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Evaluation of the School Meal Data Collection Process

Final Report

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Executive Summary

The Evaluation of the School Meal Data Collection Process study describes and evaluates the methodologies and processes used by schools, school food authorities (SFAs) and State agencies to collect and report data on three FNS forms used for the Federal school meal programs: the *Report of School Program Operations* (FNS-10), the *SFA Verification Collection Report* (FNS-742), and the *State Agency Direct Certification Rate Data Element Report* (FNS-834). In addition to describing the processes, the study identifies potential sources of error when completing the three forms, and provides useful practices and recommendations for improving data collection processes to increase the accuracy of program data.

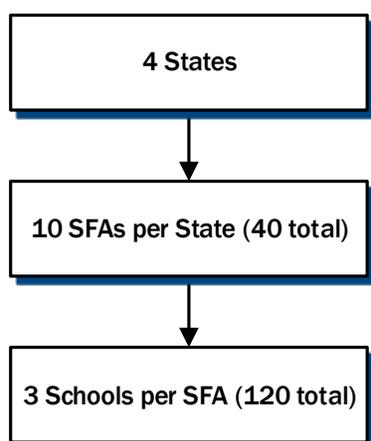
The study includes the following research objectives:

1. Document the process schools and SFAs use when submitting data used for the FNS-10;
2. Document the process SFAs use when completing the FNS-742;
3. Document the process States use when compiling data for and completing the FNS-10, FNS-742, and FNS-834; and
4. Provide a set of recommended practices for accurately and validly completing the FNS-10, FNS-742, and FNS-834.

Background and Study Design

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) are Federally-funded meal programs operating in public and non-profit private schools and residential child care institutions (RCCIs). Approximately 30 million students in about 100,000 public and non-profit private schools and RCCIs receive school lunches through the NSLP, and more than 14 million students receive school breakfasts through the SBP every school day. The Food and Nutrition Service (FNS) provides cash reimbursement for meals served in schools that meet specified nutrition standards. While FNS administers and provides directives for these school meal programs, most of the data collection and reporting originates in schools or the school food authorities (SFAs) that oversee the schools, flows up to States, and ultimately to FNS. The three FNS forms that are the subject of this study provide important information to support claims for reimbursement, and assess SFA and State performance in key program requirements.

Figure ES-1. Study sample



This process study collected data through in-person qualitative interviews with respondents across four States: Alabama, New York, Oklahoma, and Wyoming. Respondents in each State included State directors and staff from the NSLP State agency and the Supplemental Nutrition Assistance Program (SNAP) State agency, 10 SFA directors, and 30 school food managers (see Figure ES-1).

Findings

Below we present high-level information on the processes used by schools, SFAs and State agencies to collect, review and submit data for each of the three forms. For additional information on the most common processes and points of divergence among States, see the process maps in Appendices A and B.

FNS-10

The FNS-10 is a State-level form that primarily reports monthly meal counts for the NSLP, SBP and Special Milk Program (SMP). Meal counts are predominantly collected by schools at the point of sale (POS) when a student checks out with his/her tray. Most schools in the study (96 of 114) use an electronic process to collect and record meals. In 89 of these schools, students check out at the point of sale by entering a PIN.

Over half of the schools (65 of 114) maintain paper records of some kind. In most cases, these serve as backup documentation or support meal services outside of the cafeteria. Nineteen of the 114 schools maintain paper records for their SBP, afterschool snacks, and/or SMP, even the schools that electronically record meals at the POS during lunch.

All of the schools in the study express confidence in their ability to provide accurate meal counts. Mistakes that could occur were most frequently attributed to human error or systems and software failures.

The vast majority of SFAs (34 of 39) receive lunchtime meal counts from their schools via a shared data system. For some SFAs, the school data are accessible in real-time; for others, the school food managers must manually click “submit” before the SFA can view the meal count data. A handful of SFAs note that they receive paper or Excel records from schools for the SBP (especially breakfast-in-the classroom), afterschool snacks, and/or the SMP, and following system failures. In addition to meal counts, SFAs also collect data from schools in order to calculate Average Daily Meals (ADM).

All SFAs have processes in place to review the meal counts from their schools before they submit the data to their NSLP State agency. Between automated edit checks, their visual review, and the review and checks conducted at the school-level, SFA directors also express confidence in the accuracy of the meal counts.

All SFAs manually enter meal counts and submit the claims for reimbursement through their NSLP State agency’s online portal; none of the State systems accept file uploads directly from the SFAs’ data systems. Similar to SFA data systems, the State-level Child Nutrition (CN) portals contain automated edited checks and flag suspected errors. The State-level review involves examining the results of the automated edit checks; there are rarely additional items that the States need to address. State agencies provide examples of three areas where they have concerns about data quality:

- (1) paper meal counts from RCCIs;
- (2) Seamless Summer Option (SSO) meal counts; and
- (3) software glitches that cause errors.

FNS-742

The FNS-742 provides FNS with annual information on the results of SFA certification and verification for free and reduced price meals, including direct certification, for every SFA that participates in the NSLP and/or SBP. SFAs collect data for the FNS-742 from a variety of sources. The majority of SFAs track and store household applications, verification information, and direct certification data electronically. SFAs that receive hard copies of household applications or supporting documentation for verification typically enter the data into their data system and store the hard copy as backup. In SFAs with a completely manual or paper process for collecting and processing applications, SFAs create a system to record the results of verification efforts.

Reviewing and checking the data happens within the data system in the form of an electronic edit check, followed with a visual inspection by SFA staff. All SFAs submit their FNS-742 data to the State by manually entering the data into the online State portal. Similar to the SFAs' data systems, the State CN portals contain edit checks that trigger an error message when there are suspected errors. State agencies review the SFA data using the edit checks built into their systems and the FNS Excel edit check tool. State agencies upload their FNS-742 data to FPRS. States have evolved to program their forms and collect data in a way that is most compatible with FPRS to increase ease and efficiency for them and their SFAs.

Three categories emerge as the most common mistakes or challenges associated with the FNS-742: timing and delays, human error in data entry, and confusion on the FNS-742 form and/or processes. Having two dates associated with data for the household applications (Section 4 of the form)—the first day of October for number of applications and the last operating data of October for number of students—causes particular confusion for SFAs. SFAs are required to pull a sample of household applications for school meals and verify the information provided unless all of an SFA's schools and RCCIs are exempt from verification. Section 5 and Section VC-1 of the FNS-742 provide the results of verification activities, and SFAs report the former to be the most confusing section of the form. Finally, States report that SFAs with “mixed” CEP and non-CEP schools are also more prone to making errors on the form, because some sections will only apply to certain schools. SFAs and State agencies had several specific suggestions for revising the FNS-742 form and instructions to improve clarity and reduce potential errors, including simplified guidance to support the certification and verification processes on which the data are based.

FNS-834

The FNS-834 provides annual data from NSLP and SNAP State agencies that FNS uses to help assess how effectively direct certification with SNAP is implemented. Overall, States say the FNS-834 is straightforward and easy to produce. They mention a few challenges to identifying all children in eligible households, which hinder their ability to produce more precise counts, including homeschooled children and children in pre-K. States indicate no issues with producing an unduplicated count of children. Although they acknowledge that incorrect parameters could be sent to the data units in the State pulling the information, they believe these types of mistakes are always caught.

Common Mistakes and Challenges

FNS-10

- *Systems and software failures*
- *Human error*

FNS-742

- *Timing and delays*
- *Human error*
- *Confusion on the form and/or process- in specific sections 3, 4 and 5*

FNS-834

- *Identifying all children in eligible households to produce precise counts*

Useful Practices

Respondents note several useful practices that improve data accuracy associated with the three FNS forms. These practices streamline the data collection processes and increase the accuracy of reports.

FNS-10

- At the school and SFA levels, use an integrated electronic meal counting system with backup paper rosters at the POS terminal in the event of unexpected system failures.
- At the State level, customize the portal and data fields for SFA data entry as much as possible based on each SFA's particular circumstances.

FNS-742

- At the SFA level, increase automation and reduce manual processes for the collection and processing of household applications and verification data, whenever possible.
- At the State level, ensure SFAs have access to and are aware of plain-language, step-by-step training, instructions and program materials about the certification and verification processes and reporting.
- At the State level, customize the portal for reporting FNS-742 data to mirror FPRS.

FNS-834

- At the State level, foster collaborative relationships between staff in the NSLP State agency and the SNAP State agency.

Overall Recommendations

The following high-level recommendations are based on findings from the study interviews and may help improve reporting processes and data accuracy:

1. Cognitively test future changes to FNS forms and instructions with a diverse range of program operators, before the changes are implemented.
2. Ensure that the software companies that create the data systems for schools and SFAs are aware of and fully understand program requirements and changes.
3. Increase promotion of available toolkits and program materials associated with the certification and verification process, in particular the recently-issued Verification Toolkit.
4. Target support and training for teachers and other non-foodservice staff serving program meals outside of the cafeteria.
5. Provide case-by-case flexibility to State agencies in applying the SNAP Direct Certification threshold standard.

1. Introduction and Study Background

The purpose of this study, the Evaluation of the School Meal Data Collection Process, is to describe and evaluate the methodologies and processes used by schools, school food authorities (SFAs) and State agencies to collect and report data on three FNS forms used for the Federal school meal programs: the *Report of School Program Operations* (FNS-10), the *SFA Verification Collection Report* (FNS-742), and the *State Agency Direct Certification Rate Data Element Report* (FNS-834). In addition to describing the processes, the study identifies potential sources of error when completing the three forms, and provides useful practices and recommendations for improving data collection processes to increase the accuracy of program data. Appendices A and B include process maps that illustrate how data are collected, reviewed and submitted to FNS.

1.1 Background

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) are Federally-funded meal programs operating in public and non-profit private schools and residential child care institutions (RCCIs). There were approximately 30 million students in about 100,000 public and non-profit private schools and RCCIs receiving school lunches through the NSLP every school day in Fiscal Year (FY) 2017, with approximately 22 million receiving meals free or at a reduced price.¹ That same FY, about 14.6 million students were served daily through the SBP, with more than 12.4 million of these students receiving free or reduced-price meals.² Through State administering agencies, the U.S. Department of Agriculture (USDA) provides SFAs that operate the meal programs for their respective local educational agencies (LEAs) varying levels of cash reimbursement for meals served that meet program requirements.³ Together, these programs received approximately \$17.9 billion in federal funds in FY 2017.⁴

¹ <https://fns-prod.azureedge.net/sites/default/files/pd/slsummar.pdf>

² <https://fns-prod.azureedge.net/sites/default/files/pd/sbsummar.pdf>

³ LEAs also receive commodity support, commonly referred to as USDA Foods, for each lunch served.

⁴ <https://fns-prod.azureedge.net/sites/default/files/pd/cncost.pdf>

USDA's Food and Nutrition Service (FNS) administers the NSLP and SBP at the federal level. At the State level, State agencies, typically State Departments of Education or Agriculture, operate the programs through agreements with SFAs.⁵ The school meal programs are delivered to children in schools within these SFAs. Under typical meal counting and claiming procedures, schools record program meals served to each individual student at the point of sale. Federal reimbursement is provided at the free, reduced price and paid levels based on the income eligibility status of each student's household. The SFA documents income eligibility status either by directly certifying the student by obtaining proof from another agency of the household's participation in a federally means-tested program such as the Supplemental Nutrition Assistance Program (SNAP), or through completion by the household of an income application. SFAs verify a small percentage of the household applications by requesting documentation from households to support their income. Schools or groups of schools serving a high percentage of low-income children may choose to use alternate meal counting and claiming procedures under Provision 2, Provision 3 or the Community Eligibility Provision (CEP). Under these alternatives, schools count total meals served and receive Federal reimbursement based on claiming percentages (Provision 2), prior reimbursement levels (Provision 3), or the number of students directly certified (CEP).

1.2 Purpose of the FNS Forms

While FNS administers and provides directives for the school meal programs, most of the data collection and reporting originates in schools or SFAs, flows up to States, and ultimately to FNS. The three FNS forms that are the subject of this study provide important information to support claims for reimbursement, and assess SFA and State performance in key program requirements (the forms can be found in Appendix C). The purpose of each form's data and frequency of submission to FNS are described below. State agencies submit the data for these forms via the online FNS Food Programs Reporting System (FPRS), and Table 1-1 displays the dates by which States must submit data for each form to FNS.

⁵ Local educational agencies (LEAs) typically sign agreements with the State agency on behalf of SFAs. SFAs are the entity that administers the School Meal Programs. In most cases, LEAs and SFAs are part of the same entity.

Table 1-1. Due dates by form

Form	Data element	Date due to FNS
FNS-10	5 through 9	<ul style="list-style-type: none"> Monthly, 30 days following the month being reported (“actual” data from claims on hand, and “estimated” data for claims not yet received or validated) Monthly, 90 days following the month being reported (complete “actual” data only, no estimated values)
	10 through 16 17	<ul style="list-style-type: none"> Annually, 30 days following the last operating day in October Annually, 30 days following the last operating day in July
FNS-742	All	<ul style="list-style-type: none"> Annually, March 15
FNS-834	All	<ul style="list-style-type: none"> Annually, December 1

The FNS-10 form, the *Report of School Program Operations*, is a State-level form that includes information on the number of meals served in the NSLP, SBP, and SMP, and average daily meals. The meal counts on the FNS-10 support the Federal reimbursement paid by State agencies to SFAs. State agencies submit these data to FNS on a monthly basis. The FNS-10 also includes annual information, for the month of October, on the number of meals served in the programs in private schools and Residential Child Care Institutions (RCCIs), the number of schools operating each program, and the number of children approved for free lunches and reduced price lunches in the State.

The FNS-742 form, the *SFA Verification Collection Report*, is an annual SFA-level form that provides information on the certification and verification processes for determining eligibility for free and reduced price meals, the total number of schools within each SFA, enrollment, and the number of schools operating Provision 2, Provision 3 and CEP, for each SFA that operates the NSLP and/or SBP. FNS uses the direct certification data from the FNS-742 to help calculate each State’s SNAP direct certification rate.

The FNS-834 report, the *Direct Certification Rate Data Element Report*, is submitted by both SNAP State agencies and NSLP State agencies annually. SNAP agencies report on the number of school age children receiving SNAP benefits during a specific period, and NSLP agencies report on the number of students in Provision 2, Provision 3 and CEP schools that receive SNAP benefits (as matched between school enrollment records and SNAP eligibility records). FNS uses this report in the calculation of each State’s annual direct certification rate for students in households receiving SNAP.

1.3 Research Objectives

The research objectives for this study relate to assessing how entities at each of three levels of the program—schools, SFAs, and States—collect, aggregate, process, validate and transmit data about the school meal programs. The ultimate objective is to understand the likely sources of error within each of these functions at each reporting level, and to provide recommended practices for improving the processes to increase the accuracy of school meal program data. Specifically, this study:

1. Documents the process schools and SFAs use when submitting data used for the FNS-10;
2. Documents the process SFAs use when completing the FNS-742;
3. Documents the process States use when compiling data for and completing the FNS-10, FNS-742, and FNS-834; and
4. Provides a set of recommended practices for accurately and validly completing the FNS-10, FNS-742, and FNS-834.

2. Study Methodology

In this chapter we describe the methodology employed in the process study. We designed the process study to assess how each school, SFA, and State agency collects, reviews, and submits data for the three FNS forms, and produce recommended practices for accurately completing the forms.

2.1 Data Sources

The process study collected data through in-person qualitative interviews with respondents across four States. Between February and May 2018, the study team interviewed 166 staff from different entities across the four States, including NSLP State agency staff, SNAP State agency staff, SFA directors, and school food managers. Table 2-1 provides a breakdown of the number of entities in each category.

Table 2-1. Number and types of entities recruited and interviewed

Respondent entity	Form discussed	Target number	Number interviewed
NSLP State Agency	FNS-10, FNS-742, FNS-834	4	4
SNAP State Agency	FNS-834	4	4
SFAs	FNS-10, FNS-742	40 (10 per State)	39*
Schools	FNS-10	120 (3 per SFA)	119*

*One respondent from each of these entities ultimately declined to participate.

Interview guides included questions and probes to address the four study objectives, and covered topics such as the process for recording meals at the point-of-sale in school cafeterias, the software or other methods used to record and submit meal counts, the guidance received, and the challenges and facilitators. With permission from the respondents, the interviews were audio recorded and transcribed. Interviews lasted between 20 and 90 minutes depending on the participant, with school-level interviews being the shortest.

2.2 State-level Sampling

The State selection process began with input from FNS about States to consider, including information on State processes and procedures of interest and unique State characteristics related to

systems or reporting. FNS identified eight States with unique processes and/or characteristics of interest. The following criteria were identified and applied to those eight States:

1. **State Size** – We used FY 2017 data on the initial State Administrative Expense (SAE) allocation amounts for school meal program administration to categorize the States as large (top third), medium (middle third), or small (bottom third). The initial SAE allocation is an appropriate measure of program size because the allocation formula incorporates program expenditure data that account for the number of meals and the number of SFAs, among other factors, to distribute funds. As noted, we only used amounts allocated to States for school meal programs, since those programs are the subject of this study.
2. **Use and Types of Management Information Systems (MIS)** – We researched whether States’ MIS were built by a commercial vendor or in-house, and the extent to which the SFA and State systems are integrated. We focused on the systems in place for States to conduct direct certification and collect school meal counts (FNS-10) and verification data (FNS-742) from SFAs.
3. **Direct Certification Systems and Performance** – We identified each State’s most recent direct certification with SNAP performance rate, and also determined whether the direct certification process for each State is primarily a State-level match or local-level.
4. **Geography** – We sought to select States in at least three FNS regions to ensure that any differences based on that factor would be reflected in the case studies.

We used these criteria to select four States: Alabama, New York, Oklahoma, and Wyoming. Two States initially selected for the study requested to be excluded from the study due to extenuating circumstances. With FNS concurrence, Alabama and New York were selected as replacements in order to maintain State-level diversity by size, geography, and type of MIS.

2.3 SFA-level Sampling

The SFA selection process began with a review of School Year (SY) 2016-2017 FNS-742 data for every SFA in the four selected States. In our review, we identified data elements of interest, including the number of enrolled students and number of schools within each SFA, the number of schools operating CEP, Provision 2 or Provision 3 in base and non-base years, the number of students directly certified via SNAP and other programs, the number of students eligible for free and reduced price meals, and public/private status, among others.

Within each selected SFA, we planned to interview three school food managers, each at a separate school. Therefore, we removed from consideration all SFAs with fewer than three schools. We then grouped the SFAs within each State into thirds (small, medium and large) by their total number of enrolled students to ensure we included SFAs of varying sizes within each State. We took that narrowed list of SFAs and used ArcGIS⁶ to map their locations and color-code them by size. This allowed us to identify clusters of SFAs across each State around which we could plan the site visits.

A handful of SFAs declined to participate, which required the selection of alternate SFAs. Additionally, a few SFAs initially selected for the study were administered centrally by an Educational Service Center in the State. We replaced some of these SFAs to ensure diversity, as these SFAs followed the same procedures and were overseen by the same person serving as the SFA director. We followed the same selection process outlined above to select alternate SFAs that possessed similar characteristics as those originally selected in order to maintain overall diversity of respondents.

