on the application in order to be considered complete  <b>Addendum:</b> Yes. Page 21 of the October 2011 Eligibility Manual states that a complete application must include: <ul style="list-style-type: none"> <li>. Names of all household members;</li> <li>. Amount and source of current income for each member and the frequency of the income;</li> <li>. Signature of an adult household member and;</li> <li>. Last four digits of the social security number of the adult who signed the application or an indication that the Household member does not have one.</li> </ul>
	<b>DATE INITIATED:</b> 09/08/2010 <b>ADDENDUM:</b> 09/2012		
	<b>DATE DECIDED:</b> 09/14/2010 <b>Addendum:</b> 09/2012		
	<b>REFERENCE:</b> Multiple Applications <b>Addendum:</b> Oct 2011 EM pg. 21		
	<b>DECIDED BY:</b> John Endahl <b>Addendum:</b> Policy change		

15 Adults	<b>TOPIC:</b> Calculation of adults in household	<b>PROBLEM:</b> How do we reliably calculate adults in household?	<b>RESOLUTION:</b> We are actually going to eliminate the “adult” variable. It has been confusing and not necessary for our analysis.  The reviewers will not enter any data related to number of adults on the application.
	<b>DATE INITIATED:</b> 09/08/2010 Meeting		
	<b>DATE DECIDED:</b> 09/14/2010		
	<b>REFERENCE:</b> 09/14/2010		
	<b>DECIDED BY:</b> Westat Team John Endahl		

<b>16</b> <b>HHIncome</b> <b>&amp;FNSElig</b>	<b>TOPIC:</b> No space in Part 2 Student list to enter child's income.	<b>PROBLEM:</b> (Applies to several applications) Application instructions for part 4, is not to list students from Part 2. Part 2 has no space for child's income and instructions to only include students attending the same school and make separate applications for other students.  This application has only 1 student and there is an income of \$60.00 in the Foster Child section. Computer sheet shows SFA making an income based status (including the \$60). Should we assume the applicant had no other way of indicating the child's income and make an income based status or should we treat this as a "Foster Child" application?	<b>RESOLUTION:</b> Treat this as an income based application not a foster child application. It is correct to include the \$60.
	<b>DATE INITIATED:</b> 09/15/2011		
	<b>DATE DECIDED:</b> 09/21/2011		
	<b>REFERENCE:</b> Dist 132 St 01		
	<b>DECIDED BY:</b> Westat Team		

<b>17</b> <b>VerDoc</b>	<b>TOPIC:</b> Cover sheet variable (meaning)	<b>PROBLEM:</b> Does the VER DOC variable refer to whether the school has simply asked for verification or if the family provided the documentation in full?  <b>ADDENDUM Referred to JE:</b> The VERDOC variable is (1) if the family submitted all the requested documentation, (2) if the family did not submit all the requested documentation, correct?	<b>RESOLUTION:</b> VER DOC variable refers to whether or not the family has provided all documents associated with the verification process.  <b>ADDENDUM/CORRECTION</b> In past years I have been using this variable to indicate if the household file contains sufficient information to make a decision about the appropriateness of the SFA's determination as a result of verification. If the household failed to respond to the verification request and the file provides documentation to this effect, I would code this variable as a "1" indicating that the information was there to make an appropriate decision. It does not mean that the household had necessarily responded to the verification request and provided all the information requested.
	<b>DATE INITIATED:</b> 09/06/2010 meeting		
	<b>ADDENDUM:</b> MK TO JE 09/14/2010		
	<b>DATE DECIDED:</b> 09/08/2010 <b>ADDENDUM:</b> 09/14/2010		
	<b>REFERENCE:</b> All Verification applications		
<b>DECIDED BY:</b> Mustafa Karakus & Allison Roeser <b>ADDENDUM/CORRECTION</b> John Endahl			

