# Data Matching in the National School Lunch Program: 2005

## Volume 2: Select Case Studies

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# Data Matching in the National School Lunch Program: 2005

# Volume 2: State Case Studies

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**Appendix A. Highlights of Case Studies**

# List of Exhibits

# Introduction To the Case Studies

This volume contains the findings of in-depth interviews conducted during Winter 2005 with State and local agencies in six States: Georgia, Kansas, Massachusetts, Oregon, Texas, and Wisconsin. The six States were selected to represent a variety of strong approaches to State-level computer matching for NSLP direct certification.

Direct certification was the first application of computer matching for the NSLP. Current regulations give school food authorities (SFAs) the option to directly certify children for free meals by obtaining documentation from State or local agencies administering the Food Stamp Program (FSP), Temporary Assistance to Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR). Children who are directly certified for free meals do not have to complete an application and are not subject to income verification.

Five of the six States selected for case study had State-level computer matching for direct certification, and Kansas was thought to be in planning stages for State-level computer matching at the time of selection. Two States also have computer matching systems for direct verification (Georgia and Wisconsin); only Georgia was using Medicaid data for direct verification at the time of the interviews. Characteristics of States and reasons for selection are presented in Exhibit 1.

In each State, in-depth telephone interviews were conducted with the following agencies:

- State Child Nutrition Program
- State Education Agency
- State Medicaid Agency
- State Food Stamp Agency
- Two School Food Authorities (SFAs)

In addition, the State Wage Information Collection Agency (SWICA) was interviewed in Oregon regarding the use for NSLP verification of quarterly wage data reported to the Unemployment Compensation (UC) program.

The two SFAs interviewed in each State are listed in Exhibit 2, along with measures of size and Census characteristics of the school district catchment area.

All interviews were conducted by the same two-person team so that interviews were sequential and information obtained from one agency in a State could be confirmed with other agencies in the State. Most interviews lasted one hour and involved multiple participants from the responding agency. Follow-up, when needed, was done mainly via email. In addition, documentation was obtained from State websites to aid in preparation for interviews, and to supplement the information obtained from interviews.

The topics of the in-depth interviews paralleled the topics in the State surveys (summarized in volume 1 of the report). These interviews, however, obtained much more detailed information from several points of view. With regard to direct certification computer matching, respondents were asked to describe current procedures; the history of system development; the strengths and weaknesses of current operations; and the feasibility of changes. With regard to expanding computer matching to

verification, respondents discussed current methods of verification; availability of food stamp, TANF, Medicaid, and SCHIP data for computer matching; legal limitations on the use of data for NSLP verification; and potential systems models.

Results from analyses of the SY2004-05 Verification Summary Report (VSR), as reported in Volume 1, are referenced in this volume where appropriate. Massachusetts did not provide usable VSR data. VSR data from Oregon and Texas were incomplete, in that all SFAs were not included in their data submissions. Oregon and Texas data were analyzed, but results should be viewed with caution.

The six case studies follow the same general outline (Exhibit 3), although some sections are not applicable in all States. Appendix A contains a summary of direct certification and verification processes in each State (this is the same as Appendix B in Volume 1 of the report).

**Exhibit 1**

**States Selected for In-Depth Interviews and Case Study**

| State | Number of School Districts[a] | Total Student Enrollment[a] | Reason for Selection |
|---|---|---|---|
| **In-Depth Interviews – November 2005–February 2006** | | | |
| Georgia | 182 | 1.5 million | Old direct certification system (1992); does not use SSIS for direct certification[b]; on-line inquiry system; and Medicaid data used for verification. |
| Kansas | 302 | 466,000 | District-level matching in 6 districts; letter method statewide; planning for State-level match for direct certification; and SSIS currently being implemented. |
| Massachusetts | 386 | 976,000 | New system for direct certification (2004); the only Northeast State with State-level computer matching for direct certification; and does not use SSN. |
| Oregon | 206 | 550,000 | New system for direct certification (2003); uses SSIS; match by SSN; monthly matching; and the only State with a match algorithm that checks for unmatched siblings. |
| Texas | 1,265 | 4.3 million | Old system for direct certification (1992); uses SSIS; match by SSN; and large State with large number of SFAs. |
| Wisconsin | 426 | 880,000 | Old system for direct certification (1992); one of only 2 States where State-level matching is done by the food stamp agency; and computer matching system for direct verification. |

[a] Total student enrollment and number of school districts are for public schools only, for SY2004-05.

[b] Interviews clarified that the SSIS was actually used for direct certification in Georgia, and the survey data were corrected.

*Sources:* Number of districts and student enrollment are official counts from State Education Agency websites. These numbers may differ from the count of SFAs reported in the Survey of Child Nutrition Directors, and is greater than or equal to the number of SFAs reported in Appendix C of Volume 1 of the report, which excludes public SFAs with only Provision 2/3 schools.

**Exhibit 2**

**SFAs Participating in In-Depth Interviews**

| State / SFA name | Student enrollment | Percent of enrollment approved for F/RP NSLP | Urban | School District Demographic Characteristics (Percent of population) | | |
|---|---|---|---|---|---|---|
| | | | | Race/Ethnicity | | |
| | | | | White, non-Hispanic | Non-white, non-Hispanic | Hispanic |
| Georgia | | | | | | |
| Cobb County | 102,000 | 32 | 99 | 71 | 22 | 7 |
| Crisp County | 4,300 | 70 | 59 | 54 | 44 | 2 |
| Kansas | | | | | | |
| Shawnee-Mission | 29,000 | 17 | 100 | 89 | 7 | 4 |
| Wichita | 45,000 | 46 | 99 | 70 | 20 | 10 |
| Massachusetts | | | | | | |
| Boston Public Schools | 58,000 | 73 | 100 | 49 | 36 | 15 |
| Orange Public Schools | 800 | 50 | 68 | 95 | 3 | 2 |
| Oregon | | | | | | |
| Beaverton | 36,000 | 29 | 99 | 77 | 14 | 9 |
| McMinnville | 6,000 | 44 | 87 | 81 | 5 | 14 |
| Texas | | | | | | |
| Hurst-Euless-Bedford (HEB) | 19,000 | 33 | 100 | 75 | 14 | 11 |
| Victoria ISD | 14,000 | 56 | 80 | 53 | 8 | 39 |
| Wisconsin | | | | | | |
| Milwaukee Public Schools | 97,000 | 74 | 100 | 46 | 42 | 12 |
| Tomah Area School District | 3,000 | 30 | 44 | 96 | 3 | 1 |

*Sources:* National Center for Education Statistics, *School District Demographics System, Census 2000 Data.*

**Exhibit 3**

**Outline of the Case Studies**

- Highlights
- Direct Certification
  - History
  - Computer Matching Process for Direct Certification
  - Effectiveness, Challenges, and Solution
  - Costs and Benefits of Computer Matching
  - Future Directions for Direct Certification
- NSLP Application Verification Process
  - SFA Verification Procedures
  - Direct Verification Process (if applicable) or Feasibility of Direct Verification Computer Matching with FS/TANF (if applicable)
  - Feasibility of Direct Verification with Medicaid/SCHIP
  - Feasibility of Direct Verification with IEVS
- Statewide Student Information System
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  - Student Identifiers and Demographic Data
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- Medicaid Data Availability and Use
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  - Referrals from NSLP to Medicaid/SCHIP
  - Medicaid Data Sharing (if applicable)
  - Computer Matching for Medicaid Administrative Claim (MAC) Program (if applicable)
  - Computer Matching for School Health and Related Services Claims (if applicable)
- Income Eligibility Verification System (Georgia and Wisconsin) [1]
  - Income Verification for FSP, TANF, and Medicaid
  - Income Verification for SCHIP
  - Availability and Usefulness of Income Data for Verification
  - Feasibility of Using IEVS Sources for NSLP Verification

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[1] This topic was investigated in only two States. Results were consistent with findings of exploratory interviews, that IEVS is not feasible for NSLP.

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# Chapter 1
# Georgia Case Study

Georgia was chosen for case study because State-level computer matching is used for direct certification and, in addition, SFAs have query access to current FS/TANF data for direct certification and direct verification. Beginning in SY2005-2006, SFAs also have access to Medicaid data for direct verification. Georgia is in the Southeast region, has a student population of approximately 1.5 million, and all 182 public SFAs participate in direct certification.[2] Agencies interviewed for the case study are listed in Exhibit 1-1.

## Highlights

Georgia has used State-level computer matching since it began direct certification 13 years ago. After the SSIS was implemented, in SY1997-98, it was used for the match.[3] The State Education Agency (SEA) matches prior-year fall enrollment data from the SSIS with an extract of FS/TANF children provided by the FSP agency, and posts the results on a secure website for SFAs to download or print. Student data are matched by SSN, or by name and DOB. SFAs can also download data for unmatched FS/TANF children in their county.

In addition to the State match results, SFAs in Georgia can use a secure Internet-based system to look up FSP and TANF status through the State's SUCCESS system. SUCCESS is the eligibility determination system for the food stamp, TANF and Medicaid programs.[4] This query capability may be used for direct certification and direct verification. Medicaid status information is also available on this system for direct verification. Eligibility information from the State's separate SCHIP program resides on a separate computer system and is not available for direct verification.

For SY2005-2006, the SEA matched over 300,000 children in the FS/TANF file to student records, representing 57 percent of FS/TANF children ages 1 to 19. All SFAs in Georgia used direct certification in SY2004-2005, according to the CN agency and our analysis of verification summary report (VSR) data. Among public school students certified as categorically eligible for free meals, 63 percent were directly certified or otherwise not subject to verification (based on the VSR data).

The principal challenges for direct certification in Georgia are:
- untimely enrollment data for the computer match,
- missing or incorrect SSNs in student records,
- limitations of files of unmatched FS/TANF children, and
- limitations of the on-line inquiry system.

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2    This count of SFAs is as reported in the CN Agency survey. Verification Summary Report data for Georgia include 146 SFAs; all were determined to be using direct certification. Some SFAs do not take free/reduced-price applications because they operate under Provision 2/3.

3    When Georgia was selected for the case study, survey data indicated that the SSIS was not used, but that information was incorrect.

4    The SUCCESS acronym stands for System for the Uniform Calculation and Consolidation of Economic Support Services.

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**Exhibit 1-1**

**Agencies Contacted for the Georgia Case Study**

| Generic Abbreviation | Agency Name | Contacts |
|---|---|---|
| CN | Department of Education, School and Community Nutrition Division | Child Nutrition Director and staff |
| SEA | Department of Education, Information Systems Division | Data Collection Manager, Information Systems Manager |
| FSP | Division of Family and Children's Services, Dept. of Human Resources (DHR) | Contracts manager and IT liaison |
| Medicaid | Department of Community Health (DCH) | Eligibility Program Director |
| Very large SFA | Cobb County (102,000 students; 32% Free/RP) | Food Service Director and staff |
| Mid-size SFA | Crisp County (4,300 students; 70% Free/RP) | School Nutrition Director, Bookkeeper, Secretary |

The new SSIS, to be operational in SY2006-07, will have more recent enrollment data available for the statewide direct certification match.  Availability of files on unmatched students mitigates the limitations of the statewide match, but SFAs only have data on unmatched students with a FS/TANF household address in their county, and these files can take a long time to process manually.  The on-line system is available to look up FS/TANF status for unmatched students, but it requires skills that some SFAs lack and can only be used for individual lookups.  The very large SFA interviewed for this study receives applications for most directly certified students because of the timing of the direct certification and application processes.

Three States in the case studies have direct verification systems using electronic FS/TANF records, but Georgia has the most widely used system.  Both SFAs in the study used the system and found it helpful and timely.  The direct verification system provides data on children receiving Food Stamps, TANF, or Medicaid, but Medicaid in Georgia does not cover many children who are not eligible for Food Stamps, and the direct verification system does not have data for SCHIP children.  These limitations, and some SFAs' lack of understanding, led to the system being used more for verifying categorical applications than for verifying the more numerous and challenging income applications.  Adding SCHIP to the direct verification system is possible and would make it more useful for verifying income applications, but there are several legal and practical challenges to making this happen.

## Direct Certification

In Georgia, there are two methods of direct certification:  the State-level computer match and on-line inquiry.  Both methods are available statewide, and all public SFAs use direct certification.

**History**

The State-level computer match for direct certification has been in use for 13 years. The process was worked out between the CN agency, the SEA, and DHR.[5] The State never used the letter method. SFA on-line access to the SUCCESS system was implemented in the late 1990's.

Two key changes in direct certification occurred in 2005. DHR had done the match, but the SEA took this over in SY2005-2006. The switch was due to SEA concerns about keeping student information confidential. Also this year, the matching process was improved by adding a secondary match by name and date of birth for students not matched by SSN. This secondary match became possible only after the SSIS began collecting student names in SY2004-05; previously the SEA did not have a mandate to collect names.

**Computer Matching Process for Direct Certification**

*State-level Computer Match*
In the spring, the CN agency contacts DHR and sets up a meeting to plan the process. The meeting includes personnel from CN, DHR, and the SEA. They work out who will do what and the specifics of the file to come from DHR (fields, age range, and timing). They make additional phone calls back and forth as needed.

The State-level direct certification match takes place once each year in early summer. DHR provides the FS/TANF file to the SEA around June 15. The DHR file is a snapshot of the May caseload of children ages 1-19, with the following data elements: name, SSN, DOB, mother's name, mother's SSN, address (street, city, and zip), and county.[6]

The SEA extracts SSIS data from the prior-year October enrollment records. Extracted data elements include: name (first, last, MI), SSN, DOB, district number, district name, school name, school number, race, gender, and graduation status. The SSN is the State student ID, unless the child does not have an SSN (in which case the SEA assigns an ID).

The SEA's information technology group is responsible for matching SSIS and DHR data. A Visual Basic® application is used for this task. The primary match is by SSN. For SY2005-06, the SEA added an exact match on full name and DOB to increase the number of students matched. About 26,000 additional students were matched this way in the 2005-2006 school year.

Match results are posted to the SEA website in mid-July. The goal is to make match data available before schools open in late July or early August (most open in the first or second week of August). Each SFA designates specific SFA staff authorized to access the data, and they must enter user names and passwords. SFAs can browse, download and print data. Available file formats are text (for downloading) and PDF (for printing). When an SFA requests data, they are extracted from the relational database by district number. For matched students, this number is in the student record.

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[5] As noted in exhibit 1-1, DHR is the State Food Stamp Agency (Division of Family and Children's Services, Department of Human Resources).

[6] DHR extracts a snapshot of the full FS/TANF caseload on a monthly basis. The direct certification file is an extract of that regular monthly snapshot and therefore requires minimal programming effort.

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The SSIS data used for the match are not up-to-date as of the upcoming school year. However, in addition to the file of matched students, the SEA makes available two kinds of unmatched FS/TANF records: a file of unmatched FS/TANF children ages 6 to 19, and a file of 4-5 year olds (too young to have been enrolled in the past October). For unmatched FS/TANF children, the files contain name, SSN, DOB, and county code. As with the match data, access is via the SEA's secure website. The data for unmatched children are extracted by county code when the district downloads the data, using a mapping of the district number to the county code. (Most Georgia SFAs are county-based, but some counties have separate SFAs for the principal city and the rest of the county.) Districts can match these data to their SIS or look up individual child records.

### *Direct Certification Activities at SFAs*

SFAs have two options for using the match results in direct certification. They can merge the data into their free/reduced-price databases, or they can print the list and enter the information manually to their free/reduced-price databases. (The match list is available either alphabetized by grade and school or alphabetized district-wide.) The CN agency indicated that some SFAs with small numbers of FS/TANF children download the data but do not proceed to directly certify the matched children. These SFAs find that it takes less time to process applications with FS/TANF case numbers.[7]

In the mid-size SFA interviewed for this study, direct certification data are processed after the district has "rolled over" student data for the new school year.[8] The SFA's food service information system (FSIS) vendor, Horizon, downloads direct certification data and loads it into the FSIS, as covered by the support contract. The Horizon software for free/reduced price applications contains a module for loading the direct certification data (matched students) and setting the free eligibility indicator; this is accomplished by a merge on SSN. The Horizon software also reads the unmatched lists of FS/TANF children (including 4- and 5-year olds, who were not enrolled in the previous year) and attempts to match these to district students by SSN. This software is also used to generate direct certification notification letters to households.

The SFA mails applications to all students who were free/reduced-price last year and not directly certified this year. In 2005, the SFA sent 1000 applications to children who hadn't been matched and got 300 applications back. The SFA views this as a good response rate. This mailing is done to get as many students certified as possible before school starts. After school starts, NSLP applications are distributed by the schools to all students.

The direct certification process in the very large SFA is similar. School nutrition staff download the matched list and the unmatched list of FS/TANF children from the website. They send these data to the vendor that manages the district's SchoolMax SIS, and the vendor matches the direct certification list to the district database by SSN. The match is necessary because the district student ID is not in the downloaded file, and because the SSIS data reflect fall enrollment. Some children on the direct certification list do not match the district database after it is updated for the new school year. The vendor sends the direct certification data to the district's Horizon FSIS. (The SFA has a contract with

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[7]  This description seems to contradict the finding that all SFAs use direct certification. It is possible that these SFAs look up the case number on the direct certification file and mark the application as directly certified and thus not subject to verification.

[8]  Enrollment rollover is the process of updating the grade assignment in the district's SIS. School assignments are made later.

Horizon for technical support, but the SFA IT staff handle their part of the direct certification process without needing help from Horizon.)  Notification letters are mailed based on the address in the SIS; a portion of letters are returned, primarily because families move and do not notify the SFA.  This SFA indicated that, although the direct certification data include the address from the DHR system, it is not feasible to use this information for the notification letters.

The very large SFA uses a manual process to directly certify additional FS/TANF children, including children on the State's matched list who do not match the district database and the State's lists of unmatched children residing in the county.  About 25 percent of the matched list does not match the district SIS.  This most often happens because a child has moved.  Some unmatched children from the FS/TANF files are not matched because the SSN in the district database contains a transposed digit, or because an adult's SSN was entered for a child. For the manual process, the SFA generates an alphabetical list of all unmatched FS/TANF children, and SFA staff manually look up these children in the district SIS.  This process takes about a week, with 6 people working (3 full-time).  This year, the SFA matched about 100 additional children out of between 500 and 700 initially unmatched.

### *SFA On-line Access to FS/TANF Eligibility Data (SUCCESS)*
As discussed above, SUCCESS is the Georgia eligibility determination system for the food stamp, TANF and Medicaid programs. (This system does not include children approved for the separate SCHIP program.)  SUCCESS is "live", in that it is updated in real time when DHR makes eligibility determinations or other changes in the system.  SUCCESS is  "owned" by DHR and maintained by the Georgia Technology Authority (GTA). GTA owns the hardware and telecommunications platform, and maintains both the SUCCESS system and the on-line access system, known as Georgia Online or GO.

A subset of the SUCCESS system is made available to other agencies (e.g., Community Service Board, Department of Juvenile Justice). The on-line inquiry system for DHR partners was created when the SUCCESS system was created, because DHR knew that they would have partners who would need access to the eligibility data.

To use the DHR on-line system, SFAs must sign a confidentiality agreement, obtain a user ID, and install software for system access.  The system restricts them to read-only access to specific authorized screens.  The SEA help desk helps SFAs sign up for user IDs and resolve technology problems.  Users are required to have training before they can have access.  DHR provided training for SFAs for the 2005-2006 school year.

SFAs can look up information on the DHR system by client SSN or case number.  For direct certification, the SFA enters the student SSN, and the screen displays the case number and status for FSP, TANF, and Medicaid.  (Medicaid data are used only for direct verification.)  Alternatively, SFAs can enter the case number from an NSLP application to look up whether other students in the household are categorically eligible.[9] If the child's FS/TANF record is found, the user prints the screen.

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[9]     One SFA indicated that the on-line system also allows look-ups using name and DOB.  This method is not referenced in the CN agency's documentation.

The mid-size SFA uses on-line access to the FS/TANF database to directly certify children in several situations: when an application has a Medicaid number or EBT card number instead of a FS/TANF case number; to check whether siblings who were not matched are actually on FSP or TANF; to check the status of children who were categorically eligible before and have not submitted an application; and to check the categorical eligibility of children who are in need (not paying for meals) and have not been certified. This system is used throughout the year; authorized users include the SFA director, the bookkeeper, and a clerk.

The very large SFA reported that it uses the on-line access to the FS/TANF database for direct certification when a household submits an application with a Medicaid case number. The SFA staff member looks to see if the child has a FS case number that can be put on the application; if not, the application is returned to the household for income information.

**Effectiveness, Challenges, and Solutions**

Direct certification procedures in Georgia results are effective in certifying approximately 63 percent of categorically approved public school students in the State (this is the lowest rate among State-level matching systems implemented statewide, but slightly exceeds the national average). Computer matching is limited primarily by the timeliness of student records used for the match.

*Effectiveness*
The table below presents the results of the statewide match for the 2005-2006 school year. As noted above, children who are matched by the State may not be directly certified at the SFA level. This happens if match results are sent to the wrong SFA because the child has moved or left school in the past year.

|                               | Number  | Percent |
|-------------------------------|---------|---------|
| Children in FS/TANF file      | 530,611 | 100%    |
| SSN match                     | 277,282 | 52%     |
| Name and DOB match, no SSN    | 26,375  | 5%      |
| Total matched                 | 303,657 | 57%     |
| Unmatched                     | 229,654 | 43%     |

For SY2005-2006, the SEA matched over 300,000 children in the FS/TANF file to student records, representing 57 percent of FS/TANF children ages 1 to 19. All SFAs in Georgia used direct certification in SY2004-2005, according to the CN agency and our analysis of verification summary report (VSR) data. Among public school students certified as categorically eligible for free meals, 63 percent were directly certified (based on the VSR data). This rate is well above the average for States with State-level matching where the system is not statewide, but below the average for statewide systems.

The two SFAs interviewed for the study provided the following data. The very large SFA reported an increase in number of directly certified students this year, and attributed the increase to changes in the matching process at the state level.

|                                      | Mid-size SFA | Very large SFA |
|--------------------------------------|-------------:|---------------:|
| Directly certified                   | 1,748        | 7,400          |
| Categorical eligibility by application | 180        | 1,800          |
| Income eligibility by application    | 1,227        | 10,800         |
| Total free                           | 3,155        | 20,000         |
| Percent of categorically eligible directly certified | 91% | 80% |

*Challenges*

The principal challenges for direct certification in Georgia are: untimely enrollment data for the computer match; missing or incorrect SSNs; limitations of the unmatched student files; and limitations of the on-line inquiry system.

**Timeliness.** All respondents acknowledged that the timeliness of student enrollment data used for direct certification matching is a problem. The SSIS data available in the spring reflect enrollment as of the previous October, thus creating a lag of seven months between the date of enrollment data and the date of FS/TANF data. Students who were not enrolled in October cannot be matched for direct certification the following summer, including children enrolling for the first time in kindergarten during the summer. In addition, students who transferred between districts during the past school year will have the wrong district ID on their SSIS record, and direct certification records will be sent to the wrong district. The October enrollment data, however, are the only clean, final data available from the SSIS in time to allow direct certification before the start of school.

Currently, Georgia conducts the State-level direct certification match once per year. The CN agency does not see a need for additional matches throughout the school year, because SFAs have on-line access to FS/TANF data for direct certification of new students. The very large SFA, however, indicated that it would like to have an additional match during the school year, perhaps because the SFA's size made it impractical to do individual lookups.

The mid-size SFA expressed concern with the timing of State-level match results, indicating that there was not enough time between receipt of the match file in mid-July and the start of school on August 1. This left little time for getting applications out to and back from children who received free/reduced-price meals in the past year but are not directly certified this year.[10]

The very large SFA receives applications for the great majority of directly certified children. Due to timing and discrimination considerations, all students are given a free/reduced-price application packet at the beginning of the school year. The direct cert notification letter is sent to households at about the same time as they get applications, but parents do not read it, or they submit applications anyway to make sure that their children are certified. The SFA scans applications, and this process greatly reduces the impact of this duplication. The scanning system automatically identifies and rejects applications for children who have been directly certified.

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[10]    It is not clear why this is a problem since past year's eligibility certifies a child for the first 30 days of the school year, and all children receive an NSLP application on the first day of school.

**Match rate and sibling problem.** Respondents identified several reasons why FS/TANF records are not matched to student records, including student mobility, incorrect SSNs, and name discrepancies. As noted above, student mobility may result in data (matched and unmatched records) being sent to the wrong district.

Incorrect SSNs and name discrepancies result in failures to match, or mismatches (matching to the wrong record). And these data problems also contribute to the "sibling problem" (i.e., different match results for siblings), although respondents recognized that there may be a mix of FS/TANF eligibility status within households.