2.4 School-Level Sampling

After an SFA agreed to participate in the study, we contacted the SFA director by telephone and/or email to discuss and identify three schools for visits. We requested to visit one elementary school, one middle/junior high school, and one high school within each SFA. The directors provided contact information for the school food managers, as well as information on travel distances and school schedules (many of our site visits occurred over spring break and close to the end of the school year).

2.5 Analytic Approach

After reviewing the interview transcripts, a detailed coding scheme and codebook were developed to facilitate the content analysis. All interview transcripts were uploaded to NVivo 11 (qualitative analysis software) along with the coding scheme. The team used the coding scheme to categorize and organize the data by form, entity, process step (e.g., data collection, data review, data revision, data submission), and meal type (e.g., breakfast, lunch, snack, milk). The coding scheme also allowed

⁶ A geographic information system.

for double coding with valance codes to indicate factors that served as a challenge or a facilitator, and situations where a process differed by meal type (e.g., the process for collecting the meal count for breakfasts served in a school differed from the process for lunch).

Classification sheets were created to summarize the procedural steps completed by each respondent type for each form. For example, the classification sheets required that coders select from a dropdown menu to indicate whether each SFA director submits meal count data to the State by 1) directly uploading a data file to the State portal; 2) emailing a data file to a State contact; or 3) manually entering the meal count data into the State portal. Ultimately, those classification sheets provided tallies of the most common procedural steps for each form.

After coding the data, queries of the data were run to produce code reports that mapped closely to the final report outline. Staff reviewed and analyzed all code reports pertaining to that form using a shared analytic template to compile the data on each theme as well as any contradictory evidence. That analysis yielded a list of common themes, and provided insight into when and how processes differ by subgroups. Additional queries and matrix queries were run, as needed, to delve deeper into the data to explore particular themes and how they vary.

3. Processes for the FNS-10

In this chapter we describe the processes used by schools, SFAs and State agencies for data that are reported to FNS on the FNS-10, the *Report of School Program Operations*. We also describe the support that schools, SFAs, and States receive in collecting and reporting these data, the areas where respondents feel mistakes are most likely to occur, and respondents' suggestions for improvement. Appendix A provides a process map that illustrates the processes described below.

3.1 Purpose of the Form

The FNS-10 is part of the accounting system through which FNS collects monthly data on the operation of the NSLP (including afterschool snacks), SBP and SMP. The FNS-10 is a State-level form that NSLP State agencies submit to FNS monthly. Part A of the FNS-10 (data elements 5-9) includes information on the number of meals and average daily meals served in these programs in a State for the month reported. The meal counts are broken out into the three levels of federal cash reimbursement: free, reduced price, and paid.

Schools serving meals through the programs operate either paper-based or electronic “meal counting and claiming” systems (some do both) that tally up on a daily basis every lunch, breakfast, afterschool snack (and half-pint of milk for the SMP) served to students that meets USDA nutrition standards. These meal counts, when aggregated for a month across all SFAs in the State, constitute the basic data provided on the FNS-10. Because it can take time for schools and SFAs to determine final, validated counts of meals, the FNS-10 allows reporting of both actual and estimated counts: 30-day reports may contain estimated meal counts; all meal counts must be actual, final counts by the 90-day report. Beyond the basic reimbursements for free, reduced price, and paid meals, in certain circumstances SFAs and/or their schools can receive additional reimbursement if they are especially needy (NSLP), if they are severe need (SBP), or if they are certified for performance-based reimbursement (NSLP). The FNS-10 provides a means to account for this additional reimbursement.

While the data in Part A of the FNS-10 are reported monthly, State agencies also report certain data annually, for the months of October (data elements 10-16) and July (data element 17), via Part B of

the FNS-10. These data include the number of meals and average daily meals served in private schools and Residential Child Care Institutions (RCCIs) in the NSLP and SBP, in the free, reduced price and paid categories. Part B also includes the number of public schools, private schools, and RCCIs operating NSLP, afterschool snacks, SBP, and SMP during the month of October, and their enrollment. Finally, Part B includes the State’s total number of children approved for free lunches and reduced price lunches in October, and the number of nonprofit summer camps serving milk in the SMP during the month of July. The deadlines for these various data elements are shown in Table 3-1.

Table 3-1. Data submission timeline for FNS-10

Data element	Data content	Due date
5 through 9	<ul style="list-style-type: none"> Total number of meals served each month in the NSLP, SBP, and SMP 	<ul style="list-style-type: none"> Monthly, 30 days following the month being reported (“actual” data from claims on hand, and “estimated” data for claims not yet received or validated) Monthly, 90 days following the month being reported (complete “actual” data only, no estimated values)
10 through 16	<ul style="list-style-type: none"> Number of meals served in private schools and RCCIs participating in the NSLP and SBP Number of public schools, private schools, and RCCIs operating NSLP, afterschool snacks, SBP, and SMP during the month of October, and their enrollment 	<ul style="list-style-type: none"> Annually, 30 days following last operating day in October
17	<ul style="list-style-type: none"> Number of nonprofit summer camps serving milk in the SMP during the month of July 	<ul style="list-style-type: none"> Annually, 30 days following last operating day in July

The data on the FNS-10 originate within each school at the level of each meal served. Data are aggregated, reviewed by intermediate administrative entities known as SFAs and then by each State’s NSLP State agency. From there, data are submitted to FNS via FNS’s FPRS. All of these steps may be completed manually or automatically by electronic systems (see Table 3-2). Because the form provides the basis for making the reimbursements that flow from the Federal government to States, and from the States to SFAs, the FNS-10 is intrinsic to the operation of the school meal programs.

Table 3-2. FNS-10: Common manual and automated processes

Common manual processes	Both manual and automated	Common automated processes
<i>School Level</i> <ul style="list-style-type: none"> • Data Revisions 	Data Review: All levels	<i>School Level</i> <ul style="list-style-type: none"> • Data collection at the point-of-sale (POS) • Data submission to SFA
<i>SFA Level</i> <ul style="list-style-type: none"> • Data Revisions • Data submission to State 		<i>SFA Level</i> <ul style="list-style-type: none"> • Data collection via data system
<i>State Level</i> <ul style="list-style-type: none"> • Data submission to FNS 		<i>State Level</i> <ul style="list-style-type: none"> • Data collection via State online portal

In the following sections of this chapter we discuss the processes and procedures that schools, SFAs, and States use to collect, review, and report on school meals for the FNS-10. The bulk of the discussion focuses on the NSLP; when applicable, we indicate differences in procedures for the SBP, afterschool snacks, and SMP.

3.2 School-level Data Collection

Meal counts are collected by schools at the point of sale (POS) when a student checks out with his/her tray. Data from 114 school food managers⁷ reveal a number of similarities in counting and processing school meals across the four States (see Table 3-3). Most schools (96 of 114) use an electronic process to collect and record meals, starting with the way that students are identified at the POS.

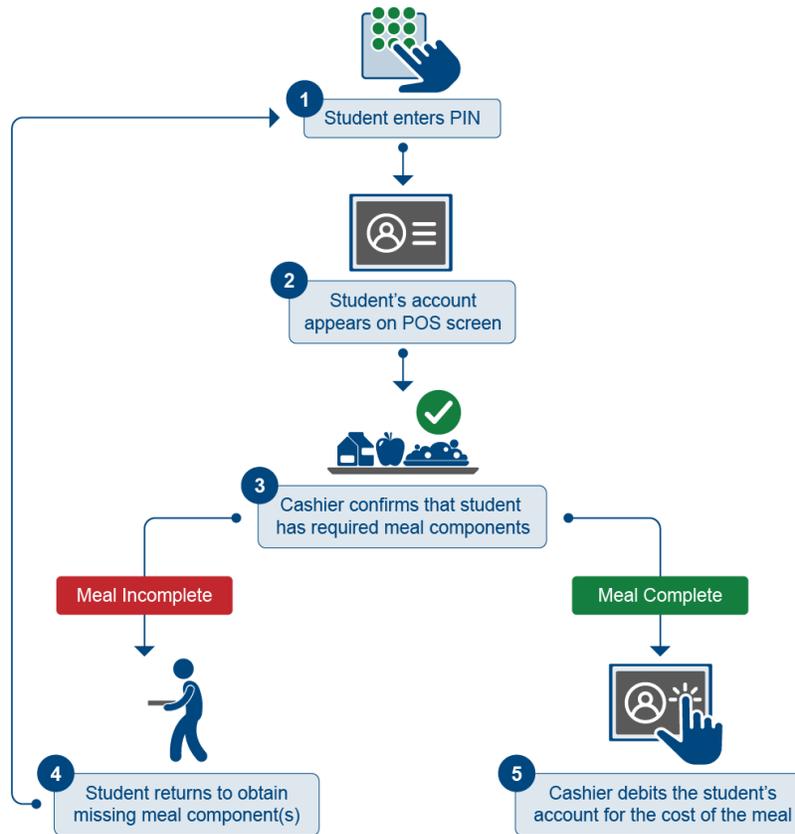
Table 3-3. How students are identified at the point of sale

Check-out option	Number of schools (114)
Enter PIN	89
Swipe ID card	7
Student name and/or ID recorded by paper	4
Other	9
Unclear	5

Figure 3-1 illustrates the most common process that students follow to check out with their meal at the point of sale.

⁷ Notes and transcripts were available for 114 interviews, although 119 school food managers were interviewed.

Figure 3-1. Process students follow to check out with their meal at the point of sale



Not all schools use an electronic process. Eleven of the 114 school food managers interviewed report that they initially record lunchtime meal counts on paper, as shown in Table 3-4. They do this in at least one of the following ways:⁸

- Cashier writes down the student's name;
- Cashier checks student's name off of a paper roster;
- Cashiers use a manual clicker or tally device to count the number of children who eat; or
- Student checks his/her name off of a paper roster.

⁸ Some school food managers report using multiple methods to collect meal counts by hand in order to verify the counts.

Table 3-4. Method of meal count data collection by school type

Methods	All schools (114)	Urban (49)	Rural (65)	Non-special provision schools (74)	Provision 2/3 schools (11)	CEP schools (29)
Meal counts are electronic	97	41	56	69	5	23
Meal counts are paper-based	11	5	6	1	6	4
Meal counts are paper-based and electronic	5	2	3	4	0	1
NA	1	1	0	0	0	1

With an average of 282 students, all of the schools that initially record meal counts on paper have relatively small student populations,⁹ and the school food managers feel that it is more efficient to put a check mark next to a student’s name during a busy lunch period than pull up each student’s account on a computer. At one school, for example, a single staff person cooks, serves, and acts as cashier, and cannot operate a computer while also tending to their other tasks. When the meal period is over, half of the school food managers enter the counts into their electronic data system and submit to the SFA; the other half send their paper records to the SFA director via interoffice mail.

Of the eleven schools that record lunchtime meal counts by paper at the POS, ten are special provision schools (i.e., those utilizing CEP or Provisions 2 or 3). A likely explanation for this is that all students in special provision schools may receive free meals, which makes the total meal count more important than precise counts for each eligibility status (non-special provision schools must capture the latter). Food managers at special provision schools simply need to be able to identify each child who receives a meal.

Over half of the schools (65 of 114) maintain paper records of some kind. This includes those schools that record meal counts electronically at the POS. Schools cite three primary reasons for maintaining paper records:

1. System outages due to storms or malfunctioning equipment;
2. New students do not appear immediately in the POS system; and
3. A different process is needed for the SBP, afterschool snacks, and/or SMP.

⁹ This is roughly half the national average for public schools: <https://nces.ed.gov/pubs2012/2012325rev.pdf>; <https://www.publicschoolreview.com/average-school-size-stats/national-data>

When power goes out or electronic equipment malfunctions, school food managers use paper records and enter the information into the data system later when it becomes operational. One manager indicates that those kinds of outages mean lost money for the school, because they may not be able to record all student names during the busy lunch period. Thus, they cannot link those students to a meal in their system when it comes back online: *“If they can’t go back and track those 50 meals, we’re out 50 meals.”*

Six schools keep paper records when there are delays in adding new students to the student POS system. This is not a problem at the start of the school year, but rather when new students move to a school district in the middle of the school year. It may take a few days for school administrators to add a student to the student POS system, including their eligibility status for school meals. Until those students appear in the system, the school food staff record the student’s name and the meal(s) they receive on paper, and enter the data in their system when the student’s account is activated.

Finally, nineteen of the 114 schools maintain paper records for their SBP, afterschool snacks, and/or SMP, even the schools that electronically record meals at the POS during lunch. Most commonly among these schools, the meal staff pre-prepare and deliver those meals or snacks directly to the classrooms, and the teachers use a paper roster to mark each student who receives food. This process requires training teachers to record each student who receives a meal. Two schools indicate that they occasionally use paper records for the SBP and SMP simply because it saves time, but note that this is not the norm. One of them said, *“sometimes, if it’s really busy, then I will just write ‘milk.’ And those kids that have a milk, I will just write their number and get them going instead of having to click, and unclick, click, and unclick [in the POS system].”*

Seventeen school food managers and two SFA directors note improvements in the quality of the meal count data following the adoption of POS software. Some of these changes occurred over five years ago, but staff still recall the more laborious and stressful paper-and-pencil methods of manual data collection, and tallying meal counts by hand. Now, says one school food manager, the process is simpler and more accurate: *“There’s no chance of it getting [the meal counts] twisted because it’s done at the register and those are the numbers that go all the way through.”* The SFA directors agree that there are fewer errors now that their schools utilize electronic POS systems.

3.3 School-level Data Review

Most schools review their meal counts at the end of each day and before submitting the data to the SFA. Thirty-six of 114 schools compare their paper and electronic records prior to submission, twenty-nine schools exclusively review electronic records, and six exclusively review paper records.¹⁰ Most of the time, the end-of-day review is a spot-check of the daily totals by the school food manager to confirm that none of the counts deviates significantly from the norm. When counts do differ significantly from one day to another, managers say the reason is often a field trip or other large student absence.

School food managers also compare meal counts from different sources or from different meal periods to confirm their totals prior to submission. One school food manager described how she compares the breakfast count to the lunch count to help her spot any errors:

This morning, after breakfast, I will write my count down. And then whenever we're doing our day end, I compare my number and if I see, well like this morning, we had 128 on breakfast. Well, at lunch, whenever I looked at that number it had 130. So I knew by that somebody's lunch had been counted as a breakfast so I had to go back through and find it. And then cancel that out and go and change it or re-count them at lunch. But that's really the only discrepancy I ever really come across.

Schools with multiple types of records may also compare their totals to confirm the meal count. For example, schools that maintain both paper and electronic records can compare the paper tallies to the number in their data system to confirm that they match. Schools also maintain written production records of the foods prepared and served, and those can serve as another check of the meal count data. One school food manager pulls in multiple sources to check her counts, saying “I run a few different reports. I run the cashier report, the deposit report, the item summary, and the transaction summary...So that's sort of when you look at it and see if something doesn't look right.”

Not all school food managers review their meal count data prior to submission. This may reflect the faith food managers have in their processes, and part of their confidence may stem from the edit checks built into the electronic POS systems. For example, when a student checks out with a meal, his/her picture appears on the screen after entering their PIN or swiping their ID card. That aids in correct identification and prevents students from using another's PIN. School food managers also

¹⁰The remaining schools we interviewed did not comment on their process specifically enough to allow us to categorize their responses.

reference the following edit checks built into their POS systems that flag potential errors at the point of sale:

- Students entering their PIN a second time;
- Students purchasing a second breakfast or second lunch;
- Incorrect PIN format; and
- A PIN entered for a student from another school within the same district.

When the POS system produces a warning message and flags a potential error, the cashier must address and resolve the matter before the system will allow them to process the transaction. The only instance in which school food managers say they override a warning message is when a student is intentionally trying to buy a second meal, and students approved as reduced price or free must pay full-price for that second meal.

One common type of automatic edit check occurs after the meal period ends: a check to make sure that the school has not counted more meals than there are students in attendance. As one school food manager explained: *“There is a report that I can look at every day that would tell me if I have...rung up more meals than there are students present today. So if I’ve rung up—if I’ve got 500 students here at school today and I rung up 515 meals, it will flag it as an error.”* If the system flags this error the school food manager must review the meal data to identify and resolve the source of the error before submitting the data.

The data review process typically occurs after data collection is complete. However, the built-in edit checks and subsequent data entry revisions that schools undergo in real-time serve as an ongoing form of review. Ultimately, both methods accomplish the same goal of helping to ensure accurate meal counts.

3.4 School-level Data Submission and SFA-level Data Collection

The vast majority of SFAs in this study (34 of 39) receive lunchtime meal counts from their schools via a shared data system. Typically, the SFA and its schools share a common software package. When schools collect data electronically at the POS, the data are stored in the software. For some SFAs, the data are accessible in real-time and staff can view meal counts as students check out in the lunch line. For others, the school food managers must manually click “submit” at the end of a day

before the SFA can view the meal count data. All SFAs can see the total number of meals served in the data that schools submit, and for non-special provision schools they can also view the breakdown by student eligibility status.

Four rural SFAs receive lunchtime meal count data only on a monthly basis. Two of these SFAs receive a copy of their schools' paper meal count records via interoffice mail at the end of each month. The other two SFAs receive monthly data submissions via email from their schools. In those situations, the schools export the data from their electronic POS data systems and attach the reports as PDF or Excel documents. It remains unclear why three of these SFAs, whose schools all use the same software package to collect the data electronically, do not collect the same electronic data directly from schools' POS software systems.

A handful of SFAs, of varying sizes and locations, note that they receive paper or Excel records from schools for their SBP, SMP and afterschool snack programs and following system failures. For its SMP, one SFA director receives paper rosters of the children who received milk each day and tallies the counts for submission to the State. Another SFA director follows a similar process for their school's breakfast-in-the-classroom program. Two SFA directors note that they receive paper records with counts for all meal programs when power outages occur or the POS systems fail, and they enter the data into the software systems themselves.

SFAs' data collection processes for the Seamless Summer Option (SSO) may differ from their normal process during the school year. Six SFAs utilize the Seamless Summer Option (SSO) to provide meals when school is not in session. Of those SFAs, two collect meal count data from the SSO program using the same electronic data system used during the school year; three SFAs collect paper and pencil tallies of meals served. One SFA director describes the paper records as, *"a roster of the whole month with every child, and it's just checked [next to each child's name]."* The SFA will then tally the count and submit the data.

SFAs also collect data on Average Daily Meals (ADM) from schools, but it is not a value that the schools calculate manually. For the schools with electronic POS systems, the software calculates the ADM automatically. Then SFAs with access to their schools' electronic POS records (via a shared data system) run a report that provides this specific value for reporting. For SFAs without direct access, the school food managers generate the report using the software and provide the value to the

SFA with their monthly meal counts. The schools that collect only paper records do not calculate or provide an ADM value to their SFA, and assume that the SFA performs those calculations.