<b>18</b> <b>SFAHHInc</b>	<b>TOPIC:</b> Irregular income calculation	<b>PROBLEM:</b> When an applicant lists income that is irregular, is the SFA supposed to include the given figure in their monthly/yearly calculations? For example, we have an applicant who has listed income (2 days/week) from being a substitute teacher though did not include this amount in her total monthly income. She does not work 2 days a week for the whole year, she only works when there is a need. SFA did include this income in the total (by multiplying the given amount by 52). Is this correct?	<b>RESOLUTION:</b> When the income of an applicant is irregular, the household has the option of providing annual household income information. In this case the substitute teacher, the SFA could have contacted the household to get clarification on the typical annual income received from substitute teaching. Without this information, if the SFA knows that the school district operates on a 9-month school year rather than year-round, instead of multiplying by 52 weeks, I would probably multiply by 39 weeks (3/4 of a year)..
	<b>DATE INITIATED:</b> 09/10/2010		
	<b>DATE DECIDED:</b> 09/10/2010		
	<b>REFERENCE:</b> Dist 212 ST 28		
	<b>DECIDED BY:</b> John Endahl		

<b>19</b> <b>SFAHHInc</b> <b>&amp;</b> <b>Verification Apps</b>	<b>TOPIC:</b> Income calculation on verified applications. <b>ADDENDUM:</b> Variables from verified applications	<b>PROBLEM:</b> Should the new income listed on the verification sheet be used for both HHIncome and SFAHHInc?  <b>ADDENDUM:</b> Variables for verified applications	<b>RESOLUTION:</b> Use income from verification sheet.  <b>ADDENDUM/CORRECTION:</b> Use income from verification sheet for determination of agreement between SFAVer and FNSVer variables only.  All variables up to SFAVer are to be pulled from the original application. For example HHIncome comes from the original application, not the amount you might find on one of the paystubs that are submitted as part of the verification process. SFAElig and FNSElig are from the original application also.  The SFAVer and FNSVer (in addition to the Verify and VerDoc) columns are those that we populate based on the verification process. If we didn't agree with the SFA after the verification process, any type of error would be documented through these two variables (i.e. they wouldn't match.)
	<b>DATE INITIATED:</b> 9/3/2010 <b>ADDENDUM:</b> 10/11/2010		
	<b>DATE DECIDED:</b> 09/08/2010 Addendum: 11/05/2010		
	<b>REFERENCE:</b> Dist 122 ST 16 Addendum: Dist 511 ST 48 to 50		
	<b>DECIDED BY:</b> John Endahl		

20 CatElig	<b>TOPIC:</b> SSN in SNAP/ TANF Section of application.	<b>PROBLEM:</b> Historically, we have assumed that if there is a number in the location for TANF or SNAP case numbers that the number is legitimate (decision log 19). However, in this case, 45 of the 50 applications in this district have what seems to be SSN#s in this box. Please see Alabama 2, 3, 26, 28 for multiple variations of this scenario.	<b>RESOLUTION:</b> I would agree that, for this school district, the numbers that appear in the SNAP/TANF case numbers do appear to be SSNs. Given, that in all instances, the household didn't skip section 4 and provided household income and that the district has processed these applications on the basis of household income, I would review these applications as if they were income-based applications, NOT categorically eligible applications.
	<b>DATE INITIATED:</b> 09/22/2011		
	<b>DATE DECIDED:</b> 10/05/2011		
	<b>REFERENCE:</b> Dist 322		
	<b>DECIDED BY:</b> John Endahl		

21 Homeless	<b>TOPIC:</b> No SFA Information Marked Homeless	<b>PROBLEM:</b> This application is marked as Homeless.  There is no SFA documentation presented by this district and we cannot verify how the SFA Reviewer Status was =1.	<b>RESOLUTION:</b> Use income based determination. Note: Homeless.  Pg. 53 of the Eligibility Manual states that acceptable documentation that the children are homeless is obtained from the LEA homeless liaison or directors of homeless shelters where the children reside. Documentation to substantiate free meal eligibility must consist of the child's name or a list of names; effective date (s), and signature of the local educational liaison or the director of the homeless shelter.
	<b>DATE INITIATED:</b> 09/28/2011		
	<b>DATE DECIDED:</b> 10/05/2011		
	<b>REFERENCE:</b> Dist 212 St 42		
	<b>DECIDED BY:</b> Westat Team		

