

EXAMINING THE POTENTIAL TO EXPAND DATA MATCHING IN THE SCHOOL MEAL PROGRAM ELIGIBILITY AND VERIFICATION PROCESSES (SUMMARY)

Background

Direct certification and direct verification use computer matching to streamline school meal program operations. Direct certification increases access to school meals for eligible students while decreasing the administrative burden on families and school district staff by limiting the amount of paperwork they must complete and process.

State Agencies (SAs) conduct direct certification by matching school enrollment data with data from means-tested programs such as the U.S. Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPIR), and certain other public programs¹ that confer categorical eligibility to students. Direct verification is the process of confirming income or categorical eligibility of a small sample of approved applications through data matching.

In a continued effort to enhance the use of data matching in school meals, the USDA Food and Nutrition Service (FNS) is conducting demonstration projects to use Medicaid data to directly certify students for both free and reduced-price meal benefits.

FNS commissioned this analysis to determine whether any additional means-tested programs might be feasible for use in the direct certification of school-age children participating in school meals or for verification of household income on meal applications.

Study Objectives

(1) Summarize the experiences, benefits, challenges, and barriers of current data matching practices in SAs and local education agencies (LEAs);

¹ Children who are categorically eligible due to their status as homeless, runaway, migrant, foster care or Head Start may be directly certified if confirmed through documentation from an appropriate State or local agency.

(2) Identify additional data sources that have potential for improving future matching processes in the school meals programs; and

(3) Obtain insights from SAs and LEAs on the potential utility of, and foreseeable barriers and challenges to, including additional means-tested programs for direct certification and verification.

Methods

This analysis draws on results from three research activities:

- A literature review;
- Interviews with experts familiar with the data files from candidate means-tested programs, and State earnings and employment files; and
- Semi-structured interviews with eight SA officials who are responsible for data matching operations.

The eligibility requirements for 70 means-tested programs were reviewed to determine if they had income eligibility criteria and certification periods similar to those for the USDA National School Lunch Program (NSLP) and School Breakfast Program (SBP), and also included school-age children in participant households. The Income Eligibility Verification Systems (IEVS) database that includes employer reports of earnings data was also considered.

Findings

The IEVS database and six means-tested programs were identified as potential candidates for data matching in the NSLP. The means-tested programs include:

- Special Supplemental Nutrition Program for Women, Infants, and Children;
- Affordable Care Act Health Insurance Marketplace;
- Public Housing and Housing Choice Voucher Programs;
- Low Income Home Energy Assistance Program (LIHEAP);
- Weatherization Assistance Program; and
- Earned Income Tax Credit.

Computer matching to wage and benefit information for verification of school meal applications is not feasible.

Matching to wage data or other income reporting systems such as the IEVS systems requires individual social security numbers (SSN) for each adult household member. Currently, only the last four digits of one household member's SSN are required to apply for meal benefits through the submission of an application.

Only the Public Housing Programs and LIHEAP were deemed potentially feasible for NSLP data matching, and each has limitations.

The Public Housing Program and Housing Choice Voucher Program assist low-income families, the elderly, and persons with disabilities in obtaining affordable housing. Income eligibility limits are established by the U.S. Department of Housing and Urban Development (HUD) for both programs and vary based on the median income for the county or metropolitan area where participants live. The sources of annual gross income used in eligibility determination are essentially identical to those used in the NSLP. HUD collects the personally identifiable information needed to perform data matching with student enrollment records in the NSLP.

LIHEAP, administered by the U.S. Department of Health and Human Services (HHS) at the Federal level through block or formula grants, assists low-income households with home heating and cooling costs, energy crisis, and weatherization assistance. Simply being eligible for LIHEAP does not assure that a household will receive LIHEAP benefits. States establish their own eligibility criteria within Federal parameters. Maximum Federal income eligibility is the greater of 150 percent of the Federal poverty guidelines or 60 percent of State median income. In most States, LIHEAP income sources closely align with those used to determine NSLP income eligibility. LIHEAP could be used for direct certification based on income eligibility determinations but not for categorical eligibility. Most household applications include fields for first and last name, date of birth, and social security number for all household members. Recertification periods vary by State but most States use eligibility determinations for a 12-month period before requiring recertification.

To evaluate data matching with other means-tested programs, States need data on the number of students that could be certified that are not already directly certified through existing programs.

States are hesitant to invest the time and money needed to establish working relationships with the administering

agencies and to incorporate additional program data into the direct certification systems without this information. If there is substantial overlap between households participating in these new means-tested programs and programs currently used in NSLP data matching, it may not be cost effective to add these programs.

States perceived a number of challenges to adding means-tested programs to current data matching processes.

Identifying and contacting appropriate SA staff and establishing an agreement and data matching process between SAs can present challenges. Differences in the privacy and confidentiality policies of each SA can make the process time-consuming. In States where the data matching occurs at the district level, training district staff to effectively and frequently perform direct certification data matches is a challenge noting that errors in this process can lead to missed or duplicate matches. The start-up costs and time requirements for integrating additional program data files into existing data matching processes can also pose a challenge.

Summary

The findings from the research detailed in this White Paper suggest that LIHEAP and HUD program files may be feasible to incorporate into NSLP data matching for direct certification. These programs meet three important criteria for inclusion:

- (1) They have identifiers needed to conduct matches with student enrollment records;
- (2) They have income eligibility criteria similar to the NSLP; and
- (3) They include participant households that are likely to include school-age children.

However, potential overlap with existing NSLP data matching may limit the cost-effectiveness of adding these programs. A pilot study conducted in three to five States to more accurately assess the number of additional unduplicated children that would be directly certified for the NSLP through data matching with HUD and LIHEAP program files may be needed.

For More Information

U.S. Department of Agriculture, Food and Nutrition Service, Examining the Potential to Expand Data Matching in the School Meal Programs' Eligibility and Verification Processes, by Steven Garasky, Roderick Harrison, Angela Campbell, Molly Matthews-Ewald, Paul Ruggiere. Project Officer, John Endahl, Alexandria, VA: October 2016. Available online at: www.fns.usda.gov/research-and-analysis.

USDA is an equal opportunity provider and employer.