Finally, there may be delays in a school's submission of the meal count data to an SFA, but the delays are often due to technological failures. Sixteen SFAs mention occasional delays in receiving data, and 12 of them say the delays are the result of power outages or software malfunctions that prevent data transmission from a school to the SFA. In the event of a software malfunction, the SFAs call their software provider for help resolving the issue. Following a power outage, however, the data will be uploaded to the SFA when power is restored. The SFAs indicate these delays are short-lived, often resolved within a single day. As such, the delays never significantly affect the monthly meal claims. Other causes of delays that SFAs mention were unique situations, such as a new SFA staff person who did not notice that a charter school neglected to submit meal count data prior to leaving on their Winter Break. She later amended her December claim to include the charter school.

3.5 SFA-level Data Review

All SFAs have processes in place to review the meal counts from their schools before they submit the data to their NSLP State agency. The vast majority of SFAs (37 of 39) review electronic records, and half of the SFAs compare the meal count data to other school-level data. For example, SFAs mention reviewing the following sources:

- Kitchen production records;
- School enrollment data (including information on new students enrolled);
- Personal data tracking files (i.e., some school food managers maintain their own records on the meals produced and served); and
- Paper tallies or rosters for afterschool snacks, SBP, and/or SMP.

They review these other data sources to verify the accuracy of their meal counts and ensure there are no instances of over-claiming.

Two SFAs review only paper records from schools. One SFA compares the counts they receive to the number of students with free and reduced price status in each school. When asked what they look for when comparing those values, the SFA director replied, *"I'm looking for some reasonability....If*

they're coming in and saying, 'Oh, we fed 5,500 kids,' but our [average daily attendance] for that month in that school was 53. Now, there's a problem I've got to investigate." At the other SFA, the director inputs the daily meal counts into her own Excel tracking sheet throughout the month. After a month ends, she compares the meal count totals in the Excel sheet to the totals in the paper records received from schools to verify that the values match.

Half of the SFAs take advantage of the quality control tools embedded within the software they share with their schools. The various software programs contain a number of useful tools that help SFA directors to review the school-level data, such as a comparison of one month's meal count to the previous month. SFA directors also mention a number of automated edit checks embedded in the software that alert them to potential errors. For example, several SFA directors mention that the software alerts them if the number of meals counted exceeds the number of students enrolled, or if meals are counted for more calendar days than there were school days. Other SFAs have students who attend classes on more than one campus, and their system alerts them if a student's PIN is used to receive a reimbursable meal at more than one school in the same day. Between the automated edit checks, their visual review, and the review and checks conducted at the school-level, SFA directors express confidence in the accuracy of the meal counts.

3.6 SFA-level Data Submission and State-level Data Collection

The remaining steps in the process are similar across SFAs and States. All SFAs manually enter meal counts and submit the claims for reimbursement through their NSLP State agency's online CN portal; none of the State systems accepts file uploads directly from the SFAs' data systems. SFAs use their personal login information to enter the State portal, where they have access only to their schools, and they manually enter the meal counts for each of their schools and submit a claim for reimbursement. Oftentimes, SFAs' data systems will provide a report that precisely matches the format and requirements of the State system to make it easier for the SFA directors to enter the data. Overall, SFAs report that the State systems are user-friendly.

Similar to those embedded within the SFA's data systems, the State-level CN portals contain automated edited checks and flag suspected errors. This third tier of edit checks (following those at the school and SFA levels) is important because the SFA directors enter data manually; no SFA system interfaces with a State system, which would facilitate a direct transmission of data. These edit

checks resemble those embedded in the SFAs' systems, and they produce either a warning or error message. A warning message is a "soft stop" that simply alerts the SFA to a potential error, while an error message is typically a "hard stop" that alerts the SFA to an error and requires that the error be corrected prior to submission. The State systems alert SFAs to the following four types of error messages when they submit data:

1. Total meal count does not equal the counts entered for each meal type (i.e., SBP, NSLP, etc.);
2. SBP count exceeds NSLP count;
3. The meal count exceeds enrollment; and
4. The number of days with meal counts exceeds the number of school operating days.

All of these scenarios produce an error message and require SFAs to correct the error before the State systems allow them to submit data.

SFAs may also encounter the following two warning messages that alert them to a *potential error* when submitting data:

1. The claim for a school is significantly higher or lower than the previous month; and
2. The same number of meals was served by a school in the previous month.

Upon encountering a warning message, SFAs have to confirm that the information they are submitting is correct, but no revision is required. SFAs say there are times when these potential errors flagged by the system are not truly errors. A claim may vary significantly from one month to another due to large student absences for holidays, field trips, weather closures or other similar events. In these cases, SFAs will move beyond a warning message alerting them to significant changes in their claim over the previous month. Similarly, an SFA may accurately claim the exact same number of meals from month-to-month, particularly for very small schools. One SFA director has a rural school with five students, and says there is little variation in their meal counts from month-to-month. Nonetheless, the SFA director receives a warning message when entering data for that school every month, and simply confirms the information is correct before submitting.

Finally, two States mention a simplified data submission process when SFAs enter meal counts for special provision schools. One State-level staff describes how their system displays a limited version of the data entry screen to SFAs when entering data for special provision schools:

For CEP and P2 participants, they only get [a] limited screen...for a [Provision 2 school] for breakfast and lunch, we have—if it's a 10-month school, we have 10 discrete sets of claiming percentages programmed into the system for breakfast, [and] 10 for lunch. So all they do is choose the month. They are asked for enrollment, days of service, and total meals in both cases. Now for CEP [it's the same thing] programmed in there: enrollment, days of service, total meals. So there are never errors in claiming on the CEP or [Provision 2] side.

The other State reports a similar process, and says that the State portal will automatically calculate a claiming percentage for special provision schools after the SFA enters a total meal count.

3.7 State-level Data Review

The State-level review involves examining the results of the automated edit checks programmed into their State portals. Because the State portals flag errors that SFAs typically have to correct prior to submission, there are rarely additional items that the States need to address. Some States provided examples of circumstances that commonly prompt them to follow up. One State sets each SFA's Average Daily Participation (ADP) rate, and an SFA's claim is put on hold for State-level review if they exceed that rate in a particular month. State also run reports to identify unusual patterns (e.g., an SFA reports exactly 400 meals for five consecutive days). New York's system, for example, has a built-in edit check that identifies any instances where a meal claim is equivalent to total meal service days multiplied by student enrollment, which would indicate (unrealistically) that every student enrolled in the school received a meal every day of the month. When States suspect there are errors, they either call or email the SFA to discuss the error and figure out how to resolve it. Thirteen of the 39 SFA directors report that their State has followed up with them about suspected errors. If they need to correct a claim, they will revise and resubmit their data via the State portal.

3.8 State-level Data Submission

All four States manually enter their FNS-10 data into the FPRS online portal. Three States have a second staff person review and confirm the values entered in FPRS prior to submission.

Commenting on the value of that second review, one State staff person reports, “We actually have one

employee key it in and another will go behind and certify [the values are correct]. So that way you have two eyes at the State level, because there's no edit check or anything with this report when you enter it into FPRS.” Overall, States report that they find FPRS easy to use, but would like instructions written in “plain English” and with less jargon. States report that new staff, in particular, need an easy-to-understand reference that defines terms and tells them the specific data that are required in each field.

3.8.1 30- Versus 90-day Reporting

It can take time to determine final, validated meal counts for all SFAs, and the FNS-10 allows States to report meal counts at 30 and 90 days after the end of each month. The 30-day report includes both actual and estimated meal counts, whereas the 90-day report includes only final, actual meal counts. NSLP State agency staff indicate that the 30-day reports largely contain actual meal counts, and they conduct estimates only for “a few” or “no more than five” SFAs.

The NSLP State agencies’ thoughts vary with regard to why SFAs may be delayed in submitting their meal counts. One respondent reports that the few that do not submit on time are often a result of a staff person at the SFA being on leave for medical or other reasons. Two States report that the largest SFAs in their States are more likely to struggle to submit data on time. Finally, one State notes that an SFA may be delayed due to the need to combine records from multiple sources:

We have instances where you may have a school system that's also participating with childcare, the snacks and things like that, and we have to combine those claims. So you may have an instance where a school board will submit a claim and that childcare will also submit a claim and it has to be combined. That [SFA] level would have to combine it before they can process it.

In this case, a delay by either the childcare entity, the school, or the SFA equates to a delay for all.

State agencies use a variety of strategies to produce estimates for the 30-day report, such as using the meal count from the previous month or using the count from the same month in the previous school year. One State-level respondent reports that the estimates are typically accurate, and she reaches out to an SFA if the estimate differs by more than 20 percent from the actual count an SFA submits later. One such circumstance she cited was when several SFAs decided not to participate in the SSO during the summer, and she had to remove the meals she had expected those SFAs to provide through that program. The States provide explanations for any large discrepancies when they submit their 90-day reports.

No State respondent reported delays or inaccuracies with the 90-day report for the FNS-10. At that point, the States provide only final, actual meal counts.

3.9 Common Mistakes and Challenges

In this section, we highlight the process steps where respondents said mistakes are most likely to be made at the school, SFA, and State levels, and the variables in the FNS-10 form that are most likely to contain errors.

All of the school food managers interviewed express confidence in their ability to provide accurate meal counts. In fact, many report that there are few ways errors could occur when systems are working as they should (i.e., there are no system outages). *“If [mistakes occur], it’s very, very seldom, because it’s such an easy system,”* remarked one school food manager. Many electronic POS systems include students’ photos so that cashiers can confirm each child’s identity upon check out, and warning messages appear when a system suspects an incorrect entry (e.g., a cashier mistakenly enters two lunches for a student). School food staff undergo annual trainings on how to record and submit meal counts and use their data systems, and they have contacts at both the SFA and the software companies that produce their data systems to help troubleshoot when problems arise. Finally, most schools count meals in multiple ways using electronic POS systems, paper records, clicker counters, production records, tray counts, and having tallies calculated by multiple staff to be sure their meal counts are accurate.

When asked where mistakes *could* occur, or have occasionally occurred, school food managers said that they suspect the root cause lies with either systems and software failures or human error.

Table 3-5 displays the breakdown of school food managers’ hypotheses about what may cause errors in their meal count data.

Table 3-5. FNS-10– Top sources of error by school type reported by school interviewees*

Error source	All schools	Urban	Rural	Non-special provision	Provision 2/3 schools	CEP schools
Human Error	63	31	32	40	7	16
Systems and Software	26	8	18	18	2	6
Student Not in POS System	9	6	3	5	-	4
Staff Training	9	4	5	5	2	2
Staff Capacity	8	4	4	4	2	2
Timing and Delays	7	-	7	6	-	1

* Bold indicates issues are among the top three for each school type

Nearly one-quarter of the school food managers (26 of 114) suspect that systems and software failures are the root cause of any errors with meal counts. As discussed earlier, these technology failures often force school staff to use paper records until the equipment becomes operational, and school staff may not be able to accurately capture every student meal on paper during a busy lunch period. However, not all of these failures are due to hardware problems. One school food manager says that she had recently identified and corrected a glitch within the POS software that was charging the cost of a lunch to students who were eligible for free meals. Another school food manager in a different State notes that they found a similar glitch in their POS system at the start of the school year after the software company made changes to the system.

The breakfast is free for everyone, and when I went to key them in I noticed that [the software] had started charging them the regular price. So that was sort of a hang up, and it took me a while to get it straightened out today, which [SFA Director] got to help me with it, too. But it wouldn't let me charge them free, it was charging them regular prices.

— School Food Manager

Over half of school food managers (63 of 114) cite human error as a potential source of errors, but they say those occurrences are rare. They most commonly attribute those errors to mistakes made by school food staff at the point-of-sale, including:

- **Entering the wrong meal**

“The only thing that I could ever foresee happening is they hit entrée one, instead of two....pizza versus hot dogs.”

- Marking a meal next to the wrong student on a paper tracking sheet**

“Honestly, the only mistakes I can really foresee is if I marked the wrong kid, which really doesn’t happen since we are in such a small school. It’s easy to get to know each child on an individual basis.”
- Forgetting to end one student transaction before starting the next one**

“Or they won’t end [the transaction with] the kid that they’re on, [and] go on to the next one.”
- Approving a reimbursable meal when it does not have all required components**

“A mistake. Probably the kids trying to buy what they’re...[they did not take] enough to count as a reimbursement meal, because they will try [to fool] us.”
- Selecting the wrong meal period in the software**

“I’ll hit ‘Lunch’ instead of ‘Breakfast,’ and then I have to come in and fix it.”
- Not catching the students who want to skip the line**

“Because they don’t either want to wait [in line] or they’ll forget. A lot of students will forget. A lot of times I’ll see students go sit down and I’ll go over to the table [and say], ‘Come on. Let’s go and do that number.’”

When sharing their thoughts on where errors might occur, some school food managers mention the chaos of school meal periods. One respondent says the lunch period is only 20 minutes, and implies that that narrow window of time to move all students through the lunch line and record their meals may contribute to any incidence of human error.

Teachers and students may make mistakes as well. The schools that offer breakfast or snacks in the classroom rely on teachers to accurately mark on paper rosters which students receive breakfasts and/or snacks in the classroom. These teachers may *“focus more on the start of class instead of the tally sheet of the breakfast,”* says one school food manager. There are not enough school food staff to monitor the process in every classroom, and teachers may make mistakes. Similarly, students may enter the wrong PIN without staff knowing. Some school staff suspect that this occurs more frequently among young children because they forget their PINs; the school staff will either look up the student’s name in POS system or write down the name and enter the meal later. Staff say that having the students’ pictures appear on the POS screen helps mitigate these errors, but not all POS systems are currently programmed to include pictures.

SFA directors and State-level staff echo the school food managers' hypotheses regarding the possible sources of error. They point to technological failures and "true human error" stemming from students, teachers, and school food service staff. Two SFA directors also identify paper records for the SBP and snack programs as a possible source of error in the instance that teachers and staff record those meal counts manually.

Three SFA directors mention possible errors that they could make once the data reach their desks. One director says that errors can occur if they run reports on schools' meal count data before the schools finish reviewing and cleaning the data. This is an issue for schools and SFAs with shared data systems, where an SFA can view the school data in real-time without the school having time to review the day's data and manually click "submit." Two directors note that the manual data entry into the online State CN portal may be another source of error. *"I mean, it is kind of easy when you print off your monthly claim and then manually key it into the online [State] system [to] transpose numbers,"* says one director. Two State-level staff echo that remark, saying that they see SFAs occasionally swap the counts for the SBP and NSLP.

The State-level staff provide examples of three other areas where they have concerns about data quality: 1) the paper counts from RCCIs; 2) the SSO count; and 3) ubiquitous software glitches. One State says its concern is not with the school-level meal counts, but with the RCCIs. The former is typically collected electronically at the POS; the latter is collected using check marks next to a child's name on a piece of paper. They did not indicate that they have found errors in the data from RCCIs, merely that they closely monitor the data because it is usually collected on paper. Another State closely monitors the SSO data, because they believe that to be a source of confusion for SFAs, particularly the performance based reimbursement¹¹:

When [SFAs are] entering claims for Seamless Summer, they won't put in their performance incentive [aka performance-based reimbursement]. We have that problem. They put in their lunch, but then they don't put in their lunch counts for their performance.

Finally, one State respondent says that they find a new glitch within the programming of a POS software program every year, and the glitch inevitably impacts every school that uses that particular program. The respondent clarifies that the issue is not with the usability of the POS system at the

¹¹SFAs that are certified in compliance with the meal patterns and nutrition standards receive additional performance-based reimbursement for each lunch served. This applies both during the school year and in SSO.

school-level, but rather it's "like a functionality in the system that's throwing off the claim." The State's schools utilize software programs from over one dozen different companies, and each year they find a glitch in a different program.

3.10 Support and Training

When asked whom they would reach out to with questions about the meal counting and claiming process, respondents easily identified at least one contact person. For school food managers, that person is usually the SFA director. For technical issues related to the software programs, however, they reach out to their school/district-level IT staff or a contact at the software company. For the SFA directors, their contact is the State-level staff person(s) responsible for reviewing and submitting the FNS-10. Finally, the State-level staff refer questions about the FNS-10 and meal claims to their FNS regional offices.

All entities across all States are in regular contact with each other via telephone, e-mail, webinars, and in-person trainings and meetings. School food managers most frequently call or email their SFA directors for assistance; none mention attending webinars. Many school food managers also attend in-person trainings held by the SFA prior to the start of each school year, where they review topics such as the components of a reimbursable meal. Only four school food managers mention receiving hard copy instructions or materials at these trainings. Managers note that there are also trainings for new staff, or existing staff in new roles, to help them acclimate to their positions and learn the meal counting process. The SFA director and/or the outgoing school food manager train new school food managers, and school food staff/managers train new cashiers.

School food managers and their staff also participate in trainings on using the software programs, particularly when the school purchases a new software program or changes are made to an existing program. As one person describes, the training and assistance they received from the software company on a new software program the school had purchased is more than a perfunctory tutorial:

We had a two-day seminar with [the software company] down here showing us and going over how to [use the software]. They had us all in the computer lab at the high school. And they had it booked up to computers, and they went through it with us. And we could make our own notes. And then, the first day of school, we had [staff from the software company] here at each school to help us that day.

Five other school food managers across the four States noted similar experiences; the software companies that produce the meal count software provide staff trainings and make any needed adjustments to the software prior to the start of each school year. We suspect that these more intensive trainings are available to schools when they adopt new software programs, and that so few school food managers mentioned it because schools do not change software programs frequently.

Similar to the schools, SFAs report that they connect with their State staff most often by telephone and email. SFAs in three of the four States also participate in webinars hosted by the State-level staff, and interact with those staff via that medium. Those States use webinars as a communication and training medium, because they provide a platform to connect with people across a wide geographic area. One SFA director said that she learns during the webinars about updates to the child nutrition program policies, and passes that information to her district's software provider so that they can begin revising the software program to comply with the new policies. No other details were provided about the content of these webinars, but one SFA director said they appreciate how webinars are less burdensome on their time compared with in-person meetings.

SFA directors across the four States also attend in-person trainings hosted by the State. These trainings cover an array of topics, including:

- Accounting Practices;
- Food Safety;
- Food Production; and
- Child Nutrition Program Regulations.

States offer these trainings either once or twice each year, and attendance is mandatory for new SFA directors in two States. One SFA director who had attended the training for new SFA directors earlier that school year, said *"I like having it in person. To me it was more hands-on. So I really liked that. Being able to sit there in a classroom with others that were new like me, and that I could network with as well."* New SFA directors in a third State receive an on-site visit from State-level staff, which involves training on the meal claims process.

Finally, all four States say that they provide manuals for their SFA directors on the meal claiming process, but few SFA directors appear to use them regularly. Only three SFA directors, all in the

same State, mention being aware of the manuals provided by their State. Overall, SFA directors express that the meal claiming process is relatively straightforward, which may suggest that they do not feel a need to seek out hard-copy instructions. Furthermore, SFAs repeat the meal claims process every month, which quickly familiarizes them with the steps involved and may make them less likely to require instructions. It may also be the case that SFAs are simply more likely to call their States with questions than try to find the answer in a manual.