<b>22</b> <b>SSN redacted</b>	<b>TOPIC:</b> Redaction of SSN on applications: full or partial	<b>PROBLEM:</b> The boxes or lines used for SSN are partially or fully redacted. Should we assume that the SSN is present on the application?	<b>RESOLUTION:</b> Consider any type of redaction (full or partial) as a complete SSN. Please include a note for these applications that says: "SSN redacted".
	<b>DATE INITIATED:</b> 10/05/2011		
	<b>DATE DECIDED</b> 10/05/2011		
	<b>REFERENCE:</b> Dist 221 all Dist 332 all		
	<b>DECIDED BY:</b> Westat Team		

<b>23</b> <b>Incomplete application (missing required information)</b>	<b>TOPIC:</b> Comment for FNSElig = 4 Incomplete Application	<b>PROBLEM:</b> Clarification on the Comment variable when FNSElig = 4.	<b>RESOLUTION:</b> When FNSElig = 4, instead of writing “incomplete application” we will write “Required SSN missing” or Required signature missing”.
	<b>DATE INITIATED:</b> 09/27/2010		
	<b>DATE DECIDED:</b> 09/27/2010		
	<b>REFERENCE:</b> Multiple cases		
	<b>DECIDED BY:</b> Allison Roeser Westat Team		

24 Application	<b>TOPIC:</b> Blank Applications	<b>PROBLEM:</b> CBIS = 1. Comment by SFA reviewer on coversheet "Nothing on Application. No explanation". Student name and number but the rest of the application is blank.  Variation St 39 CBIS = 2 with the same note and the application is blank except Student name and number, ethnicity and SFA Status and signature in SFA section.  Should we treat these as "No Application Submitted", or X's for all variables except the cover sheet, FNSElig and ProcErr?	<b>RESOLUTION:</b> X's for missing variables.  <b>NOTES:</b> CBIS different than FNSElig. Application incomplete.
	<b>DATE INITIATED:</b> 9/26/2011		
	<b>DATE DECIDED:</b> 10/05/2011		
	<b>REFERENCE:</b> Dist 312 St 28,29,30 & 39 variation		
	<b>DECIDED BY:</b> Westat Team		

25 CatElig	<b>TOPIC:</b> Zeros in the middle of Case numbers.	<b>PROBLEM:</b> Seven applications with 00 in the middle of the case numbers. SFA processed Apps 20, 25, 45, 49 as Income based Status = 2. SFA processed Apps 4, 5, 21 as income based Status = 1. On App 20 SFA circled the 2 zeros then proceeded to make an income based status.  Do we assume SFA knows #'s are incomplete?	<b>RESOLUTION:</b> All should be considered categorically eligible. ProcErr = 1. Per DL#19 decided by John Endahl: Assume that if there is number in the location for TANF or SNAP case numbers that the number is legitimate. As independent reviewers, we have no knowledge of what the format of a legitimate case number might look like for a specific locale. To that end, we assume that SFA has done due diligence and made sure that the number conforms to the format of a legitimate case number.
	<b>DATE INITIATED:</b> 09/29/2011		
	<b>DATE DECIDED:</b> 10/05/2011		
	<b>REFERENCE:</b> Dist 412 St 20, 45, 25, 49 Variant St 4, 5, 21		
	<b>DECIDED BY:</b> Westat Team John Endahl		

26 <b>Duplicated Applications</b>	<b>TOPIC:</b> Duplicate applications with differing SFA Status determinations	<b>PROBLEM:</b> SFA sent duplicate applications with entire HH information. On one application SFAElig based on Income and full HH. On the other application SFAElig based on Foster child and Foster Inc.  Please review cover sheet note and advise which application to use.  Additional Question: Foster child income of \$1596.00 makes income based status = 2 for HHSize = 1.	<b>RESOLUTION:</b> Consider Foster Child. Decision remains free and no error.  JE: I would have processed this based on household income, not that of a Foster child. Regardless of how it was processed, the district reached the correct decision in terms of eligibility (free).  It is unclear why some of the information is typed while the name and address is hand-written. It appears that the district may have preloaded some information from somewhere. While it is OK to preload student names, school names, grade, etc., it is not OK to load income information. To that end, I would indicate that a processing error had occurred.
	<b>DATE INITIATED:</b> 09/29/2011		
	<b>DATE DECIDED:</b> 10/05/2011 11/10/2011 JE		
	<b>REFERENCE:</b> Dist 412 St 34		
	<b>DECIDED BY:</b> Westat Team JE 11/10/2011		