Respondents identified the following potential causes of match problems:
- SSN errors happen because of data entry mistakes (transposed digits, etc.) by the school, or because the wrong SSN is provided by the parent.
- Names may be recorded differently in the SSIS and the FS/TANF file due to differences in how the parent reports the name or due to entry errors.
- Sibling status may be different if TANF households have a child with SSI, not on TANF.

**Automated processing at the district level.** The CN, SEA, and SFA respondents felt that SFAs were generally able to access the direct certification data without difficulty. The SEA indicated that most calls from SFAs to the help desk are to ask when the data will be available, not how to get access. The two SFAs that we interviewed had no problems downloading State match results and processing the data within their software programs. They were very satisfied overall with the matched data. There is no systematic information on how other SFAs process direct certification match results, but our analysis of Verification Summary Reports indicates that all SFAs in Georgia use direct certification.

The very large SFA noted two difficulties with the files of unmatched children. One problem is that the SFA gets all of the unmatched children residing in the county of residence listed on the FS/TANF record. The very large SFA is in a county where another SFA serves the principal city, thus the two SFAs get the same list of unmatched FS/TANF children and have to go through the entire list. Second, the SFA has to manually go through the list or do its own match. The mid-size SFA does this additional district-level match using its FSIS.

Several issues were noted regarding use of SUCCESS to query the FS/TANF eligibility system. The CN agency does not track how many SFAs use the system, but CN staff mentioned that some SFAs do not have staff who are sufficiently skilled to learn and use the system. Smaller SFAs appear less likely to use the system. The user must go through numerous screens to log in and look up a child. Users at the very large and mid-size SFAs mentioned that sessions are sometimes terminated while the user is trying to look up a group of children, and it takes some time (5-15 minutes) to get back in if a session is terminated.

**Costs and Benefits of Computer Matching**

The CN agency was unable to quantify the costs of direct certification computer matching. Initial startup costs were incurred long ago, and information is not available. The web file transfer system was part of a project for districts to upload finance data, so there was little additional cost for the direct certification files. In-house programmers developed and operate the direct certification process; they did not provide time estimates for startup and ongoing efforts.

DHR does not charge to provide the FS/TANF file, and did not charge to do the match in past. DHR's ongoing costs are small, because the direct certification file is pulled from a monthly extract that is generated for other uses. For the same reason, DHR did not have any significant startup costs.

The CN agency and DHR provided some information on the time spent to revise the data sharing agreement for the 2005-2006 school year. There were four hours of meetings with up to 15 people attending, plus some additional phone calls between CN, SEA, and DHR staff.

The CN agency pays the Georgia Technology Authority for providing SFAs with access to SUCCESS (the FS/TANF eligibility system) The charge is based on usage time, with an annual cost of about $90,000 per year (including usage for direct certification and direct verification). The CN agency and DHR provided SFAs with two one-day training sessions on the SUCCESS system this year, to explain use for direct verification and promote use for direct certification. Information on the costs of this training was not available.

There was mixed information from the two SFAs on whether direct certification reduced their application processing costs. The mid-size SFA indicated that direct certification eliminated applications for most directly certified students. On the other hand, the very large SFA indicated that it received applications for nearly all directly certified children, although these applications did not require much effort because they are scanned and automatically identified as directly certified. Both SFAs indicated that direct certification reduced the number of applications requiring verification. Neither SFA could identify a discrete cost for direct certification software or support. Georgia has never used other direct certification methods, so no data were available on cost savings versus the letter method.

**Future Directions for Direct Certification**

Two issues were discussed with respondents regarding future directions for direct certification computer matching. First, planned changes to the SSIS, scheduled for implementation in SY2007. Second, the feasibility of expanding the direct certification computer match to include Medicaid and SCHIP data.

The SEA is implementing a new SSIS, which may affect direct certification. The new SSIS will use a new state student ID, replacing the SSN as the unique student ID although SSNs will continue to be collected. The new SSIS will also collect address information, which could be useful for direct certification.[11] Advance documentation for the new SSIS indicates that student data will be submitted monthly, providing an opportunity to use more recent data for the State-level computer match for direct certification.

*Feasibility of Computer Matching with Medicaid for Direct Certification*
The CN agency, SEA, and SFAs all indicated a desire to use Medicaid data for direct certification. The CN agency approached FNS about doing this, but it is not authorized under current statute. Both SFAs mentioned that a match to Medicaid might help certify higher-income students, however, the Medicaid income-eligibility limit in Georgia is 100% of the Federal poverty level for ages 6-19, and

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[11]     Source: Georgia DOE, "Georgia Statewide Student Information System Element Detail for District Data Warehouse Uploads", February 2006. (http://www.gssis.org/_documents/2006GSSISElements.pdf).

133% of poverty for children age 1-5, so relatively few children are eligible for Medicaid and not Food Stamps. Nonetheless, some children in households with income up to 100% of the poverty level may enroll in Medicaid and not Food Stamps.[12]

The Georgia SCHIP program (PeachCare) covers children up to 235% of the Federal poverty level (FPL). This program has a separate eligibility system maintained by the contractor that provides enrollment services. Families can apply for PeachCare coverage for their children by mail or on-line; if PeachCare applicants are income-eligible for Medicaid, their applications are sent to DHR. The State Medicaid Agency (DCH) has a combined database of all Medicaid/SCHIP members, but this system does not have income data.

Based on these facts and discussion with DCH, it appears that there are several hurdles to using Medicaid/SCHIP data for a statewide computer match for direct certification, beyond the issue of whether and under what circumstances SFAs would be authorized to do this by USDA. Many of these issues would also apply to use of combined Medicaid/SCHIP data for direct verification.

- DCH is not sure whether it can share the data with DOE or DHR for this purpose. Currently, DCH receives Medicaid certification data from DHR, but DCH does not send any eligibility data to DHR or any other agency. DCH has not authorized any use of Medicaid data by the NSLP for direct verification.

- There is no language in the Medicaid or PeachCare application for consent to disclose the data, other than for specific Medicaid/SCHIP purposes. A modification would be needed, and consent would be needed from current clients.

- Few additional certifications would be gained from matching with Medicaid because Medicaid income eligibility for children is 100% of the poverty level; although some FSP-eligible children may be enrolled in Medicaid and not food stamps. (Medicaid application poses a lower burden because it does not require an in-person interview and allows on-line applications. Also, Medicaid eligibility is family-based, where as FSP eligibility is household-based.)

- Information about household income and household size would be needed to determine if PeachCare members are eligible for free/reduced-price meals (unless they are made categorically eligible).

- To match with PeachCare, DOE would have to send student data to the enrollment contractor, or else the contractor would have to send PeachCare membership data with income and household size (or an NSLP eligibility indicator) to DOE. Either way, a data sharing agreement would be needed among DOE, DCH, and the PeachCare contractor, and both DOE and the contractor would need to do programming for the exchange and match.

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[12]   The food stamp participation rate for eligible children was 80 percent in 2004, and the rate for eligible children living with non-citizens was approximately 50 percent.

- DCH indicated that a match would have to be by SSN due to the likelihood of false positives and false negatives in a match on name and DOB.

- PeachCare has no information on whether a household receives food stamps, so an added step at DOE would be needed to eliminate duplicates between the two matches.

- PeachCare has a 12-month redetermination period. The program allows self-declaration of income and does not currently use computer matching to verify income for most members. Thus, there is an issue of whether some or all PeachCare members' eligibility information is sufficiently reliable and timely for use in NSLP direct certification.

## NSLP Application Verification Process

Among the six States selected for case study, Georgia is the only State where SFAs have access to online electronic data for direct verification.[13] SFAs use the SUCCESS system to verify categorical applications, in much the same way that they use the system to look up individual students for direct certification. The SFAs interviewed for this study reported that they do not contact their local Food Stamp/TANF office to verify categorical applications.

In 2005, Medicaid information was made available to SFAs through SUCCESS, and the CN agency and DHR conducted training to encourage use of the system and to emphasize direct verification of income applications using FS/TANF/Medicaid data. The CN agency advised SFAs to try using the system for any applicant (i.e., categorical and income applications), and to ask households for documentation as a second step, if not directly verified.

### SFA Verification Procedures

Both SFAs interviewed for this study reported using computerized selection of verification samples. In SY2005-2006, the mid-size SFA used a focused sample, while the very large SFA used a random sample.[14] In the previous year, this SFA used a focused sample but got a low response rate. The SY2004-05 VSR data indicate verification response rates of 79 and 65 percent for the mid-size and very large SFA, respectively.

The mid-size SFA described the following verification process:
- The SFA often sends 2-3 letters to each household, but rarely receives complete documentation with a household's first response.
- Follow-up for response or additional documentation is made by telephone.
- Additional follow-up, if needed, is made via principals or social workers at the schools.
- The Social Security Administration is sometimes contacted to obtain benefit information, if parents provide authorization.

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[13] Oregon and Wisconsin also use electronic FS/TANF records for direct verification, but SFAs do not have online access to the data.

[14] This SFA was one of the large SFAs entitled to use either a 3 percent random sample or a 1 percent focused sample for verification, if they attempted direct verification of all sampled applications.

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- The SUCCESS system was used for direct verification of categorical applications; and the SFA attempted to directly verify income applications via SUCCESS but had a low "hit rate." (The SFA had only one categorical application in the verification sample for SY2005-06.)

The very large SFA described the following verification process:
- The SFA sends up to 2 letters to each household.
- If a letter is returned, the SFA sends it home with the child.
- The SFA follows up by phone if the household does not respond to the letters.
- Translators are used for phone calls to non-English speakers.
- The SUCCESS system was used for direct verification of categorical applications; the SFA had 11 categorical applications in the verification sample for SY2005-06.

The very large SFA reported four contacts, on average, are needed to get a household response. Some households respond after benefits are denied, but most wait until next year and apply again.

**Direct Verification Process**

SUCCESS has been available for direct verification of categorical applications for as long as it has been in use for direct certification. The SFAs found this system helpful, timely, and easy to learn.

For direct verification, the mid-size SFA uses the on-line system to look up applicants by SSN, case number on application (for categorical applications or if a Medicaid case number is given), or name and DOB. The system indicates whether the applicant is on FS, TANF, or Medicaid. This year the SFA used Medicaid for direct verification of income applications, but it had only one hit out of 28 income applications.

The very large SFA used the on-line system for direct verification only if someone in the household was directly certified or approved as categorically eligible. If a household submitted an application with a FSP case number for one child and not for all children, the SFA used the on-line system to look up the other children in the household so that they could process all as categorical. If the application did not have a FSP or TANF case number, the SFA did not use the on-line system.

*Lessons from Direct Verification with Electronic Records*
The CN agency described the direct verification system as very satisfactory. They had no complaints about the system from SFAs, and they believed that SFAs were happy with the system. Costs incurred for usage indicate that SUCCESS is definitely being used by SFAs, though the usage bills do not separately identify usage for direct certification versus direct verification. The CN agency noted, however, that the cost of the system is more affordable for Georgia than for states with smaller numbers of students or lower participation rates. This is because the SAE funds are a function of the number of reimbursable meals, and Georgia's meal count is high.

Both SFAs found the SUCCESS system useful. The mid-size SFA reported that the system requires some time and effort to learn: staff need training to use it, and if they don't use it for a while, they need to consult documentation. The very large SFA described the system as easy to learn, though one person does nearly all of the inquiries and has used it for over 4 years.

Neither SFA had information on how much their peers use the on-line system. The mid-size SFA suggested that small counties may not use the on-line system because they have limited numbers of

computers, or because of other technology issues (such as the learning curve). Data on the verification samples suggest that small SFAs are likely to have few if any categorical applications to verify, and thus would not be likely to use the system for this purpose.

**Feasibility of Direct Verification With Medicaid/SCHIP**

Although the CN agency encouraged direct verification of income applications, one of the two SFAs (the very large SFA) was not aware of this option and did not know why the Medicaid information was available. This SFA questioned how to use it for income verification, since the direct verification system only provides an indicator of Medicaid eligibility, not income data. (This is not actually a problem in Georgia, because virtually all Medicaid children have family incomes below 130 percent of the poverty level.) As noted above, the mid-size SFA attempted to directly verify income applications but found only one match; the SFA did not specify whether this was to FSP, TANF, or Medicaid data.

The preceding discussion of the feasibility of using Medicaid and SCHIP data for direct certification points to the following issues regarding use of these data for direct verification:

- Uncertainty about whether DCH can disclose Medicaid and SCHIP data for this purpose
- Providing for informed consent to this disclosure
- Low probability of matching income applications to Medicaid data, given near-total overlap of FSP and Medicaid eligibility in Georgia
- Need to match by SSN and use income and household size data to determine eligibility based on SCHIP information
- Need for an agreement between CN, DCH, and the SCHIP contractor to share SCHIP data
- Twelve-month redetermination period for SCHIP versus 6-month limit on the age of data for direct verification.

As discussed below, DCH is planning a match of SCHIP data with employer wage records. If this match is implemented, DCH will have a database of wage/salary income, parent SSN, and medical case number that could be linked to student data. These data might be used for NSLP verification, but DCH would need to see a business case and work out an agreement with the CN agency. A key issue would be whether this would be an allowed use under SCHIP rules and HIPAA.

At present, SUCCESS is primarily used for direct verification of categorical applications. This is because some SFAs do not understand that the system can be used for income applications, and because SFAs get a low hit rate on income applications. Adding SCHIP to the direct verification system is technically possible and would make it more useful for verifying income applications, but there are several legal and practical challenges to making this happen.

## Statewide Student Information System

Georgia has had an SSIS since SY1997-1998. The current system includes student records from all public school districts. Districts upload these data using web-based applications, and the SEA uses the data for official statistics and performance monitoring. As discussed above, the SEA is implementing a new SSIS, which will replace the current system in SY2007.

**Data Collection Schedule**

Districts are required to provide a listing of all students enrolled as of the first Tuesday in October. This "October FTE count" is required by law and specified as the official basis of student counts for state funding. Districts are allowed until October 24 to correct and sign off on their data, and the data are available by the end of October. These are the most recent data that are final in time for use in direct certification; they are also the basis for official enrollment counts. There is a second upload of student data in March, but it is not cleaned and available in time for the direct certification extract.[15] Similarly, the student records submitted at the end of the school year (final due by June 15) are not available in time for direct certification.

**Student Identifiers and Demographic Data**

The October enrollment (FTE) data include the following identifying and demographic information for each student: name, DOB, SSN/alternate number, gender, and race/ethnicity. The database also includes information on the county and district of residency, district and school attended, grade level, student status, special education needs, and attendance.

*SSN policy and issues*
The SSN is the primary identifier in the SSIS. According to the SEA, 93 to 95 percent of student records have a SSN, even though providing the SSN is voluntary. If a student does not provide a SSN, the SEA assigns a number to be used as the student ID in the SSIS. The SEA noted that it has considered dropping the SSN from the new SSIS, but this would pose problems for direct certification and other matches.

*Potential identifiers for matching*
The array of potential identifiers for computer matching is limited. Name, DOB, SSN, county, and district are currently used for direct certification; gender and race/ethnicity are not. Other identifiers (place of birth and address) may be available in the new SSIS.

*Validation of district data*
The SSIS validates data submitted by districts against criteria for each element. This includes a check for duplicate student IDs. The system reports errors and warnings, depending on the nature of the problem. Districts review the data on-line, certify their correctness, or make corrections.

# Medicaid Data Availability and Use

Georgia has mandatory Medicaid coverage for children (up to 133% FPL for ages 1-5, up to 100% for ages 6-19). The separate SCHIP program (PeachCare) covers children up to 235% FPL.

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[15] The SEA data coordinator also stated that the March data are less inclusive. Information on the SEA website suggests that the March FTE data submission includes all active students at that time. Thus the differences from the October FTE data are (a) students withdrawn after October are not in the March data, and (b) inactive students are included in October data but not in the March data unless they have become active; these students might return in the fall.

**Relationship of Medicaid/SCHIP To Food Stamp Program**

The Department of Community Health (DCH) administers Medicaid and SCHIP. DCH contracts with DHR to determine eligibility for Medicaid. Families can apply jointly for Medicaid, FSP, and TANF at local DHR offices.

DCH contracts separately with a private firm to enroll children in PeachCare and maintain eligibility information. Families can apply for PeachCare coverage for their children by mail or on-line; if PeachCare applicants are income-eligible for Medicaid, their applications are sent to DHR.

DHR uses its SUCCESS system to determine and maintain eligibility data for Medicaid. PeachCare has a separate eligibility system maintained by the contractor that provides enrollment services. The State Medicaid Agency (DCH) has a combined database of all Medicaid/SCHIP members (MultiHealthNet), but this system does not have income data.

**Referrals from NSLP To Medicaid/SCHIP**

The CN agency is working with DCH to set a referral process to send information from NSLP applications to PeachCare outreach workers. The process is yet to be determined, but the basic plan is to include a check box for parents to indicate permission to share information, the school compiles the data, and the data go to PeachCare. Some SFAs may already have a check box on the NSLP application and an informal referral process. DCH expects that the process will be manual at the start, with an automated process as the goal. The interagency agreement was almost final at the time of the interview (as of January 2006). The next step is revising the NSLP application. DCH plans to have the process available statewide at the start of next school year.

# Income Eligibility Verification System

The FS, TANF, and Medicaid programs require documentation of income at application and redetermination. The integrated eligibility system for these programs is linked to external databases that provide information for income verification. The eligibility system prompts the FS/TANF/Medicaid caseworker to log into these databases to look up data when processing an application or a change. These external databases include Department of Labor (DOL) employment records, SDX, and BENDEX. The inquiries are mostly used to detect possible discrepancies, or otherwise trigger an inquiry by a caseworker. For example, caseworkers confirm every job identified in employment databases by calling the employer or requesting a termination notice.

**Income Verification for SCHIP**

Until October 2005, SCHIP applicants were allowed to self-declare income, and no external sources were used for verification. In October, a new quality control process was implemented. As of the time of the interview, the SCHIP enrollment contractor drew a 10 percent random sample of new applications and renewals, and contacted the family to request documentation. The contractor sent two letters and allowed the family two months to comply. Benefits were terminated if the family did not respond. In the first sample, 33 percent were terminated for nonresponse. If benefits were cancelled for this reason and the family reapplied, the family had to provide documentation. DCH planned to evaluate the effectiveness of the process.

DCH was working on a Memorandum of Understanding (MOU) with the Department of Labor (DOL) to do a data match. The plan is to match SCHIP first with DOL wage data by the SSNs of the parents. The quality control sample for documentation requests would be drawn from the non-verified members. DCH had not yet established the specifics of the process to do the match and send the results to the SCHIP enrollment contractor for the documentation request. Another issue to be settled was the threshold for accepting income as verified, as there needs to be a tolerance level if there is not an exact match; also what happens if the match indicates that the family is over income.

According to DCH, the discussions on the MOU took at least 15 months. DOL did not accept DCH's plan to send the wage data to the SCHIP enrollment contractor to be matched, even after DCH got legislation to enable this. DCH then agreed to do the match in house and send the results to the contractor (just indicating who needs to get a letter requesting documentation, and who is verified; not the earnings, employer name, and employer ID).

**Availability and Usefulness of Income Data for Verification**

*Employer Wage Reports*
DOL declined to complete a full interview, but the contact provided some basic information. First, the agency's position is "We are very protective of wage data". DOL does not provide wage data to other agencies. Second, employment data are shared with DHR, but not wages. Last, to facilitate child support enforcement, DOL cooperates with orders to garnish wages.

DCH and DHR both view the DOL quarterly employment data as not up-to-date. As discussed above, DHR uses these data to trigger inquiry if there is a possible discrepancy or change in income.

*Other Data Sources*
According to DHR, the most reliable sources are SDX data from SSI and Unemployment Compensation Benefits. These data are accepted as verified.

Both DHR and DCH indicated that in some cases the SSA BENDEX benefits data are not accurate. The data may not be up to date when Social Security has been terminated, and the system has lots of embedded codes that cause confusion. DHR requires an award letter as proof of benefits.

DHR uses the State New Hires system to check if a recipient is employed, then follow up. The respondent was not sure how many matches this source provides or how useful it is. DHR does not use the Federal New Hires database but is looking into it.
DCH can request bank data but does not obtain this automatically. Applicants sign a release, and the worker checks if the applicant reports an account but doesn't have documentation. Workers do not request data unless an account is reported.

**Feasibility of Using IEVS Sources for NSLP Verification**

The SFAs and others acknowledged the potential benefits of using the IEVS or a similar system to verify NSLP applications, but they identified numerous feasibility issues.

- The CN agency was concerned about giving SFAs access to wage records and other income data, so it saw a State-level verification system as preferable. However, it does not have the

resources to undertake this, and there would be practical issues (such as how to handle appeals).

- Privacy issues were a concern and a possible barrier.  DOL is not willing to share wages with other agencies.  The SEA cannot release student SSNs.  Parent concerns about such a process, even if it were legal, could also be a problem.
- SFAs would need information on all sources of income:  wages, child support, SSI, farm income, other non-wage income.  These data would have to be compiled into a database or shared by an agency that already has one (such as tax records).
- Parent SSNs would be needed to match to the wage sources.  The SEA does not collect these, and SFAs have them only in their free/reduced-price application systems if they are in any database.

# Chapter 2
# Kansas Case Study

Kansas was chosen for case study because the State recently implemented a statewide student information system (SSIS) and indicated plans to develop a State level computer matching system for direct certification. Information was sought from Kansas on current NSLP certification and verification practices, and on the challenges, barriers, and costs of planning and developing State-level computer matching. Kansas is in the Mountain Plains region and has 302 public school districts and a student population of approximately 466,000. Agencies interviewed for the case study are listed in Exhibit 2-1.

## Highlights

As of 2005, direct certification in Kansas was achieved through the combination of district-level matching (six districts) and the letter method (statewide). Data from the SY2004-05 verification summary reports (VSR) indicate that direct certification accounts for 81 percent of categorically approved children in public school districts statewide. This percentage is well above the average across all States, and matches the average for States using State-level matching on a statewide basis.

The six districts using district-level computer matching account for 27 percent of free/reduced-price children in Kansas. Therefore, while direct certification is highly effective in terms of certifying a very high percentage of eligible children, other benefits of computer matching (reduced burden for households and reduced costs for SFAs) are not being realized on a large scale.

NSLP direct verification is currently limited to verification of FS/TANF case numbers on categorical applications. SFAs may contact State or local food stamp offices by letter or telephone to obtain verification of categorical eligibility. The State has not investigated direct verification of income applications using FS/TANF data, Medicaid data, or other sources.

The Kansas Department of Social and Rehabilitative Services (SRS) administers most social services including the Food Stamp Program (FSP), Temporary Assistance for Needy Families (TANF), Child Support Enforcement, child care assistance, energy assistance (LIHEAP), and vocational rehabilitative services. For medical assistance (Medicaid and SCHIP), SRS determines eligibility and the Department of Administration, Division of Health Policy and Finance administers benefits. SRS maintains an integrated eligibility information system for the FSP, TANF, medical assistance, and other programs. Respondents from both the FSP and Medicaid indicated that it would not be technically difficult to provide data for a State-level computer match for direct certification or direct verification. However, Medicaid officials indicated that legal issues would have to be addressed regarding informed consent.

## Direct Certification

Currently, two methods of direct certification are used in Kansas:

- Six SFAs use district-level computer matching, including the two SFAs participating in interviews for this study.

**Exhibit 2-1**

**Agencies Contacted for the Kansas Case Study**

| Generic Abbreviation | Agency Name | Contacts |
|---|---|---|
| CN | Department of Education, Child Nutrition and Wellness | Director |
| SEA | Department of Education | Director of Planning and Research |
| FSP | Department of Social and Rehabilitative Services (SRS) | Food Stamp Program Manager |
| Medicaid | Division of Health Policy and Finance, Department of Administration | Two staff members |
| Large SFA #1 | Wichita (45,000 students; 46% Free/RP) | Food Services Director; Food Services Operations Technician |
| Large SFA #2 | Shawnee-Mission  (29,000 students; 17% Free/RP) | Food Services Manager |

- The letter method is used statewide, with letters sent to all children in households receiving food stamps or TANF, including those attending districts that use district-level matching.

Kansas expects to implement a State-level computer match for direct certification; however, a formal planning process will not begin until SY2006-07.

**History**

The letter method has been used statewide in Kansas for 15 years, ensuring that all FS/TANF children have the opportunity to be directly certified.  The State Food Stamp Agency (SFSA) generates and mails approximately 32,000 letters, with postage costs paid by the Child Nutrition Agency. The SFSA also sends, to each school district, a hard-copy printout of children eligible for direct certification within their county.[16]  The SFSA incurs the cost of sending printouts to districts. The printouts are used in different ways: some districts use the printout when enrolling new students, some use it to manually look up students for direct certification, and some just keep the printout as a backup.