3.11 Suggestions for Improvement

Respondents had relatively few suggestions to improve the process to count and claim school meals. Those who identified areas for improvement included 23 schools, 14 SFAs, and two States. In this section we discuss the additional guidance requested by respondents, and changes they proposed to the FNS-10 form and to systems and software.

3.11.1 Suggestions for FNS

Improvements to Guidance

Most respondents indicate that the meal counting and claiming processes are straightforward, and they do not require additional guidance. No SFA directors requested additional guidance on the process..

Improvements to FPRS

Two State-level respondents suggest improvements to the data systems for the FNS-10. One State-level respondent says entering the data manually into FPRS is time-consuming, and they want the ability to directly upload a file from their system into FPRS. Another respondent says that programming FPRS to generate reminders for reporting deadlines could improve the timeliness of the 30-day reports. The same respondent says they want FPRS to prompt them if a report is still pending and needs to be submitted. The respondent completes and submits a number of reports via

FPRS, and says that if a submission from a prior month is rejected it will not show up in her queue and so she may not realize that it needs attention.

3.11.2 Suggestions for NSLP State Agencies

Some SFAs made similar suggestions for altering the State portals to make it easier to submit data. One SFA would like a search tool or a list of “shortcut” links in the State’s portal so that they could view submissions from prior months, find forms to download, and otherwise easily navigate the portal. Another SFA says they want a more streamlined submission process to the State, because they currently submit separate claims for supper versus breakfast and lunch, and then have to wait until each is approved by the State before they go back to the portal and combine the two claims for final submission.

Four SFAs want the ability to upload data directly to the State portals. As noted earlier, none of the four State portals accepts file uploads directly from the SFAs’ data systems; all SFAs manually enter their values for the FNS-10 into the portals. These four SFAs say that having the ability to directly upload an Excel file or other report from their data systems would reduce the chance for human error when entering and submitting data to the State. As one SFA director notes, allowing SFAs to upload files directly would not negate the need for staff to review the data, but it would save some time and eliminate the possibility of data entry mistakes.

3.11.3 Suggestions for SFAs

Two school food managers, who operate afterschool snack- or breakfast-in-the-classroom programs, would like to see more training and guidance for teachers counting the meals in their classrooms. One respondent suspects that teachers may not fully understand the importance of maintaining accurate counts.

Most suggestions for improvement from school food managers (15 of 23) focused on changes to the POS technology and data systems they are currently using. Many of these changes could be initiated at the SFA level, through a dialogue with schools and the software companies that manufacture the POS technology data systems.

Seven school food managers did improve staff use of the technology during checkout. One person felt it would help if all schools in a district used the same POS terminals, because staff sometimes move between schools and the POS keyboard looks different at each school (i.e., buttons are in different places). Another respondent said larger touchscreens would be helpful.

Five rural schools suggested changes to the meal count software system to make reporting easier. Four of these schools would like to see the software include a reporting tool that could generate their production records, which indicate the types and quantities of food prepared each day. Currently, they calculate and complete those production records by hand. The fifth school says that they would like the software system to improve the search functions so that they can more easily locate specific transactions by student name, date, and other characteristics.

3.12 Adherence to FNS Guidance and Instructions

There is one data element on the FNS-10 where variation from FNS guidance and instructions may be more likely: calculation of “Average Daily Meals.” The instructions for the FNS-10 provide an example of how Average Daily Meals may be calculated, which is followed by the statement that State agencies may use “any valid method to determine the number of average daily meals.” In our interviews at all respondent levels—schools, SFAs and State agencies—we did not hear that this was an issue. As noted earlier, in most cases ADM is calculated automatically in the software, either at the SFA or school level.

4. Processes for the FNS-742

In this chapter we describe the processes used by SFAs and State agencies for data that are reported to FNS on the FNS-742, the *SFA Verification Collection Report*. We also describe the support that SFAs and States receive in collecting and reporting these data, the areas where respondents feel mistakes are most likely to occur, and respondents’ suggestions for improvement. Appendix B provides a process map that illustrates the processes described below.

4.1 Purpose of the Form

The FNS-742 provides FNS with information on the results of SFA certification and verification for free and reduced price meals, including direct certification, for every SFA that participates in the NSLP and/or SBP. In addition to the information on the certification process, the form also provides the total number of schools and RCCIs in the SFA, and the number of schools operating CEP, Provision 2 or Provision 3, and their enrollment. FNS uses the FNS-742 results of direct certification with SNAP to help calculate each State’s SNAP direct certification rate and determine whether States are meeting the direct certification benchmarks.. The verification non-response data may also be used by State agencies and SFAs to determine if an SFA qualifies to select an alternative verification sample in the subsequent school year. Similar to the FNS-10, the processes to complete the FNS-742 may be manual or automated (see Table 4-1).

Table 4-1. FNS-742: Common manual and automated processes

Common manual processes	Both manual and automated	Common automated processes
SFA Level <ul style="list-style-type: none"> Data collection: Section 5, via households’ paper applications and verification documentation Data submission to State 	Data Review: All levels	SFA Level <ul style="list-style-type: none"> Data collection: Sections 1-4, via SFAs’ data systems
State Level <ul style="list-style-type: none"> Data submission to FNS 		State Level <ul style="list-style-type: none"> Data collection via State online portal

SFAs conduct the certification and verification process that is reported on the FNS-742 just prior to, and at the beginning of each school year. If the SFA is using CEP district-wide, the SFA completes sections 1 and 2 of the form and obtains direct certification information, but does not process free and reduced price applications or complete verification. Similarly, SFAs or schools in the SFA

operating under Provision 2 or Provision 3 only complete the certification process, including direct certification, when they are establishing a base year¹².

A number of deadlines guide the collection, verification, and submission of the data found on the FNS-742 (see Table 4-2). All SFAs, regardless of their counting and claiming process, must complete the applicable FNS-742 sections with information about their schools and, if applicable, use of alternate claiming provisions annually. SFAs submit the data that comprise the FNS-742 to the State agency no later than February 1 of the following year. State agencies then check the data submitted by SFAs and submit to FNS via FPRS no later than March 15.

Table 4-2. Deadlines for FNS-742

Task	Deadline
• SFA completes verification	November 15
• SFA submits FNS-742 data to State agency	February 1
• State submits FNS-742 to FNS	March 15

In the following sections we discuss the processes and procedures that 39¹³ SFAs and 8 State agencies (4 NSLP, 4 SNAP) follow to collect, review and report data for the FNS-742.

4.2 SFA-level Data Collection

SFAs collect data for the FNS-742 from a variety of sources. For Sections 1 and 2 of the form, where SFAs report student enrollment for each type of school and institution,¹⁴ the data come from their school meal data systems. Aggregating or compiling these data is done by the data systems; no SFAs manually compile the school counts or the number of enrolled students. Respondents describe the process of completing these sections as straightforward:

[Software vendor] has done a great job where we actually print a report now that pretty much mirrors this [FNS-742 section 1]...[For section 2], same thing...the software

¹²A base year for Provision 2 or Provision 3 is the school year in which student eligibility determinations are made and meal types by count are taken in order to establish the basis for Federal reimbursement in subsequent years. See 7 CFR 245.9(b) and (d).

¹³One SFA declined to participate during the site visit, thus the total number of interviewed SFAs is 39, not 40.

¹⁴All schools and RCCIs; schools that operate CEP; schools that operate Provision 2 or 3; schools that operate alternative provisions for SBP or NSLP.

identifies those and gives you the number of schools and the number of students that are on CEP.

The remaining sections of the FNS-742 provide the SFA's results of direct certification (Section 3), certification through household applications (Section 4), and verification of a sample of household applications (Section 5). SFAs use a combination of paper and electronic data to determine and record each student's current eligibility for free or reduced price meals.

To complete Section 3 on direct certification, SFAs need the count of students directly certified through SNAP and other public benefits programs.¹⁵ Alabama and Wyoming perform the direct certification match at the State and then send the list of matched students to each SFA. SFAs in Oklahoma and New York receive a list of children in households receiving SNAP from the State and use software to conduct the matching themselves at the local level.

The direct certification process is not without flaws. For example, six SFA interviewees shared that updating the school enrollment roster with the State direct certification list can be challenging because students in a household may not share the same last name. Students may be half-siblings, families may be blended, or a student may be in foster care. Siblings may also have different addresses or other common identifiers, which makes it difficult to link their records. One SFA says they found a way to streamline the sibling match process using software: the SFA's data system automatically checks the home address of new students added to the system against the home addresses of existing students, and flags potential sibling matches based on a shared address. Regardless of whether direct certification is completed electronically or manually, by the State or by the SFA, some SFA Directors have lingering concerns that students may "fall through the cracks." They worry that a student may not be matched in direct certification if the student's family moves to a new address, the student's last name changes, or if siblings are registered with different last names. In these circumstances accurate matching for direct certification becomes increasingly difficult and can ultimately lead to lower direct certification rates.

Some of those gaps in the direct certification lists can be resolved with household applications for school meal programs. Applications always include information on the number of household

¹⁵Direct certification is a process conducted by the States and by local educational agencies to certify eligible children for free meals without asking households to submit an application. This is accomplished by matching student enrollment lists against SNAP agency records and the records of other assistance agencies whose participants are categorically eligible for free meals.

members, income, and case numbers for public benefits (e.g., SNAP). They may also include more specific information, such as the ages or grade levels of children in the household, or a flag for any foster children. Households that are not directly certified may include in their school meal applications a SNAP case number or other documentation that proves their child’s categorical eligibility for free school meals based on their enrollment in other benefits programs. SFAs include the number of students approved as categorically eligible for free school meals in Section 4 of the FNS-742. Section 4 also includes the number of students approved as eligible for free or reduced price meals based on calculations of household size and income.

Households complete either a hard-copy or online school meal application. Of the SFAs in the study without special provision schools, and who were therefore accepting applications, two-thirds (18 of 27) accept only paper applications from households. Three SFAs collect both electronic and paper applications, while only two SFAs accept applications exclusively online. Table 4-3 shows the breakdown.

Table 4-3. SFA application modes

Application modes	SFA count (35)*
Paper	18
Online	2
Paper and Online	3
Not applicable (All Special Provision or CEP)	12

*Application methods were not discussed in 4 SFA interviews.

SFAs accepting hard-copy applications usually manually enter the application information into their data system. For the SFAs that accept online applications, the data are automatically pulled into their system.

When the household applications lack key information (e.g., social security numbers, number of household members, etc.), SFA directors will call the household to obtain the information or return the application to the household for revision and completion. If the household does not respond, the SFA approves the student as “paid.”

SFA directors share that moving to electronic systems is a distinct transition that they have made over time. For those SFAs that have moved away from paper, accepting applications electronically is seen as easier, more streamlined and safer because students are no longer turning in applications that

contain personal information to teachers or school staff. Similarly, being able to store applications, whether scanned paper or submitted electronically, is helpful to SFAs.

Most SFA staff make eligibility determinations (i.e., whether a student is approved as free, reduced price, or paid) themselves using the information submitted on the applications (see Table 4-4). A household’s size and income, as reported on the application, are the key drivers of a student’s eligibility for free or reduced price meals. Less commonly, when application data are pulled into an SFA’s data system, the system analyzes the data and makes a determination. With the latter approach, some SFAs perform an additional review on top of what the data system conducts to confirm the determination made. Table 4-2 shows SFA methods for household eligibility determinations.

Table 4-4. SFA methods for household eligibility determinations

Methods	SFA count (36)*
SFA staff determine after reviewing application	15
Software makes determination	6
Software makes initial determination and SFA staff confirm	3
Not applicable (All Special Provision or CEP)	12

*Application methods were not discussed in 3 SFA interviews.

SFAs are required to pull a sample of household applications for school meals and verify the information provided unless all of an SFA’s schools and RCCIs are exempt from verification.¹⁶ Sections 5 and VC-1 of the FNS-742 provide the results of verification activities, and SFAs report that the former is one of the more confusing sections of the form (see Section 4.8.4 for more detail).

Once a household is selected for verification, SFA directors send a letter to the household requesting that the household provide income documentation (e.g., pay stubs). SFAs have flexibility in how they contact households when they do not receive a response to the initial request for verification information. SFAs use certified mail, follow up with phone calls, or request the assistance of a school social worker or principal to try to collect the verification data. Collecting these data is not always easy, as households do not always understand the request or the reason for it; SFA directors note that the verification letter template can be intimidating, long, and esoteric.

¹⁶The FNS-742 instructions specify the situations in which this may occur, including schools operating the CEP, schools operating Provision 2 or 3 in a non-base year, and schools with no free or reduced price eligible students.

Some SFA directors also express discomfort with collecting this information when they live in small towns and know the people from whom they are requesting proof of income.

While collecting additional household information for verification, SFA directors say that the most common missing data stems from a household's non-response to the request for information or a lack of sufficient supporting documentation (e.g., the pay stubs submitted do not contain all required information). In these instances, SFA directors will follow up by phone, email, and mailed letters.

SFA directors conduct the “standard” verification process (data element 5-3)¹⁷, and rely on algorithms in their data system to calculate the number of error-prone applications (data element 5-4) and the total number of applications selected for verification (data element 5-5). Using the data system to make these calculations should be seamless, but SFAs report instances of the systems miscalculating (incorrectly rounding-down) the number of applications that need to be selected. In the past, this has resulted in SFAs pulling too few applications for verification.

The majority of SFAs conducting verification (21 of 27) track and store the household applications and verification information electronically. SFAs that receive hard copies of household applications or supporting documentation for verification always store the hard copies, and some scan or enter the data into their system as a backup. The six SFAs with a manual or paper process for collecting and processing applications create a system to record the results of verification efforts, including the date(s) the household is contacted, the number of attempted contacts, and the final eligibility determination.

4.3 SFA-level Data Review

As most of these processes are automated, reviewing and checking the data happens within the data system in the form of an electronic edit check, followed with a visual inspection by SFA staff. Most SFAs rely on their systems' edit check functions to flag suspected errors, such as when reporting numbers do not match up. SFA directors will also manually check the data by printing out reports from their data system and visually inspecting the values entered. Finally, 10 of the 39 SFAs (nine of

¹⁷Standard verification means the SFA has to pull the lesser of 3 percent or 3,000 error-prone applications for verification.

which were small or medium-sized SFAs) have multiple staff review the data prior to submission: *There's usually at least three or four eyes here in the office that go over that information and make sure that we keep all the documentation together."*

4.4 SFA-level Data Submission and State-level Data Collection

All SFAs submit their FNS-742 data to the State by manually entering the data into the online State CN portal. Approximately one-quarter of SFAs (9 of 39) have been asked to make revisions, and say that their State contacted them and walked them through how to make the necessary edits.

Similar to the SFAs' data systems, the State CN portals contain edit checks that trigger an error message when there are suspected errors, such as the number of applications is higher than the total number of students or the number of applications selected for verification is higher or lower than expected. In those instances, the SFAs must review and adjust the numbers before completing their submission.

4.5 State-level Data Review

States review these data in a couple of different ways. The edit checks built into the online State CN portals perform most of the data review. States also use the FNS-742 edit check tool provided by FNS. This FNS tool is an Excel file into which the States can paste the SFA data they receive and run reports that produce "warning" messages if unexpected values are found. If any warning messages arise, States contact the SFA to ask them to make any necessary revisions. However, as one State mentions, not all warnings require follow-up:

There's a couple edits in the tool that we don't agree with, so we just disregard them because we don't agree with the information there. So direct verification. There's a box on the form that says have you conducted direct verification? They say 'yes,' but they didn't find anybody, they have to report zero. That Excel document says there was an error, but there's not really an error because they didn't find anybody.

4.6 State-level Data Submission

As with the FNS-10 data, NSLP State agencies submit the FNS-742 data through FPRS. This often requires exporting data from the State CN portal, manipulating the data into the correct format, and then entering the values into FPRS. States have evolved to program their forms and collect data in a

way that is most compatible with FPRS to increase ease and efficiency. For example, Alabama NSLP State agency staff worked with their State IT department to update their online portal to make it more compatible with FPRS. Now, the form on their State portal is identical to what FPRS requires, thus streamlining the submission process:

...Over the years we have managed to get our report to be compatible with the USDA report so it goes in with so much ease....We've made [our reporting tool] so it comes out in the same format that FPRS requires it. So it makes it really easy for us now. I literally go into our reporting tool... It puts it in the same format [so] that all I have to do is, once I know that everything's okay, I have to add our State name and hit upload and it runs through the process.

4.7 Common Mistakes and Challenges

Three categories emerge as the most common mistakes or challenges associated with the FNS-742: timing and delays, human error, and confusion on the FNS-742 form and/or process. Table 4-5 shows the number of respondents who mention these top challenges. Districts with “mixed” CEP and non-CEP schools face additional challenges. We explore each category in further detail below.

Table 4-5. FNS-742 Top sources of error reported by SFA interviewees

Source of error	SFA Count (39)
Timing and Delays	17
Human Error	11
Misunderstandings about the Form and/or Process	8

4.7.1 Timing and Delays

The most frequently mentioned source of confusion that contributes to errors is having two different time periods for capturing data reported on the FNS-742. Section 4 of the form instructs SFA directors to report the number of approved applications as of October 1, and the number of students as of the last operating day of October. SFA directors say that having two different dates is confusing.

SFA directors with later school start dates also struggle with the October 1 date. There is an overlap with the 30-day carry-over period for schools that begin their school year in September because they have not yet been in session for 30 operating days by October 1. This means that some students are still in their data systems with the prior year’s eligibility status. To address confusion about these

dates, one State programmed their FNS-742 report to pull the last operating day of October enrollment information directly from the claim for reimbursement for October.

The timing of receipt of direct certification lists can also be challenging.

If the SFA receives the lists after the school year begins, additional and sometimes unnecessary work can occur. Households that have not yet been directly certified and notified before the start of school may complete and

submit applications. If the SFA has the

direct certification list before the school year starts, they can send letters to those eligible households notifying them of their direct certification and eliminating the need for that household to complete and submit an application.

The reason we want [the direct certification list] earlier is because we can formulate letters, we can mail them home, and if they're directly certified they don't have to fill out a free, reduced application. So less for us, less for them. There's no need for you to fill one out. And quite honestly, we have students that are directly certified and they fill out an application, and it comes back either denied or reduced. Well, direct cert trumps either one of those. So then when you figure out, okay, they're directly certified, and we got it late, now I've got to reject this application, go back in, make them direct cert...

— SFA Director

Another challenging situation mentioned by NSLP State agencies is the timeliness of the review of the FNS-742 data by FNS. Though any edits checks triggered in FPRS have been resolved by the State, respondents share that they have been contacted by FNS several months after that to resolve different data inconsistencies. This is challenging for States:

The only thing that I would really like to know about is why once you've uploaded in FPRS and you didn't get any errors, and you didn't get any warnings, why it is like six months later, USDA comes back and says, 'There's this error, there's this error, this is error.' Why wasn't the error-- wasn't the edit checks for their FPRS system picking up those errors prior. We could have addressed them much earlier had we been aware.