<b>27</b> <b>Expired Application</b>	<b>TOPIC:</b> Expired application	<b>PROBLEM:</b> Application shows students and adult signature and SSN. Computer print-out shows free then "Expired" notations.	<b>RESOLUTION:</b> It looks as though the applicant didn't provide the necessary income information. As a result, their application expired. FNSElig = 4 with a note "Incomplete application".
	<b>DATE INITIATED:</b> 10/05/2011		
	<b>DATE DECIDED:</b> 10/05/2011		
	<b>REFERENCE:</b> Dist 541 St 44		
	<b>DECIDED BY:</b> Westat Team		

<b>28</b> <b>SFAHHInc</b> <b>&amp;</b> <b>SFAHHSize</b>	<b>TOPIC:</b> Electronically filled/ produced applications with no SFA section	<b>PROBLEM:</b> A copy of an electronically filled or produced application is supplied with no SFA section. SFA Status and possibly SFA name are in a line superimposed over the top of the application. We have no indication of how SFA calculated status unless we use the information from the application. We have an SFA Status so we can't use SFAElig=99. Should we use the information from the application or just put X's for the missing SFAHHSize and SFAHHInc variables?  Addendum1 Changes	<b>RESOLUTION:</b> Assume SFA presented document as SFA information. Use data on application to fill in SFAHHInc, SFAElig and use Household count as SFAHHSize.  Addendum 1. See Decision Log item 10 for abstraction instructions.
	<b>DATE INITIATED:</b> 10/06/2011		
	<b>DATE DECIDED:</b> 10/06/2011 631 10/26/2011 741		
	<b>REFERENCE:</b> Dist 631 and 741 Multiple applications Addendum:		
	<b>DECIDED BY:</b> Westat Team		

<p>29 FNS variables</p>	<p><b>TOPIC:</b> Multiple Online applications with missing or redacted information</p>	<p><b>PROBLEM:</b></p> <p>1. Some online applications show indications that names, incomes and frequencies have been covered over with correction tape or white out. This inhibits our ability to gather FNS variable information from the applications</p> <p>Do you think that this is a redaction of some sort by the SFA?</p> <p>2. Some of these also have 2 applications, however they have not carried over names, income from the other application (i. e., a frequency correction for a child's income is all that is on the second application).</p> <p>In all cases the SFA computer activity printout shows the information needed to fill in FNS variables to allow FNS status determinations. Should we use both applications and the printout to populate the missing FSN variables?</p>	<p><b>RESOLUTION:</b></p> <p>1. Yes, redaction must have occurred.</p> <p>2. Use both information on the applications then printout to populate the variables.</p>
	<p><b>DATE INITIATED:</b> 09/30/2011</p>		
	<p><b>DATE DECIDED:</b> 10/19/2011</p>		
	<p><b>REFERENCE:</b> Dist 342 St 28, 31, 36, 41</p>		
	<p><b>DECIDED BY:</b> Westat Team</p>		

30 <b>SFA Computer Information</b>	<b>TOPIC:</b> Use of SFA Application Activity tracking list.	<b>PROBLEM:</b> Along with screen shots of the SFA Data Base interface that has data that usually doesn't match the application, we sometimes receive an application activity tracking log.  Using the data from the activity tracking log gives a more accurate set of SFA variables for calculations at the time of the application.  This would make a different status finding from CBIS.  May we use the activity log to make our comparisons for the time of application?  Should we make it a ProcErr =1 Note: "SFAElig and FNSElig different that CBIS?"	<b>RESOLUTION:</b> Yes, it is appropriate to use the earlier SFA variable data for the SFA Status calculations. There should be no ProcErr.  ProcErr= 2 and note "SFAElig and FNSElig different that CBIS".
	<b>DATE INITIATED:</b> 10/06/2011		
	<b>DATE DECIDED:</b> 10/14/2011		
	<b>REFERENCE:</b> Several Districts		
	<b>DECIDED BY:</b> Westat Team		