Six public school districts in Kansas use district-level matching: Kansas City, Leavenworth, Seaman, Shawnee Mission, Topeka, and Wichita.[17]  These six districts accounted for 24 percent of statewide student enrollment and 27 percent of free/reduced-price children in SY2004-05.[18]  The State CN director characterized these districts as large districts with sophisticated information technology and enough free-eligible children to make the investment in computer matching worthwhile.  District-level matching has been used for over 10 years.

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[16]   The Shawnee Mission school district reported that its hardcopy listing is about 30-40 pages in 8pt font.

[17]   In a ranking of district student enrollment, these districts rank as follows: Wichita (1), Shawnee Mission (2), Kansas City (4), Topeka (6), Leavenworth (22), and Seaman (30).

[18]   These percentages were calculated from the SY2004-05 Verification Summary Reports.

The State is interested in State-level computer matching to reduce costs and improve match results. A State-level match was not considered feasible prior to the implementation of a statewide student information system in SY2005-06.

**Computer Matching Process for Direct Certification**

This section describes current district-level computer matching, and State agency expectations for a State-level system.

*District-level computer matching*
District-level matching is a process involving the State Food Stamp Agency (SFSA) and individual school districts. Each year, the SFSA distributes FS/TANF data files (in plain text format) to the six participating school districts via e-mail during the second week of July.[19] Each district receives two files: a) file of children age 3 and 4 (eligible for pre-K CACFP) and b) file of children age 5-18 (K-12). Data files contain records of children in households authorized to receive food stamps or TANF as of the end of July, and residing in counties served by the school district. The files contain the following data items: child name, child SSN, child date of birth, name of head of household, street address, city, ZIP code, FS/TANF case number, indicator of FSP or TANF program. All six districts use computer matching to identify children for direct certification, with computer matching procedures determined by individual school districts.

The Wichita and Shawnee Mission SFAs reported that the direct certification list from the SFSA is sent via email to the SFA director. In Wichita, SFA staff process the direct certification files and complete the computer match. In Shawnee Mission, the SFA director sends the files to the district IT department for processing.

The Wichita SFA imports FS/TANF data into MS-Access and matches the data to district enrollment by the following match rules:

- For students with SSN in the district information system (about one-third of students):
  - Match by SSN and date of birth
- For students without SSN in the district information system, match by 3 sequential rounds of matching:
  - By first name, last name, and date of birth
  - By last name and date of birth, with manual review
  - By address, with manual review
- The SFA reviews the remaining unmatched FS/TANF records and manually searches for the children in the district student information system.

The SFA estimates that it spends 56 staff hours on direct certification: three days for matches, and four days to examine mismatches. After identifying children for direct certification, the list is imported into the district student information system (eSIS software) so that direct certification

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[19] Letters are also mailed to households during the second week of July.

notification letters can be generated from eSIS using address data maintained by the district.[20]  Data are then transmitted to the NSLP software (Horizon). Letters are mailed at the end of July, well before the start of school (for SY2005-06, school began on August 23).

The Shawnee Mission SFA relies on the district IT department to process the computer match for direct certification.  The files from the SFSA are loaded onto the district server and records are extracted for all FS/TANF children with addresses in the area served by Shawnee Mission. (This step is seen as necessary because data are received for all of Johnson County, which contains five school districts).[21]  Data are matched to district enrollment using first name, last name, and date of birth. SSN is not used because the district does not have SSN on file for all students. Two types of matches are identified:

- Exact match on last name, first name, and date of birth.
- Near match — having a match on 2 of the 3 identifiers, duplicate matches, or a close match on name.

Exact matches are loaded into WINSNAP without further review. The SFA generally has about 500 near matches (an average of 10 per school), which personnel review and manually enter into WINSNAP. Near matches are researched by verifying additional data items available in both the FS/TANF file and the district information system. For example, the SSN may be used to resolve near matches if a child has an SSN in both files, or the address may be used. As a last resort, the SFA will contact the school to verify a match.

The Shawnee Mission SFA reported two problems with the match process: matches are uncertain when multiple children have the same name and date of birth; and sometimes all siblings are not matched.  The SFA reported that it is a really big struggle resolving the "half-dozen names and dates of birth" associated with more than one student.  Because of this problem, the district intends to add middle initial to the matching algorithm next year.  The more common problem is when all children in a family are not on the direct certification list. The SFA does not see this as a problem of the matching process, but it results in more work for the household and SFA because an application is required from the household.

The Shawnee Mission SFA reported a two-week turnaround from receipt of direct certification data to loading exact matches into WINSNAP. An additional three days is spent researching near matches. Direct certification notices are mailed to households just before school starts in mid-August, and the households receive the notices before the first day of school, when most schools (including all elementary schools) distribute NSLP applications to students.  Some high schools and middle schools distribute application packages by mail in late July.  The SFA director reported, however, that families eligible for direct certification know the process by the time their children reach middle

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[20]  In some States, SFAs use the FS/TANF address to mail direct certification notices.  The Wichita SFA uses the address already stored in the district SIS because it is technologically easier to produce the letters this way.

[21]  If FS/TANF addresses are not up to date, or contain other inaccuracies, it is possible that this step of the process may exclude from the computer match children currently attending the Shawnee Mission school district.

school and high school, and they know to wait until direct certification notices come in the mail.[22] Direct certification notices also inform households that they do not need to return the direct certification letter received from the State.

Both SFAs use passive consent whereby students identified for direct certification are automatically certified without any action from the household. Households are informed that they can decline benefits, but districts report that this rarely happens.

Because district-level matching co-exists with the letter method in Kansas, some households return SFSA letters to SFAs that use computer matching. These are generally from students who were not matched, or from families enrolling in food stamps after the end of July; these families receive a direct certification letter from their caseworker upon determination of eligibility.

The State CN director recognizes two limitations of district-level matching: it is not statewide and it is not standardized. The two SFAs interviewed for this study used very different matching algorithms and, as a result, spent different amounts of time manually reviewing uncertain matches.

*Expectations for State-level computer matching*
The CN director did not consider a State-level computer match for direct certification to be possible prior to implementation of the SSIS in SY2005-06. When surveyed in Fall 2005, the CN director indicated plans to implement State-level computer matching for direct certification in SY2006-07. However, given the demands of implementing the reauthorization provisions this year, planning and development for a State-level match is not expected to begin prior to SY2006-07.

The CN agency expects to develop a computer matching system in-house. The CN director has a computer systems background, and there are two programmers on staff with computer matching experience. The CN agency currently does computer matching to verify CACFP provider applicant licensing prior to enrollment, and to verify license status on an ongoing basis (the match is done weekly).[23]

State-level computer matching will use FS/TANF data. There is no centralized source of FDPIR data, so students eligible for FDPIR will continue to be certified by application. Direct certification of migrant children has not been assessed, but might be possible if sufficient information is available in the SSIS.

The State cited two main challenges for computer matching. First, student SSNs are maintained in the SSIS as an optional data field, and currently only 47 percent of student records contain an SSN.[24] The CN director, however, is hopeful that district submission of SSNs can be increased when districts understand that the data will be used for NSLP direct certification. The second challenge is computer matching of names, given the potential for nickname use, spelling variations, hyphenated names, and name changes.

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[22] Categorical applications are checked against the direct certification list upon receipt. If every child on the application is already directly certified, the application is not processed.

[23] The CACFP match has been done for a long time, although CN revised it recently to make it more sophisticated. The match involves 4,800 day care licenses.

[24] Districts determine whether to submit optional data fields, and include optional data for students if available.

The State CN agency plans to meet with the six districts currently using district-level matching to learn about their procedures, matching algorithms, and challenges. The six districts worked independently in developing matching systems, and the State expects to learn much by bringing that knowledge together.

One change considered for the State-level match is an increase in the frequency of computer matching for direct certification. The CN agency would like to receive monthly FS/TANF data and run a monthly match to identify children newly eligible for free NSLP meals. (A monthly match will not identify NSLP eligibility for students newly enrolled in Kansas schools because the SSIS is updated only twice per year, at the start and end of the school year.)

The SFSA is supportive of a State-level match for direct certification. They agree that the CN agency should do the match, because "it is their program," and because the SFSA has limited IT resources. The SFSA is also supportive of a State match because expansion of district-level matching would put a burden on the SFSA: "it would be messy, and not feasible to send files to lots of districts by e-mail."

The SEA is also supportive of a State-level match. The SEA believes it is up to the CN leadership to drive and oversee the process, but the SEA will provide the student enrollment data and, if needed, programming assistance. In the short term, a computer match for direct certification must be done outside the SSIS, but the SEA hopes to set up a data warehouse with integrated matching capability in the future.

**Effectiveness, Challenges, and Solutions**

Direct certification methods in Kansas are effective, insofar as a high percentage of FS/TANF children are directly certified throughout the State. In SY2004-05, 81 percent of categorically approved children in public schools were directly certified. This exceeds the direct certification rate in other States using a combination of district-level matching and letters, and it is similar to the direct certification rate in States using State-level computer matching on a statewide basis. Computer matching, however, is limited in scope: only six districts use computer matching to reduce NSLP administrative costs.

*Effectiveness*
The effectiveness of computer matching used at the district level cannot be measured by match rates. Generally, an approximate "match rate" could be calculated as the percent of FS/TANF children matched to student enrollment records. In Kansas, however, districts receive data for all FS/TANF children age 3-18 within the county, but the districts interviewed for this study are in counties served by multiple school districts.[25]

*Challenges*
Match accuracy has been a challenge for districts using district-level matching, and is an anticipated challenge for State-level matching.

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[25]    There are 297 public and 106 private SFAs in Kansas, and 105 counties.

The Wichita SFA indicated that failures to match records are just as much due to errors in the district SIS as to errors in FS/TANF records. For example, the district SIS has fields for "preferred" name and "given name," but the SFA sees errors in how these are entered (FS/TANF data tend to have the formal given name). Errors in date of birth are sometimes revealed when names match and the date of birth is off by one month or one day. SFA personnel cannot correct data in the district SIS, but they notify schools to investigate possible errors (e.g., when the date of birth does not match the FS/TANF record). Without this follow-up, a "mismatch" this year will be a "mismatch" next year as well.

The Shawnee Mission SFA reported that it fine-tuned the match algorithm over time. About 2 years ago, the SFA matched only on last name and date of birth, and this resulted in incorrect matches and telephone calls from families who said they never received food stamps. Now, SFA personnel believe the matches are more accurate, and the only parent complaints about computer matching occur when students with the same name and date of birth are improperly matched. The SFA is "looking forward to a State ID uniquely identifying persons on the direct certification list." But this will require the State to develop methods of resolving duplicate records with the same name and date of birth before sending match results to districts.

The CN director recognizes the complexity of computer matching without a single unique identifier. Part of CN's strategy is to encourage more school districts to submit student SSNs to the SSIS, so that more matches are based on SSN.

Technologically, the CN director sees the biggest challenge as "making it easy for the end-user." The CN director is confident that the State can meet this challenge, based on her years of experience as a programmer and systems analyst. In addition, SFAs are "up-to-speed" on web use because they provide claims data via the web, and they have an incentive to participate in any effort to "eliminate situations where eligible children are not enrolled in NSLP, get meals, and don't pay."

**Costs and Benefits of Computer Matching**

Planning for State-level computer matching is in its infancy and it is therefore too early to obtain information on the start-up costs associated with planning and development. The SEA IT department expects its role to involve a small cost for providing SSIS data. The SFSA does not anticipate additional costs associated with State-level matching.

The CN agency and the SFSA estimate combined cost savings from eliminating the letter method to be about $20,000. The CN agency pays postage costs for 32,000 letters to households (about $10,000). The SFSA incurs a cost of approximately $10,000 to copy, collate, and mail printouts to districts (5-6 person days of labor plus expenses).[26] In addition, the implementation of State-level matching could largely eliminate the current costs incurred by SFAs using district-level matching. However, as we learned from other States, the cost of using State match results depends critically on whether SFAs can import State match results to the district SIS using a unique student identifier.

For SFAs currently relying on the letter method, State-level matching could produce savings relative to the letter method and relative to application processing (if State-level matching yields higher direct certification rates). The two SFAs interviewed for this study reported that, relative to application

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[26]    Providing printouts is labor-intensive because districts do not map neatly to counties, and the SFSA manually collates printouts according to a district-county matrix.

processing, district-level computer matching is a "huge labor savings." These SFAs reported that most of the time required for application processing is phoning households when the application is incomplete. The Shawnee Mission SFA estimated it takes about 3 minutes per direct certification (largely due to review of non-matches) and 37 minutes to process an application, largely due to the time needed to follow-up by phone to get complete information.[27]

In planning for the State-level match, the State might consider whether the barriers to more widespread district-level matching will affect use of State-level match results. The SFAs interviewed for the study perceived that district-level matching was not widespread because some SFAs were not aware that electronic files could be obtained from the State ("they are surprised to hear what Wichita does"). In addition, they believe that there may be a lack of IT support for CN programs in some districts. (The Wichita SFA needed support from the district IT department until a few yrs ago, and the Shawnee Mission SFA relies on the district IT department to do the computer match). They concluded that the "State should be instrumental in making it happen for districts, rather than districts re-inventing the wheel."

### Future Directions for NSLP Certification

Two issues were discussed with respondents regarding future directions for NSLP certification: increased use of technology for the NSLP application process, and the feasibility of expanding the direct certification computer match to include Medicaid data.

*Application processing*
The Wichita SFA began scanning NSLP applications in SY2004-05 and has a long-term plan for online application submission over the Internet, including stations setup at schools for households without computers or those requiring assistance. On-line applications would solve the problem of incomplete applications requiring follow-up, because the online form would be programmed such that the application could not be submitted if not complete.

*Expansion of direct certification*
All respondents to the interviews were asked about the potential for adding Medicaid as a source of data for direct certification. The SFSA reported that FS/TANF and Medicaid data are integrated, and it is possible to produce an unduplicated list of children eligible for free or reduced-price meals. However, adding Medicaid would greatly increase the size of direct certification lists, and it would no longer be feasible to provide hard-copy printouts to districts. Thus, direct certification with FSP, TANF, and Medicaid data would be feasible only if done electronically.

The SFAs also had positive views about increasing the direct certification list. One SFA said "no problem, as long as it's electronic." Both SFAs reported that families often put a Medicaid card number on the NSLP application or complain that the income application should not be needed because "my child is on Medicaid."

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[27]    The estimate of 37 minutes per application appears high. With 2,221 applications in SY2004-05, it is equivalent to eight people working for 4 weeks.

# NSLP Application Verification Process

NSLP application verification is primarily a local procedure conducted by SFAs. Local FS/TANF offices provide assistance by verifying categorical applications. At the State level, the CN agency provides guidance, but no verification assistance. The SFSA is available to provide direct verification of categorical applications by phone, if requested.

**SFA Verification Procedures**

Both SFAs interviewed for this study use computer software to select an error-prone sample of applications for verification. They also use computers to enter verification information for computerized determination of eligibility. Both SFAs also report that they rely primarily on household documents to verify eligibility. The Wichita SFA selected a verification sample after October 1, while the Shawnee Mission SFA selected a sample on a rolling basis beginning one week after the start of school (because the verification deadline was changed from December 15 to November 15). Procedures for contacting and following-up with households differ slightly across SFAs.

The Wichita SFA sends a notification letter to households via regular mail, with a two-week response deadline. Generally a few letters are returned as undeliverable, and addresses are confirmed with the schools. Follow-up consists of a second letter, phone calls, and if needed, a letter sent home with the child. If categorical applications are selected, the Wichita SFA sends FS/TANF case numbers to the local FS office for verification. For income applications, they sometimes call employers to verify employment or check the frequency of income if documents are unclear. All households require at least two contacts, and some require up to six contacts. The Wichita SFA verification sample in SY2004-05 was 190 applications. The level of effort is one full-time staff person for a six-week period (240 hours), plus time for the SFA director to review documents received. The Wichita SFA reported that it could request a direct certification file in January (current as of December 15) to check if verification nonrespondents are eligible for direct certification, but the SFA has not done this.

The Shawnee Mission SFA had a verification sample of 86 income applications in SY2005-06, and no categorical applications. The SFA relies on household documents; personnel sometimes call employers to verify employment, but employers do not release income data. Households are notified of selection via certified letter, although the SFA reports that over 50 percent of these letters are returned because families say they don't go to the Post Office to get certified mail because it is usually bill collections. Nonrespondents receive a second letter via regular mail (with some returned as undeliverable), followed by up to three telephone calls. The SFA estimated the level of effort to be 20 hours per verification. This year the response rate was just over 50 percent.

The SFAs report that verification activities are burdensome, partly because they are busy with applications at the start of the school year, and partly because it is hard work getting household response. One of the challenges is communicating with families so that they understand the documentation requirements and are not intimidated by the process. The SFAs perception of the household response problem is that "families don't read notices, or lay them aside and forget." There's a range of households from very cooperative to very angry. Families do not see verification as a privacy issue, but they have the impression that the district is questioning their integrity. There is also some frustration on the part of SFAs that they cannot use the SSNs collected for verification to truly verify income, because they lack access to records.

**Verification of Categorical Applications**

The SFSA facilitates verification of categorical applications in two ways:

- The SFSA communicates to local FS/TANF offices that they should work with SFAs to verify case numbers. The State provides a standard form for this process; larger SFAs may send electronic files, but the SFSA could not confirm this.

- The SFSA provides direct verification by phone, and has informed local offices that they can verify case numbers via phone.

Districts indicated that they appreciated the help of the local FS/TANF office, saying "it's certainly easier than contacting the families!"

**Feasibility of Direct Verification Computer Match With FS/TANF**

The CN agency in Kansas has not investigated computer matching with FS/TANF data for direct verification of NLSP categorical or income applications. Both districts interviewed for this study indicated that they are "interested in any opportunity to directly verify." But at least one respondent indicated that FS/TANF data might not be useful because most children in families receiving FS/TANF are directly certified and not in the verification sample, and SFAs sample error prone applications and have no categorical applications in their sample.

The SFSA indicated that it could, in theory, facilitate a direct verification process by providing the SEA with access to query the FS/TANF eligibility information system. The SFSA would not, however, consider giving this access to school districts. The SFSA is aware that other States provide inquiry access indirectly — for example, Tennessee provides a data file to the CN agency, which is made available on-line for district direct certification and direct verification queries. In this case, the CN agency is responsible for data security.

**Feasibility of Direct Verification With Medicaid/SCHIP**

Direct verification using Medicaid/SCHIP data was perceived as potentially useful by all respondents. The CN agency has not investigated this option because the current priority is development of a State-level computer match for direct certification.

Respondents in all State agencies indicated that direct verification would not be technically difficult, but there are legal issues to work out. The State Medicaid Agency indicated that direct verification would probably have to be done as a data exchange, not a live query. From a technical standpoint, it would not be difficult to determine eligibility for free or reduced price meals for children enrolled in Medicaid or SCHIP because client records indicate family poverty level. A three-way agreement would be needed between the CN agency, Medicaid/SCHIP agency (DHPF), and SFSA; and families would have to be notified of this data sharing.

**Feasibility of Direct Verification With Wage Information**

State agency respondents indicated that use of wage information from employers for NSLP verification would be very challenging due to privacy concerns. On the other hand, one SFA was

primary concerned with the complexity of using wage information: "I'm not sure how it would work. If there are multiple sources of income, how would we know we got them all? And we would want to understand how current the information is because some families are eligible due to recent changes in income."

## Statewide Student Information System

Kansas implemented a statewide student information system (SSIS) in SY2005-06, known as the Kansas Individual Data on Students (KIDS) Collection System. KIDS was developed with Federal grant money and collects information about all public and private school students in the State.[28] KIDS has two components: a student assignment system (SSID) and a data warehouse (SSIS). The SSID assigns unique State student IDs to students, which are required before records can be submitted to the SSIS.

### Data Collection Schedule

School districts submitted data to KIDS for the first time in August 2005. This data submission was practice, to get districts used to the upload process. Because this is the first year of implementation, KIDS is collecting data from districts six times in 2005-2006.

Beginning with SY2006-07, districts will submit data to KIDS four times during the year. Student records will be collected in the Fall and at the end of the school year (with aggregate data collected for the other submissions). Fall submission of student records will be a snapshot of enrollment as of September 20. Districts will submit these data beginning September 21, with submission open for a 2-week period. The end-of-year submission of student records will be in June, after schools close, and will include attendance and truancy data.

### *Upload and validation of district data*
Data are uploaded by district IT staff in Excel or tab delimited file formats. (The SEA hopes to move to XML). After submission, each school principal reviews and signs off on a system-generated report; then the district superintendent signs off to finalize the district data. For the Fall submission, the SEA expects all data to be final by October 20. Districts have an incentive to complete the process on time, because State aid payments are based on reports generated from these data.[29]

The data submission process includes edit checks for missing fields. The system reports provide principals and superintendents with aggregate data for review, and allows them to drill down to detail if statistics look incorrect (e.g., counts by race). At the State level, student data submitted to the SSIS are checked against previous SSIS submissions and against the student assignment system (SSID).

Audits of district data are done by the State throughout the year, and district data are corrected in KIDS as audits are completed. Certain data items are audited: for example, attendance, English as a Second Language (ESL) status, and special education. Data items that are not related to funding, however, are not audited (e.g., gender).

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[28] The grant paid for the entire SSIS, including hardware and personnel.

[29] In Fall 2005, only one district late with data submission, due to delays with their SIS vendor.

**Student Identifiers and Demographic Data**

As noted above, KIDS has two components: an assignment system for State student IDs (SSID) and a data warehouse (SSIS). Students must be assigned an SSID before records can be submitted to the SSIS.

*Unique Student IDs*

The Kansas student assignment system is a commercial product from eScholar, used to look-up and assign unique student IDs. For example, new students or transfer students, without a known State ID, are looked up in the SSID. The query is based on name, date of birth, and gender. The SSID uses a probabilistic matching algorithm, and depending on results, may automatically accept a match, assign a new ID, or provide probable matches for the district to review and investigate.[30]

The SSIS and SSID store both the unique State student ID and district student IDs. District student IDs are used in routine checks for duplicate records. In addition, data are sent back to school districts with both the district and state student IDs so that the district can put the State ID into its system. Likewise, districts maintain both IDs in their systems because they need State IDs for SSIS data submissions. The State believes that districts could phase out the local ID over time, and use only the State student ID.

As noted above, the SEA runs routine checks for duplicate student records — i.e., two students with the same SSID or two different SSIDs for the same student. Thus far, duplicates have not been a large problem. When duplicates are found, the SEA follows up with schools to resolve the problem by assigning a new ID or retiring a duplicate ID.

*Potential identifiers for matching*

KIDS includes the following data elements for each student: legal first and last name, legal middle name, school ID, district ID, gender, date of birth, grade, district student ID, State student ID, SSN, race/ethnicity, eligibility for NSLP, presence of IEP, migratory status, homeless status, ESOL status, and first language.[31] As discussed above, direct certification matching will likely rely on name, date of birth, gender, and SSN (when available).

The CN director was not involved in planning for the SSIS, mainly because she did not see a need to be involved. The SSIS has fields for NSLP status and SSN, and these fields meet CN needs.

*SSN policy and issues*

Student SSNs are collected for the SSIS, if available at the district-level. File specifications for the KIDS data collection provide the following guidelines for submission of student SSNs: "May be blank, since giving the information or not is a parent option. Please use actual SSN or leave blank."

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[30]  According to the Kansas SEA, the eScholar system knows and learns matching patterns – e.g., nicknames and reversal of month and day in date of birth. eScholar based its software on the Census probabilistic matching program.

[31]  This list is of data items not exhaustive, and does not include attendance and outcome measures. Complete documentation can be found at kids.ksde.org.

The SEA reported that about 47 percent of student records contain an SSN. The CN director is aware of the prevalence of missing data and intends to encourage increased collection of SSNs by communicating with districts about the value of SSNs for State-level direct certification matching. It is not known whether districts will be receptive to this request, since it imposes a burden and may raise privacy concerns.

**Other Computer Matching of K-12 Data**

Currently, the Kansas SEA performs a computer match with employer wage records to measure employment outcomes for students who participated in federally funded career and technical education programs during grades 11 and 12. The SEA is also investigating development of a "pre-K through age 20" information system with Board of Regents.

*Career and Technical Education Match*
The Career and Technical Education division of the Kansas SEA collects data for all approved career and technical education programs receiving Federal funds under the Carl D. Perkins Vocational and Technical Education Act. Data are used to provide accountability measures in four core indicators, as required by Federal reporting requirements: academic attainment, skill attainment, completion, placement and nontraditional participation/completion.

Career and technical education programs submit data, via file upload to the SEA, through a web application. Data are collected about programs, instructors, and students. Data items collected for students include: student SSN, first and last name, grade level (11 or 12), gender, ethnicity, disabled, economically disadvantaged, program code, status (enrolled, completed, exited without completion), and GPA. Students voluntarily disclose SSN and if they refuse, the field is filled with a school-supplied student ID.