4.7.2 Human Error

The SFAs and States feel that most mistakes can be attributed to human error. Specifically, they mention data entry errors when SFAs are submitting FNS-742 data to the State or the State is submitting the data to FNS via FPRS. A respondent describes their experience transposing numbers:

A lot of times I'll screen chat it and send [State contact], "Well, this is what I have. What am I entering in wrong?" And most of the time, it's me transposing the lines of what's different from [my screen] to their site. I know I've done that last year or the year before. I transposed. I put my numbers in the wrong spots. But we're human and it happens.

Another source of human error pertains to querying the data system to determine the number of applications to pull for verification . With the increase in automation and reliance on data systems, many SFAs program their data system to select the applications for verification on October 1. The challenge for SFAs is that when they run a query in their database to determine how many applications they must verify, their programs will give them a percentage of applications to verify based on the number of applications on file when they run that query unless the SFA changes the time period for the query. The number of applications required for verification may change between when they begin verification on October 1 and when they report on their efforts via the FNS-742 , and not all SFAs remember to change the date (see call-out box for further explanation).

When Challenges Arise in Calculating the Number of Applications to Verify

Take the following example. An SFA queries its database on October 1 to determine how many applications it needs to verify. The SFA is conducting “standard” verification, meaning they have to verify the lesser of three percent or 3,000 error-prone applications. As of October 1, this SFA has received 100 applications and must therefore select three to verify. When the SFA is preparing to submit their verification data to the State, they run the same query again to confirm that they verified the correct number of applications. However, at the time they run the query, the SFA has received 130 applications and the data system tells the SFA that they must now select four applications to verify (three percent of the 130 applications received). Unless the SFA changes the date range in their query to pull the data as of October 1, it will appear as if the SFA is one verification short.

4.7.3 Misunderstandings about the Form and/or Process

A final and important challenge relates to misunderstandings about the data elements on the form and the verification process itself. Both State and SFA directors point to confusing data elements and/or reporting instructions for the FNS-742 as the root source of some errors. When respondents misunderstand which data are requested in a particular cell or section of the form, they will not provide what is intended. This leads to requests for data corrections or, if it is not caught, erroneous data. The aspects of the form where respondents report some confusion include:

- Section 3 (Students Approved as Free Eligible Not Subject to Verification)data elements 3-1, 3-2, 3-3
- Section 4 (Students Approved as Free or Reduced Price Eligible through a Household Application) number of approved applications
- Section 5 (Verification) data elements 5-3, 5-6, 5-7

4.7.3.1 Section 3, Direct Certification

States and/or SFAs struggle with three data elements in this section. Data element 3-1 includes a box to check only if all schools in the SFA are exempt from performing direct certification with SNAP. One NSLP State agency says that the instructions for Section 3-1 are unclear, and SFAs make mistakes when completing it:

When it first came out, the instruction on 3-1, it wasn't clear that CEP schools did not fill in that section and so that was always confusing, so we found a lot of mistakes there and we still find mistakes there so we try to just clean that up ourselves.

The use of Medicaid for direct certification can impact reporting in Section 3, and subsequently the State's SNAP direct certification performance rate. New York is the only State in the study that participated in the Medicaid direct certification demonstration project¹⁸. Initially, they found that SFAs did not report all of the students on the direct certification list for SNAP (data element 3-2), because some of those students were directly certified through Medicaid (and reported in data element 3-3). Consequently, the State's SNAP direct certification rate dropped to a level that required a Continuous Improvement Plan. New York has since instructed SFAs to fully report all students who were or could have been directly certified with SNAP. This may arise in other States if the Medicaid demonstration project is expanded, making it important to understand and watch for these mistakes.

4.7.3.2 Section 4, Household Applications

In Section 4 of the FNS-742 form, SFA directors report the number of approved applications as of October 1, and the number of students as of the last operating day of October. As described previously, having two different dates for capturing the data is confusing.

4.7.3.3 Section 5, Verification

For data element 5-3, one State agency reports that SFAs are not as familiar with “alternate one” and “alternate two” (options 2 and 3) as types of verification samples. As a result, SFAs tend to select the standard verification option because it is the most “comfortable.” Furthermore, the instructions between data elements 5-3 and 5-4 state: “If 1 or 3 is checked in 5-3, report 5-4. If 2 is checked in 5-

¹⁸See 42 U.S.C. 1758(b).

3, enter “N/A” in 5-4.” These instructions confuse SFAs. One NSLP State agency says that their SFAs continuously enter data in 5-4 even when they do not need to.

One NSLP State agency suspects that some SFAs do not fully understand the difference between direct certification and direct verification. As a result, data element 5-6, which asks about direct verification, and data element 5-7 asking for “confirmed through direct verification” can be mixed up. They say direct verification and may be mistaken for direct certification. A suggestion offered by one respondent was to add parentheses to 5-7 so that the text reads: “5-7: Confirmed through direct verification (not direct certification).”

As noted earlier, some SFAs express uncertainty about the verification process, in general. Because they conduct verification only once a year, staff have to remind themselves each year of the process they need to go through. SFA staff feel that step-by-step instructions on how to communicate with families and complete verification would help them to ensure they are completing the process accurately and submitting the data required.

4.7.4 Districts That are Mixed CEP and Non-CEP

Another possible source of error arises when districts have both CEP and non-CEP schools. Having a “mixed” district adds a layer of complexity to reporting and requires further review of the data prior to submission. The complexity here is that an SFA has to report differently for its CEP schools than for its non-special provision schools. For example, SFAs do not report the number of students directly certified in section 3 of the FNS-742 form for CEP schools, but they must report it for non-special provision schools. It takes extra review to be sure reporting is accurate in “mixed” districts.

One of the problems that we had was schools that are CEP versus non-CEP and if they're mixed. So we're always having our staff go through the data just to make sure it's correct and same thing right before we report it as we're going through it to make sure that they checked all the boxes. So if something's missed, we catch it before we report it to USDA.

— NSLP State Director

4.8 Communication and Guidance from States to SFAs

States differ in the types of training and resources they offer their SFA directors. However, all of the States participating in the study train their SFA directors in person and provide information to SFAs through online manuals or webinars, which can be read or viewed as needed. Another State has a manual with step-by-step instructions for filling out the FNS- 742 and they offer a webinar to SFAs before the FNS-742 is completed. A third State produces an income verification booklet each year which has the prototype letters and all procedures that SFAs are required to follow. This State also offers webinars. Despite these offerings, online materials were reported to be less helpful than “live” trainings. An SFA director in one State described his staff as “self-trained;” in another State, SFAs indicated they would like more in-person trainings, particularly around verification processes.

I break [the instructions] down into districts that are not provision or any provision that are error prone. And so I do instructions for that. Then I do instruction and districts in private schools. Then I do instructions for districts in private schools ... that aren't error prone that are choosing alternate one. ... Then I have instructions for provision, and we only have one that's provision 3, but they're in a base year this year, so that was interesting to get them to understand that “You're in a base year so when you report, you have to report not as a provision [2 or 3 district].”

— NSLP State Director

Regardless of how they receive information on completing and submitting the FNS-742, SFAs in all four States report that their NSLP State agency staff are available by phone or email to assist. All describe these State staff as being “helpful” and ready to answer any questions, although there are limits to their knowledge. For example, one respondent mentions that the State is able to provide technical assistance on the online State submission forms, but not the software the SFAs use. In a second State, some SFA directors create their own guidance documents more tailored to their needs and circumstances than the State-provided materials.

4.9 Suggestions for Improvement

SFA directors and State agencies offered suggestions in several different realms: training and guidance; materials provided to SFAs; systems and software, including FPRS; and the FNS-742 form. In the sections below we group these suggestions by the entity responsible for implementing any changes.

For verification, I would actually like a training. I think a good, solid—even if it's a PowerPoint or webinar that they do and say, 'Hey, we're going to walk through the verification from start to finish.' And that might take a half a day, but at least we're walking through it and we kind of could get an idea of what we're doing.

— SFA Director

4.9.1 Suggestions for FNS and NSLP State Agencies

SFAs request improvements to training and guidance, particularly to clarify the verification process. Responsibility for making these changes could fall to FNS or to NSLP State agencies, or both.

SFAs offer several suggestions on the types of materials that could be provided for additional training and support. Providing one-page documents, similar to a “frequently asked questions” document, that ties back to State manuals on the FNS-742 form would improve their understanding of the data elements and the process. SFAs also request a manual with step-by-step instructions that walk through the verification process from beginning to end, all in plain language. One respondent explains:

Because coming in as a newbie...I think that would be very, very helpful.. Step-by-step, this is what has to happen through this whole entire process. Right now, the guidance is very heavy with jargon. A beginner users guide. I think just the whole steps are kind of vague.

SFAs also want guidance on contacting households during verification; several were unsure if it is permissible to contact households via emails. Related, SFAs and States suggest making the verification letter sent to households shorter and clearer. One respondent suspects that response rates to verification efforts are low because the verification letter sent to parents is too complicated, and thinks that parents likely set the letter aside.

There is also interest in increased training on the FNS-742. SFAs in one State would like the verification training to happen earlier in the school year, before verification begins. Additionally, SFAs expressed an interest in learning from peers, i.e., other SFA directors.

4.9.2 Suggestions for NSLP State Agencies

Several respondents want to see corrections or improvements to data systems and software. A general recommendation is for State agencies to link as many data points on the FNS-742 with data they already have in their MIS from SFAs. One State has done this for most of the data in Sections 1 and 2 of the FNS-742 and it streamlined their processes. Creating linkages will reduce manual data entry and additional efforts to pull data.

State respondents describe challenges with the software programs used at the SFA-level. For example, one respondent notes, *“One of the software companies that offers to do the calculations for how many applications would need to be pulled for verification was rounding down rather than up, so the number was actually short.”* In other words, the SFAs using this particular software program were being told by the software to pull fewer applications for verification than they should have. Another State respondent shares that counting errors have occurred when changes are made to a student’s original application; the software program generates a new application when a change needs to be made, thereby counting two applications instead of one. As a result, the data system over-estimates how many applications to verify. The State says that they “eventually caught this, but it was difficult at first.”

Although it is not a State’s responsibility to review the programming for every software program that SFAs use, the States are in the best position to identify trends in the errors across SFAs (e.g., SFAs pulled too few applications for verification). When such a trend is determined to be the result of faulty software programming, the NSLP State agencies are best positioned to petition the software companies to revise their programs and fix the problem for all SFAs.

4.10 Adherence to FNS Guidance and Instructions

For the FNS-742, there are several areas where SFAs may not always follow FNS guidance or instructions. Based on interview data, non-adherence appears to stem from confusion about the instructions, i.e., a misunderstanding of what is being asked. State agencies, however, are aware of these potential points of error, as discussed in this chapter, and routinely check for them. They do this either automatically through system edit checks or manually through spot checks of these data elements in each SFA’s report. The FNS edit check tool has been very helpful in this regard; any future improvements to the tool would further increase data accuracy.

5. Processes for the FNS-834

5.1 Purpose of the Form

The State Agency Direct Certification Rate Data Element Report, commonly known as the FNS-834 form, was developed in connection with the final rule, *NSLP: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, published on February 22, 2013. The purpose of the report is to ensure that SNAP and NSLP State agencies provide to FNS, and to each other, the information needed to assess how effectively direct certification with SNAP is implemented. The importance of the form stems from the importance of direct certification, which is a method that offers an effective, efficient way to certify eligible children for free school meals without a household application.

Three data elements are required to calculate a State's direct certification rate:

- Data Element #1 is the count of those direct certifications with SNAP that are performed as of the last operating day in October. The first data element comes from Section 3-2 of the FNS-742 form, discussed in the prior section, and is the responsibility of the NSLP State agency.
- Data Element #2 is the unduplicated count of school-aged children (5 to 17 years old) in SNAP households during the months of July, August, and September. Supplying this count is the responsibility of the SNAP State agency and is required to be reported to both the NSLP State agency and FNS by December 1st each year.
- Data Element #3, the number of SNAP children in special provision schools operating in a non-base year, is the responsibility of the NSLP State agency and is required to be reported to FNS by December 1st each year.

The direct certification rate is the sum of data elements 1 and 3, divided by data element 2 – essentially, all students directly certified plus students in special provision schools who likely would otherwise have been directly certified if the school was not already participating in a special provision divided by the universe of children who could be directly certified.

5.2 State-level Data Collection, Review and Submission

Both the SNAP and NSLP State agencies collect, review, and submit data for the FNS-834. In the sections that follow we describe the different data elements that each State agency contributes.

5.2.1 SNAP State Agencies and Data Element #2

The SNAP State agency provides Data Element #2, the denominator for the direct certification rate. The procedure for providing an unduplicated count of school-aged children 5 to 17 years old in SNAP households in July-August-September is relatively simple for SNAP State agencies and is performed in largely the same way across the four study States. In the words of one informant, “there’s a report that’s pulled by our data people, and they give me the number, and then I put the number in the [FNS 834] form.” While essentially straightforward, each SNAP State agency performs this task in a slightly different way:

- *Alabama.* Responsibility for 834 reporting lies with the SNAP agency’s policy unit but the information comes from the data unit. The information gets pulled on a quarterly basis from the State’s SNAP data system and they use the July through September quarter for the FNS-834. The data unit supplies the information in an electronic report, and the policy unit manually enters the number into FPRS.
- *New York.* The State pulls the data from their Welfare Reporting and Tracking System. They use an IBM report-writing tool called Cognos and it calculates the data element #2 number for them. Once they have the number, they do not review the calculation, but the agency compares the number to the previous year. At the point of submission, several staff review that the number gets entered into FPRS correctly before they submit.
- *Oklahoma.* Every month, the SNAP agency submits data on children who are receiving SNAP, TANF, and foster care to the NSLP State agency. At the end of the year, the SNAP agency manually combines the monthly files for July through September, removes TANF and foster care participants, and then removes SNAP duplicates. The State pulls 50 casefiles to compare to the reported results and, if they all match correctly, uses the combined file. The total number of records in the file is the number for the FNS-834 report. Prior to submission, agency leadership checks to confirm that digits have not been accidentally transposed and certifies the accuracy of the number. The SNAP agency manually enters and submits the number electronically via FPRS.
- *Wyoming.* Staff responsible for completing the form provide parameters to a specific IT staff person who pulls the data from the State eligibility system for SNAP. That IT staff sends back a spreadsheet with unduplicated case numbers of SNAP children ages 5 to 17, who were enrolled in the program in July, August and September. The person who completes the FNS-834 form scrolls to the bottom of the spreadsheet to see how many lines – and therefore children – the State had. That number is manually entered into FPRS.

5.2.2 NSLP State Agencies and Data Element #3

The two data elements – Data Elements #1 and #3 - needed to calculate the numerator of the direct certification rate are supplied by the NSLP State agency. Data element #1 was discussed in Chapter 4 related to the FNS-742 report. The NSLP State agencies prepare data element #3 in different ways, as discussed below:

- *Alabama.* The State does not have schools operating Provision 2 or 3 but does report the number of students matched with SNAP in CEP schools. To ensure that they only count SNAP children, they use their direct certification reports. Because direct certification is performed at the State level, rather than SFA level, the report delineates whether the match was SNAP, TANF, homeless, etc. Therefore, they can pull the SNAP number very quickly. They enter the final number manually into FPRS.
- *New York.* The NSLP State systems are divided between New York City and the rest of the State. In order to complete the FNS-834, the State agency depends on the New York City (NYC) Chancellor's Office to provide numbers of SNAP, Medicaid, TANF and extension of eligibility to directly certified matched eligibles. These eligible students are populated in the NYC Chancellor's data system by both the NYC Human Resources Administration (HRA) and by the NYS Education Department's New York State Student Identification System (NYSSIS). NYS Education provides monthly files of statewide student identification numbers with DC matches to SNAP and Medicaid. Because the NYSSIS has a much more sophisticated matching algorithm than the NYC Chancellor's Office system, when the Chancellor's Office washes this additional file over their student database it provides additional eligible students that have not been matched in the NYC Chancellor's data system. When all data has been populated in the NYC Chancellor's data system by both NYC HRA and NYSSIS, the unduplicated resulting numbers are what are reported to NYS Education for reporting to USDA for the FNS 834. The final tally is entered manually into FPRS.
- *Oklahoma.* The NSLP State staff send instructions to a data programmer who pulls the information from their database and sends it back in hardcopy. The number is entered manually into FPRS.
- *Wyoming.* Several stages and steps are required to obtain the 834 number. For schools where special provisions/CEP are district-wide, the NSLP State agency pulls up each special provision district in the State's direct certification system and chooses SNAP (i.e., unselects other programs), and calculates the number for that district for July. The informant then repeats the process for August and September, checking for additions only. Where provision/CEP is not district-wide, the informant calls the SFA staff for the information, because they are only the ones who can see school-level data. The numbers for all the SFAs and schools are then totaled and the final tally is entered manually into FPRS.

Special Circumstances Box

Two of the four States report that they never check the special circumstances box. One State used to check it because data were only available at the local level, but no longer needs to do so as they tied local reporting by SFAs to receiving September reimbursements. Another State used to use it, but stopped because they believe nothing comes of it.

5.3 Common Mistakes and Challenges

Overall, State-level respondents say the FNS-834 is straightforward and easy to produce. Still, they mention a few challenges to identifying all children in eligible households, which hinders their ability to produce perfect counts.

Some children in SNAP households and listed on the SNAP rolls may not attend NSLP schools. Roughly five percent of the country's schools do not participate in the NSLP.¹⁹ Three of the States included in this study—Alabama, New York and Wyoming—do not separate out children in SNAP households who attend non-NSLP schools. As a result, the denominator is higher (and the direct certification rate lower) for these States.

State respondents mention a handful of other challenges, some State-specific, to producing an accurate count of directly certified students. To start, it can be difficult to identify students from SNAP households who are homeschooled. The requirement to identify children 5- to 17-years old creates an additional step for States with pre-K programs participating in the NSLP, because they must exclude those children. A struggle for Wyoming is that the State permits students to skip Kindergarten and begin school with the first grade. As the NSLP State agency explains, “*And so, we have some kids that are showing up on the SNAP list that aren't in schools, but I have no way to know what that number is. Same thing with homeschool. I really have no ability to pull a homeschool number out.*” Finally, missing key indicators in student records (e.g., social security number, date of birth) creates complications for States. According to one SNAP agency respondent, not all schools in the State require social security numbers, and sometimes the date of birth is incorrectly recorded. All of these factors may slightly skew the direct certification rate for a State.

¹⁹<http://frac.org/programs/national-school-lunch-program>

Finally, one NSLP State agency has questions about the timing of the data pulls for direct certification. State-level staff observe that schools applying to be CEP schools pull their direct certification numbers by April 1 of the school year prior to when they want to be certified as a special provision school (i.e., a school applying to be certified as CEP in SY 2018-19 would pull their direct certification numbers by April 1, 2018, which is part of SY 2017-18). The confusion for this State is why they have to wait to submit the direct certification information in December via the FNS-834, rather than submitting the data on April 1 when they are already working with those data.