<b>31</b> <b>No Income Frequency</b>	<b>TOPIC:</b> Income Frequency missing for both applicant and SFA	<b>PROBLEM:</b> No income frequency is noted by either the applicant or the SFA. The SFA denied certification on the grounds that the family makes too much. I am assuming they used a frequency more often than "Monthly". If they did use monthly, the certification should be reduced-price. On situations where no income frequency is provided, what would you like us to do?	<b>RESOLUTION:</b> For cases such as Wilkes-Barre where the household has failed to include income frequency, one can't make an eligibility determination....this should be viewed as an incomplete application. The district should have attempted to contact the household to determine what the income frequency should be.
	<b>DATE INITIATED:</b> 08/29/2012		
	<b>DATE DECIDED:</b> 10/17/2012		
	<b>REFERENCE:</b> Dist 231 app 12		
	<b>Decided by:</b> John Endahl		

<b>32</b> <b>SFAElig</b> <b>VS</b> <b>Coversheet notation</b>	<b>TOPIC:</b> SFA Income based certification VS Notation of later Direct Certification	<b>PROBLEM:</b> District 411 has several applications where the SFA proceeded to use income calculations for their determination of status. We have only provided a few examples and can provide additional examples. The reviewer has placed comments on the cover sheet stating that student was later found to be eligible through direct certification. On the application someone has written Direct certification some with dates that are after the SFA made their determination and some without any date at all. We have no activity sheet to examine for a timeline. Should we continue as if the DC status was not in effect at time of application? IF you decide these are Direct Certification based on the cover sheet comments, how do you want us to treat the applications? Do they belong in the sample?	<b>RESOLUTION:</b> For Lena-Winslow CUSD #202 (District 411) I don't see a problem... The sample was supposed to include any student that had applied for meal benefits and was approved for free or reduced-price benefits or was denied benefits. It appears that these households submitted applications for benefits and subsequently were identified as directly certified. I would process the application as if the household was not directly certified at the time of certification and determine if eligibility determination was correct at the time of certification. However, when examining benefit issuance status, assume these households were eventually identified as directly certified and the thus should be receiving free meals (regardless of the date or non-date associated with the notation "Directly Certified").
	<b>DATE INITIATED:</b> 10/08/2012		
	<b>DATE DECIDED:</b> 10/17/2012		
	<b>REFERENCE:</b> Dist 411 Several Applications		
	<b>DECIDED BY:</b>  John Endahl		

<b>33</b> <b>Other Categorical determinations</b>	<b>TOPIC:</b> Application column for other Categorical types	<b>PROBLEM:</b> The District has added a column next to the House hold list column. Its purpose is to indicate whether any or all of the household members are Migrants, Homeless, Foster child or Runaway. The instructions are for the applicant to circle the letter that would make that indication. Several applicants have circled M or F for each member in their household. There is no evidence of categorical eligibility, and the SFA has done an income based status assessment. Upon closer examination, it appears that the applicants are attempting to indicate the gender of each household member.	<b>RESOLUTION</b> Regarding cases when the individual who completed the application marks "M" and "F" for several members of the family:  If the "M" and "F" correspond with male and female family members, and the SFA used income to determine the applicant's eligibility, we can assume that the individual got confused and did NOT mean to designate "migrant" and/or "foster" for these family members.
	<b>DATE INITIATED:</b> 09/27/2013		
	<b>DATE DECIDED:</b> 09/30/2013		
	<b>REFERENCE:</b> Dist 211 & 212 Several Applications		
	<b>DECIDED BY:</b> <b>Westat Team</b> AR		