The SEA sends student data to the Department of Labor (DOL), where a computer match is run with employer wage records, based on SSN. Student records are included in the match only if they give permission upon exit from the program. DOL returns aggregate data to the SEA indicating employment outcomes for matched students. The SEA has a memorandum of understanding with DOL. Many steps were involved in setting up the MOU, including: signing agreements, checking security, providing assurances acknowledging confidentiality of data, consequences of unauthorized release, and duty to report breaches.

*Development of a "Pre-K through Age 20" System*
The SEA, along with the Board of Regents, is considering development of a new student information system to track students from pre-kindergarten to age 20. The system might use the SSIS student ID for data exchanges with post-secondary schools: community colleges, vocational-technical schools, colleges and universities. Currently there are no data matches between the SEA and Board of Regents. Until the SSIS student ID is maintained on post-secondary student records, the only way to analyze performance through higher education is to use computer matching of SSIS and post-secondary data.[32]

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[32]   Development of a "pre-K through age 20" system requires a method for assigning IDs for students entering Kansas higher education from out-of-state. Nebraska, Iowa and Missouri use the same SSID system to generate student IDs, so there would be no duplicates among these states.

Several people from the SEA and Board of Regents attended a workshop on "total systems" for measuring student outcomes. (They identified the States of Florida and Washington as leaders in this field). "Total systems" include secondary, post-secondary, and employment data. Kansas is at a preliminary stage in examining ways of link all these data.

# Medicaid Data Availability and Use

In Kansas, school-age children are eligible for Medicaid if they reside in families with income less than the Federal poverty level (FPL). The Kansas SCHIP program, known as HealthWave, has an income eligibility limit of 200 percent FPL for school-age children. Eligibility data for Medicaid and SCHIP are maintained in the same integrated information system serving FS/TANF.

### Relationship of Medicaid/SCHIP To Food Stamp Program

The Kansas Department of Social and Rehabilitative Services (SRS) administers the FSP, TANF, Medicaid, SCHIP, and many other programs.[33] SRS has an integrated eligibility system for FSP, TANF, Medicaid, and SCHIP.[34]

Kansas has a joint application process for SRS programs at local offices, access points, and through the Internet. There is also a simplified application for Medicaid and HealthWave (SCHIP) for applicants interested only in medical assistance. The SRS on-line application/assessment tool was implemented in August 2003 and includes FSP, TANF, Medicaid, SCHIP, Child Support Enforcement, child care assistance, energy assistance (LIHEAP), and vocational rehabilitative services.[35] Completed on-line applications are electronically sent to local SRS offices, where they are printed and handled as if received by mail. While HealthWave is included on the integrated application, applications for HealthWave are sent to a central processing site.

### Referrals from NSLP To Medicaid/SCHIP

Currently there is no information sharing between NSLP and the Medicaid program. In early 2005, the State CN and Medicaid agencies discussed the sharing of NSLP data with SRS for Medicaid/SCHIP outreach. Several hurdles were identified: there is no centralized database of NSLP applications; SRS would need data in a standard format, but data coming from multiple districts would be in a variety of formats; and NSLP applications do not have SSNs for children, so there is no unique individual identifier for matching.

Despite the hurdles, the State began development of a pilot project to share free/reduced-price applicant data for SCHIP outreach. The project involves the Kansas Health Institute (nonprofit

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[33]  SRS programs also include services for: adoption, adult protective services, child care, child support enforcement, commodity food distribution, disabilities, foster care, general assistance, Head Start, LIHEAP, mental health, refugee assistance, substance abuse, and vocational rehabilitation.

[34]  Recent organizational changes have separated the Division of Health Policy and Finance (DHPF), which administers Medicaid and SCHIP benefits, from SRS. However, DHPF contracts with SRS to determine eligibility and maintain the eligibility system.

[35]  The on-line application is located at https://srits004.sr.state.ks.us/.

research organization), the Sunflower Foundation (funding agency), and the Child Nutrition agency. School districts have been recruited for the pilot (10 percent of all districts agreed to participate) and data sharing will begin next school year. The specific arrangements for data sharing had not been determined at the time of the interview, for example, whether data sharing will be paper or electronic. The project was put on hold due to the reorganization that moved Medicaid program administration out of SRS.

The two SFAs interviewed for this study indicated that they do not share NSLP applicant information with other organizations. The State NSLP application has a waiver of confidentiality for referrals to other programs; SFAs can use this at their discretion by including checkboxes so that households can provide consent for data sharing with specific programs. One SFA reported that data are not shared because "our district has chosen not to waive fees for low income children." The other SFA reported that many groups would like access to NSLP data to establish eligibility for their programs, but none meet the criteria identified by USDA. This SFA sends written notice to households of their NSLP eligibility, and households can use the notice for other programs.

**Medicaid Data-Sharing**

The State Medicaid Agency does not currently share Medicaid/SCHIP eligibility data outside of the SRS eligibility system. They do not share data for the purpose of establishing or verifying eligibility for applicants to other programs, and the Medicaid application does not contain informed consent or disclosure of data sharing activities. The State believes that Federal regulations prohibit the sharing of eligibility information without explicit client consent. The State treats eligibility information as protected health information (PHI) under Medicaid.

**Medicaid Administrative Claim (MAC) Program**

The MAC program provides reimbursement to school districts for Medicaid-related administrative and support services provided to students. Reimbursement is based on the costs of services and the percentage of district students who are eligible for Medicaid. In many States, computer matching of Medicaid records with student enrollment records determines the percentage of children eligible for Medicaid in each district.

The SEA has no role in administering or facilitating the MAC program in Kansas, and was unable to provide information on the determination of the percentage of Medicaid-eligible children per district. The MAC program is administered by the State Medicaid Agency, which contracts with MAXIMUS, Inc. to oversee administrative claiming. Documentation indicates that administrative cost calculations for each school district are based on time studies, district cost reports, and the percentage of eligible individuals in the school district's county.[36] County estimates of Medicaid-eligible children may be based solely on Medicaid records, without computer matching to district enrollment; however, none of the interview respondents had knowledge of these estimates.

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[36]  Department of Health and Human Services, Office of Inspector General. "Medicaid School-Based Administrative Activities in Kansas," April 2005, http://oig.hhs.gov.

# Income Eligibility Verification System

The State Food Stamp and Medicaid agencies were asked about income eligibility verification systems (IEVS) for those programs. In Kansas, the eligibility systems are integrated, and IEVS activities are the same for food stamps and Medicaid. These agencies were asked about the quality of data used for verification and the feasibility of NSLP using similar data matches for income verification.

All IEVS matches for FSP and Medicaid rely on client SSN as a unique identifier. Respondents indicated that data quality varies by source, and the most important limitation in applying IEVS for NSLP is the need to follow up on match results.

SRS does not use IEVS at application. Local office workers rely on wage stubs or letters from employers to document earnings at application.[37]

Some known limitations of IEVS data were highlighted:

- Quarterly wage data are available with a lag, which is problematic because work and wages can fluctuate significantly for some clients;
- Social security benefits are known to be accurate;
- The Social Security Administration's Beneficiary Earnings Exchange Reports (BEERS) data are very old and not helpful;

Kansas is currently testing the use of New Hires data for TANF. This is expected to provide more current information on employment status and the identity of employers. New Hires does not, however, provide wage information, so caseworkers need to call employers to obtain wage and hours information.

**Future Directions for Food Stamps**

As mentioned above, Kansas has had an on-line application/assessment process for all SRS programs since August 2003. (For some programs, the on-line process is limited to self-assessment, while for others it is an application process.) Applicants can complete and submit applications on-line and direct their application to go to a designated local office. The on-line application does not currently include a process for electronic signatures, so applicants must print the on-line form, sign it, and mail the signature page, or request SRS to send the signature page by mail.

On-line applications can be completed at any of 50 county SRS office, plus an additional 700 access points.[38] Access points are categorized by the level of service, with the lowest having at least paper applications; the next level has PC access, fax and phone; and the highest level has PC, fax, phone, plus help (these are mostly community action agencies, food pantries, etc.).

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[37] In contrast, Texas runs all applications through wage matches, and uses information obtained at application to indicate possible employment and need for follow-up.

[38] Access points include health departments, doctors offices, post offices, libraries, county extension offices, and food pantries.

The on-line SRS application is a "bare-bones" system developed in 2-3 months, with a fast and simple approach. The State admits that it is not easy to use, but it works.  For example, the field staff print applications from their screens, and they are not happy with this procedure. As soon as an application gets to a local office and is assigned, it is printed and handled like a paper application. The application data do not flow directly into the FSP eligibility system.  The State is working on upgrades, but there is no timetable.

# Chapter 3
# Massachusetts

Massachusetts was chosen for case study because it is the only New England State currently using State-level computer matching for NSLP direct certification. In addition, the computer match in Massachusetts does not rely on Social Security Numbers (SSNs).  Massachusetts has 386 public school districts and a student population of approximately 976,000. Both public and private SFAs have access to State-level computer match results for direct certification. Agencies interviewed for the case study are listed in Exhibit 3-1.

## Highlights

Computer matching for NSLP direct certification was piloted in the Boston and Springfield public school districts in SY2002-03, expanded to 12 additional districts in SY2003-04, and extended statewide in SY2004-05.  For Boston and Springfield, the food stamp agency provided data to school districts, and the districts developed computer matching procedures.

For statewide matching, the food stamp agency delivers a file to the State Education Agency, and the SEA matches FS/TANF records with data from the statewide student information system (SIMS – Student Information Management System), implemented in SY2000-01. Key players in the State expressed the opinion that implementation of SIMS made State-level matching for direct certification possible.  Massachusetts has done a State-level computer match for 2 years. The primary limitation of State-level matching, at the current time, is that the State has been unable to deliver match results to SFAs prior to the start of the school year.

NSLP direct verification is currently limited to a manual process by which some SFAs contact local FS/TANF offices, however, there are no data on how widespread this practice is. The State CN agency is aware of the potential for using computer matching for direct verification, and has had preliminary conversations with the State Medicaid Agency, but there is no plan for direct verification matching at the current time.

## Direct Certification

Currently, three methods of direct certification are used in Massachusetts:

- State-level computer match is done for all public school districts.

- Boston and Springfield receive data directly from the Department of Transitional Assistance (DTA), which administers the FSP.  These districts continue to use the computer matching procedures developed for the pilot of direct certification matching.

- The letter method is used to directly certify children attending private schools, Residential Child Care Institutions (RCCIs), and FS/TANF children who are public school students but are not identified through computer matching.

**Exhibit 3-1**

**Agencies Contacted for the Massachusetts Case Study**

| Generic Abbreviation | Agency Name | Contacts |
|---|---|---|
| CN | Department of Education, School Nutrition and Health | Executive Director |
| SEA | Department of Education, Finance and Operations, Data Collection Processing and Reporting | Data Collection Supervisor, Data Analysis and Reporting Supervisor |
| FSP | Department of Transitional Assistance (DTA) | Food Stamp Program Manager |
| Medicaid | Executive Office of Health and Human Services, Office of Medicaid (MassHealth) | Director of Waiver & SCHIP Administration |
| Very large SFA | Boston Public Schools (about 58,000 students; 73% Free/RP) | Food and Nutrition Services Director |
| Small SFA | Orange Public Schools (elementary only, about 800 students; almost 50% Free/RP) | Food Service Director |

**History**

Massachusetts began using the letter method of direct certification in the 1980's. Every August, letters were mailed to households with children under 19 receiving FS/TANF. It was determined, however, that, on average, only about 50 percent of letters were returned to schools.[39]

Direct certification was piloted in the Boston and Springfield public school districts in 2002, as part of a Child Nutrition Access Project (CNAP) funded by USDA under a grant to the Project Bread organization.[40] The goal of CNAP was to centralize access to Federal nutrition programs (school meals, WIC, and food stamps), increase enrollment of families in multiple programs, and increase overall participation in each of the three programs. Project Bread established an Interdepartmental Task Force of Federal, State, and local officials to pursue the goals of streamlining application procedures, sharing data for direct certification or referrals, and conducting outreach.[41]

Project Bread reported one of the most important hurdles to overcome in CNAP was creating "a mechanism to exchange data between State agencies in accordance with State privacy laws." To solve this problem, a new consent clause was added to school meals, WIC, and food stamp benefit applications so applicants give explicit consent to share their identifying information across programs

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[39] Hall, Bryan (2003). *Breaking Child Nutrition Barriers: Innovative Practices in Massachusetts School Breakfast, Summer Food, and After-School Snack Programs.* Waltham, MA: Brandeis University, The Heller School for Social Policy and Management, Center on Hunger and Poverty.

[40] Project Bread is the leading anti-hunger organization in Massachusetts.

[41] The CNAP project is documented in, "The Child Nutrition Access Project," Project Bread-The Walk for Hunger, Updated November 9, 2005.

for direct certification and referrals.[42]  This explicit consent for referrals between food stamps and WIC has become obsolete. In August 2004, Massachusetts launched a "Gateway to Health and Human Services" (Internet portal) providing a single common intake tool whereby registered providers can assist clients in applying for multiple programs, including food stamps, WIC, Medicaid, and SCHIP.

The direct certification pilot in Boston and Springfield (SY2002-03) was found to dramatically increase the number of children directly certified for free meals (193% in Boston; 60% in Springfield), and to increase overall enrollment in school meal programs (5.7% in Boston; 6.8% in Springfield).

After expanding the pilot to 12 additional districts in SY2003-04, direct certification was extended statewide in SY2004-05. However, Boston and Springfield continue to match data using the systems they developed for the pilot, due to limitations in the State system discussed below.

### Computer Matching Process for Direct Certification

The statewide computer match for direct certification is performed by the information technology (IT) division of the State Education Agency, due to FERPA restrictions on the release of student records to outside agencies.  The Child Nutrition division of the SEA does not do the match because they do not have access to student records.  Within the SEA IT division, one programmer works on the match, spending about 40 hours on the process, spread over a longer calendar time due to other responsibilities.  Direct certification procedures and timeline are shown in Exhibit 3-2.

### Effectiveness, Challenges, and Solutions

The direct certification computer match in Massachusetts is considered effective, insofar as a high percentage of FS/TANF children are matched to student enrollment records.  The primary challenge for the State has been timely completion of the match, and distribution of match results before the start of the school year.  For the past 2 years, SFAs have not received direct certification data in time to use it for its primary purpose, which is to reduce the application burden. However, the data have been used to identify applications exempt from verification sampling, thus reducing the burden of verification.

Additional challenges for direct certification in Massachusetts are: a) provision of technical support to SFAs during implementation, b) the "sibling problem" whereby all children in a households are not directly certified, and c) developing automated procedures for handling match results in small SFAs.

*Effectiveness*
The State Education Agency reported a direct certification match rate of about 80 percent for SY2005-06 — i.e., about 80 percent of FS/TANF children were matched to the file of students

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[42]  The current Massachusetts food stamp application, revised March 2004, does not contain a consent clause regarding data sharing.

The State Child Nutrition Agency directs school districts to use the USDA prototype application, which contains the following clause:  "We MAY share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules."

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**Exhibit 3-2**

**Direct Certification Computer Matching Process—Massachusetts, SY2005-06**

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*State agency procedures*

August    Department of Transitional Assistance (DTA) sends a data disk to State Education Agency (SEA)[1]
- File contains children ages 0-19 in households receiving FSP or TANF benefits as of July 2005 (approximately 120,000 children in 2005)
- Identifiers:
  - FS/TANF client ID
  - FS/TANF program code
  - First name, last name, and middle initial
  - Date of birth
  - City of residence
  - Address (Boston and Springfield only)
  - Parent/guardian name (Boston and Springfield only)

August    SEA pulls an extract of student records from the Student Information Management System (SIMS), representing Spring 2005 enrollment.

SEA runs a computer match of the DTA file and student enrollment file. Match is done using FoxPro database software on a PC, with 3 rounds of matching using the following match rules:
1. Exact match on NAME and DOB
2. Exact match on NAME and DOB with month and day switched
3. Match on first initial of FNAME, exact match on LNAME, DOB, City of residence

Sept    State match results are available in Excel files on the SEA web portal for download by districts (this year, available September 13, 2005).[2]

SEA sends a file of unmatched DTA records back to DTA in late September, and DTA sends letters to households.

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*Procedures at small elementary school SFA*

Sept    Download direct certification list from SEA website.

Manually match the direct certification list against student enrollment for the 3 schools in the district (paper process because the SFA director does not have access to an electronic database of students).

Sort through files of NSLP applications to identify applications received for students on the direct certification list, and mark the application to be excluded from verification.

This year, about 300 students were on direct certification list, but these included high school and middle school students. It appeared the SEA parsed the list by ZIP code, not district.[3]

This year, no notification letters were sent because all directly certified students had already submitted applications.

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*Procedures at Boston SFA*

August    District IT department receives and checks data from Department of Transitional Assistance (DTA). Data are matched to Fall student enrollment using Visual Basic (ASP), via 4 rounds of matching:[4]
1. Match by DTA number (this is kept in the district SIS from previous year's match)
2. Match by DOB and student name (1st char of Fname, 1st 5 char of Lname)
3. Match by DOB and parent's name (1st char of Fname, 1st 5 char of Lname)
4. Match by DOB and address

Nearly all matches are from rounds 1 and 2, with less than one percent from rounds 3 and 4.
Match results are loaded into WINSNAP food service system; SFA staff review matches

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(See notes on next page.)

**Exhibit 3-2**

**Direct Certification Computer Matching Process—Massachusetts, SY2005-06**

[1]   Quarterly files are provided to Boston and Springfield in August, November, January, and April.

[2]   MS-Excel format was determined to be the most compatible with the various software used by districts.

[2]  One of the problems in "parsing" the list of students for elementary and secondary districts is that the match is made against enrollment from the prior school year.  Since students "roll over" to the next grade (and possibly a new district), the State cannot parse the list by the District ID on the student record. This problem does not occur in unified school districts.

[4]  Rounds 3 and 4 of matching in Boston use data (parent name and address) not maintained in the statewide student information system.  The Boston district information system does not maintain student SSNs.

enrolled in public school districts. Unmatched FS/TANF children include those enrolled at private schools, children who are not school age, and children entering kindergarten in SY2005-06 who are not represented in the student enrollment data from Spring 2005.

The Boston SFA reported that it consistently matches 80 to 85 percent of FS/TANF children to the district enrollment file.[43]  There are three reasons why this SFA achieves a higher match rate: 1) the SFA retains the FS/TANF client ID in the school district information system after a match is made, so matches requiring manual review do not require review in subsequent years; 2) the SFA uses information (parent name and address) maintained by the district but not reported to the State; and 3) the SFA uses Fall student enrollment, reflecting rollover of prior year enrollment and registration for new students.  The Boston match process involves four rounds of matching: first by FS/TANF client ID, second by name and date of birth (similar to the State match), and two more rounds (3 and 4) using information not available to the State.  About 400 additional matches are obtained from rounds 3 and 4 of matching, accounting for less than 5 percent of direct certifications for the district.

As noted above, computer matching increased the number of children directly certified for free meals by 193 percent in Boston and 60 percent in Springfield.[44]  The State was unable to report the impact of computer matching on direct certifications statewide because districts did not report direct certifications prior to SY2004-05.[45]  However, as noted above, previous research indicated that about 50 percent of letters were returned on average, and the State had anecdotal evidence suggesting a wide range of effectiveness for the letter method.  Some SFAs reported a low percentage of households returned direct certification letters (one reported 10%), while other SFAs conducted outreach and achieved high rates of return.

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[43]   Boston received State match results this year, but did not compare those results to district results because the timing of the school enrollment files is different and they didn't expect to get the same matches.

[44]   Between SY2001-02 and SY2002-03, direct certifications increased from 4,446 to 13,043 in Boston and from 4,290 to 6,873 in Springfield.

[45]   The Verification Summary Report was a new reporting requirement in SY2004-05. The VSR requires reporting of the number of students "not subject to verification", which includes direct certifications, homeless children, income-eligible Head Start, and pre-K even Start.  We were unable to determine the proportion of categorically approved children in Massachusetts who were directly certified, because VSR data were not available.

*Challenges*

Massachusetts State and local officials identified four technical challenges in implementing State level computer matching for direct certification: a) getting match results to districts on a timely basis, b) improving match accuracy and solving the "sibling problem", c) providing small SFAs with automated means of processing direct certification lists, and d) providing technical support to SFAs.

**Timeliness.** For the first 2 years of statewide operation, State match results were available to districts in mid-September, about two weeks after the beginning of the school year in most districts. The goal is to make results available 5 to 10 days prior to the start of the school year. DTA files containing FS/TANF records have been provided to the SEA on timely basis, but the SEA has experienced problems "fitting in" the direct certification match during the busy summer months. The primary bottleneck is that all matches after first round are manually reviewed.[46]

**Match rate and sibling problem**. The State experienced initial problems with an over-identification of matches (false positives). The problem was identified through feedback from districts. The problem occurred because matches were based on name alone, without requiring a match on date of birth. Subsequently, the State made the match rules more stringent.

Currently, the State is aware that the match rate is limited by the difficulty in obtaining an exact match of names. The SEA believes its system contains legal names for most students, but it is possible the SEA or DTA file sometimes contains a nickname or preferred name not matching the legal name.

The "sibling problem" remains an issue insofar as SFAs do not have a clear understanding of why some but not all siblings are sometimes on the direct certification list. The State has not evaluated this problem to assess the extent to which it is due to the limitations of the match algorithm versus real variation in FS/TANF status for siblings. The Boston SFA reported this was a bigger problem when using the letter method (its not clear why), but the SFA saw some improvement with computer matching. Initially, the Boston SFA used a household ID to tie families together in the district SIS, allowing the application staff to follow up by calling DTA to check on siblings if the parent called to complain. Boston officials reported, however, that they take DTA information "as is" because there are reasons why all children in a household may not be eligible.

**Automated processing at the district level.** The small SFA interviewed for this study indicated direct certification is a manual process (Exhibit 3-2). This SFA expressed a need for an automated system to incorporate State match results into operations. There is a larger need for IT support for the food service administration. The SFA reported it has POS software in each of the schools, but the POS central software (to access information from each school at the SFA office) does not work well and district IT resources have not been available to help resolve this problem.

**District technical support.** According to the State, when direct certification was first implemented, a lot of technical support to districts was needed because the entire process was new, from the web

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[46]    Despite of the lack of timeliness, SFAs were not in favor of returning to the letter method. One SFA reported that a large burden of the letter method was that households returned the letters unsigned and the SFA had to return them for signature (households were required to provide a signature indicating that they wanted benefits).

portal login to direct certification. SFAs were, however, experienced with on-line ordering from vendors so they were familiar with the web browser interface. The State indicated that one challenge was that direct certification requires SFA directors to coordinate with district IT personnel, where there was often no prior relationship.

Ongoing technical support to school food service staff may be required in the following situations:

1. The SFA does not know how to get into the security portal. This problem may happen with staff turnover within the district. These calls may go to the CN agency or the SEA, but SFA staff will be referred back to the district person who maintains portal access rights for district personnel. (All security for the portal is managed at the local level.)

2. The SFA has questions about specific matches. These inquiries are directed to the programmer who runs the match in the SEA IT division.

3. The SFA does not know what to do with the Excel file. Direct certification instructions advise school food service staff to consult with district IT personnel about this.

**Costs and Benefits of Computer Matching**

The Massachusetts implementation of a State-level computer match for direct certification is somewhat unusual because it was facilitated by a third-party organization (Project Bread) funded by a USDA grant. The State CN Director reported that "startup" involved numerous meetings with Project Bread and the Food Stamp and WIC agencies. But it is not possible to identify the start-up costs for direct certification computer matching, net of the other CNAP data sharing initiatives.[47]

The SEA was unable to quantify the setup cost for the computer matching process. They indicated some of the process and computer code might have been borrowed from another project. The ongoing cost, as discussed above, is about 40 hours of programmer time.

It is difficult to compare the benefits of direct certification computer matching relative to the letter method. For example, DTA reports a saving of 44 cents for every letter it does not mail; however, that cost is largely shifted to an SFA mailing of direct certification notification letters. Therefore, the primary cost saving is from reduced application processing and verification costs at the SFA level. As noted above, however, SFAs are not experiencing a reduced application burden because the State has been unable to provide timely direct certification data. Currently, the State reports most SFAs see computer matching as an improvement, because it reduces the verification sample and reaches more FS/TANF children than the letter method.

The Boston SFA (which performs the match prior to the start of the school year) indicated savings from three sources: first, about 10,000-14,000 fewer NSLP applications are printed; second, the

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[47] For a time, Child Nutrition, Food Stamps, WIC and Project Bread held 2-hour meetings every 6 weeks. However, many of the initial meetings discussed whether data sharing was even permissible. This discussion was necessary for sharing between WIC and other agencies, but child nutrition and food stamps already had a data sharing agreement in place.

savings from reduced application processing is at least 100 person weeks[48]; and third, the verification sample is reduced. These savings are not representative of SFAs that use the State-level match.