Despite the issues with data definitions, State agencies believe there are few mistakes in reporting the FNS-834 numbers. Respondents indicate no issues with producing an unduplicated count of children. In the words of one SNAP agency:

We have to do that all the time for a lot of different purposes.... We have unique client identifiers. I mean sometimes there's the odd case where you may get-- you'll have one person with two identifiers, but it's just one person. But if we have 34 [John Smith's], we can figure out which one is which.

Agencies acknowledge that incorrect parameters could be sent to the data units pulling the information, but believe that these types of mistakes are always caught. In addition, agencies believe that past mistakes are unlikely to repeat and are, in fact, learning experiences. As one NSLP respondent indicated, “*And I think because of that error we made, I have a somewhat better understanding of what we're actually looking for there.*” Finally, although many agencies enter their final values manually into FPRS, the agencies take care to double check those values (sometimes having multiple staff review them) prior to submission.

5.4 FNS Communication and Guidance

Communication with, and guidance from, the FNS regional offices in regard to the FNS-834 is rare across the four States. The sole comment, from a SNAP State agency, reveals that the regional office contacted them about a suspected error in the values reported a few years ago, and that was the only time anyone could recall being contacted about this form.

Several States expressed the view that FNS instructions could be clearer. For example, one informant thought (until corrected) that the “July – August – September” instruction was giving the State a choice of which month to use. Another initially thought that CEP schools were not

“provision” schools; the instruction for data element 3 does not clarify that CEP falls under the provisions.

5.5 Suggestions for Improvement

States did not provide suggestions to improve the process to collect and report the FNS-834 data. They feel the process is straightforward. However, given the challenges that States expressed with regard to counting the number of children in SNAP households (described above), additional guidance around those specific issues may resolve lingering questions.

5.6 Adherence to FNS Guidance and Instructions

State respondents found the FNS-834 to be straightforward. Any issues with inconsistency in following FNS guidance and instructions occurred in the first few years States used the form and appear to have been resolved. The “special circumstances” box at the bottom of the form is not well understood by States, but it does not appear to impact reporting on the two required data elements.

6. Final Discussion

The three FNS forms that are the subject of this study—the FNS-10, FNS-742 and FNS-834—provide important information to support program claims for reimbursement, and assess SFA and State performance in key program requirements. Study respondents at all levels generally have processes in place that accurately collect and report program data. More often than not, these processes are automated. When errors occur, they tend to be based on a misunderstanding of the data that are requested, software misuse or incorrect programming, or human error. Data collection methods for the forms appear to be consistent with FNS guidance and instructions, especially at the State agency level. State adherence to the FNS guidance means that issues and deviation at the SFA or school level are more likely to be identified and corrected before data are reported to FNS. Developing and promoting simple, accessible training and other materials for the staff who implement and report on these programs in schools and SFAs would be helpful to many.

6.1 Useful Practices for Data Accuracy

Respondents note several useful practices that improve data accuracy associated with the three FNS forms. They feel that these practices streamline the data collection processes and increase the accuracy of reports.

For data reported via the FNS-10, having an integrated electronic meal counting system with backup paper rosters at POS terminals to address unexpected system failures or missing data in the systems, helps to ensure data accuracy at the school and SFA levels. At the State level, customizing the portal for SFA data entry and customizing data fields as much as possible (e.g., hiding fields that do not apply to special provision schools) increases accuracy by reducing confusion and human error in data entry and ensuring consistent reporting.

Similarly, for the FNS-742, respondents support increasing automation and reducing manual processes wherever possible. Building an online portal to accept and process household applications for school meals is one such example. Plain-language, step-by-step training, instructions and program materials from State agencies and FNS were also cited as critical to ensuring SFA success in certification and verification processes and reporting. Finally, State agencies say that customizing

their online State portals to mirror FPRS and replicate its edit checks helps to reduce reporting errors earlier in the process when SFAs submit the FNS-742 data to the States.

Collaboration between State agencies is a consistent theme in interviews about data for the FNS-834. In addition, respondents generally feel that State-level direct certification matching provided better results than local-level matching.

6.2 Overall Recommendations and Possible Next Steps

The following high-level recommendations were developed based on findings from study interviews. They include steps for FNS to consider in order to increase support to program operators in certain areas, decrease burden and confusion among those who collect and report data, and ultimately improve reporting processes and data accuracy. These recommendations are in addition to suggestions specific to each of the three forms which were previously discussed in the relevant chapter of the report.

6.2.1 Cognitive Testing of Forms and Instructions

Some instances of misreporting stem from a misunderstanding of the data being reported. In some cases, respondents indicate unfamiliarity with terms on the forms and instructions. Cognitively testing future changes to FNS forms and instructions prior to implementing them would provide the opportunity to fine-tune form wording and instructions to help reduce potential confusion and misreporting. Cognitive tests will elicit the most useful feedback if they include program operators at the State and local levels from diverse States across the country, as well as SFA directors of varying levels of program experience and understanding.

6.2.2 Support for Software Used by SFAs

State agency and SFA respondents identify programming errors in SFA software systems as a contributing factor to reporting error. There is also concern that, in some cases, software companies are not aware of changes to program requirements until notified by SFAs. Increasing FNS support and communication to software companies that provide POS systems and other software (such as household application processing) for the school meal programs would help ensure the companies

are aware when program requirements change. Improving support to the companies would also help to ensure that they understand the intent of the changes and accurately reflect new requirements in their software. Support could take a variety of forms, including instituting a mechanism by which software companies could register to receive FNS policy updates, and providing training and information-sharing webinars targeted to software vendors.

6.2.3 FNS Materials to Assist SFAs

Respondents share that verification of household applications is a challenging aspect of SFA responsibilities. There were requests for short, plain-language sample letters for SFAs to use in their contacts with households, and requests for simple, step-by-step instructions on conducting verification. FNS developed and released a Verification Toolkit in 2018 that includes revised sample letters, training materials, and other information to help SFAs understand and communicate with households about the verification process.²⁰ FNS may wish to explore ways to increase promotion of the Verification Toolkit to ensure SFAs are aware of it, and other similar toolkits and program materials available to them.

6.2.4 Training for Teachers Involved in Food Service

With the increase in schools serving meals and snacks in locations other than the cafeteria (e.g., breakfast in the classroom), some schools struggle to ensure that classroom teachers (and other staff not normally involved in food service) understand the requirements for meal service, including documentation. Non-traditional locations for meal service also likely introduce a higher risk for error. FNS and State agencies could identify ways to increase training and support for these schools. Two such examples include implementing training requirements for classroom teachers in these schools, and developing and disseminating simplified materials such as “tips” sheets and prototype forms to accurately record program meals.

²⁰This toolkit was released in March 2018, which was in the middle of data collection. Therefore, many SFAs were not aware of the availability of the toolkit when we interviewed them.

6.2.5 Application of the SNAP Direct Certification Threshold

Study respondents report some challenges with the data used by FNS to calculate each State's rate of SNAP direct certification. Specifically, not all children ages 5 through 17 served through SNAP attend schools that participate in NSLP/SBP, including children who are homeschooled and those who do not attend Kindergarten. Because this number could be expensive or impossible for the State to quantify, this means that the actual rate of SNAP direct certification may be slightly higher than what the data reported to FNS show. In instances in which a State agency is within a few percentage points of but does not meet the 95 percent threshold for SNAP direct certification, FNS could work with the States to minimize burden on a case-by-case basis. This could include streamlining what is required for State Continuous Improvement Plans, or granting a waiver to the requirement for a Continuous Improvement Plan, if warranted.

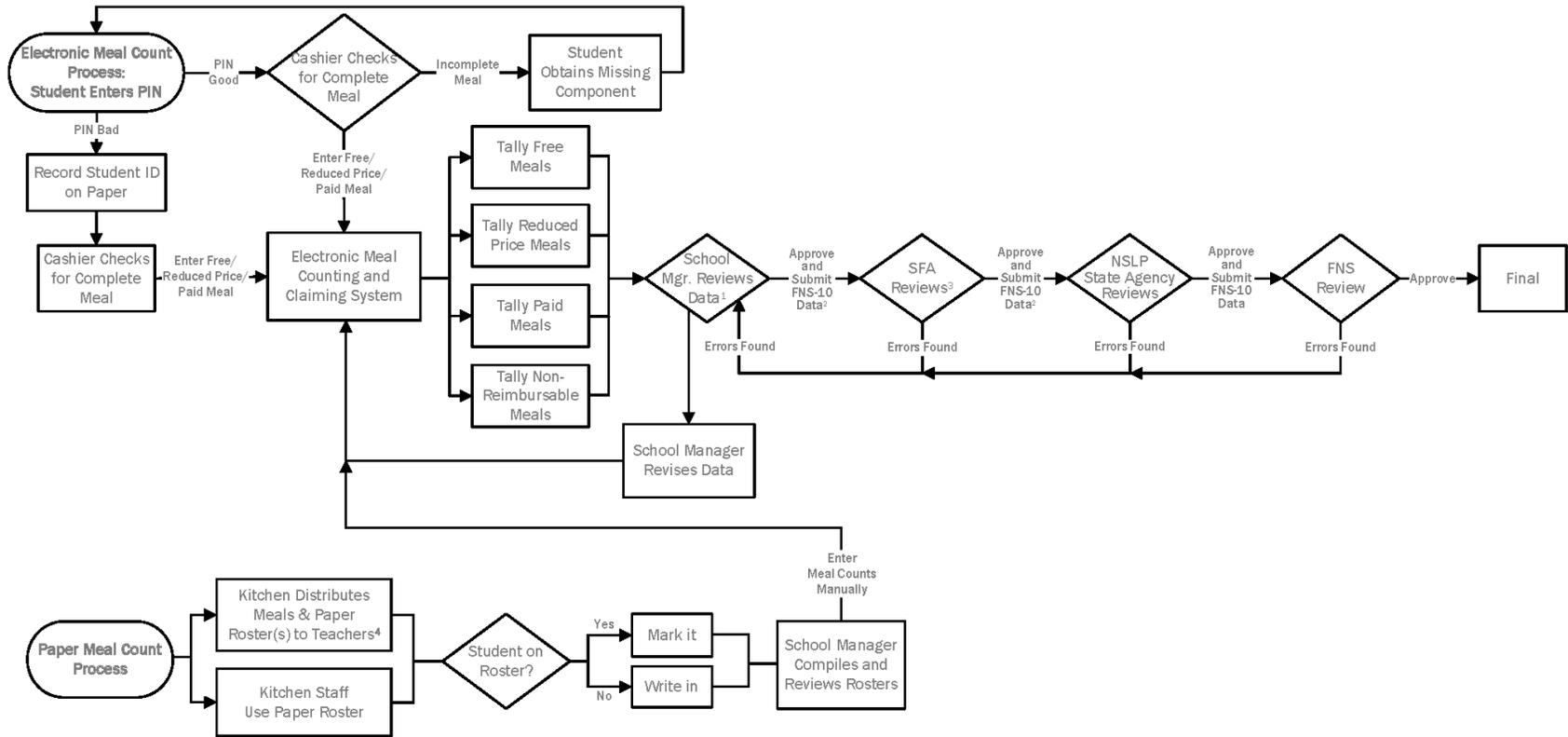
Conclusion

Although respondents express confidence in the quality of the data reported on the three FNS forms, they also offer honest insights into where mistakes are likely to be made. The suggestions cited in this report, many of which were raised by the respondents themselves, may help FNS, States, and SFAs to improve the trainings, data systems, and processes used to report data on the school meal programs via the FNS-10, FNS-742, and FNS-834.

Appendix A
FNS-10 Process Map

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FNS-10 Process Map



¹ School Manager Reviews Data - data is reviewed by comparing paper and electronic records (most common in Oklahoma and Wyoming), by visually inspecting the electronic data (most common in Alabama), or by utilizing the automated edit checks built into the Meal Counting and Claiming System. New York schools food manager follow a mix of those three processes. Schools across the four States utilize automated edit checks.

² School Approves and Submits FNS-10 Data: school food managers either manually click "submit" at the end of each day (most common in New York) or the data will be visible in real-time to the SFA (most common in Alabama and Oklahoma). Wyoming exhibits a mix; schools in some districts share data with SFAs in real-time, while others submit data daily or monthly.

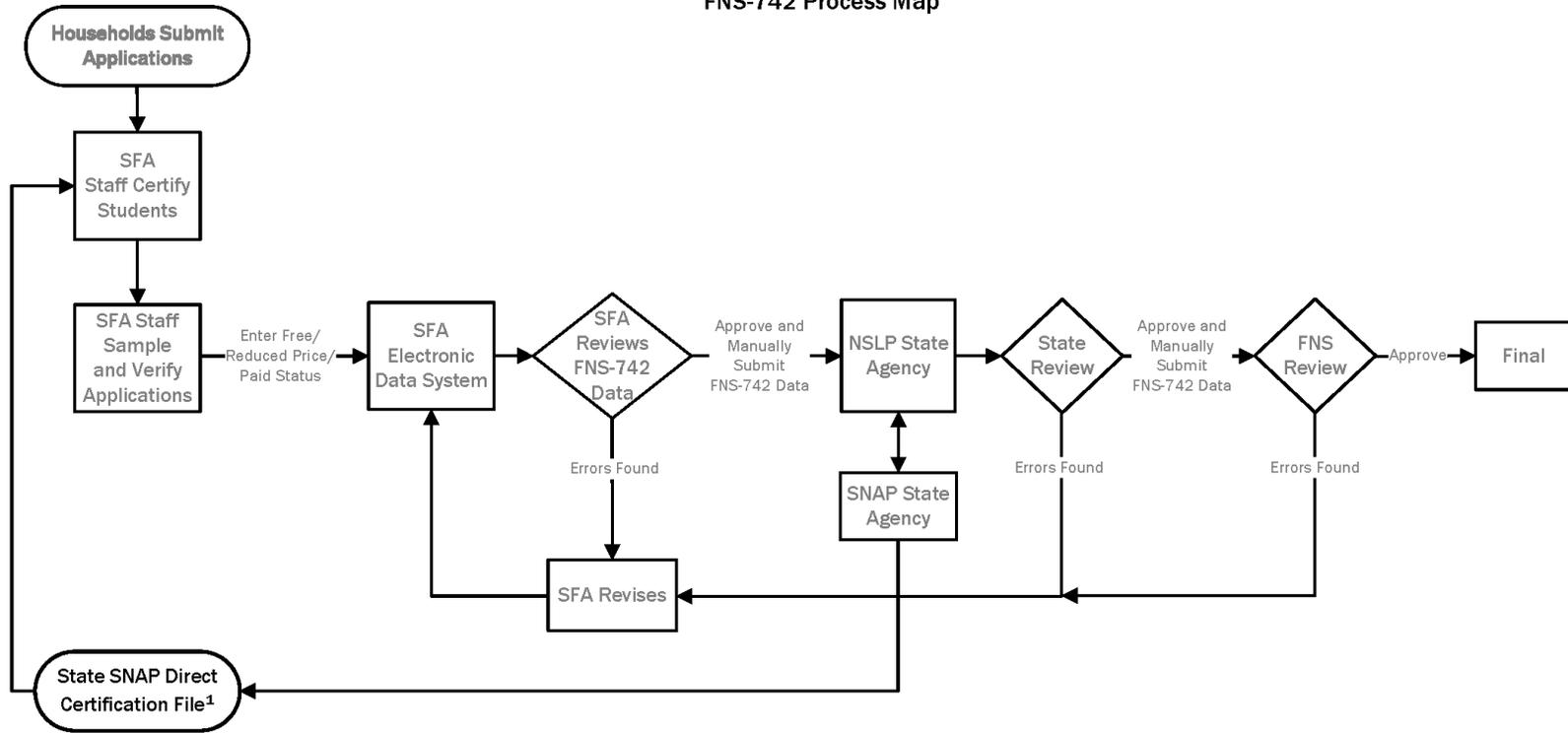
³ SFA Reviews - SFAs review data by comparing paper and electronic records (most common in Alabama and Oklahoma) or by visually inspecting the electronic data (most common in New York and Wyoming).

⁴ Paper rosters go to the teachers when meals are provided in the classrooms.

Appendix B
FNS-742 Process Map

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FNS-742 Process Map



¹ State SNAP Direct Certification File – the most common processes differ by State. In New York and Oklahoma, SFA Directors typically receive a list of students in SNAP households from the State SNAP agency, match that list to their student roster, and directly certify those students for free meals. In Wyoming and Alabama, the State NSLP agency performs the direct certification match, and sends SFA Directors a list of all students in each district who can be directly certified for free meals.