<b>34</b> <b>Applications: out of state residents</b>	<b>TOPIC:</b> Five residents of Vermont applying to a school district in the state of New Hampshire.	<b>PROBLEM:</b> There are five applications from this NH district that indicate a residence in Vermont. (Applications 35 and 36 are from the same household).  Is this a problem?	<b>RESOLUTION</b> The eligibility manual does not discuss an analysis of address.  Address isn't part of the requirements for a complete application (pages 17 & 18 of the eligibility manual) so we will assume that these students are properly part of the intended district sample.
	<b>DATE INITIATED:</b> 09/24/2013		
	<b>DATE DECIDED:</b> 9/24/2013		
	<b>REFERENCE:</b> Dist 111 Apps 3,12,35,36, & 46		
	<b>DECIDED BY:</b> Westat Team AR		

35 SFA HHInc	<b>TOPIC:</b> Large differences between SFAHHInc and FNS calculated HHIncome.	<b>PROBLEM:</b> Several applications: (FNSElig = 3). The Applicant has provided their income, the SFA chooses to round the annual income down to significantly lower amount than the actual salary and puts a + (plus sign) next to it. Ex: application income is approx. \$103800 but SFA writes \$80000+. This normally leaves a ProcErr = 1 for income differences (we can't factor a "+" so I'm using their base rate to calculate SFAHHInc). <u>Monthly</u> income differences range from \$1000.00 to \$3000.00. The SFA does not use standard amount. (For an HHSIZE of 3 or 4 they report 80K+ or 90K+ when 35K or 42K would put them into paid). Status is the same but would this be an Administrative error?	<b>RESOLUTION</b> I would not consider a ProcErr because the SFA knows they are way into the "Paid" territory and they are using a shorthand calculation.  Per AR: Use notation: SFA truncated income
	<b>DATE INITIATED:</b> 09/25/2013		
	<b>DATE DECIDED:</b> 09/26/2013		
	<b>REFERENCE:</b> Dist 112 Apps 1,3,6,7,9,25 Multiple applications		
	<b>DECIDED BY:</b> Westat Team MK		

<p>36 SFA Sections Blank</p>	<p><b>TOPIC:</b> SFA Sections Blank and no SFAHHSIZE or HHIncome variables available.</p>	<p><b>PROBLEM:</b> The SFA has been leaving the SFA section at the bottom of application blank for the majority of applications in this district. The SFA has included an unsigned handwritten notification letter that states the certification status. Can the notification letter be used as a proxy for SFA eligibility? If so, is there still a processing error due to SFAHHInc and SFAHHSIZE missing?</p>	<p><b>RESOLUTION</b> In this Scenario, it appears that there is information available about the eligibility status determination but not the elements that led to that determination. One can't determine if the LEA correctly calculated household size and household income, but can assess the correctness of the final eligibility determination. I would use the notification letter that states the certification status as the final eligibility status determination by the SFA.</p> <p>I would not view the lack of data in the SFA only box indicating the SFA determination of household size and household income as a processing error.</p>
	<p><b>DATE INITIATED:</b> 10/28/2013</p>		
	<p><b>DATE DECIDED:</b> 12/03/2013</p>		
	<p><b>REFERENCE:</b> Dist 232 App 16 &amp; multiple applications.</p>		
	<p><b>DECIDED BY:</b> John Endahl</p>		

<p>37  <b>No SFA Sections or documentation with SFA variables or status</b></p>	<p><b>TOPIC:</b>  No available information for SFA Variables. Electronic notation in upper left corner "PAID: on every application.</p>	<p><b>PROBLEM:</b>  This district uses electronic applications and there is no space for SFAInc and SFAHHSIZE. However, at the very top left hand side of the page, there is a notation of "Paid," along with someone's name (perhaps an SFA official). Does this status notation serve as SFA Elig?   CBIS matches FNSElig in every case, but the SFAElig (i.e. "Paid" for EVERY app) does not match every application. Some applications that actually should be "Paid" would match, but the vast majority are actually "Reduced" or "Free," which means the SFAElig at the corner that says "Paid" is wrong.</p>	<p><b>RESOLUTION:</b>  With regard to this scenario, I have no idea what "paid" means in the first line of the application. Given that the current benefit issuance status is consistent with the eligibility determination made by Westat I would not consider any of these applications in error.   Note: Treated as missing SFA section SFAElig Coded as 99. ProcErr = 2.</p>
	<p><b>DATE INITIATED:</b>  10/28/2013</p>		
	<p><b>DATE DECIDED:</b>  12/03/2013</p>		
	<p><b>REFERENCE:</b>  Dist 411 All</p>		
	<p><b>DECIDED BY:</b>  John Endahl</p>		