**Future Directions for Direct Certification**

The current focus of the SEA is to improve the timeliness of the direct certification matching process and deliver data to districts before the start of the school year.  To this end, the SEA has discussed the possibility of retaining a crosswalk of Student ID and FS/TANF ID from year-to-year, to reduce the number of matches requiring manual review.

The SEA is also trying to establish a process to do the computer match again in January and March, when the SSIS is updated. Boston and Springfield do quarterly matches, and Boston reported it gets a total of about 200 direct certifications from these additional matches.

# NSLP Application Verification Process

SFAs in Massachusetts rely primarily on household documents for verification of NSLP applications, and may contact local FS/TANF offices for verification of categorical applications.  The State has no current plans for implementing direct verification.

**SFA Verification Procedures**

The SFAs interviewed for this study use similar procedures for verification, with some exceptions.  In 2005, Boston used a focused sample for verification and selected applications by computer, while the small SFA used a random sample and selected applications manually.  Both SFAs had only income applications in their verification sample in 2005 (no categorical applications), and both SFAs relied on household documents for verification.  The SFAs reported verification requires multiple requests to households (2 or 3 mailings), and sometimes households do not respond until their child is denied benefits.

Boston uses the WINSNAP computer program to select a focused sample for verification.[49]  The SFA relies solely on documents provided by households to verify income applications.  Verification information is entered into WINSNAP, and WINSNAP determines eligibility.  While no categorical applications were sampled in 2005, in past years the SFA relied on household documents for verification of categorical applications, or called the local DTA office.

In the small SFA, the verification sample for SY2005-06 was fewer than 10 applications. The SFA director determined the sample size and selected applications manually.  If a selected household was sampled in the past year, another household was selected. Household documents were collected and verification data were processed manually. The SFA did not contact local FS/TANF offices for verification of categorical applications, but relied on household documents.

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[48]  Before computer matching, the SFA hired 25 short-term staff for data entry, sorting, and filing for 6-12 weeks. After computer matching, the SFA hired the same number of staff, but half were hired for 6 weeks and the other half for 8-9 weeks.

[49]  Boston reported one limitation of the WINSNAP software — it does not prevent a family from selection if the family was selected the previous year.  An older sampling program, run on the district's mainframe student information system, allowed the SFA to restrict how often a family was chosen for verification.

**Verification of Categorical Applications**

As noted above, Boston has directly verified categorical applications by contacting the local DTA office. The State indicated that some SFAs have good relationships with local DTA offices and call them or send lists for verification of FS/TANF status. However, there are no formal procedures for directly verifying applications with the local DTA office, and DTA offices do not reply electronically due to confidentiality concerns. The State Child Nutrition director indicated that requests to households for FS/TANF documentation should not be overly burdensome because DTA maintains an 800 number for clients to call and request a letter verifying program status.[50]

**Feasibility of Direct Verification Computer Match With FS/TANF**

Massachusetts has no current plans for direct verification of categorical applications through a computer match. Direct verification of case numbers provided on NSLP applications would require access to current food stamp data, whereas the SEA currently receives only a July DTA file for direct certification. In addition, the State is currently focused on improving the direct certification process, and direct certification reduces the number of categorical applications requiring verification.

**Feasibility of Direct Verification With Medicaid/SCHIP**

The Massachusetts State Child Nutrition director began preliminary discussions with the State Medicaid Agency (SMA) regarding direct verification with Medicaid data. Those discussions are currently on hold due to staff shortages in the CN division. Initial discussions identified three main issues to be resolved: a) the relevant levels of Medicaid eligibility, b) the legality of data exchange, and c) the challenge of collecting verification sample data from SFAs.[51] The State expects large SFAs to be most interested in direct verification, and Boston has offered to serve as a pilot site.

Thus far, other staff at the SEA had not been involved in discussions of direct verification. During our interview, however, they indicated that a computer match similar to direct certification was feasible. They also understand that Medicaid data may be used to verify free and reduced-price NSLP status, and do not anticipate this to be a large complication.[52] The SEA expects that direct verification matching might have to be administered by the SEA due to FERPA restrictions on release of data, but the SEA does not have primary jurisdiction over NSLP application data. The main challenge for direct verification would be establishment of an interagency agreement with the SMA.

The SMA had preliminary discussions with the CN agency about direct verification, but there had been no internal follow-up. The SMA is primarily concerned with disclosure of Medicaid records

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[50]  It is not known whether SFAs provide the DTA 800 number to NSLP households with the verification notice. The State does not provide State-specific prototype verification materials to SFAs, but directs SFAs to customize FNS prototype documents.

[51]  The Medicaid income eligibility limit is 150% of the federal poverty level for children ages 1-5 and 6-19. The SCHIP program covers children with income up to 100% of poverty.

[52]  The SEA offered two solutions: either the SMA provides a Free/RP flag on the Medicaid records, or the SMA provides data on household size and income and the SEA programs a conversion of that data to Free/RP eligibility.

under HIPAA privacy regulations, and suggested two solutions to the disclosure problem. The first solution is to put a disclosure statement on the NSLP application whereby parents sign a release for use of Medicaid information.  The second solution is for families to provide Medicaid information as part of the NSLP verification process, without any data transfer.[53]

From the SMA's viewpoint, the main barrier to data sharing is establishing legality under HIPAA. Data sharing would require the approval of the Medicaid/SCHIP privacy officer and HIPAA attorney, and might require appropriate permissions be obtained from NSLP applicants. Currently there is a privacy statement on the Medicaid/SCHIP application notifying applicants that data matching will be used for verification of Medicaid/SCHIP eligibility, but there is no notification of data sharing to establish eligibility in other programs. Even after establishing data sharing permissions, the computer match might have to be done by the SMA so only information for matched NSLP applicants is released to education agencies.

Another barrier to sharing Medicaid data is that the SMA does not typically establish data sharing agreements with agencies outside of the Executive Office of Health and Human Services (EOHHS). If this barrier is overcome, the only remaining requirements for allowing a match are the technical agreements on file format, data transmission mode, and other specifications of the data file.

As discussed below, Massachusetts participates in the Medicaid Administrative Claim (MAC) program.  To determine reimbursement under MAC, school districts determine the percent of enrolled students eligible for Medicaid through a computer match of Medicaid records with student enrollment records. The SMA provides Medicaid records to districts for this purpose. This record disclosure is permitted because school districts act as an agent of the SMA with respect to the MAC program. In contrast, there is no relationship between the SMA and districts with regard to the NSLP.

**Other Methods of Direct Verification**

In July 2004, Massachusetts implemented an electronic process for households to directly submit information to an eligibility screening gateway maintained by the EOHHS.  In its initial implementation, this tool includes eligibility screening for Food Stamps, Medicaid, SCHIP, Healthy Start, Child Care, WIC, Early Intervention, Substance Abuse, and Women's Health Network. The State plans to add other programs such as energy assistance.  Individuals may use the gateway to search a "catalogue of services" containing descriptions of EOHHS programs, or to use the screening tool. In addition, an intake tool was rolled out gradually to registered service providers, allowing them to collect information from a client into one on-line form and to generate applications for multiple HHS programs and services.  Clients may indicate the programs for which they would like to apply, and client information entered through the gateway is reportedly verified (though details were not provided). Eventually, the gateway will allow individuals to directly apply to EOHHS programs without going through registered providers.

Several State officials interviewed for this study provided information about the EOHHS gateway. Currently, there are no plans to include the NSLP in the gateway, but it is a tool that may potentially be used for this purpose in the future.  For example, the NSLP could be listed among the other social

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[53]    This was the original method used in Massachusetts to establish eligibility for public utility discounts. Eligibility for these discounts is now determined by computer matching. Public utilities provide a list of customers to DTA for a computer match against client data.

service programs on the gateway, and persons submitting information to the gateway could choose to learn their eligibility for NLSP and apply to the program online.  If eligible, the applicant's information would be sent electronically to the relevant SFA. The SFA would be relieved of both application processing and verification.

## Statewide Student Information System

Massachusetts implemented the Student Information Management System (SIMS) in SY2000-01. SIMS is a statewide student information system containing data for all students who are publicly funded, including public school students and publicly funded special education students attending private schools.  The SEA has no jurisdiction over private schools and no authority to collect data from them.[54]  Public school districts submit data to SIMS through an Internet portal.

**Data Collection Schedule**

When first implemented, SIMS had a quarterly data collection schedule for student records: October, December, March, and end-of year. The December data collection was dropped in SY2005-06 when Federal reporting of special education students changed from December to October.

The "October data collection" is a reporting of October 1 student enrollment. The due date for data submission is November 17, with an extended due date of December 1, if requested by a district superintendent. Districts are given a wide window for data submission, recognizing that there is a lot of activity at the start of the school year, and districts have a lot of new students to get into the system.  Thus the data collection schedule reflects the time period of data submitted to the State, but not the timing of data availability at the State level.  Districts have a shorter window for March data submission (one month) because this submission involves minor updates.

The SEA has not experienced major problems receiving data from districts, and attributes this to the wide window for data submission.[55]  In addition, the SEA is in close contact with districts.  Staff persons are assigned certain districts, and they know what is happening in those districts. When districts miss data submission deadlines, the SEA follows up weekly until data are submitted.

The direct certification computer match uses end-of-year student enrollment data. This is because Fall data are reported as of October 1, well after the start of the school year. Even if the Fall data were submitted by districts to the State on October 1, it would be too late for use in direct certification.

**Student Identifiers and Demographic Data**

The statewide student information (SIMS) in Massachusetts operates as in many other States: there is one system component for assigning unique student IDs, and another component to warehouse student membership data.  State student IDs must be assigned to students, by districts, prior to submitting membership data to the State.  To obtain a State student ID for a new student, a district

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[54]   The SEA requests aggregate data from private schools, and schools that receive federal funding are required to report aggregate data by race and first language.

[55]   In SIMS' first year of operation, one district was unable to submit data at all; but after the first year, all districts have met data submission requirements.

logs into the State system through a web interface and submits identifying information about the student. Student IDs can be requested at any time. The system runs a check to determine if the student is already in the system (based on first and last name, middle name, date of birth, and city of birth). If the system can not be certain of "no match" or "match" to an existing record, SEA staff must investigate the case prior to assignment of a student ID.

*Potential identifiers for matching*
SIMS contains the following student identifiers: student first and last name, middle initial, gender, date of birth, race/ethnicity, and city or town of birth. Identifiers that are potentially useful for computer matching, but not maintained in SIMS, include: SSN, address, and parent/guardian information. As discussed previously, one of the reasons that the Boston SFA continues to operate district-level matching is that the district information system has more identifying information to use in a match than SIMS, and the SFA believes it achieves higher match results with this information.[56]

*SSN policy and issues*
SIMS does not maintain student Social Security Numbers. The SEA indicated that, during development, there was discussion about using the SSN as a student ID. However, many students do not have an SSN, some districts do not collect SSNs, and there were confidentiality concerns. After deciding against using the SSN as an ID, the SEA decided not to store it as an additional identifier to eliminate the possibility of releasing an SSN when a student record is released.

*Upload and validation of district data*
Data uploaded to SIMS by districts are validated by automated procedures. The primary problem addressed by these automated checks is the problem of duplicate records for the same student, where either a) multiple State student IDs were assigned to the same person, or b) the same student ID is associated with multiple students.

Duplicate records in SIMS may occur for the following reasons:
- School did not enter transfer information for the student and obtained a new ID
- Parent did not communicate transfer information, and the school obtained a new ID
- There is a misunderstanding about which district has financial responsibility for a special education student

Duplicates are reconciled by the following process:
- SIMS computer program identifies duplicates (usually about 2,500 students are claimed by multiple districts)
- The SEA works with the districts to determine where the student was enrolled on October 1. The SEA posts the duplicate lists in a web application. Districts log in, view the list, and submit information to resolve duplicates (i.e., indicate that student was enrolled or not on October 1, and whether they know of transfer)

Data accuracy is not considered a problem in the SIMS system. After implementing SIMS, the State compared demographic data to the data collected from prior year assessments (through filling in bubbles on forms) and found SIMS was 99% accurate.

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[56] A direct comparison of State and district-level matching is not possible because the timing of FS/TANF data extracts is different.

# Medicaid Data Availability and Use

Massachusetts provides Medicaid coverage for school age children in households with income up to 150 percent of the poverty level. Income eligibility for the separate SCHIP program is 200 percent of poverty. The State Medicaid Agency (SMA) administers all publicly funded medical assistance programs in the State, and eligibility information for all medical assistance programs are maintained in a single statewide information system.

## Relationship of Medicaid/SCHIP To Food Stamp Program

The SMA is separate from the State agency administering food stamps and TANF (DTA). All three programs were under the same agency until about 10 years ago when the State "delinked" health and welfare following welfare reform. The SMA and DTA maintain a relationship because families eligible for TANF are automatically enrolled in Medicaid, thus data flow from DTA to the SMA, but not the other way around.

## Referrals from NSLP To Medicaid/SCHIP

Currently there is no data-sharing relationship between the NSLP and the SMA, which does not receive information from NSLP applications as referrals for Medicaid or SCHIP.

## Medicaid Administrative Claim (MAC) Program

As noted earlier, Massachusetts participates in the MAC program. MAC reimbursements to school districts are determined by a formula based partly on the percentage of Medicaid-eligible students in the school district. In Massachusetts, this percentage is determined through a computer match of Medicaid records with student enrollment records, done by school districts or their contractors. The State Education Agency has no role in administering MAC or facilitating data transfer between the SMA and districts.

In 2005, 320 districts participated in MAC— nearly the entire State. Participating districts enter into a business partner agreement (including a data sharing agreement) with the SMA. The SMA uses a vendor, the University of Massachusetts Medical School (U-Mass), to process and transfer Medicaid records to districts on a quarterly basis. The data transfer process includes the following steps:

- Districts report their geographic catchment area to the SMA
- The SMA parses the data by geographic area and sends to U-Mass
- U-Mass "cleans up the data" and sends data to districts through mail or by courier; electronic transfer is not used due to HIPAA

Each quarterly file includes all children in the district catchment area who are eligible for medical assistance programs and have household income up to 200 percent of the poverty level, as of the fifth day of the first month of each quarter. Districts must do a quarterly match and submit quarterly MAC claims. Some districts contract with vendors to file MAC claims. The SMA does not mandate the match criteria for MAC computer matching, but expects that multiple identifiers are used, such as name, SSN, date of birth, and gender.

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The transfer of data from the SMA to districts, rather than the other way around, is dictated primarily by administrative ease for the SMA. However, the SMA was unaware of whether FERPA regulations allow the SEA or districts to share student data with the SMA for MAC matching. There have been no discussions of streamlining the match process by using the education department's statewide student information system, primarily because other operational issues have priority over streamlining and improving MAC. In addition, districts have an incentive to do the match because Federal reimbursement goes to districts.

# Chapter 4
# Oregon Case Study

Oregon was selected as a Western State with a relatively new direct certification system using the SSIS. This State was the only one identified in the State CN agency survey as having a secondary match for direct certification that uses FS/TANF household information to identify potentially eligible siblings of matched students. Oregon has 206 public school districts and a student population of approximately 550,000. All public SFAs participate in the State-level computer matching system for direct certification. Agencies interviewed for the case study are listed in Exhibit 4-1.

## Highlights

Oregon piloted computer matching for direct certification in the Portland public school district from 2001 to 2003, then implemented direct certification statewide in 2003. Previously, local FSP offices sent direct certification letters, and procedures were not consistent throughout the State. The SEA conducts the direct certification match using data from the State Student Identification (SSID) system, which is part of the SSIS implemented in 2001-2002. The FSP agency (Department of Human Services or DHS) provides a combined file of FSP and TANF children for the match. The primary match is by SSN, and a secondary match identifies siblings of children matched by SSN using FS/TANF head of household information. In SY2005-2006, the matches were conducted monthly, and the SEA planned to implement a web-based process to replace the existing e-mail system for distributing match results to SFAs.

The direct certification process in Oregon has strengths and weaknesses. The main weakness is that the match relies on SSN, while only about 50 percent of student records in the SSIS contain SSN (two districts do not collect SSN for any students; other districts have SSN for some students). The State is able to match about two-thirds (65 percent) of FS/TANF children to student records at the state level by using sibling data to supplement SSN matches (i.e., identifying unmatched FS/TANF children with matched siblings). A strength of the system is use of the SSID student database, which minimizes the lag between enrollment updates at the district level and the availability of these data for use in direct certification. The State also provides file extracts of unmatched FS/TANF children to districts so that districts may attempt to directly certify these children. Finally, all districts have access to monthly direct certification match results, which they may use at their option.

The principal challenges for direct certification in Oregon are: (a) missed opportunities to match student and FS/TANF records, (b) timing of the direct certification process relative to the free/reduced-price application process and the start of the school year, (c) varying capabilities to efficiently process direct certification at the SFA level, and (d) lack of a solution for directly certifying students who are not enrolled in public schools. The CN agency is aware of these challenges and interested in ways to address them.

In the 2005-2006 school year, SFAs had a State-level direct verification option. They submitted verification samples via secure file transfer to the FSP agency central office. Central FSP staff contacted local FSP offices to obtain verification information, and this information was returned to the SFAs via secure file transfer. NSLP eligibility could be verified based on eligibility for the FSP,

**Exhibit 4-1**

**Agencies Contacted for the Oregon Study**

| Generic Abbrev. | Agency Name | Contacts |
|---|---|---|
| CN | Department of Education (DOE), Child Nutrition and Food Distribution | Child Nutrition Director, School Nutrition Programs Team Lead |
| SEA | Department of Education, Office of Assessment and Information Services | Assistant Superintendent; Manager of Customer Systems |
| FSP | Department of Human Services (DHS), Div. of Children, Adults and Families, Office of Self Sufficiency Programs | Food Stamp and Prevention Program Manager |
| Medicaid | Department of Human Services, Div. of Children, Adults and Families | Medicaid Policy Unit Manager |
| SWICA | Employment Department | Research Analyst |
| Large SFA | Beaverton (36,000 students; 29% Free/RP) | Program Specialist (NSLP application coordinator) |
| Mid-size SFA | McMinnville (about 6,000 students; 44% Free/RP) | Accounting Assistant |

TANF, or Medicaid.  Only 10 SFAs used this option.  Barriers to use included the limited time for verification, the turn-around time for this largely manual process, and lack of awareness of the option among SFAs. The CN agency, SEA, and FSP/Medicaid agency have discussed the possibility of an automated direct verification system, but improvements to direct certification have a higher priority, and the cost could be substantial.


# Direct Certification

State-level computer matching is the primary method used for direct certification.  All public SFAs are included in the match.  There are also two methods for looking up unmatched children. SFAs may request that the CN agency look up individual students; or SFAs may receive file extracts for selected zip codes to use for student lookups.  FS/TANF households can obtain a handwritten direct certification form from a county case worker.

### History

The current method was developed by DOE and DHS because the previous method (the letter method) was missing large numbers of FS/TANF children.  The DOE CN office expressed interest in matching in 1998, and the SSIS made the statewide match possible.  A pilot was conducted Portland from 2001 to 2003.

Initially, children were matched only by SSN.  A second match to find unmatched siblings was added in 2004, because parents and SFAs indicated that many eligible siblings were not being matched.  Monthly matches were added in 2005 to increase direct certifications and reduce the number of children subject to verification sampling.  The monthly match was recommended by the "Data

Collection Group" – a group of district people who meet quarterly to discuss data issues. Previously, matches were done in August, September, and January.

**Computer Matching Process for Direct Certification**

The DOE Office of Assessment and Information Services does the direct certification match. They took this on because DHS preferred not to do the match. This approach also keeps student data within the educational system.

DHS combines FSP and TANF data from their separate systems, and provides a single unduplicated file of all FS/TANF children to DOE. Child data include SSN, first and last name, date of birth, gender, head of household name, and address.

Student records from the State Student Identification (SSID) system are used. These are the most current data identifying students and their current district. Districts are required to update their student data in this system at least once a year, and for practical purposes they have strong reasons to update by mid-September and again by January. Some districts update weekly to keep their systems in synchronization with the SSID system.

The SSID system is used to assign the unique student ID and identify the district where the student is enrolled; the system provides the ID number for a student already known to the system upon inquiry by a district when enrolling the student. The SSID look-up system uses legal first and last name, birth date, and gender. Additional required information in the SSID system includes: ethnicity, enrolled grade, resident district and school, and attending district and school.

There are two steps in the direct certification matching process. First, FS/TANF children are matched to student enrollment records by SSN. The match is accepted if there is also a match on gender and either name or date of birth. Second, matched FS/TANF children are matched to unmatched FS/TANF children using the first and last name and address of the head of household; this identifies unmatched siblings. The file indicates which type of match was made for each child ("hard" or "soft"). Hard matches were actually matched to the SSID and these records contain the State student ID from the SSIS; "soft" matches were not matched to the SSID and do not contain the student ID.[57]

The sibling match was added because of concerns about the number of unmatched children. About 50 percent of children in the SSID file have SSNs, but some of the SSNs are wrong or duplicated across children in the family.

About one-third of public districts (65) receive extracts of unmatched FS/TANF children for their catchment areas. The number of districts using computer matching for direct certification of these children versus manual look-ups is unknown. The CN agency does a small number of look-ups in the unmatched FS/TANF child master file (between 100 and 150 each year).

*Direct Certification Activities at SFAs*
As of November 2005, files of match results were sent monthly to SFAs by secure e-mail. State CN personnel provide technical assistance to SFAs for using the files. Each month's match files include all students in the current SSIS who are matched to the current FS/TANF data extract. The CN

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[57] "Soft" matches are essentially FS/TANF records that the district may try to match to their files.

agency planned to begin posting the data on its secure website in early 2006 (rather than using e-mail); districts would log in and request an extract. In addition, the CN agency planned to make the data on unmatched FS/TANF children available on the secure website for SFAs to browse or download.

According to the CN agency, 150 of the 187 SFAs have software that loads direct certification match results into their information systems. The remaining SFAs manually enter direct certification data. These SFAs tend to be small and their numbers are shrinking as more of them adopt automated systems for processing applications and making free/reduced-price status information available at the point of sale. All SFAs that use direct certification send letters to eligible students; the State CN agency provides a template for these letters on its website.

One of the SFAs in the study uses an automated process to import the direct certification match results into its MealTime® food service information system (FSIS). The process is as follows:

- In mid-August, the first match for each school year is available. At this time, the data in the SSIS still represent the spring enrollment, so some matched children have graduated, and students who are new to the district (including kindergarten students) have not been matched.
- The staff member in charge of direct certification imports the entire file from this match into Excel, reviews it to make sure the data appear clean, and reformats the file to facilitate the import to the FSIS.
- The FSIS allows the user to select the columns of the Excel file to be imported. In particular, the SSN is not imported.
- The FSIS updates the student records for those who have been directly certified and generates notices to parents. Notices are mailed to the address from the FS/TANF record, not address on file with the district, per instruction from the CN agency. The letters are mailed in the third week of August.
- The SFA receives monthly files of matched and unmatched FS/TANF students. SFA personnel manually compare these lists to the student database and update the status of students who are categorically eligible for free meals.

The other SFA in the study uses the same FSIS, but uses a manual process to enter direct certification information to the FSIS. (The reasons for using a manual process are discussed in the section on direct certification effectiveness.) This SFA follows these steps:

- The data are imported into Excel, sorted by head of household name and student name, and printed out.
- Direct certification information is manually entered into the FSIS.
- The SFA generates and mails direct certification letters in daily batches, using the address from the FS/TANF file and the format provided by the CN agency.
- Entry of direct certification from the initial matched list is completed by the start of school at the beginning of September. Additional matching from the unmatched list continues until the end of September.
- After the initial direct certification process, the SFA uses the monthly matched list to identify additional categorically eligible children and updates their information in the FSIS. Because of the length of the matched file, the SFA does not take the time to review the unmatched file.

**Effectiveness, Challenges and Solutions in the Direct Certification Process**

The direct certification computer matching process in Oregon is limited by reliance on an SSN match, but the State uses several strategies to improve the match rate. Sibling matches supplement SSN matches.  The SSID student database is used to minimize the lag between enrollment updates at the district level and the availability of these data for use in direct certification.  Also, the CN agency facilitates direct certification of unmatched children and provides monthly updates to further assist SFAs' efforts to identify children who are categorically eligible for free meals.

*Effectiveness*
At the state level, 65 percent of all FS/TANF children are matched to the SSIS, leaving about 68,000 FS/TANF children unmatched.  Some FS/TANF children cannot be matched because they are not school-aged, enrolled in private schools or RCCIs, or enrolled in one of the two public school districts that do not collect SSNs.