Appendix C

Forms: FNS-10, FNS-742, FNS-834

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<p>U.S. DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE</p> <p style="text-align: center;">REPORT OF SCHOOL</p> <p style="text-align: center;">PROGRAM OPERATIONS</p> <p>STATE AGENCY: Submit report according to the instructions 30 and 90 days following the month being reported. Send original to the Regional Administrator, Food & Nutrition Service.</p>	<p>1. STATE</p> <hr/> <p>2. CALENDAR YEAR</p> <hr/> <p>3. MONTH</p>	<p>4. TYPE OF SUBMISSION (*X* ONE)</p> <p>A. <input type="checkbox"/> 30 - DAY</p> <p>B. <input type="checkbox"/> 60 - DAY</p> <p>C. <input type="checkbox"/> 90 - DAY</p> <p>D. <input type="checkbox"/> 90 - DAY</p> <p>REVISION NO. (1 = 1st rev., 2 = 2nd, etc.)</p> <p>E. <input type="checkbox"/> CLOSEOUT</p> <p>F. <input type="checkbox"/> OTHER - (Describe)</p>	<p style="text-align: center;">FOR FNS USE ONLY</p> <p style="text-align: center;">CAL. YEAR MONTH TYP</p> <table border="1" style="margin: auto; width: 100%; text-align: center;"> <tr> <td style="width: 20px;"> </td> </tr> </table> <p style="text-align: center;">STATE CODE</p> <table border="1" style="margin: auto; width: 100%; text-align: center;"> <tr> <td style="width: 20px;"> </td> </tr> </table>																

PART A - (Complete Monthly)

ITEM <small>(Include Residential Child Care Institutions (RCCIs) in Items 5 thru 8.)</small>	FOR FNS USE ONLY	NUMBER OF MEALS AND HALF-PINTS SERVED				
		PAID (A)	FREE (B)	REDUCED PRICE (C)	TOTAL (D)	AVERAGE DAILY MEALS (E)
5. NATIONAL SCHOOL LUNCH PROGRAM a. Total lunches served in the NSLP <small>(Include all lunches reported in 5b1 and 5b2)</small>	ACTUAL					
	ESTIMATED					
	TOTAL					
b1. Lunches served in school food authorities that qualify the state for additional payment	ACTUAL					
	ESTIMATED					
	TOTAL					
b2. Lunches served in school food authorities certified for performance based reimbursement	ACTUAL					
	ESTIMATED					
	TOTAL					
c. Total afterschool snacks served in all approved schools and sites. (Include in Col. B, all free snacks reported in item 5d, below)	ACTUAL					
	ESTIMATED					
	TOTAL					
d. Total afterschool snacks served in area eligible schools and sites	ACTUAL					
	ESTIMATED					
	TOTAL					
6. SCHOOL BREAKFAST PROGRAM <small>(Include schools with severe need)</small>	ACTUAL					
	ESTIMATED					
	TOTAL					
7. SCHOOL BREAKFAST PROGRAM <small>(Severe need only)</small>	ACTUAL					
	ESTIMATED					
	TOTAL					
8. COMMODITY SCHOOLS <small>(Lunches only)</small>	ACTUAL					
	ESTIMATED					
	TOTAL					
9. SPECIAL MILK PROGRAM a. Schools <small>(Include Residential Child Care Institutions)</small>	ACTUAL					
	ESTIMATED					
	TOTAL					
b. Nonresidential Child Care Institutions	ACTUAL					
	ESTIMATED					
	TOTAL					
c. Summer camps	ACTUAL					
	ESTIMATED					
	TOTAL					

FORM FNS-10 (04-12) Previous Editions Obsolete

SBU

Electronic Form Version Designed in Adobe 9.1 Version

NO FURTHER MONIES OR OTHER BENEFITS MAY BE PAID OUT UNDER THESE PROGRAMS UNLESS THIS REPORT IS COMPLETED AND FILED AS REQUESTED BY EXISTING REGULATIONS (7 C.F.R. 210, 215, & 220)

PART B - (Complete Once A Year As Specified)

ITEM	FOR FNS USE ONLY	NUMBER OF MEALS SERVED					AVERAGE DAILY MEALS (E)		
		PAID (A)	FREE (B)	REDUCED PRICE (C)	TOTAL (D)				
10. REPORT NO. OF MEALS SERVED IN PRIVATE SCHOOLS ONLY									
a. National School Lunch Program									
b. Afterschool snacks (include area eligible snacks reported in 10c.)									
c. Afterschool snacks served in area eligible schools & sites.									
d. School Breakfast Program (include severe need)									
e. Severe Need School Breakfast Program									
11. REPORT NO. OF MEALS SERVED IN RCCI'S ONLY									
a. National School Lunch Program									
b. NSLP - Snacks									
c. School Breakfast Program (include severe need)									
d. Severe Need School Breakfast Program									
OCTOBER	OPERATING A PROGRAM THIS MONTH	NATIONAL SCHOOL LUNCH (F)	NSLP SNACKS (All schs & sites; incl. Col. H) (G)	NSLP SNACKS (Area Elig. Only) (H)	SCHOOL BREAKFAST (Inc. Sev. Nd) (I)	SCHOOL BREAKFAST (Sev. Nd Only) (J)	COMMODITY (K)	SPECIAL MILK (L)	
	12a. Number of Public Schools								
	b. Membership (Enrollment)								
	13a. Number of Private Schools								
	b. Membership (Enrollment)								
	14a. Number of Residential Child Care Institutions								
	b. Membership (Enrollment)								
	15. NUMBER OF CHILDREN APPROVED FOR:								
	a. Free Lunches - - TOTAL								
	b. Reduced-price Lunches - - TOTAL								
	16. NUMBER OF NONRESIDENTIAL CHILD CARE INSTITUTIONS								
	JULY	17. NUMBER OF SUMMER CAMPS OPERATING A PROGRAM FOR THE MONTH OF JULY ONLY							

18. REMARKS

 I CERTIFY THAT THIS REPORT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.	19. AGENCY
	20. SIGNATURE
21. TITLE	22. DATE SIGNED

INSTRUCTIONS

(ALL ITEMS SELF-EXPLANATORY UNLESS NOTED BELOW)

For each applicable month, all schools, residential and nonresidential child care institutions, and summer camps known to have operated a program during the month being reported should be accounted for on this report. The 30-day report should include "actual" data from valid claims on hand, and "estimated" data for those claims which have not been validated or received by the reporting due date. In any event, data reported which is not based on valid claim data should represent the best estimate of the reporting office of the actual level of operation. The 30-day report is due in the FNS Regional Office 30 days following the month being reported.

A 60-day report is not required.

The 90-day report containing only valid final claim data must be submitted to the FNS Regional Office within 90 days following the month being reported. The 90-day report must not contain "estimated" data for any item.

For completion of the Form FNS-10, the following reporting schedule should be followed:

1. Items 5 through 9, MONTHLY.
2. Items 10 through 16, ONCE A YEAR, October.
3. Item 17, ONCE A YEAR, July.

If any of the items do not apply to the State Agency's operation, please leave appropriate spaces blank.

DEFINITIONS (for the purpose of this report):

1. "Average Daily Meals" is the number of meals served on an average day during the month being reported. It may be determined in accordance with the following example: School A served for 20 days a total of 2,000 meals; 2,000 divided by 20 equals an average of 100 meals served daily. School B served for 16 days a total of 2,400 meals; 2,400 divided by 16 equals an average of 150 meals served daily. School C served for 30 days a total of 1,800 meals; 1,800 divided by 30 equals an average of 60 meals served daily. One hundred (Average daily meals served for School A) plus 150 (Average daily meals served for School B) plus 60 (Average daily meals served for School C) equals 310, total aggregate average daily meals for the three schools.

The reporting office may use any valid method to determine the number of average daily meals. The method chosen however, should provide a result similar to the result obtained in the calculation method cited above. Under normal circumstances, the number of average daily meals should not vary appreciably from one month to the next. If there is any significant monthly change in the number of average daily meals served, it should be explained in the "Remarks" section of the report.

Note: Unless all schools and residential child care institutions in the State have the same number of food service operating days, do not divide total meals served in the State by the number of calendar school days in order to determine the number of average daily meals for the State. This method will result in significant monthly variations in the data reported, and is not an accurate measure of the number of average daily meals.

In addition to the "Paid", "Free", and "Reduced Price" meals reported each month, "Average Daily Meals" is the primary element used by FNS during the fiscal year to project State agency operational levels.

2. A "Commodity School" is a school that does not participate in the NSLP but which operates a nonprofit lunch program and receives donated foods, or receives donated foods and cash or services of a value of up to 5 cents per lunch in lieu of donated food for processing and handling the foods.

3. A "Free Meal" is one which is served to a needy child determined to be eligible for such meal under the eligibility criteria of the School Food Authority or residential child care institution approved by the State Agency.

4. "Free Milk" is milk served under the Special Milk Program to needy children determined to be eligible for such milk under the eligibility criteria of the School Food Authority or child care institution approved by the State Agency.

5. **Membership (Enrollment)** - A pupil is a member of a school from the date he presents himself/herself at school and is placed on the current roll until he/she permanently leaves the school for one of the causes recognized as sufficient by the State. The date of permanent withdrawal should be the date on which it is officially known that the pupil has left school, and not necessarily the first day after the date of last attendance. Membership is obtained by adding the total original entries and the total reentries and subtracting the total withdrawals; it may also be obtained by adding the total number present and the total number absent. This term is also known as the number belonging. This same definition may be applied to residential child care institutions.

Membership should be based on the State agency's best assessment of available records for the month of October. Membership may be determined either by using one operating day or by averaging several or all operating days in October.

6. A "**Nonresidential Child Care Institution**" is a licensed nonschool public or nonprofit private institution providing day care services where children are not maintained in residence.

7. A "**Paid Meal**" is one which is served to a child who has not been determined to be eligible to receive "free or reduced price meals," as defined herein.

8. A "**Reduced Price Meal**" is one which is served to a needy child determined to be eligible for such meal under the eligibility criteria of the School Food Authority or residential child care institution approved by the State Agency. The reduced meal price must be less than the full meal price and must be 40 cents or less for lunches and 30 cents or less for breakfasts.

9. A "**Residential Child Care Institution**" is a public or licensed nonprofit private organization including but not limited to orphanages, homes for the mentally retarded, etc., where children are maintained in residence.

10. A "**School**" is an educational unit of high school grade or under operating under public or nonprofit private ownership in a single building or complex of buildings. When separately administered elementary and secondary grade levels are housed in the same building, each is considered a separate school. When both levels are administered as one unit, it should be considered a single school.

11. A "**School Food Authority**" is the governing body which is responsible for the administration of one or more schools and which has the legal authority to operate a lunch program therein.

12. A school with "**severe need**" is a school which is approved for School Breakfast Program reimbursement in excess of the specified standard rates of reimbursement.

13. "**Total Meals**" and "**Total Half-pints of Milk**" are all free, reduced price, and paid meals and all free and paid milk served during the month being reported to all eligible children participating in the child nutrition programs covered by this report.

14. A "**site**" is a nonschool facility participating under the agreement of a School Food Authority and offering afterschool snacks.

15. "**Area eligible**" means a school or site located in the attendance area of a school in which at least 50% of the enrolled children are certified eligible for free or reduced price meals.

16. A school food authority certified for "**Performance based**" reimbursement earns an additional National Lunch Program per lunch reimbursement of 6 cents, adjusted annually.

MONTHLY REPORTING

Note: If complete valid claim data is not available for Items 5 through 9 by the due date, estimates will need to be developed in order to complete the 30-day report. While the reporting office may use whatever methods are most suitable to their needs, the following method is suggested:

For all claims not received for schools and institutions known to be operating a program(s), adjust the most recently received valid claim record available for a full operating month for each reporting unit to the days of operation for the current month. The sum of the estimated outstanding claims should be reported on the "estimated data" line. The sum of the valid claims received should be reported on the "actual data" line. The sum of estimated outstanding claims when added to the tabulation of valid claims actually received should be reported on the "total data" line.

It should be noted that this method may not be appropriate for estimating data for the summer months, the beginning of the fall school term, or any other month affected by inclement weather, strikes, widespread illness, etc.

Any estimation method used by the reporting office will be measured by FNS for accuracy. Reporting offices should make reasonable adjustments for any known program growth or decline.

Item

5a. Enter in appropriate columns the total number of lunches served in schools and residential child care institutions to eligible participants. Any lunches served to persons not eligible for program participation or any served that do not meet the Lunch Pattern Requirements are examples of lunches that must not be reported. (Include all lunches reported in 5b.)

5b1. Enter total number of lunches served in school food authorities that qualify the State for additional payment.

5b2. Enter the total number of lunches served in school food authorities certified to receive performance based reimbursement.

5c. Enter in appropriate columns, the total number of snacks served to eligible children in after school care programs as authorized by regulation. Any snacks served to persons not eligible for program participation or any served that do not meet the meal pattern requirements are examples of snacks that must not be reported.

5d. Enter in Column B, the total number of snacks served free to children in afterschool care programs in area eligible schools and sites. Any snacks served to persons not eligible for program participation or any served that do not meet the meal pattern requirements are examples of snacks that must not be reported.

6. Enter in appropriate columns the number of breakfasts served in schools and residential child care institutions to eligible participants. Include breakfasts served in schools and residential child care centers designated by the State Agency as Severe Need programs. Any breakfasts served to persons not eligible for program participation, or any served that do not meet at least the basic meal requirements are examples of breakfasts that must not be reported.

7. Following the same procedure as for Item 6, report only free and reduced-price breakfasts served in the Severe Need Programs. Those breakfasts should be included in Item 6. Report the total of free and reduced-price Severe Need breakfasts in Column D of Item 7.

8. Enter in appropriate columns the number of lunches served to eligible participants. Include lunches served in both Commodity schools and Commodity residential child care institutions. Any lunches served to persons not eligible for program participation, or any served that do not meet the requirements as set forth in Part 210.10 of the NSLP regulations, are examples of lunches that must not be reported.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB Control Number for this information collection is 0584-0002. The time required to complete this information collection is 2 hours and 15 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.

Note: For Items 5, 6, 7, 8, 10, and 11, Column E, compute "Average Daily Meals" in accordance with Definition No. 1.

9. Enter in appropriate columns by applicable outlet unit the number of half-pints of milk served in the Special Milk Program (SMP) to eligible participants. Milk served in nonpricing outlets should be counted as paid milk served. Include SMP milk served in residential child care institutions with milk served in schools.

ONCE-A-YEAR REPORTING FOR THE MONTH OF OCTOBER (90-day report only)

Item

10. Enter in appropriate columns the number of lunches, breakfasts and snacks served in private schools to eligible participants. Any meals served to persons not eligible for program participation, or any served that do not meet at least the basic meal requirements are examples of meals that must not be reported. For Item 10e, report the total of free and reduced-price Severe Need breakfasts in Column D.

11. Enter in appropriate columns the number of lunches, snacks, and breakfasts served in residential child care institutions to eligible participants. Any meals served to persons not eligible for program participation, or any served that do not meet at least the basic meal requirements are examples of meals that must not be reported. For Item 11d, report the total of free and reduced-price severe need breakfasts in Column D.

12. Enter in appropriate columns the number of public schools participating in the child nutrition programs covered by this report. Report in Column G the total number of public schools and sites serving afterschool snacks, including area eligible schools and sites. Report only the area eligible public schools and sites in Column H. Enter in the appropriate columns the aggregate membership (enrollment) of participating public schools only.

13. Enter in appropriate columns the number of private schools participating in the child nutrition programs covered by this report. Report in Column G the total number of private schools and sites serving afterschool snacks, including area eligible schools and sites. Report only the area eligible private schools and sites in Column H. Enter in the appropriate columns, the aggregate membership (enrollment) of participating private schools only.

14. Enter in appropriate columns the number of residential child care institutions (public and private combined) participating in the lunch, snack, breakfast, commodity, and milk programs and their aggregate membership (enrollment).

15. Enter in Column F the number of children approved for free lunches in public schools, private schools, and RCCIs, and the number of children approved for reduced-price lunches in public schools, private schools, and RCCIs.

16. Enter in Column L the number of nonresidential child care institutions (public and private combined) participating in the Special Milk Program.

ONCE-A-YEAR REPORTING FOR THE MONTH OF JULY

17. Enter in Column L the number of nonprofit summer camps (public and private combined) which served milk in the Special Milk Program during the month of July.

Department of Agriculture, Food and Nutrition Service			
School Food Authority (SFA) Verification Collection Report			
State agencies must report the information on this form ANNUALLY for each SFA with schools operating the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP). All SFAs, including SFAs with all schools exempt from verification requirements, must complete applicable sections.			
According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB number for this collection is 0584-0026. The time required to complete this information collection is 45 minutes per response, including the time to review instructions, search existing data resources, gather the data needed and complete and review the information collection.			
State Agency Name:		SFA ID#:	Type of SFA: <input type="checkbox"/> Public <input type="checkbox"/> Nonprofit/Private
SFA Name:		SFA City:	School Year: From: 20 To: 20
		SFA Zip code:	<input style="width: 20px; height: 15px; border: 1px solid black;" type="text"/> <input style="width: 20px; height: 15px; border: 1px solid black;" type="text"/> <input style="width: 20px; height: 15px; border: 1px solid black;" type="text"/> <input style="width: 20px; height: 15px; border: 1px solid black;" type="text"/>
Section 1	Total Schools, Residential Child Care Institutions (RCCIs) and Enrolled Students	**All SFAs must report Section 1**	
		1-1: Total schools (<i>Do not include RCCIs</i>):	A. Number of Schools OR Institutions
		1-2: Total RCCIs (<i>Do not include schools counted in 1-1</i>):	B. Number of Students
		1-2a: RCCIs with day students (<i>Report ONLY day students in 1-2aB</i>):	
		1-2b: RCCIs with NO day students:	
Section 2	SFAs with schools operating alternate provisions	**ONLY SFAs with alternate provisions must report Section 2**	
		2-1: Operating Provision 2/3 in a BASE year for NSLP and SBP:	A. Number of Schools AND Institutions
		2-2: Operating Provision 2/3 in a NON BASE year for NSLP and SBP:	B. Number of Students
		2-2a: Provision 2/3 students reported as FREE in a NON BASE year:	
		2-2b: Provision 2/3 students reported as REDUCED PRICE in a NON BASE year:	
		2-3: Operating the Community Eligibility Option:	
		2-4: Operating other alternatives for NSLP and SBP:	
Section 3	Students approved as FREE eligible NOT subject to verification	**ALL SFAs must report Section 3 or check box 3-1 if applicable**	
		3-1: <input type="checkbox"/> Check the box only if all schools and/or RCCIs in the SFA were not required to perform direct certification with SNAP (<i>i.e. NON BASE year Provision 2/3 for all schools</i>)	B. Number of FREE Students
		3-2: Students directly certified through Supplemental Nutrition Assistance Program (SNAP): <i>Do not include students certified with SNAP through the letter method.</i>	
		3-3: Students directly certified through other programs: <i>Include those directly certified through Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), or Medicaid (if applicable); those documented as homeless, migrant, runaway, foster, Head Start, Pre-K Even Start, or non-applicant but approved by local officials. DO NOT include SNAP students already reported in 3-2.</i>	
Section 4	Students approved as FREE or REDUCED PRICE eligible through a household application	**ALL SFAs collecting applications must report Section 4**	
		4-1: Approved as categorically FREE Eligible: <i>Based on those providing documentation (e.g. a case number for SNAP, TANF, FDPIR on an application)</i>	A. Number of Applications
		4-2: Approved as FREE eligible: <i>Based on household size and income information</i>	B. Number of Students
		4-3: Approved as REDUCED PRICE eligible: <i>Based on household size and income information</i>	
T-1: Total FREE Eligible Students Reported:		<input style="width: 50px; height: 20px;" type="text"/>	T-2: Total REDUCED PRICE Eligible Students Reported:
		<input style="width: 50px; height: 20px;" type="text"/>	

ALL SFAs must report Section 5 or check box 5-1 if applicable 5-1: <input type="checkbox"/> Check the box if ALL schools and/or RCCIs are exempt from verification (see instructions for list of exemptions). If 5-1 is checked, no further reporting in Section 5 is required.									
5-2: Was verification performed and completed? <input type="checkbox"/> Yes, completed by November 15th <input type="checkbox"/> Yes, completed after November 15th <input type="checkbox"/> No, verification was NOT performed or the process was not completed.					5-3: Type of Verification process used: 1. <input type="checkbox"/> Standard (Lesser of 3% or 3,000 error-prone) 2. <input type="checkbox"/> Alternate one (Lesser of 3% or 3,000 selected randomly) 3. <input type="checkbox"/> Alternate two (Lesser of 1% or 1,000 error prone applications PLUS lesser of one-half of one percent or 500 applications with SNAP/TANF/FDPIR case numbers)				
If 1 or 3 is checked in 5-3, report 5-4. If 2 is checked in 5-3, enter "N/A" in 5-4.			5-4: Total ERROR PRONE applications: <i>Report all applications as of October 1st considered error prone</i>			5-5: Number of applications selected for verification sample:			
ALL SFAs must report 5-7 or check box 5-6 if applicable 5-6: <input type="checkbox"/> Check the box if direct verification was not conducted in the SFA, (i.e. not one of the schools and/or RCCIs in the SFA performed direct verification). If 5-6 is checked, skip 5-7.								A. Number of Applications	B. Number of Students
Report if FREE and/or REDUCED PRICE eligibility is confirmed through direct verification with SNAP/TANF/FDPIR/MEDICAID as of November 15th						5-7: Confirmed through direct verification:			
5-8: Results of Verification by Original Benefit Type For each original benefit type (A, B, & C), report the number of applications and students as of November 15th for each result category (1, 2, 3, & 4). Do NOT include students and applications already reported in 5-7A or 5-7B.									
A. FREE-Categorically Eligible <i>Certified as FREE based on SNAP/TANF/FDPIR documentation (e.g. case number) on application</i>			B. FREE-Income <i>Certified as FREE based on income/household size application</i>			C. REDUCED PRICE-Income <i>Certified as REDUCED PRICE based on income/household size application</i>			
Result Category	a. Applications	b. Students	Result Category	a. Applications	b. Students	Result Category	a. Applications	b. Students	
1. Responded, NO CHANGE:			1. Responded, NO CHANGE:			1. Responded, NO CHANGE:			
2. Responded, Changed to REDUCED PRICE:			2. Responded, Changed to REDUCED PRICE:			2. Responded, Changed to FREE:			
3. Responded, Changed to PAID:			3. Responded, Changed to PAID:			3. Responded, Changed to PAID:			
4. NOT Responded, Changed to PAID:			4. NOT Responded, Changed to PAID:			4. NOT Responded, Changed to PAID:			
VC-1: Total questionable applications verified for cause (Enter "N/A" if not applicable): <i>Report the number of applications as of November 15th verified for cause in addition to the verification requirement.</i>									

Additional Instructions for Reporting the FNS-742

For additional guidance on verification requirements and procedures, refer to the Eligibility Manual (<http://www.fns.usda.gov/cnd/guidance/EliMan.pdf>). Enter the State agency name, SFA name, SFA ID, SFA city, SFA zip code for each SFA with schools and/or RCCIs operating the NSLP and/or SBP. Select if the SFA overall is a public or a private/nonprofit entity and enter the school year for which the report is completed. Include schools and/or RCCIs and the enrolled students only once if operating both NSLP and SBP.