<b>38</b> <b>No SFA Information</b>	<b>TOPIC:</b> Blank SFA sections electronic applications	<b>PROBLEM:</b> This district has two types of electronic applications (both have space for SFA determinations). One type of application is computer generated with hand written sections by the applicant but the SFA section is blank. The other type is entirely computer generated (including applicant information). The entire district has no SFA information on the application. The SFA made reference to using "Rocket Scan", their on- line system.	<b>RESOLUTION:</b> In this Scenario, it appears that there is information available about the eligibility status determination but not the elements which led to the determination. One can't determine if the LEA correctly calculated household size and household income, but can assess the correctness of the final eligibility determination. It appears that the final eligibility determination appears at the top of the application. Comparison of these SFA determinations with the independent assessment by Westat is all that can be done. I would not view the lack of data in the SFA only box indicating the SFA determination of household size and household income as a processing error.
	<b>DATE INITIATED:</b> 10/28/2013		
	<b>DATE DECIDED:</b> 12/03/2013		
	<b>REFERENCE:</b> Dist 212 all apps Dist 221		
	<b>DECIDED BY:</b> John Endahl		

<b>39</b>  <b>No SFA Information</b>	<b>TOPIC:</b> Electronic applications with no space for SFA Household Size or House hold income.	<b>PROBLEM:</b> This district uses electronic applications and there is no space for SFAInc and SFAHHSIZE. However, at the very top left hand side of the page, there is a notation of "Paid," along with someone's name (perhaps an SFA official). Does this status notation serve as SFA Elig?  As background: CBIS matches FNSElig in every case, but the SFAElig (i.e. "Paid" for EVERY app) does not match every application. Some applications that actually should be "Paid" would match, but the vast majority are actually "Reduced" or "Free," which means the SFAElig at the corner that says "Paid" is wrong.	<b>RESOLUTION:</b>  With regard to this scenario, I have no idea what "paid" means in the first line of the application. Given that the current benefit issuance status is consistent with the eligibility determination made by Westat I would not consider any of these applications in error.  Note1: Treated as missing SFA section SFAHHIM, SFAHHSIZE and SFAElig Coded as 99. ProcErr = 2 See DL 10  Note 2: See DL 37 also.
	<b>DATE INITIATED:</b> 10/28/2013		
	<b>DATE DECIDED:</b> 12/03/2013		
	<b>REFERENCE:</b> Dist 232 App 16 Multiple Applications		
	<b>DECIDED BY:</b> John Endahl		

40  <b>Electronic Apps SSN</b>	<b>TOPIC:</b> SSN on electronic Apps = NONE	<b>PROBLEM:</b> If SSN = None on an electronic application, would this be coded a 2 or 3?  SFAElig and FNSElig both = 1.	<b>RESOLUTION :</b>  SSN=2; there is no processing error.
	<b>DATE INITIATED:</b> 12/03/2014		
	<b>DATE DECIDED:</b> 12/03/2014		
	<b>REFERENCE:</b> Global Electronic applications		
	<b>DECIDED BY:</b> WESTAT TEAM		