The mid-size SFA in the study reported that directly certified students account for 85 percent of the FS/TANF children certified for free meals in SY2005-06.  Directly certified children include children matched at the state level and "unmatched children" who were manually matched by the SFA.  The large SFA did not provide an estimate of its direct certification rate for FS/TANF children, but this SFA indicated that the State had matched only 45 percent of district FS/TANF children, and the remaining 55 percent were in the unmatched file.[58] The Verification Summary Report for SY2004-05 indicates that this SFA directly certified about 80 percent of the FS/TANF children approved for free meals, thus the SFA was successful in matching a large percent of children in the unmatched file. Both SFAs judged the direct certification process to be worthwhile because it increased the proportion of students certified for free meals.

*Challenges*
The principal challenges for direct certification in Oregon are:  (a) missed opportunities to match student and FS/TANF records, (b) timing of the direct certification process relative to the free/reduced-price application process and the start of the school year, (c) varying capabilities to efficiently process direct certification at the SFA level, and (d) lack of a solution for directly certifying students who are not enrolled in public schools.

**Timeliness.** Both SFAs indicated that they would like to get State-level match results earlier in the summer, before distribution of NSLP applications, because currently they receive many applications for children who are directly certified.  Depending on the SFA and the grade level, applications were distributed between mid-July and the beginning of September, while direct certification letters were mailed no sooner than the third week of August and as late as the end of September.  The SFAs provide very clear notices that children approved for FS/TANF will likely be directly certified, but parents send applications for these children anyway (regardless of whether they have been directly certified in the past).  To minimize the duplication of effort, the large SFA holds applications for categorical eligibility until direct certification is processed if possible (within the 10-day limit for processing applications) and destroys the application if the children are directly certified.

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58    About one-fourth (27 percent) of students in the matched file were matched through the secondary sibling match.

Now that monthly matches are available, SFAs will have the opportunity to start direct certification for SY2006-2007 sooner if they choose (assuming that the CN agency permits this). If the State provides a July match, it could largely eliminate the overlap of direct certification with the application process.

The timing of updates to the SSIS also creates a problem. When direct certification is processed in August, the SSIS has not been updated to "roll over" enrollment, so it includes students who have graduated and excludes new students. While the SFAs perceive this as a limitation of the SSIS, the timing is determined by when the school district's data coordinator chooses to send updates to the SSID. This decision is presumably affected by other considerations that the districts view as more important than the needs of direct certification, such as the need to meet end-of-year reporting requirements.

The availability of monthly matches offers a solution to the problem of outdated SSIS information. However, SFAs must sift through these matches to find the students who have not already been directly certified. For example, the large SFA reported that the matched list for November had 129 students, but half of the students had already been directly certified, and only two of the others were enrolled in the district. Particularly if a district is manually matching to the first match list, it may be less likely to use the subsequent monthly files because of the number of records for children on previous months' lists. At the time of the interviews, the CN agency and SEA had not received systematic feedback on the usefulness of the monthly matches and the problem of separating "old" and "new" matches.

**Match rate and missed siblings.** Discussions with the CN agency and the SFAs identified several reasons why categorically eligible students are not directly certified.

- Students are not directly matched if there is an error in their SSN or if the SSIS does not have their SSN. In the large SFA, it appeared to the food service department that SSNs were no longer being collected for new students, but we were not able to confirm that the policy had changed.
- The SSN match is not confirmed if there are too many inconsistencies in other data (gender, date of birth, and name). Two specific problems with identifying data are (a) handling of hyphenated last names and (b) inconsistency in the format of the DOB. Problems with these identifiers also affect an SFA's ability to match records in the direct certification file to the district-level database.
- One SFA reported instances of children who were approved for the FSP (as confirmed by the local DHS office) but did not appear on any direct certification list.[59]
- Students who are matched at the state level are not directly certified at the local level when the State student ID doesn't match because of an error in either the district SIS or the SSIS. (This only applies in SFAs that use the State student ID when importing the match file.)
- Siblings who are matched by parent name and address, rather than SSN, do not have a State ID in the direct certification file. The SFA cannot match the student by SSN, and if

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[59] This SFA contacted parents who had not applied to renew free meal status for their children. If parents verbally reported that the child was approved for FSP, the SFA contacted the local DHS office for confirmation.

the child information (name, gender, and DOB) is not consistent with the SFA data, the child will not be directly certified. Also, if there is an inconsistency in the parent name and address information, the SFA may not be able to directly certify the student.[60]

- The unmatched list is selected by the address on file at DHS, so students who are enrolled but have out-of-date addresses are not listed.
- Districts with limited resources choose not to use the unmatched lists for direct certification.

**Private schools and RCCIs.** There is no direct certification method for students in private schools and RCCIs, except for the option that parents can obtain a hand-written letter from the local DHS office. It is not economically feasible for DHS to automate the letter method, because this would require DHS to send letters to all 68,000 unmatched children. This would duplicate the effort by public districts to directly certify the unmatched children in their local area through computer matching or manual review. DHS indicated a willingness to look into alternatives for direct certification of private school and RCCI students.

**Automation at the district level.** There was a considerable contrast in the level of automation and information technology support for direct certification at the district level. The mid-size SFA described the direct certification process as smooth and substantially automated. In this SFA, both district IT staff and the FSIS vendor had provided assistance to set up the process. Once the process was working, food service staff were able to conduct direct certification without outside assistance.

As discussed above, the large SFA was unable to perform an automated match between the direct certification match file and the SFA's FSIS. The SFA was advised by other SFAs, the FSIS vendor, and a CN representative that the FSIS would not accept the direct certification match file for import. The SFA tried to match the file to its database by SSN in the first year of computer matching, but the lack of SSNs for some students made this infeasible. It would be possible to import the data if the district student ID were attached to the records in the match file, but the food service department does not have access to a crosswalk between the district student ID and the state student ID that is provided in the file.[61] Also, the State student ID is not provided for children in the matched file if they were not directly matched by SSN, and the date of birth is in a different format than the district file (a barrier to matching by name and date of birth).[62] The food service department does not get support from the district IT personnel or the FSIS vendor for direct certification.

**Parent notification.** Both SFAs noted that a substantial percentage of direct certification notice letters are returned because of an incorrect address from the DHS file. This may result from a failure to report a change of address or an error by DHS. Returned notices may be set aside for a time until staff have time to investigate and find an alternate address.

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[60] While the SFAs did not explain why the parent information affected their ability to directly certify a child, we presume this is an issue if there is more than one child with the same name, DOB and gender.

[61] The SEA reported that the district student ID is included in the direct certification match file, but it appears to be present only for students matched by SSN.

[62] It appears that the format of the date of birth depends on whether if the student is matched by SSN or through a sibling.

SFAs rarely get objections from parents when children are directly certified. The CN agency noted that occasionally a dispute between parents arises when they have joint custody and one parent learns that the child has been approved for free meals because the other parent has obtained food stamps. The mid-size SFA reported that no parent has refused direct certification in the 3 years this option has been available.

**Costs and Benefits of Computer Matching**

Startup costs for direct certification at the state level appeared to be minimal. The SEA did not charge the NSLP for technical support and did not have records of costs for direct certification. The CN director estimated that the SEA programmers spent less than 40 hours developing the matching programs. Both the DHS system for creating the FS/TANF extract, and the SEA system for distributing match results, were already available when direct certification was implemented.

CN staff currently spend a substantial (but unmeasured) amount of time supporting direct certification at the start of the school year, both for technical assistance and distributing the files. Neither the SEA nor DHS indicated a significant amount of time spent on operational tasks for direct certification, although DHS noted that its staff effort increased when the monthly match was implemented. The elimination of direct certification letters saved time for the local DHS staff that had formerly done this, but DHS did not have any data on the savings.

The SFAs provided partial information on direct certification costs and benefits. The mid-size SFA spent about two staff days to process the initial match directly certifying 700 students. Overall, this SFA reported that direct certification has made a "very noticeable" reduction in data entry time versus the letter method. The large SFA had three staff persons working on direct certification—one exclusively, the others part-time—for six weeks, to directly certify approximately 3300 students, thus spending at least 30 person-days. This SFA did not think that direct certification has reduced central staff time for NSLP applications, but the increase in certifications has reduced the time spent by school staff on collection letters to parents of students with negative balances in their meal purchase accounts. Neither SFA spent any funds on software for direct certification.

**Future Directions for Direct Certification**

The CN agency and DHS have discussed the possibility of expanding direct certification to use Medicaid information. The CN agency sees this as a logical extension of direct verification and something to pursue once current systems for direct certification and direct verification are working more smoothly. Challenges to be addressed for using Medicaid information in direct certification include: working out data sharing agreements, determining how to identify students eligible for free/reduced-price meals, educating SFAs and parents on the process and its limitations, and resources to implement the changes.

# NSLP Application Verification Process

SFAs in Oregon rely primarily on household documents for verification of NSLP applications. Procedures for verifying categorical applications are in transition. SFAs previously contacted local FS offices, but the State implemented direct verification in SY2005-06, and SFAs are encouraged to use the new system rather than local contacts. The new system centralizes verification of categorical

applications at the state level, but it is currently a manual process for the State. The system was not widely used in its first year.

**SFA Verification Procedures**

The application verification process is similar in the two SFAs interviewed for this study. Both SFAs use computers to select applications for verification, and both use focused samples. Because of the selection criteria for the samples, both SFAs usually have only two or three categorical applications in their verification samples.

Both SFAs rely entirely on household documents for verification of income applications. The household notification process is similar in the two SFAs, with some differences in follow-up. Both SFAs send a letter and instructions to sampled households. The large SFA follows up with a phone call to all sampled households; this call makes the process "less scary" and helps promote a high response rate (2 non-responses out of 29 sampled, or 7 percent). This SFA follows up with letters, phone calls, or home visits as needed. The mid-size SFA sends a second letter to non-responding households and follows up with a phone call if there is no response to the second letter.

**Verification of Categorical Applications**

We received mixed information regarding whether local FSP offices provide verification of categorical applications to SFAs. DHS indicated that local offices were told not to communicate directly with SFAs for the SY2005-2006 verification process, because SFAs were supposed to use the State-level direct verification process instead (as described below). Both SFAs indicated that they sometimes contact the local DHS office to verify FSP eligibility if the household does not respond. For the SY2005-2006 cycle, the large SFA had not needed to do this in; the mid-size SFA was not sure whether it had contacted the DHS office. Neither SFA mentioned the change in policy at the state level regarding contacts with local offices.

**Direct Verification**

The CN agency and DHS implemented a centralized process of direct verification for SY2005-2006 using FSP, TANF, and Medicaid data. The process uses secure electronic communications, but manual lookups. The steps are as follows:

- The SFA completes a table in Microsoft Word® listing the following for each sampled child: names of all children in household, head of household name, address, DOB, case number for each child if available, and date of application. SFAs can request verification of income applications as well as categorical applications. SSNs are not collected.
- Forms can be submitted to DHS between October 1 and October 10, using the SEA's secure e-mail system.
- The designated staff person at DHS contacts the local DHS office to inquire whether the children are participating in FSP, TANF, or Medicaid.
- The DHS staff person fills in one of the following responses for each application on the request form and returns it via the secure file transfer system:
    - Receiving food stamps/TANF (eligible for free meals)
    - Medicaid benefits at 133% of poverty level (eligible for free meals)
    - Medicaid benefits at 185% of poverty level (eligible for reduced priced meals)

o   Not receiving benefits—must continue with verification and request documentation.

Utilization of this system was low:  between 10 and 15 SFAs used it in SY2005-2006.  Neither of the sampled SFAs used the system.  There were several barriers to effective direct verification:

- Verification staff in some SFAs may not know about or understand the system.  The staff in one of the two SFAs in the study were not aware of it; in the other SFA, staff thought it was only for categorical applications.
- Because of the nature of the process, it took time to provide a response, thus leaving SFAs with less time to get information from households.   Direct verification information provided to SFAs indicated that verification results would be provided by October 20.
- According to the CN agency, about one of five applications was directly verified. The reasons for not matching could include:  insufficient information, errors by the household or the SFA, and attempting to verify income applications for households not receiving benefits.  Given the problems of matching by name and date of birth, it is likely that the lack of SSNs was a factor influencing the "hit rate".
- The option to use Medicaid information for direct verification but not for direct certification was confusing to some SFAs.

The CN agency and DHS indicated that the lack of an automated direct verification process was the result of the limited time and resources to meet the mandate for making a process available in October 2005.  The agencies have discussed how to automate the process, but funding would be needed and the options are limited.  The CN agency envisions a process whereby SFAs submit requests on-line. The SEA estimated that a secure, user-friendly system to upload SFA verification samples and provide match results could cost $50,000 to $100,000. The current FSP computer system is over 30 years old and cannot support on-line inquiry over the Internet.

**Feasibility of Direct Verification With Medicaid/SCHIP**

As noted above, the current direct verification process uses manual lookups of Medicaid/SCHIP eligibility as well as FS/TANF eligibility.  Wider use of this process would require more DHS staff time or automation, and an automated system would require that legal and security requirements be met.  DHS Medicaid officials indicated that they did not see any legal barriers to data exchange with the SEA for direct verification, and that the data sharing agreement would take a few months to set up.  DHS is currently implementing an on-line application system for Medicaid/SCHIP applications (Oregon Clicks).  While DHS did not explicitly suggest this, the on-line application system might provide a platform for direct verification.  Similar systems in other states provide an option for authorized users to check the benefit status of individuals.

Other than the current direct verification process, DHS does not have any current arrangements to exchange Medicaid/SCHIP data or student data with the SEA or SFAs.  According to the SMA survey, there is no process of providing information on Medicaid enrollment to school districts in Oregon, either aggregate statistics or student-level data. The DHS Office of Medical Assistance Programs, which has overall responsibility for Medicaid and SCHIP policy and administration, has conducted some school-based outreach, but none of the respondents had information on how potential applicants for medical assistance were identified.

**Feasibility of Applying the Income and Eligibility Verification System To NSLP Verification**

Information gathered in the Oregon interviews provides insight into the feasibility of applying the Income and Eligibility Verification System (IEVS) or its components to computer matching for NSLP income verification. Topics discussed include: experience of the FSP and Medicaid/SCHIP with computer matching for income verification; policies and procedures of the State Wage Information Collection Agency (SWICA); and requirements and issues for using the IEVS for the NSLP.

*FSP, Medicaid/SCHIP, and SEA Experience with Wage Matching and Other Income Verification*
DHS uses the IEVS to verify meet income verification requirements for the FSP, Medicaid, and SCHIP. The following observations on the usefulness of the IEVS emerged from discussions with DHS FSP and Medicaid representatives.

Quarterly wage data from the SWICA are used, but their usefulness is limited by the lag between the end of the quarter and the availability of the data. According to the SWICA, employers have 30 days to report wages, and entry of employer reports takes 60 to 90 days. Thus, there is a lag of up to four months between the end of the quarter and when the data are available.

DHS relies on up-front documentation and employer contacts to verify income at application. Quarterly wage data are checked at application, but they are used more for recertification. DHS has a special unit that reviews quarterly wage matches. If a discrepancy is found, a worker contacts the employer to obtain current information. DHS supplements the SWICA data with employment and wage data from The Work Number, a commercial database that provides more current information from the employers that choose to share their data. The SCHIP eligibility database has a single field for income, so it is very difficult to automate the process of detecting discrepancies in reported earnings. Although parents who do not enroll in Medicaid/SCHIP are not required to provide their SSNs, they usually do because they complete the portion of the application that requests this information. Thus, availability of parent SSNs is not a significant problem for the use of wage matching by Medicaid/SCHIP.

Use of other sources for income verification has been constrained by DHS' limited resources and other problems. In general, the use of computer matching for income verification is constrained by lack of resources. Technical issues with the FSP computer system have caused problems with using matches with the SSA. DHS is currently working on new procedures to use the State Verification Exchange System for SSN verification and updating Social Security/SSI benefit data. Child support information is used, but it is not available if tax refunds have been intercepted (due to confidentiality restrictions on tax information). State income tax information is only used for quality control and overpayment investigations, because of the time lag in the data and access restrictions. Federal tax information has generally not been cost-effective, and few discrepancies have been found through the U.S. Department of Health and Human Services' Public Assistance Reporting Information System (PARIS) used for interstate matching.

The DHS Medicaid contact pointed out a general problem with interagency data matches. Even when the SSN is used as the common identifier, matches are less certain when agencies have different names for the same person. This may be due to error or to different procedures: some agencies use the preferred name, while others use the legal name. DHS' master client index has known aliases, and this information is helpful in resolving name differences. Also, a name discrepancy may raise

issues for verification, e.g., whether there has been a change in marital status or household composition affecting eligibility.  In some cases, a worker can resolve a name discrepancy by calling the local Social Security Administration office, but workers usually  request documentation from the client.

The SEA does not do any wage matching.  There has been discussion of the idea of  matching student data to employer wage data in order to conduct longitudinal analysis of the relationship of school performance to employment success.  The SEA respondents did not have information on why this has not happened, but there is continued interest.  Currently, the SEA is attempting to do longitudinal analysis of test scores within the SSIS.

*SWICA Policies and Procedures*
The Oregon Department of Labor is the SWICA.  It can disclose wage data only for specified purposes.  Oregon's statutes prohibit the use of wage data for eligibility determination except for programs that are specifically authorized to do so, such as TANF.  These programs are barred from sharing the data with a third party.  Thus, a change in statute would be required to make wage data available to the NSLP for verification.  However, it might be legal for the SWICA to match SSNs provided by the NSLP as a research project to determine how often wage information could be found.

The SWICA has a standard process and requirements for data sharing agreements. The SWICA makes wage data available in two ways.  Most users submit text files of SSNs to be matched, either on CD or in a password-protected e-mail.  No matches are done without SSNs.  Match results are usually returned the next day.  DHS and certain other authorized agencies have terminals that permit on-line access to the wage database for inquiries.  This access is within a State computer system, not over the Internet.

*Feasibility of Using Income Eligibility Verification System for NSLP*
The following would be required to use employer wage data and other components of the IEVS to verify NSLP applications in Oregon:
- The statute governing the wage data would have to be revised, either to permit the SWICA to share data with NSLP officials or to permit DHS to do so.
- One or more data-sharing agreements would be needed, with review by legal and security officials.
- All users would need to authorization, and must acknowledge restrictions on use and disclosure of data.  A key issue would be that users cannot disclose wage data to anyone, not even the employee in question.
- The process would require SSNs of adults living in households with NSLP applicants.
- The use of wage data would have to be disclosed to NSLP applicants.
- Workers at the CN agency or the SFAs who used verification data would need to be trained in how to interpret the data.
- The NSLP would need procedures and resources for following up with employers when discrepancies were detected.

The SFAs saw the potential usefulness of matching with employer wage data, but they had several concerns.  One issue was the fact that the information is not current; SFAs would need clear instructions on how to use the information and what to do if there is a discrepancy.  Another concern was the sensitive nature of the data:  some parents will not want schools to have access to this

information. A related issue was that informed consent is difficult to obtain, because parents often don't read materials that the SFA sends to them, particularly if they have submitted NSLP applications several times in the past. The Medicaid contact raised the issue of verifying that the child currently lives with the household specified on the application, noting that children may move among relatives and the school may not have current information.

## Statewide Student Information System

Oregon implemented its SSIS in the 2001-2002 school year. All public school districts and all public school students are represented in the student-level data. Private schools and residential child care institutions (RCCIs) are not included.

The student-level data collections include the Secure Student Identifier (SSID), Student Membership, and Average Daily Membership (attendance). The SSID collection assigns a unique state student identifier to each new student reported by a district, validates the state student identifier for other students reported by districts, and maintains a central record of the district, school, and grade where the student is currently enrolled. As discussed above, the SSID file is used for NSLP direct certification because it represents the most current information. Other student-level data collections require a valid state student identifier from the SSID. The Student Membership data represent snapshots of the student population at points in time. These data and the Average Daily Membership data are used for official reporting and funding formulas.

### Data Collection Schedule

School districts update the SSID at least twice a year, and some do so as often as weekly. A district must submit an update after July 1 before submitting student records for other data collections. Nearly all districts submit updates by mid-September, because the SEA uses the SSID file to post on-line tests for students in September. Districts must also update the SSID before submitting the Second Quarter Average Daily Membership file; the SSID update for this purpose happens by January. The advantage of frequent data submissions is that the district's SIS stays synchronized with the SSID.

The SY2005-2006 schedule for the other comprehensive student-level data collections are as follows:

- Fall Student Membership (as of October 1): December 15, 2005
- Second Quarter Average Daily Membership: March 13, 2006
- Spring Student Membership (as of May 2): May 26, 2006
- Annual Average Daily Membership: July 15, 2006

School districts (or their service providers) submit student-level and aggregate data through the Consolidated Collections Application, which utilizes a secure web portal. Data can be submitted on-line or in batch mode. Most school districts use commercial software or service providers to format their data for exchange with the SSIS. The SEA specifies the file formats, field definitions, and business rules for each submission. The SSIS validates data submissions and reports errors for resolution by the district.

**Student Identifiers and Demographic Data**

The primary repository of student identifiers and demographic data is the SSID system. As described above, this system is dynamic, with updates occurring whenever districts choose to provide them.

*SSN policy and issues*
The SSN is an optional field because the SEA cannot require SSN reporting. A student's SSN may be unavailable because the parent declines to provide it, the district does not collect it by policy, or the district collects SSNs but does not submit them to the SSIS. District policies on submitting SSNs to the SSIS have been stable; once a district programs its system to send SSNs, it continues to do so.

The SSIS uses the SSN for matching if it is provided. When districts submit data, the SSNs are matched to the SSID file as part of the process of confirming that the State student ID is correct. The SSIS identifies when a SSN is assigned to more than one student, or when a district submits an SSN that does not match the record in the SSIS for the same student. The SEA noted that immigrant families often give the same SSN for all of their children. These errors are sent to the district for resolution via the secure website.

*Potential identifiers for matching*
In the SSID, the required data elements are: race/ethnicity, enrolled grade, resident[63] school and district, legal first and last name, gender, date of birth, and SSID number (assigned by the SSIS if the student is new to the system). The SEA emphasizes the importance of using legal names and has a high degree of confidence (80 to 90 percent) that the data in these fields represent the legal names. Other optional SSID elements are: attending district and school, phone, address (number and street, city, zip), preferred first and last name, suffix, economically disadvantaged, special education, migrant, Indian education, talented and gifted status (multiple fields). According to the SEA, most large districts have address and phone information, and if they have the information, they submit it to the SSIS. Over 50 percent of student records have addresses.

The economically disadvantaged indicator is based on certification for free/reduced-price meals and must be included in the Fall and Spring Student Membership files. Districts can submit this information with the membership file submission or any time during the school year via the SSID system, either as a batch submission of an extract from the district SIS or on-line via the SSIS secure website. The SSIS provides a capability for the district to transfer the data from the SSID system to the membership file.

*Validation of district data*
The SSIS uses a series of matching algorithms to validate identifying information in student records submitted by school districts, and to determine whether a record is an update or a new student requiring a new State student ID number. All data collections must match the identifying information in the SSID system before the data are accepted, so the district must update the SSID system before submitting additional student data for other files. When records are submitted to the SSID system, match fields include the State student ID, legal and preferred name, district student identifier, SSN, DOB, and gender. Depending on the matched fields, the system characterizes the match as "hard" (sufficiently reliable to accept the record as update) or "soft" (requiring review and validation by the

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[63] The resident school and district are responsible for the student. The school attended by the student may be different due to school choice, special education placements, etc.

district).  A new SSID is assigned if the record does not meet any of the match criteria.  The SSID system is checked weekly for duplicate student records, and the affected districts are notified to resolve the problem.  Districts sometimes detect duplicate records and notify the State Help Desk.  The SSIS also has edit checks to assure that birth dates are in the valid format.

The SEA reports that parents frequently request changes to student names in the SSIS.  This must be done through an update to the SSID system.  One reason for name changes is to reverse the order of hyphenated last names (e.g., Smith-Jones to Jones-Smith).  Sometimes a district makes an error in entering such names.  Documentation for name changes is preferred but not required.

## Medicaid Data Availability and Use

Oregon provides mandatory Medicaid coverage for children (up to 100 percent of the Federal poverty level for children age 6 to 19, and 133 percent of poverty for children age 1-5).  The State operates a separate SCHIP program covering children with family incomes up to 185 percent of the Federal poverty level.  Health care for Medicaid and SCHIP children is delivered through a managed care system, the Oregon Health Plan.  Oregon's Family Health Insurance Assistance Program (FHIAP) subsidizes private health insurance for families and individuals who are over-income for Medicaid/SCHIP.

### Relationship of Medicaid/SCHIP To Food Stamp Program

The Oregon DHS administers the FSP, TANF, and Medicaid/SCHIP.  The Child, Adult and Family Services Division of DHS determines eligibility for all three programs.  Families can apply for any or all of these programs at local DHS offices, using a multi-program application.  In addition, families can apply by mail for medical assistance; the medical assistance application can be obtained by calling DHS or by downloading from the DHS website.  The DHS Office of Medical Assistance Plans is responsible for Medicaid/SCHIP policy, provider relations, and claims.