Section 1

All SFAs with schools or RCCIs operating the NSLP and/or SBP must complete this section regardless if all schools are exempt from verification. Report schools or institutions operating the NSLP and/or SBP and students with access to the NSLP and/or SBP as of the **last operating day in October**.

1-1A & B: TOTAL number of schools (not including RCCIs) operating the NSLP and/or SBP and the TOTAL number of enrolled students with access to the NSLP and/or SBP.

1-2A & B: TOTAL number of RCCIs operating the NSLP and/or SBP and the TOTAL number of enrolled students with access to the NSLP and/or SBP in RCCIs.

1-2aA & 1-2aB: Of the RCCIs reported in 1-2A; enter the number of RCCIs with DAY students and ONLY the DAY students with access to the NSLP and/or SBP in RCCIs (day students are those students NOT institutionalized and eligibility is determined individually by application or direct certification as applicable).

1-2bA & 1-2bB: Of the RCCIs reported in 1-2A; enter the number of RCCIs with NO day students and the TOTAL number of institutionalized students.

NOTE: The sum of the students reported in 1-2aB and 1-2bB will NOT equal the total in 1-2B.

Section 2

All SFAs with some or all schools and/or RCCIs operating under an alternative provision must complete this section. For RCCIs operating an alternate provision, include both day and residential students. Report students with access to the NSLP and/or SBP as of the **last operating day in October**. 2-1 through 2-4 should be reported only if the school operates alternate provisions for BOTH programs resulting in no collection of applications for the school. Schools operating Provision 2/3 for only one program and collecting household applications for the other program should report applicable provision data in 2-5.

2-1A & B: BASE year is when certification procedures are conducted.

2-2A & B: NON BASE year is when no certification procedures are conducted.

2-2aB, 2-2bB: Multiply the most recent base year FREE percentage by the enrollment reported in 2-2B to determine 2-2aB. Multiply the base year REDUCED PRICE percentage by the enrollment reported in 2-2B to determine 2-2bB.

2-3A & B: Number of schools operating the Community Eligibility Option and the number of enrolled students in the schools with access to the NSLP and/or SBP.

2-4A & B: Other alternatives include Provision 1 and universal meal service through census data or socioeconomic surveys.

2-5A & B: Enter the number of schools and/or RCCIs and students enrolled operating an alternate provision for **ONLY SBP** or **ONLY NSLP**. Include schools/RCCIs operating in both a base year and non base year.

Section 3

All SFAs must complete this section. If all schools and/or RCCIs in the SFA were not required to perform direct certification with SNAP, then check box 3-1. Direct certification is the process by which the student is certified eligible based on documentation received directly from the applicable program (e.g. SNAP or TANF agency). This process eliminates the need for the household to submit an application. Report students approved FREE eligible as of the **last operating day in October**.

3-2B: Include students directly certified with SNAP. If a student is directly certified with SNAP as well as with another program (e.g. TANF/eligible homeless), include the student in this SNAP count (3-2B). Also include in this count any student in the SFA deemed eligible based on extended categorical eligibility via an eligible student in the primary household who has been directly certified with SNAP. DO NOT include SNAP letter method certifications in this SNAP count, report these in 3-4B below. (SNAP letter method certifications are when the family submits a letter from the SNAP agency to document receipt of SNAP benefits. This is no longer considered to be direct certification.)

3-3B: Include students directly certified through programs other than SNAP. Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household directly certified with TANF or FDPIR. DO NOT include SNAP students already reported in 3-2 or to be reported in 3-4 as certified categorically through SNAP letter method.

3-4B: Include ONLY students certified as categorically FREE eligible based on a letter submitted by family from the SNAP agency. Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household certified as FREE categorically eligible with the letter method with SNAP.

Section 4

All SFAs with schools and/or RCCIs collecting individual household applications must report this section, including schools and/or RCCIs in a Provision 2/3 base year. Report number of **applications (A)** approved as of **October 1st**. Report number of **students (B)** as of the **last operating day in October**.

4-1A & B: Number of **applications** approved FREE eligible based on documentation submitted on an application (i.e. case number for SNAP, TANF, or FDPIR on an application) on file as of **October 1st** and the number of **students as of the last operating day in October** approved FREE eligible based on documentation submitted on an application (i.e. case number for SNAP, TANF, or FDPIR on an application). *Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household categorically FREE eligible with SNAP, TANF, or FDPIR.*

4-2A & B: Number of **applications** approved FREE eligible based on income information submitted by the household on file as of **October 1st** and the number of **students as of the last operating day in October** approved FREE eligible based on income information submitted by the household.

4-3A & B: Number of **applications** approved REDUCED PRICE eligible based on income information submitted by the household on file as of **October 1st** and the number of **students as of last operating day in October** approved REDUCED PRICE eligible based on income information submitted by the household.

T-1: Enter the total number of students reported as FREE eligible.
(3-2B) + (3-3B) + (3-4B) + (4-1B) + (4-2B) + (2-2aB, if applicable)

T-2: Enter the total number of students reported as REDUCED PRICE eligible.
(4-3B) + (2-2bB, if applicable)

Section 5

If **ALL** schools and/or RCCIs in the SFA are exempt from verification activities, check box 5-1 and no further reporting is required in Section 5. Verification activities are NOT required for:

- schools/RCCIs in which all children have been certified under direct certification procedures including children documented as eligible foster, migrant, runaway or homeless children;
- RCCIs which do not have day students;
- schools electing the Community Eligibility Option;
- schools/RCCIs in which FNS has approved universal meal service through census data or using socioeconomic surveys; e.g., special cash assistance claims based on economic statistics regarding per capita income (Puerto Rico and the Virgin Islands);
- schools participating only in the Special Milk Program;
- schools in which all children are served with no separate charge for food service and no special cash assistance is claimed, (i.e., non-pricing programs claiming only the paid rate of reimbursement);
- all schools are Provision 2/3 schools in a non base year;
- schools which do not have any free or reduced price eligible students;
- other FNS determined exemptions on a case-by-case basis.

5-2: Indicate whether verification was performed and completed by the deadline of November 15th. If verification was completed after the deadline, report the remainder of Section 5 as applicable.

5-3: If verification was completed, check the type of verification process used to comply with the requirements of 7 CFR 245.6a. Please note the qualification requirements in 7 CFR 245.6a(d) must be met to use the two alternate sample sizes.

- *Standard:* Verify 3% or 3,000 of approved applications, whichever is less, selected from error-prone applications on file as of **October 1st**. If there are not enough error-prone applications, LEAs must select at random additional applications to complete sample size.
- *Alternate one:* Verify 3% or 3,000, whichever is less, of all randomly selected approved applications on file as of **October 1st**.
- *Alternate two:* Verify the lesser of 1% or 1,000 approved applications as of **October 1st** selected from error prone applications PLUS the lesser of one-half of one percent or 500 applications approved as of **October 1st** that provided a case number in lieu of income.

5-4: Error-prone applications are household applications approved as of **October 1st** indicating monthly income within \$100 of the monthly limit or annual income within \$1,200 of the annual limit of the applicable income eligibility guidelines.

5-5: Enter the total number of applications initially selected for the verification process as indicated in 5-3.

5-6: Check if direct verification was not conducted in the SFA (not one school in the SFA conducted direct verification). Direct verification is using records from public agencies to verify income and/or program participation.

5-7A & B: Only report applications and students if FREE and/or REDUCED PRICE eligibility is confirmed through direct verification. Report applications and students not directly verified in the appropriate category in 5-8.

5-8: For the purposes of this report verification is complete:

- for households whose eligibility does not change as of the date of the confirmation of eligibility by a reviewing official;
- for households which do not appeal a change in eligibility as of the first operating day following the last date for filing an appeal in response to a notice of change in eligibility;
- for households which appeal a change in eligibility as of the first operating day following a decision by the hearing official.

Responded: The household provided sufficient documentation. This includes verbal or written notification that the household declines benefits.

NOT Responded: The household did not provide sufficient documentation or the household did not provide a response.

A1, B1, & C1: Number of applications with no change and the number of students on these applications.

A2 & B2: Number of applications changed to REDUCED PRICE based on sufficient documentation provided by the household and the number of students on the applications.

C2: Number of applications changed to FREE based on sufficient documentation provided by the household and the number of students on the applications.

A3, B3, & C3: Number of applications for which the eligibility was changed to PAID based on sufficient documentation by the household and the number of students on the applications.

A4, B4, & C4: Number of applications for which the eligibility was changed to PAID because documentation necessary to complete the verification process was NOT provided and the number of students on the applications.

The number of applications reported in 5-8 should include both the results of verification from verification process and the results from any applications verified for cause reported in VC-1.

VC-1: If applicable in at least one school and/or RCCI, report all applications verified for cause outside of the verification process (7 CFR 245.6a) as of November 15th. Applications verified for cause are NOT considered part of the required sample size.
Include the results of verification for cause by original benefit type in the appropriate category in 5-8.

<p>U.S. DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE STATE AGENCY (NSLP/SNAP) DIRECT CERTIFICATION RATE DATA ELEMENT REPORT</p> <p>This annual interagency report collects data elements from the State agencies that administer the Supplemental Nutrition Assistance Program (SNAP) and from the State agencies that administer the National School Lunch Program (NSLP).</p> <p>A separate, completed FNS-834 report must be submitted to the Food and Nutrition Service (FNS) no later than December 1st each school year by:</p> <ul style="list-style-type: none"> • the SNAP State agency, providing Data Element #2 below; and • each State agency that administers the NSLP, providing Data Element #3 below. <p>These data elements are needed to compute the Direct Certification Rate with SNAP that is required by the Food, Conservation, and Energy Act of 2008 (Public Law 110-246) and by the Richard B. Russell National School Lunch Act, as amended by the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296) and promulgated by the regulations published on February 22, 2013, the <i>National School Lunch Program: Direct Certification Continuous Improvement Plans required by the Healthy, Hunger-Free Kids Act of 2010</i>, which added a new section 7 CFR 245.12 to NSLP regulations and amended SNAP regulations at 7 CFR 272.5 to allow for this collection.</p> <p>For an understanding of the formula to calculate NSLP direct certification rate with SNAP, and to see how these data elements come into play, please refer to the reverse side of this form.</p>	State	<div style="border: 1px solid black; width: 100%; height: 40px;"></div>
	School Year	<div style="border: 1px solid black; width: 100%; height: 40px; display: flex; align-items: center; justify-content: center;"> 20__ - 20__ </div>
<p>State Agency Name and Address:</p>		
<p>Contact Information: (Name, Title, Email, Phone)</p>		
<p>According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB number for this collection is 0584-0577. The time required to complete this information collection is 30 minutes per response, including the time to review instructions, to search existing data resources, to gather the data needed, and to complete and review the information collection.</p>		

SNAP State agency completes this section
<p>Data Element #2 – The number of school-aged children in SNAP households during the months of July, August, and September.</p> <p>Please enter, in the box provided below, the unduplicated count of the number of children ages 5 to 17 years at any time during the months of July, August, or September of this school year who were members of households receiving assistance under SNAP at any time during the months of July, August, or September of this school year. See reverse side for specific instructions.</p>
<p>Data Element #2</p> <div style="border: 1px solid black; width: 100%; height: 40px;"></div>

NSLP State agency completes this section
<p>Data Element #3 – The number of SNAP Children in Special Provision Schools Operating in a Non-Base Year.</p> <p>Please enter, in the box provided below, the number of children from households receiving SNAP benefits that attend schools operating under the provisions of 7 CFR 245.9, if such schools were reporting in a year other than the base year. See reverse side for specific instructions.</p>
<p>Data Element #3</p> <div style="border: 1px solid black; width: 100%; height: 40px;"></div>

Optional - The NSLP or SNAP State agency may complete this section, if applicable
<p>Special Circumstances</p> <p>If there are special circumstances that would affect the direct certification rate calculation for your State that you would like to bring to our attention, please let us know by marking an "X" in the box to the right. See reverse side for more instruction.</p>
<div style="border: 1px solid black; width: 40px; height: 40px; display: flex; align-items: center; justify-content: center;"> <input type="checkbox"/> </div>

STATE AGENCY (NSLP/SNAP) DIRECT CERTIFICATION RATE DATA ELEMENT REPORT (continued)

PURPOSE - This report collects data elements necessary to compute direct certification rates for comparison with certain benchmarks required by 7 CFR 245.12(b). The benchmark for school year (SY) 2012-13 is 90%, and the benchmark for SY 2013-14 and every school year thereafter is 95%.

To promote transparency and to strengthen the direct certification process so that States can monitor their own performance using the same measures and methodology that FNS will use, this report identifies each of the data elements and its role in the formula to calculate a State's NSLP Direct Certification Rate with SNAP, even if, like Data Element #1, it is not collected on this form.

Direct Certification Rate Formula:

$$\begin{array}{r}
 \text{Percent of} \\
 \text{SNAP children} \\
 \text{directly} \\
 \text{certified for} \\
 \text{free school} \\
 \text{meals}
 \end{array}
 =
 \frac{
 \begin{array}{r}
 \text{SNAP children} \\
 \text{directly certified for} \\
 \text{free school meals}
 \end{array}
 +
 \begin{array}{r}
 \text{SNAP children in special} \\
 \text{provision schools operating} \\
 \text{in a non-base year}
 \end{array}
 }{
 \begin{array}{r}
 \text{School-aged children in SNAP households during} \\
 \text{the months of July, August, and September}
 \end{array}
 }
 =
 \frac{
 \text{\#1} + \text{\#3}
 }{
 \text{\#2}
 }$$

Data Element	Instructions and additional information
# 1	<p>SNAP CHILDREN DIRECTLY CERTIFIED FOR FREE SCHOOL MEALS: This is the number of children directly certified with SNAP for free school meals as of the last operating day in October. THIS DATA ELEMENT #1 DOES NOT COME IN ON THIS FORM; it comes in instead on the FNS-742, line 3-2B. It is due to the NSLP State agency no later than February 1st and to FNS no later than March 15th each school year.</p>
# 2	<p>SCHOOL-AGED CHILDREN IN SNAP HOUSEHOLDS: For our direct certification rate formula, we define "school-aged" as 5 to 17 years old. A query on the database must yield any child in a household receiving assistance under SNAP during the months of July, August, or September and whose birthdate is between July 1st (of the SY-minus-18) and September 30th (of the SY-minus-5). For example, for SY 2012-2013, that would be children born between July 1, 1994 (2012 minus 18) and September 30, 2007 (2012 minus 5); and for SY 2013-14, that would be children born between July 1, 1995 (2013 minus 18) and September 30, 2008 (2013 minus 5). So long as the child's birthday falls within the birthdate age-range listed for the given school year, include the child in the count. Be careful, however, that you do not count the same child more than once. We are looking for the unduplicated count, so even if the child is in a SNAP household for each of the three months, s/he is counted only once. We need only the counts, not the list of names of such children. THIS DATA ELEMENT #2 IS REPORTED ON THE FRONT OF THIS FORM BY THE SNAP STATE AGENCY in the space provided. It is due to FNS as soon as possible, but no later than December 1st of each school year. In addition to submitting a completed report to FNS, you, as the SNAP State agency, must also send a copy of this completed report to the State agency that administers the NSLP in your State so that they will know the data element you are reporting to FNS. Reporting this data element as soon as it is available will allow these NSLP State agencies to better monitor their own performance.</p>
# 3	<p>SNAP CHILDREN IN SPECIAL PROVISION SCHOOLS OPERATING IN A NON-BASE YEAR - To get this count, NSLP State agencies must ensure that a match is run between SNAP records and school enrollment records from schools operating under the provisions of 7 CFR 245.9 (special provision schools) in a year other than the base year. Although you will not actually directly certify children attending these schools in a non-base year, this process will provide a measure for the count of the number of children who could have been directly certified with SNAP had it been a base year when direct certification with SNAP is conducted. Such special provision school matching efforts should occur in or close to October, but must occur no later than the last operating day in October. (Please refer to the preamble of the final rule cited on the front of this form and to other FNS Guidance regarding special phase-in allowances and CEO school options.) THIS DATA ELEMENT #3 IS REPORTED ON THE FRONT OF THIS FORM BY THE NSLP STATE AGENCY in the space provided. It is due by December 1st of each school year. [Note: In a base year, actual SNAP direct certifications will be reported on the FNS-742, line 3-2B and included in Data Element #1 instead of in Data Element #3. If your State does not have any special provision schools operating in a non-base year for this school year, enter "0" in the box on the front of this form.]</p>
Special Circumstances (Optional)	<p>If your State has special circumstances that you want us to consider to more closely approximate either of the two data elements collected on this form, please alert us by putting an "X" in the Special Circumstances box on the front of this form. FNS would then contact any State agency that marks this box, asking the State agency to forward a description of the circumstance they want FNS to consider, the count of the number of children affected by the circumstance, the methodology for estimating the count, and the source(s) of published State or Federal data used to support that methodology.</p>
<p>Please note that although this is an interagency form, it is not a shared form. FNS expects separate forms to come in from each State agency. The SNAP State agency is to fill out the front of this form, completing Data Element #2 and leaving Data Element #3 blank. The State agency that administers the NSLP in the State is to complete the front of a separate form, completing Data Element #3 and leaving Data Element #2 blank. (If more than one State agency administers the NSLP in the State, they each are to submit separate forms.) Either State agency may mark the Special Circumstances (Optional) box.</p>	