<b>41</b>  <b>No income listed</b>	<b>TOPIC:</b>  <b>Blank and/or no indication of no Income</b>	<b>PROBLEM:</b>  In the latest eligibility manual (2013), it states that each household member who does not have income must indicate zero income on the application. It is possible, based on prior years, that the applicant will leave the income portion blank with no other indication. In these instances, should we consider the income as missing rather than zero? If it is an income based application does it become PAID for being incomplete?	<b>RESOLUTION :</b>  For income applications (those without SNAP/TANF case numbers), if the income portion is left blank (i.e., no 0's in the income section or no indication that the household member had zero income) then that application should be viewed as incomplete and the certification status should be "PAID".  If on the other hand, the application contains income for some household members but the income section is left blank for other household members (i.e., no 0's or an indication of zero income), that application should NOT be viewed as incomplete, but there should be some flag that an administrative error has occurred.  FNS is interested in both the number of applications that have zero income as well as the number of applications where there is no indication of income for some household members
	<b>DATE INITIATED:</b>  10/20/2014		
	<b>DATE DECIDED:</b>  10/23/2014		
	<b>REFERENCE:</b> Global Issue		
	<b>DECIDED BY:</b>  John Endahl		

<p>42 New Variables and coding changes.</p>	<p><b>TOPIC:</b> Additional variables for abstraction and analysis</p> <p><b>DATE INITIATED:</b> 10/23/2014</p>	<p><b>PROBLEM:</b></p> <p>Westat will be adding additional variables to our abstraction efforts this year to answer additional research questions.</p>	<p><b>RESOLUTION :</b></p> <p>The new variables and coding are:  <b>Inclnc</b>= Incomplete Income (for income based applications).  <b>CatInc</b>= if the application is categorically eligible and the SFA uses income to make the determination.  <b>CompP</b>=there is a computer printout attached to the application  <b>EA</b>= Electronic Application  <b>CatElig</b> adding choice (4) Other Source Categorically Eligible  <b>MixHH</b> - Mixed Household application</p>
	<p><b>DATE DECIDED:</b> 10/23/2014</p>		
	<p><b>REFERENCE:</b> DL 102</p>		
	<p><b>DECIDED BY:</b> Westat Team MK and AR</p>		

<p>43</p> <p><b>HHSize Foster Child</b></p>	<p><b>TOPIC:</b></p> <p>Foster Child Coding confirmation</p>	<p><b>PROBLEM:</b></p> <p>For a foster child application, does the household size remain as 1?</p>	<p><b>RESOLUTION:</b></p> <p>A foster child is categorically eligible for free meals without further application. For purposes of determining eligibility for free or reduced price school meals for other children in the household, the foster child is considered a member of the household in which the other children reside. The foster child's income is only considered when the foster family applies for meal benefits for the non-foster children in the household.</p> <p>For an individual foster child application, the household size should remain 1. If the sample student on a mixed application is identified as a foster child, then the household size should be 1 and income of 0.</p>
	<p><b>DATE INITIATED:</b></p> <p>10/20/2014</p>		
	<p><b>DATE DECIDED:</b></p> <p>10/23/2014</p>		
	<p><b>REFERENCE:</b></p> <p>Global Issue</p>		
	<p><b>DECIDED BY:</b></p> <p>John Endahl</p>		

<p>44</p> <p><b>Frequency variable clarification</b></p>	<p><b>TOPIC:</b></p> <p>Follow up question on missing income frequency and application status</p>	<p><b>PROBLEM:</b></p> <p>Based on decision log item # 31, we have been considering any frequency of income that is missing to result in an incomplete application and PAID status. Your comments seem to indicate that we should use logic and review on a case by case basis. Please confirm.</p>	<p><b>RESOLUTION:</b></p> <p>Having discussed this with CN, we are in agreement that if the frequency of income is missing but the SFA can logically deduce the frequency one should not automatically record this as an incomplete application. The SFA should have contacted the household to confirm the income frequency. But if the income is sufficiently high to make the assumption that the income is an annual figure or is such that even if the income was assumed to be weekly and the household is still eligible for free meals, then that logic should prevail.</p>
	<p><b>DATE INITIATED:</b></p> <p>11/21/2014</p>		
	<p><b>DATE DECIDED:</b></p> <p>11/21/2014</p>		
	<p><b>REFERENCE:</b></p> <p>DL 31</p>		
	<p><b>DECIDED BY:</b></p> <p>John Endahl</p>		