DHS has one computer system for the FSP and a separate system for TANF and Medicaid/SCHIP.  Non-TANF child care assistance and refugee benefits are also included in the TANF/Medicaid/ SCHIP system.  The two systems exchange data to coordinate certification and case management.

DHS integrates data from its programs in two systems.  First, DHS has a master client index, the Client Information System.  This system contains basic identifying information (name, SSN, gender, and DOB), case numbers for DHS programs, and indicators for the programs in which the person is enrolled. The system is updated whenever cases are added to the program eligibility systems.  Second, DHS has a Federal reporting system that receives data extracts from the program systems and also Social Security Administration data needed to produce reports for the FSP, TANF, Medicaid, SCHIP, Child Support Enforcement, Child Welfare, and other Federal programs.

### Referrals from NSLP To Medicaid/SCHIP

The CN agency allows SFAs to share information from NSLP applications with Medicaid/SCHIP if the parent actively consents via a check-off on the application.  The DHS Medicaid contact indicated that some local or regional outreach initiatives may use this referral process, but she was unable to provide specific information.  Neither of the SFAs in the study has provided NSLP applicant information to Medicaid/SCHIP.  The large SFA offers the option to share NSLP application

information, but parents do not check off the option, and no Medicaid/SCHIP representative has requested the data.

There is no State-level process for providing free/reduced-price status information to Medicaid/SCHIP for outreach. Although the SEA has this information, it does not have the required consent to share the data.

**Other Matches With Medicaid/SCHIP Data**

Oregon does not have a program to reimburse school districts for Medicaid administrative services. There is no exchange of data between Medicaid and the SEA.

There is a monthly match between Medicaid and FHIAP to catch dual participation, which is not allowed. FHIAP sends a file to Medicaid, and Medicaid performs the match and reports the results. The data sent back to FHIAP include name, SSN, DOB, Medicaid ID, zip code, category of aid, and source of medical coverage (child welfare, TANF, or other). FHIAP workers also have access to look at screens on the TANF/Medical system. There is a data sharing agreement between the programs to meet DHS' privacy policy, which the DHS contact described as stricter than HIPAA.

DHS also does a match to verify clients' eligibility for the Oregon Telephone Assistance Program (OTAP). Households enrolled in the FSP, TANF or Medicaid are eligible for reduced rates on telephone service. A household must apply to the Public Utility Commission for assistance and authorize DHS to share data; the form can be completed when applying for the FSP, TANF or Medicaid. On a monthly basis, OTAP sends a file of applicant information (name, DOB, and SSN) to DHS, and DHS verifies the applicants' eligibility. This exchange is governed by a data-sharing agreement between the agencies.

# Chapter 5
# Texas Case Study

Texas was chosen for case study because the State has used State-level computer matching for direct certification for over 10 years.  In addition, the CN agency reported in the survey that it used programs written in the Statistical Analysis System (SAS®), so we expected that the programs would be readily transferable to other States.  Furthermore, the State has a system of computer matching between the SSIS and Medicaid enrollment data for use in determining reimbursements to school districts for Medicaid administrative claims (MAC).  Texas is in the Southwest region and has 1,265 public school districts and a student population of approximately 4.3 million.  All public SFAs have access to direct certification computer match results. Agencies interviewed for the case study are listed in Exhibit 5-1.

## Highlights

Texas conducts an annual statewide direct certification match of FS/TANF data to the SSIS, using matches on SSN and on name and DOB.  About 760,000 children are matched, accounting for 57 percent of all FS/TANF records for children under age 21.  The CN agency's web-based information system is used to distribute direct certification results to SFAs, which can download and import the data or manually process direct certifications.  The large SFAs in the study were generally satisfied with the direct certification process and saw it as clearly reducing their workload.

The principal challenges for direct certification in Texas are:  the match does not use current student enrollment data (student data are from the previous October); significant resources are sometimes required to process direct certification results at the SFA level; and FSP client addresses may be out-of-date, resulting in direct certification notices mailed to incorrect addresses.  This study estimated that 41 percent of students eligible for direct certification in Texas were directly certified (or otherwise not subject to verification), less than the average of 49 percent for States with State direct certification systems that are not statewide.  Student mobility, data entry errors, false SSNs, and inconsistencies in names affect the direct certification match rate at the State level. Unlike most other States in these case studies, Texas does not provide SFAs a way to directly certify students who are not matched at the state level.  Finally, many districts do not use State match results, contributing to the low rate of direct certification.

The CN agency is interested in establishing a direct verification system using FSP, TANF, and Medicaid data.  There have been some discussions of this possibility among the CN agency, the SEA, and the FS/TANF/Medicaid agency, but there are no specific plans.  A potential model for direct verification may be the current system for providing Medicaid eligibility information to school districts for determining reimbursement for services provided to special education students.

## Direct Certification

The statewide computer match is the only method of direct certification used in Texas.  The match includes all public school students, but SFA use is optional.  There is no method of direct certification for students in the 400 SFAs that are private schools or residential child care institutions.

**Exhibit 5-1**

**Agencies Contacted for the Texas Study**

| Generic Abbrev. | Agency Name | Contacts |
|---|---|---|
| CN | Texas Department of Agriculture, Food and Nutrition Division | Assistant Commissioner and staff |
| SEA | Texas Education Agency | Information Services Division, direct certification coordinator; SSIS division director; Interagency Coordination division contact for Medicaid Administrative Claiming |
| FSP | Health and Human Services Commission (HHSC) | Business Area Manager for direct certification; Program Consultant, Special Nutrition Programs; additional policy and information systems staff |
| Medicaid | Health and Human Services Commission (HHSC) | Eligibility Policy Specialist for Medicaid and SCHIP; Medicaid Administrative Claiming liaison. |
| Large SFA #1 | Victoria ISD [14,000 students; 56% free/RP] | Food Service Director |
| Large SFA #2 | Hurst-Euless-Bedford (HEB) (19,000 students; 33% free/RP) | Food Service Director, NSLP application supervisor |

## History

Texas began direct certification in the 1992-1993 school year, one year after the SSIS was implemented. The large number of SFAs made State-level matching an attractive approach, and the SEA had the capability to perform the match. The process was created through the cooperative efforts of the SEA, the CN agency and the State FSP agency.

The direct certification process has changed in several ways since it was first implemented. For the first several years, SFAs received paper printouts of match results. This method evolved to distributing the results in electronic format, first via physical media and then via the CN agency's website (which is hosted and supported by the SEA). The matching criteria have evolved over time (see below). In 2005, the State added TANF data to the match, after resolving a policy issue regarding whether these data could be shared for direct certification.[64] In addition, the SEA transferred the direct certification process from its mainframe computer (where the process ran in SAS) to a server (using .Net, C#, and Visual Basic). This change gave the CN agency more flexibility to move the process to another computer center if desired. Another State could license the programs used by the SEA for direct certification.

## Computer Matching Process for Direct Certification

The Texas Health and Human Services Commission (HHSC), which administers the FSP, extracts data for FS/TANF children from its eligibility system and provides the data to the SEA in an ASCII

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[64] The CN survey response indicated that in 2004-2005, TANF data were not used because they were not available in a suitable form. The FSP agency indicated that the addition of TANF was recent but did not specify when.

file. The file includes SSN, full name, date of birth, ethnicity, sex, address, client number, TANF case number, FSP case number, and head of household name.

The SEA Information Systems Division receives the FS/TANF data, extracts student data from the SSIS, and performs the direct certification match. The SEA conducts the match due to FERPA restrictions on the release of student records to outside agencies. The SEA IS division also hosts and maintains the CN agency's secure website for the Child Nutrition Program Information Management System (CNPIMS), which SFAs use to access the match results. The SEA provides support to SFAs for technical issues with website access, while the CN agency provides support to SFAs for policy and procedural issues regarding direct certification. The direct certification process is governed by an interagency agreement between the CN agency, the SEA, and the HHSC. The timeline and steps of the process are shown in Exhibit 5-2.

**Effectiveness, Challenges, and Solutions**

The State-level match in Texas is successful in matching to student records 57 percent of FS/TANF children age infant to 21. These match results are made available to SFAs via a secure website, but examination of VSR data indicates that only 41 percent of SFAs use the State-level match results. Thus the primary challenge is to improve the process and remove barriers to SFA participation.

*Effectiveness*
For SY2005-2006, the FS/TANF file for direct certification contained about 1.3 million records. Of these, 758,396 were matched by SSN, and 760,499 were matched by name. After removing duplicates, the final direct certification file had 759,921 children, or 57 percent of FS/TANF children. The net effect of the name match was to add 1,525 children to the file, representing just 0.2 percent of the total matched. The high percentage of matches based on SSNs is not surprising, since 91 percent of SSIS records have SSNs, and the SSIS has edit checks to minimize SSN errors.

The analysis of verification summary reports for this study estimated that 41 percent of public school students categorically approved for free meals in Texas were directly certified or otherwise not subject to verification (less than the average of 49 percent for States with State direct certification systems that are not statewide). In Texas, the distribution of free-eligible students in SY2004-05 was 16 percent directly certified, 23 percent categorically eligible based on applications, and 61 percent eligible by income application. Thus, the majority of students enrolled in the FSP or TANF were not directly certified.[65]

The SFAs in the study are generally satisfied with the direct certification process. They described several problems but did not see these as major. Both are large SFAs, with food service management systems capable of importing the direct certification file and automatically updating student records. Thus, their perspective may be different from that of smaller SFAs with less automated systems for processing the direct certification file.

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[65]   SY2004-05 VSR data for Texas were incomplete because all SFAs did not report data. These results should be viewed with caution.

**Exhibit 5-2**

**Direct Certification Computer Matching Process: Texas, SY2005-2006**

*State Agency Procedures*

| | |
|---|---|
| November 2004 | After school districts submit fall enrollment data (as of 10/28/2004) to SSIS, SEA validates data, districts revise as needed, and SEA finalizes data by 3/2/2005. |
| June 2005 | HHSC extracts May data for all children (infant to age 21) approved for FSP or TANF, sends extract to SEA by June 3. |
| June-July 2005 | SEA matches FS/TANF data to SSIS: |

- 1st match is exact match on SSN, using name, DOB and gender to confirm (two of three must match exactly).
- 2nd match is exact match on name, DOB and gender. (Entire files are matched, not just unmatched records after 1st match.)
- Files are merged and duplicates with the same SSN are dropped.
- Duplicate matches on name, DOB and gender are resolved using state student ID database—if the state student ID is the same, one is dropped and the other is kept.

SEA posts the match results to the Child Nutrition Program Information Management System (CNPIMS) website and notifies SFAs that data are ready for download. The file has name, SSN, DOB, sex, grade, and FS/TANF household address (street and number, city, zip).

| | |
|---|---|
| July-August 2005 | SFAs download direct certification results for their students from the CNPIMS and update their databases. |

- Data can be downloaded in Excel or comma-delimited format.
- SFAs with automated capability import the results to their student information systems or food service management systems.
  - Victoria SFA follows these steps:
    - The SFA updates the district master student database for current enrollment and school assignment
    - The master student database is imported into the FSIS (PCS RIGHTRAK®).
    - The direct certification data are merged into the FSIS by SSN.
  - HEB SFA follows these steps:
    - The SFA sorts the direct certification list by city and zip code, and removes students who do not have addresses in the district.
    - The SFA matches the edited direct certification file to the district enrollment file by SSN and name, then attaches the district student ID.
    - The SFA sends the direct certification file and the current student database to the FSIS vendor (Nutrikids®).
    - The vendor merges the data by district student ID, sets a flag to indicate which students are directly certified, and sends back the updated student database.
- Other SFAs manually enter direct certification status.
- Some SFAs do not use the direct certification data.

SFAs print the direct certification list as backup, even if they use automated import.

| | |
|---|---|
| July-August 2005 | SFAs send notices to directly certified students, using a template provided by the CN agency. |

- Victoria SFA produces the notices from the FSIS, using the address from the household's last NSLP application or the direct certification file.
- HEB SFA produces the notices by doing a mail merge in Microsoft Word® with the direct certification file.

If a notice is returned as undeliverable, the SFA mails it to an alternate address (if available).

*Challenges*

The principal challenges for direct certification in Texas are: the timeliness of the student data, missed matches at the State level, the steps and resources required to process direct certification results at the SFA level, and mailing direct certification notices to correct addresses.

**Timeliness**. The SSIS collects student records from districts in fall and spring, representing enrollment as of October and June. Fall data are due in December and released in March; spring data are due in July and released the following October. Direct certification is conducted in June and July, before the start of the school year. At that time, the most recent SSIS data available are from the prior October. As a result, the match includes students who have graduated or are no longer living in the same district, and it does not include students who enrolled in Texas schools after the reference date—particularly incoming kindergarteners and first-graders.

Both SFAs noted that there is a high degree of student mobility among districts, and as a result they receive many matched records for students who are not currently enrolled. One SFA reported it is not uncommon to get records for students who were enrolled in the district in the previous year but are now living at the opposite end of the State. This SFA does a preliminary cleaning of its match file by excluding students with FS/TANF addresses containing ZIP codes outside the district's attendance area.

SFAs report that the addresses in the direct certification file are frequently out of date. The FS/TANF data for direct certification constitute a snapshot of the active caseload in May, including clients enrolling up to 6-12 months in the past.[66] One district reported that about 30 percent of direct certification notification letters (mailed to FS/TANF addresses) are returned as undeliverable. About half of the returns are for students who moved out of the district, and the other half are for students who moved within the district. This SFA also noted that sometimes the address in the district SIS is out of date but the school has a more current address. The other SFA had a much lower return rate, because it mails direct certification notices to addresses maintained in the food service information system. Both SFAs noted that there is a lot of mobility of students over the summer months, some of which is driven by parents seeking a better school district or a better school within the district. Thus, some FS/TANF addresses would be out of date even if all addresses were accurate as of May.

The CN agency and the SFAs indicated that match results are available in time for SFAs to avoid processing applications from directly certified students. However, SFAs would like the data prior to end of the previous school year, for use in notifying households that their children are eligible for free pre-kindergarten. SFAs try to enroll these children early.

The CN agency indicated that a second match with the Spring enrollment data was possible. However, the agency did not have the resources to do this, and furthermore this match would have to take place in November or later, thus having little impact on the number of free/reduced-price applications processed and no impact on the verification sample.

**Match rate and sibling problem**. It is somewhat surprising that the match rate at the State level is only 57 percent of FS/TANF children, given that over 90 percent of student records have SSNs. The low match rate is due to several factors. First, the FS/TANF file includes all children under age 21,

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[66]  Clients are required to report address changes but some do not until prompted by the FSP agency.

but many of these do not attend school (ages 0-4, ages 19-21, and dropouts). Second, the timing of available student data is such that students who enroll in Texas public schools after October of the prior school year are not matched for the current school year. Third, SSN matches are accepted only if there is a match on two of the following elements: full name, DOB, and gender. Thus, a discrepancy in two of these elements could cause a legitimate match to be rejected. The SEA did not report the proportion of SSN matches that were dropped because of discrepancies in other data elements.

A fourth factor affecting the match rate is the extent of inaccuracies in SSIS data. The SEA noted that district data entry workers may make errors in entering SSNs and other identifying information. According to the SEA, these workers have low pay, high stress, and high turnover. The SSIS has edit checks to find some types of errors, such as duplicate SSNs (two students, one SSN) and records with different SSNs for the same student. However, the SEA is aware that a substantial problem of false Social Security cards exists. SSNs in the SSIS are only verified if the district obtains documentation or if the SEA identifies a problem.

Related to the match rate, SFAs have expressed concerns about the fact that children are often directly certified but their siblings are not, due to the limitations of the matching process. Some SFAs adopted the practice of directly certifying siblings of matched children, but the CN agency directed them to stop this practice because it was not consistent with USDA regulations.

Some States distribute an "unmatched" file of FS/TANF records to SFAs; these are records that are not matched by the State's computer matching algorithm, but may be matched by SFAs (usually through manual review). The SEA noted that it is not feasible to associate a FS/TANF record with a district unless the record is matched to the SSIS so that the student's school district is known. The SEA does not have a database that allows geocoding of addresses to districts, because of the large number of districts and the complexity of their boundaries (which often divide counties and ZIP codes). Thus, there is no way to select unmatched FS/TANF records for each district so that the district can directly certify these children.

**Automated processing at the district level.** The CN agency indicated that many SFAs were reluctant to use direct certification when it was first available, because they could only get hard-copy lists and did not have the resources to key-enter the information. The switch to electronic distribution made direct certification more popular among SFAs. However, the CN agency acknowledged that some small SFAs do not use direct certification because of resource constraints;  some SFAs lack the expertise or the district-level IT support to merge direct certification data with their student databases. These SFAs can print the direct certification data and manually enter the information, but they may lack the staff time for this, or may find it less work to process applications for categorically eligible students.

One limitation of the direct certification process is that the files provided by the State cannot always be directly imported into district food service information systems (FSIS). FSIS generally identify students by the district student ID, which is not in the direct certification files.[67] If the district FSIS contains the SSN, then direct certification data is imported in a straightforward manner. Otherwise,

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[67]    Direct certification files contain: first and last name, middle initial, SSN, DOB, sex, grade, and mailing address.

SFAs must use a two-step process: first, add the district student ID to the direct certification file through a match with the district SIS (match by SSN and name); second, import the direct certification file into the FSIS, matching by district student ID. From the SFA's perspective, it would be more reliable and efficient to have the district student ID included in the direct certification file. The SSIS has a field for the district student ID, but districts submit this data item at their discretion.[68]

**Costs and Benefits of Computer Matching**

The CN agency reported the initial programming cost for direct certification (in 1992) to be about $24,000. According to the SEA, the programmer cost to run direct certification is $630 per year. The process is automated, including the posting of match results to the website. The CN agency pays the SEA to host the CNPIMS website, and direct certification access is just one function of this system. The cost of hosting the CN portion of the SEA website was not available, but the SEA reported the total annual cost for all SEA website support is $216,000, including all changes, enhancements, and new functionality. The HHSC does not currently charge the CN agency for providing FS/TANF data; the last such charge, in the late-1990s, was $728.

Given the very modest costs of direct certification at the State level, it appears that the largest costs are SFA expenses for mailing direct certification notices and researching addresses for returned notices. HEB SFA provided partial information on the costs of direct certification at the SFA level. In this SFA, the district IT staff spend 10 to 12 hours on the initial processing of the direct certification file, prior to sending it to the FSIS vendor to be loaded into the student database. The SFA indicated that its largest costs are the mailing of direct certification notices and the staff time to research addresses for notices returned as undeliverable. The SFA did not, however, have data on these costs.

Victoria SFA did not provide data on its costs for direct certification, but it was clearly less time-consuming due to the simpler process for loading the data and the lower rate of returned notices. This SFA estimated that direct certification initially saved about 6 days of staff time previously spent on processing applications, and automation of the process saves at least 2 days of time relative to the previous manual process.

**Future Directions for Direct Certification**

The CN agency does not plan any changes to the direct certification process. However, the agency notes that use of direct certification will increase as the mandate in the 2004 CN reauthorization is implemented. On the other hand, the SEA sees some evidence that SFAs are putting less emphasis on encouraging parents to provide SSNs, so the availability of this key matching variable might decline.

*Feasibility of Computer Matching with Medicaid for Direct Certification*
According to the CN agency, the primary challenge to using Medicaid information in direct certification would be working out the data sharing agreement with the State Medicaid agency. This is a challenge because of competing priorities, not because of resistance or legal issues. The agreement would have to address legal and technical issues, including data security, but these issues are considered manageable. (Interview respondents from the State Medicaid Agency did not confirm

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[68]    We do not have information on the extent to which districts submit their student ID numbers. Using the State student ID is not an option, because districts do not have this information.

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or contradict the CN agency's views on the legal and technical issues involved with direct certification or direct verification.)

Medicaid in Texas is limited to mandatory coverage—for children ages 6 to 19, family income must be at or below the poverty level, and income must be at or below 130 percent of poverty for children age 1-6. Nearly all children enrolled in Medicaid are income-eligible for free NSLP meals. But it is also true that these children are income-eligible for the FSP, and FSP applicants are screened for Medicaid eligibility.[69] However, Medicaid children are not screened for the FSP if their families used the Medicaid-only application process (as described in the Medicaid section).[70]

Texas SCHIP covers children up to 200 percent of the poverty level. Use of SCHIP data for NSLP direct certification would require filtering by income. There are also more practical constraints to using SCHIP data, as compared with the feasibility of using Medicaid data. The Medicaid eligibility information is in the same HHSC computer system as FSP and TANF eligibility data, but SCHIP eligibility data reside in a separate computer system operated by a contractor. Thus, SCHIP is likely to offer a larger pool of additional children for direct certification, but the process of constructing a suitable file would be more complicated than for Medicaid. In addition, SCHIP does not require disclosure of SSN at application, and about 30 percent of SCHIP records do not have the child's SSN. Thus, the percentage of SCHIP children matched to student data would likely be lower than for the FSP, using the current match rules.

## NSLP Application Verification Process

SFAs in Texas rely exclusively on household documents for verification of NSLP applications. State FS policy prevents SFAs from contacting local FS offices to directly obtain verification of categorical application; households are required to obtain documentation and provide it to SFAs. The State CN and FS agency have discussed the possibility of developing a system for direct verification, but they have no firm plans at the current time.

### SFA Verification Procedures

Both SFAs in the study use their FSIS to select their verification samples. Victoria SFA selected a 3 percent error-prone sample of 107 applications, including 3 categorically eligible applications. HEB SFA selected a 1 percent sample of 102 error-prone applications, none of which was based on categorical eligibility.

In both SFAs, the verification process begins with letters to households as soon as possible after the sample is selected. Victoria SFA follows up with a second letter about two weeks before household

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[69]   As noted in previous chapters, some children eligible for both Medicaid and food stamps may be enrolled in Medicaid only. In 2004, the food stamp participation rate for school-age children was 80 percent overall, and 51 percent for US-born children living with noncitizens. (USDA, Food and Nutrition Service, *Food Stamp Program Participation Rates: 2004*.)

[70]   There are Medicaid children in Texas whose household income is over 130 percent of the poverty level and thus not income-eligible for the FSP or free school meals. These include "medically needy" children, those under age 6 with household incomes between 130 and 133 percent of the poverty level, and those whose family income qualifies for Medicaid but whose household includes non-family members with additional income.

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responses are due; after the due date, the SFA calls non-respondents. This SFA received complete responses from about two-thirds of the sample, an improvement on past years. HEB SFA follows up by telephone if the household does not respond to the first letter or if the documentation is incomplete. The SFA does not have trouble getting current contact information, but only 52 percent of households responded this year. This SFA noted that most households responding to verification requests, do so in the first few days and provide good documentation.

**Verification of Categorical Applications**

HHSC policy is that FSP clients are responsible for obtaining an eligibility statement from their local office and providing this as documentation to the SFA. According to HHSC, an SFA can call a local FSP office to request that the office provide a statement to a client, but local offices will not release information to schools without client release. Victoria SFA reported that it always asks the household to provide documentation of FS/TANF eligibility. This SFA tried contacting the local FSP office, but did not get a timely response. HEB SFA, on the other hand, reported that it mainly confirms FSP eligibility by calling the local FSP office and following up by getting paper documentation from the FSP office or the household. This SFA had tried sending requests for documentation by letter, but the FSP office did not respond within the desired time frame. As noted above, HEB did not verify any categorical applications in SY2005-2006.

**Feasibility of Direct Verification**

The CN agency expressed interest in an automated system for direct verification and has discussed this possibility with the SEA and with HHSC representatives for FSP, TANF, and Medicaid. The CN agency envisions a system in which SFAs would upload data on their samples and the SEA would match these data to FS/TANF/Medicaid data. Possible barriers identified by the CN agency include: assuring the security of the data; the number of data files uploaded; and coordination among the participating agencies.

Information from HHSC identifies opportunities and challenges for using Medicaid and SCHIP data for direct verification. The HHSC contact for data sharing with school districts noted that there is an existing system of data exchanges with districts for School Health and Related Services claims that could provide a model for direct verification. (This system is discussed in the Medicaid section.) On the other hand, as noted in the discussion of direct certification, the overlap between FSP and Medicaid caseloads is likely to be high, SCHIP data are not maintained in the FS/TANF/Medicaid system, and 30 percent of SCHIP records do not have SSNs. These hurdles for direct certification are also challenges for direct verification.

One SFA saw direct verification as helpful, indeed "awesome" if the SFA could email a list of students in the verification sample to the State agency and have the State agency verify them. The other SFA expressed discomfort about this use of confidential information and indicated a preference to rely on household documentation of income. This respondent also suggested that many parents would not apply for free meals if the application stated that their FSP, TANF, or Medicaid information could be used for verification of their income. On the other hand, another respondent in the same SFA expressed the view that awareness of this verification would reduce fraudulent applications, and that parents are aware that a great deal of data-sharing goes on. The concept of using Medicaid information to verify income was difficult for some respondents to understand.

Lastly, SFA respondents noted that small SFAs already have difficulty doing direct certification, and direct verification could pose similar technical barriers.

## Feasibility of Direct Verification With Income Eligibility Verification System

This study explored the feasibility of directly verifying NSLP income applications through use of income reporting systems. This issue was discussed with State officials knowledgeable of the Income Eligibility and Verification System (IEVS) for FS, TANF, and Medicaid.

### *Background on FSP and Medicaid Use of Computer Matching for Income Verification*
For FSP and Medicaid eligibility verification, HHSC uses the conventional IEVS sources and additional commercial databases. Quarterly employer wage records and unemployment compensation data are provided by the Texas Workforce Commission (TWC). HHSC also uses *The Work Number* database from the TALX Corporation to verify employment and earnings. Other data sources for verification include the child support enforcement system, the Internal Revenue Service, the New Hires database, and commercial credit bureaus. Matches are done by SSN.

The primary user of verification data is HHSC's Office of Inspector General, where specialized staff review match results and target cases for local office follow-up or investigation.[71] Local office access to verification data varies. Texas currently has two computer systems for FSP, TANF, and Medicaid eligibility determination because the State is in the process of rolling out the new Texas Integrated Eligibility Redesign System (TIERS).[72] Selected local offices have access to TIERS, while remaining local offices use the legacy System of Application, Verification, Eligibility, Referral and Reporting (SAVERR). Access to verification data is external to SAVERR, but the new TIERS integrates access to these data.

### *NSLP Verification Issues*
The respondents did not comment on the feasibility of using the IEVS and other income databases to verify NSLP applications. The following perspectives were provided on the strengths and limitations of specific sources:
- Employer wage reports from TWC are not used directly for income verification because they are not timely.
- *The Work Number*, provided by the TALX Corporation, provides a more current source of employment information.
- Unemployment compensation data from TWC are considered timely because they are up to date through the end of the previous week.

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[71] The respondents in the FSP and Medicaid interviews could not comment on the effectiveness of using specific verification data, because of the Inspector General's primary role in this process. We did not interview the State Wage Information Collection Agency in Texas (i.e., TWC).

[72] TIERS is a browser-based system that will integrate the application process for more than 50 health and human services programs in Texas, replacing several systems including SAVERR. TIERS was rolled out in two counties in January 2006. Statewide implementation was scheduled for December 2006, but is now expected to be delayed.

# Statewide Student Information System

The SEA Information Systems Division operates the SSIS, which in Texas is called the Public Education Information Management System (PEIMS). This system provides data used for funding and accountability required by Federal and State laws. School districts or their data providers submit data using a web-based application (EDIT+), which validates the data. Like other States, the Texas SSIS consists of a data warehouse and a student ID assignment system; but unlike other States, the State student ID is not communicated to districts. The Personal Identification System and Database (PID) stores student identifying information submitted by the districts (name, SSN or alternate ID, DOB, sex, ethnicity, mother's maiden name), and assigns and maintains State student ID numbers for each student. The State student ID is used to identify students in the data warehouse, but no other identifying information is stored in PEIMS, outside of the PID system. The PID database provides a linkage to district data (through SSN/alternate ID, name, and DOB), and a linkage to PEIMS (through State student ID). PID ensures privacy by shielding student identities from users of PEIMS data.

## Data Collection Schedule

School districts submit individual data on all enrolled students twice each school year. The following is the schedule for SY2005-2006.

- Fall enrollment, as of October 28, 2005 is due by December 8, 2005. This submission includes data on enrolled students and leavers; at the same time, districts submit data on budgets and staff. The SSIS processes the data and reports errors back to the districts for resolution. Districts can resubmit their data until January 19, 2006, and the data are released to customers by March 2, 2006.

- End-of-school-year data are due by June 22, 2006. These data include attendance and other performance data on all students enrolled during the school year. Revisions to by districts are due by July 20, 2006, and the data are released by October 4, 2006.

Under this schedule, the fall enrollment data are available in the spring, and the year-end data are available the following fall. The length of time between initial submission dates and final data availability is due to the amount of review and editing required to assure data quality. Other data submissions during the school year collect aggregate data or student records for specified subsets of students.

## Student Identifiers and Demographic Data

The PID system links a student's name, sex, DOB, ethnicity, district, and SSN (or alternate district-assigned number) to the student's State ID number, the PID number. When a district uploads student records, the system matches them to its database to assign the correct PID number. If the student record is new (based on the match criteria), a PID number is assigned. If a record matches partially but a key variable does not match (e.g., name and DOB match but SSN does not), or if a record appears to be a duplicate, it is sent to a reject file to be resolved. Once the correct PID number is attached to a student record, it is added to the appropriate database in PEIMS. Outside of the PID system, the only identifier for student records is the PID number.

*SSN policy and issues*

According to the SEA, all districts in Texas request SSNs, and 91 percent of student records in the PID system have SSNs. According to FERPA, districts cannot require SSNs, but in Texas they encourage parents to provide them. Among other considerations, SSNs are used to match data between K-12 education and higher education institutions, to determine the percentage of each district's graduates enrolled in higher education, a performance measure. Students without SSNs have a unique district-assigned alternative number; each district has its own specified range of these numbers. A student SSN may be unavailable because the student has no SSN, or because the parent chooses not to provide it, for reasons of privacy or concern about being traced. (See the previous discussion of SSN problems in the direct certification section.)

*Potential identifiers for matching*

The "major demographics" in the PID system are the SSN, name, DOB, and PID number. Additional demographics that are used for matching when available are sex and ethnicity.

*Validation of district data*

For the personal identifying data, validation checks in the PID system include:

- More than one student record with the same SSN — the SSN must be validated by a copy of the Social Security card or a report from the Social Security Administration.
- More than one student record with the same name and DOB — if the SSN does not match, the newer record is assigned a "PID reject number" that allows use only for the data collection for which the record was submitted, i.e., it cannot be linked to other collections.
- A change to more than one major demographic for an individual (e.g., name and DOB, or DOB and SSN) — this requires special processing to protect against accidental changes.
- Missing major demographics — the record is rejected.

The PID system reports errors to the district, and the district can resubmit the data to resolve the errors.

**Other Computer Matching of K-12 Data**

The SEA matches PEIMS data on K-12 students with enrollment data from the Higher Education Commission, in order to determine how many students from each district have enrolled in post-secondary education. This match is done using SSNs. The SEA also matches PEIMS data to Medicaid data for the Medicaid Administrative Claiming program, as described below.

# Medicaid Data Availability and Use

Texas has two separate medical assistance programs for low-income families. Medicaid eligibility extends to 133 percent of the Federal Poverty Level (FPL) for children through age 5 and 100 percent for children ages 6 to 19. Thus, all Medicaid children have family incomes within the gross income limit for the FSP. The TexCare SCHIP program covers children up to 200 percent of FPL.

**Relationship of Medicaid/SCHIP To Food Stamp Program**

HHSC administers both Medicaid and SCHIP, but the programs operate separately. Local HHSC offices determine eligibility for Medicaid along with the FSP and TANF, using a common application form and a shared eligibility system. (FSP applicants are screened to determine if they may be

eligible for Medicaid or SCHIP.)  Eligibility for SCHIP is determined separately from Medicaid, by a contractor who also maintains the SCHIP eligibility data.  Families can apply for medical assistance alone by phone, fax, mail, or online (in addition to the in-person process) and the SCHIP contractor processes these medical-only applications, referring any that may be eligible for Medicaid to HHSC.

The new TIERS eligibility system will change the application process for Medicaid, allowing applications by mail, phone, fax, and on-line.  The State is contracting with a firm to operate call centers for application processing; enlisting community agencies to provide access to and assistance with self-service application processes; and closing about one-third of the local human services offices.  As noted above, statewide implementation of TIERS, originally scheduled for December 2006, is delayed, in part due to problems with the call center system.

### Referrals from NSLP To Medicaid/SCHIP

SFAs provide a generic referral to households approved for free/reduced-price meals, indicating that their children may be eligible for Medicaid or SCHIP.  According to the CN agency, there was an individual referral process about 5 years ago.  SFAs sent copies of applications or electronic lists of consenting children to the Medicaid/SCHIP program.  The volume of referrals was more than Medicaid/SCHIP could handle, and the individual referral process was stopped.

### Medicaid Administrative Claim (MAC) Program

To determine district-level Medicaid eligibility percentages for MAC, the SEA matches student data from the SSIS to a file of children enrolled in Medicaid.  This statewide match is done once a year, usually in October.  The Medicaid data include all children ages 3 to 21 enrolled at some time between August of the previous year and May of the current year (for example, August 2004 through May 2005 for the FY2006 match).  The SSIS data are the most recent submission available at the time of the match.  The SEA does the match because of student privacy considerations and the effort that would be required to assure the security of student data if they were to be shared with HHSC.  In addition, this approach makes it possible to use the student data sooner than if they had to be prepared for release to HHSC.

The match uses name, DOB, and SSN; these are the only variables provided from the Medicaid database.  As with the direct certification match, there is a first match by SSN (confirmed by a second identifier, either DOB or name) and a second match by name and DOB.  Names are truncated for matching (ignoring suffixes, which were a source of problems in matching).  Most matches are by SSN, and there are few duplicates between the two matches, because 90 percent of students in the SSIS have SSNs.  The SEA estimated that about 30 percent of student records were matched to Medicaid data. The results of the match are used to compute each district's percent of students enrolled in Medicaid.  The SEA provides this information to all 1,200 districts and to HHSC Medicaid officials.  About 700 districts participate in MAC.

HHSC and the SEA indicated that setting up the agreement and procedures for this match required a substantial amount of effort.  There were many details to work out, with confidentiality and security being among the most important.  HHSC was concerned about confidentiality of its data until the SEA made clear that districts would receive only their Medicaid enrolled percentages, not individual data.  The annual process of updating the agreement and carrying out the match process is much

easier, but the SEA indicated that it does not have the resources to do the match more than once per year.

**Computer Matching for School Health and Related Services Claims**

HHSC also has a matching process that allows school districts to obtain Medicaid eligibility information so that they can file claims for reimbursement of school health and related services (SHARS). Under this process, the district sends an electronic file of students to HHSC, and HHSC matches the file to determine which students are enrolled in Medicaid. The match is monthly and uses the same rules as for MAC. Although districts can submit their entire student database, they can only bill for services to special education students, so many districts send data only for their special education students. Districts can also check the Medicaid eligibility of individual students through an automated telephone system. This system is used for transfers and for students without an SSN in the district database. About 1,000 districts (83 percent) use the SHARS matching system. Many districts use vendors to bill for SHARS, and these vendors have the capabilities necessary for the data exchange with HHSC.

# Chapter 6
# Wisconsin Case Study

Wisconsin has used State-level computer matching for direct certification for 13 years. The computer match does not use the SSIS and is not based on SSNs. (The SSIS became operational in SY2005-2006.) In SY2005-06, the State expanded the direct certification system to support direct verification. Wisconsin is in the Midwest region and has 426 public school districts and about 400 private/RCCI SFAs. The student population is approximately 880,000 at public school districts and 137,000 at private school districts. Both public and private SFAs have access to State-level computer match results for direct certification. Agencies interviewed for the case study are listed in Exhibit 6-1.

## Highlights

Wisconsin implemented direct certification in 1992, using a State-level computer match of student data submitted by school districts to the State agency administering the eligibility system for FSP and TANF.[73] Currently, SFAs initiate the match by uploading student records via the Internet using secure File Transfer Protocol (FTP) whenever they choose, so the student information and the FS/TANF information are as current as possible. The system uses an exact match on name and DOB.

SFAs interviewed for this study described the direct certification process as smooth and timely. The process has several important advantages:
- The matching system is automated and requires no action at the state level.
- SFAs can obtain matches when they wish, and as often as they wish.
- Private SFAs may use the system.
- The data exchange process was simple and inexpensive for the State to implement.

There are several challenges for direct certification in Wisconsin:
- SFAs must choose to initiate the match, and submitting data for direct certification duplicates the SFAs' data submissions to the SSIS. About one-third of public SFAs directly certified students in SY2004-2005, well below the average for States with State-level but not statewide direct certification.[74]
- There are missed matches and false matches due to lack of a unique common identifier, reliance on exact match by name and date of birth, and errors in name and/or DOB.
- There is no method for directly certifying students who are not matched.
- SFAs need technical expertise to set up data exchange and import results to their student databases.
- The CN agency has limited information to manage and improve direct certification. There are no statistics, overall or for individual SFAs, on the percentage of FS/TANF children matched.

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[73] In Wisconsin, food stamp (and Medicaid) policy and eligibility determination are under the jurisdiction of the Department of Health and Family Services (DHFS), while the Wisconsin Department of Workforce Development (DWD) administers the eligibility information system.

[74] This estimate comes from our analysis of SY2004-2005 verification summary reports. Alternate estimates of the percent of SFAs using direct certification in Wisconsin are discussed in the text.

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**Exhibit 6-1**

**Agencies Contacted for the Wisconsin Case Study**

| Generic Abbrev. | Agency Name | Contacts |
|---|---|---|
| CN | Department of Public Instruction (DPI), School Nutrition Team | Child Nutrition Director |
| SEA | Department of Public Instruction (DPI), Information Technology Team | Information Technology Director |
| FSP | Department of Workforce Development (DWD), Bureau of Workforce Programs, Automated Operations Section | Section Chief |
| Medicaid | Department of Health and Family Services (DHFS) | Medicaid Director, Systems Section Chief |
| Very large SFA | Milwaukee Public Schools (97,000 students; 74% Free/RP) | Supervising Dietician, NSLP applications coordinator, programmer |
| Mid-size SFA | Tomah Area School District (3,000 students; 30% Free/RP) | NSLP applications coordinator, information technology director |

Note: DWD was the point of contact for the FSP interview because it operates the direct certification system and the FS/TANF/Medicaid eligibility system. DHFS supervises the FSP, which is called FoodShare in Wisconsin.

Direct verification in Wisconsin uses the same system as direct certification: SFAs submit data on students in the verification sample, and download match results. However, the State does not know how many SFAs use the system for direct verification versus direct certification. SFAs interviewed for the study did not use direct verification and we were unable to determine how well it works.

Direct verification with Medicaid data may be feasible in Wisconsin. The State Medicaid Agency has an existing web-based process to match district student data with Medicaid files for Medicaid Administrative Claiming and reimbursement of school-based services. From a purely technical perspective, this system could serve as a model or platform for direct verification with Medicaid data.

# Direct Certification

The statewide computer match is the only method of direct certification used in Wisconsin. The State-level computer matching system can be used by public and private SFAs.

### History

Wisconsin implemented direct certification 13 years ago, with a State-level computer match of student data submitted by districts to the Department of Workforce Development (DWD), which administers the eligibility system for FSP and TANF. SFA use of direct certification is voluntary.

The current methods for direct certification were developed by the CN and FS agencies, although the first formal interagency agreement was not established until 2005. There was no SSIS when the direct certification process was developed; Wisconsin implemented its SSIS in SY2005-06. Direct

certification does not currently use the SSIS because it is so new and does not include private school students.

Within the SEA, only the Child Nutrition team is involved with direct certification. There was mixed information about why the computer match is done by DWD, not the SEA. According to CN, at the time direct certification was established, DWD wanted to keep control of the FS/TANF data. DWD stated that there is no legal barrier to sharing the data, but the SEA did not have the programming staff to do the match when direct certification was implemented, and the SEA's resources for this type of programming are still limited.

Direct certification procedures changed somewhat over time. Files were originally exchanged via computer tape or disk. When the tape drive became unavailable several years ago, DWD made the FTP process available to the few SFAs previously submitting tapes. In 2005, disks were eliminated and all SFAs were required to use FTP because DWD wanted a fully automated process for data submission and matching. The CN agency indicated that some SFAs (mostly private ones) stopped submitting direct certification files as a result of this change. However, the new file exchange process is faster and more automated. It is now feasible for SFAs to submit data multiple times during the school year, and to use the system for direct verification as well as direct certification.

Changes in match criteria were also implemented in 2005, with the intention of increasing the match rate. Before 2005, DWD matched an SFA's student data to the subset of FS/TANF children with school codes corresponding to the SFA's schools.[75] The CN agency and SFAs believed that this approach caused many children to be missed by the match, because the school code was frequently out of date or missing in the FS/TANF file. DWD stopped using the school code and changed the process so that each SFA's data are matched to the entire FS/TANF database.

One final change over time was the elimination of a hard-copy report that DWD provided, upon request, to districts unable to submit a data file for matching. The report listed FS/TANF children for the SFA, based on the FS/TANF school code. The list could be used to manually identify children for direct certification. The report was eliminated because the school code was not considered reliable. Eliminating this report also reduced the workload for DWD (not a reason for the change, but a result nonetheless).

**Computer Matching Process For Direct Certification**

SFAs initiate the direct certification match. They extract student data from their food service information systems (FSIS), or district SIS, and submit these data to DWD via secure FTP. The DWD mainframe automatically receives and processes the file of student data, and matches it to the current file of FS/TANF children (FS/TANF data are updated monthly). The computer matching program was written in COBOL and requires an exact match on name and date of birth. Match results are available for download (via FTP) within 24 hours.

SFAs are required to submit data using a specified file format, containing the following data fields:
- SSN (optional for SFA use, not matched)
- Last Name, First Name, Middle Initial

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[75] FS/TANF eligibility workers enter school codes into the system at application.

- Date of Birth (MMDDYYYY)
- School District Code
- Eligible Code (filled by DWD)
- Filler (available for SFA use).

The SFA can put the district student ID in the filler field (as the very large SFA does). When the system is used for direct verification of categorical applications, the SFA can put the FS/TANF case number in the filler field. The same file format is used for uploading student data and downloading direct certification results.

SY2005-06 was the first year that the process was fully automated and SFAs could obtain match results multiple times during the year. About 25 SFAs used the matching process more than once this year, but some may have used it for direct verification rather than additional direct certification.

Exhibit 6-2 shows the timeline for direct certification in the two SFAs interviewed for the study. The very large SFA begins the process in late June, while the mid-size SFA begins in mid-July. The State indicated that direct certification submissions occur throughout the summer, and many SFAs submit data and process direct certifications between mid-August and late September. Most schools in Wisconsin open at the beginning of September.

In both SFAs, the IT department creates an extract of student records from the district SIS and submits the data to DWD. (The very large SFA uses the software package, eSIS; the mid-size SFA uses an in-house custom SIS.[76]) Student data represent current enrollment when the data are extracted.

In the very large SFA, match results are loaded into the software package VBOSS, the food service information system, and directly certified children are flagged.[77] (VBOSS is the current system for application processing and POS functions; the district installed it in SY2004-2006.) The district student ID is used to import direct certification records to the VBOSS student database (the SFA plans for this by including the ID in the filler field when uploaded files matching). The SFA describes this matching process as automated and "seamless." Once the data have been processed, the SFA spends 7 to 10 days preparing direct certification letters.

In the mid-size SFA, the IT director downloads the direct certification data and matches the data into the district SIS. (The SIS holds the database of free/reduced-price students for use by the food service office and the POS system.) A C++ program was written to extract district data for uploading to the state system, and for processing State-level match results. The program matches by name and DOB, and updates the free/reduced-price indicator in the student database; it retains the previous status and the date of direct certification. The program also generates direct certification notices, which the SFA sends home with approved students on the first day of school.

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[76]  eSIS is a student information system software product, a product of Administrative Assistants Ltd.

[77]  VBOSS is the acronym for Visual Back Office Software Solution, a product of Horizon Software International, LLC.

**Exhibit 6-2**

**Direct Certification Computer Matching Process:  Wisconsin, SY2005-2006**

| | |
|---|---|
| **All SFAs** | SFAs sign up with DWD for access to direct certification (a one-time requirement for each SFA) |
| **Very large SFA** | |
| Late June | • SFA submits student data to DWD secure FTP site. The file is automatically processed and matched to FS/TANF data. Match results are available on the FTP site the next day. |
| | • SFA downloads match results and updates its free/reduced-price application database. |
| Mid-July | • Notification letters are sent to directly certified students. |
| | • Free/reduced-price meal applications are printed for all enrolled children; the SFA pulls the application, prior to mailing, if the child is directly certified. |
| August 1 | • First day of school, in some schools. |
| October | • SFA submitted a second file of students for direct certification. |
| **Mid-size SFA** | |
| Mid-August | • SFA submits its data in mid-August and processes direct certifications |
| September 1 | • First day of school: |
| |    - Direct certification notices are sent home with students. |
| |    - NSLP meal applications are sent home with all students. |

**Effectiveness, Challenges, and Solutions**

Wisconsin was unable to provide statistics on the percent of FS/TANF children matched to student records for direct certification.  The lack of statistics is due to the dynamic design of the system, with SFAs initiating matches at different points in time.  The SY2004-05 VSR data indicate that direct certification accounted for 51 percent of public school students who are categorically approved for benefits, but the revised matching algorithm for SY2005-06 is expected to improve results.
The primary challenge for the State is to improve the direct certification process and increase SFA participation.

*Effectiveness*
Approximately 114,000 school-age children were enrolled in the FSP in August 2004 (reported by DHFS).  The food stamp agency does not, however, monitor or report on the number of children matched to district files for direct certification.  The best available statewide data on the effectiveness of direct certification are from SY2004-05 Verification Summary Reports (VSRs), although these data do not provide precise estimates.

The SY2004-2005 VSR data for Wisconsin indicate that direct certification accounted for 51 percent of public school students who were categorically approved for free meals (approximately 47,000 direct certifications).  The 47,000 children directly certified, represent about 41 percent of all FSP

children in SY2004.[78]  However, as discussed above, DWD expected a higher match rate for SY2005 after changing match procedures (eliminating the school code).

The probability of direct certification for a child enrolled in food stamps depends on three factors: whether a child is enrolled in an SFA using direct certification, whether the child's student and FSP records are matched at the state level, and whether the child's direct certification data are matched to student records at the SFA.

Compared with the statewide data for SY2004-2005, the SFAs in the study reported higher percentages of categorically eligible children who were directly certified in SY2005-2006.  The very large SFA had 81 percent of this group directly certified, while the mid-size SFA had 66 percent.

*Challenges*
There are several challenges for direct certification in Wisconsin:
- Direct certification is currently optional.  SFAs must choose to initiate the match, and submitting data for direct certification duplicates SFA data submissions to the SSIS.  About one-third of public SFAs directly certified students in SY2004-2005, well below the average for States with State-level but not statewide direct certification.[79]
- SFAs need technical expertise to set up data exchange and import results to their student databases.  Setting up the FTP process is more complicated than signing up and logging in to use a secure website, such as other used by other States in the study.
- There are missed matches and false matches due to lack of a unique common identifier, reliance on exact matches, and errors in name or date of birth.
- There is no way to directly certify students who are not matched.
- The process gives the CN agency limited information to manage and improve direct certification and direct verification.  For example, there are no State-level data on the percentage of FS/TANF children matched, and the CN agency does not have information on how many SFAs are using direct verification.

**SFAs not using direct certification.** The exact number of SFAs using direct certification is somewhat uncertain.  In the survey, the CN agency reported that 200 SFAs (22 percent) used the State-level match in 2004-2005.  Analysis of VSR data identified a total of 168 SFAs (20 percent) as having directly certified children in SY2004-2005, including 150 of 414 public SFAs and 18 of 419 private SFAs.

In SY2005-06, the number of SFAs using direct certification declined when FTP was required as the mode for data exchange.  In that year, DWD reported 110 SFAs (12 percent) submitted a file once or more often.  The CN agency acknowledged a decline in the use of the direct certification by private schools, attributing this to changes in the file transfer process. From the available data, it appears that there was a decline in direct certification by public SFAs as well.  Depending on which estimate for SY2004-2005 is used, the decline in SFA usage appears to be between 35 and 45 percent.

The CN agency mentioned the following reasons why SFAs choose not to use direct certification:

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[78]  The analysis also indicates that 45,000 FS/TANF children were approved for free meals based on applications.  We ignore the TANF/non-FSP children, assuming these are few.

[79]  Alternate estimates of the number of SFAs using direct certification in Wisconsin are discussed in the text.

- SFAs did not get correct or complete data when the match depended on the school code. Therefore, some SFAs concluded it was not worth the effort.
- Some SFAs—particularly small ones—decide that they do not have enough free-eligible students to make it worthwhile. In contrast, very large SFAs are motivated by the size of the application burden and amount of funding affected by free/reduced-price certification.
- SFAs must put student data in the specified file format and set up the file transfer. SFAs with less technological capabilities and support may find these requirements too difficult. Evidence of this burden was the decline in SFA participation in SY2005, which was at least partly due to the new FTP requirement.
- Some SFAs may have declined to use direct certification in SY2005-2006 because they no longer had the option to obtain a paper list of FS/TANF children in their district.
- Finally, the decline in direct certification usage in SY2005-06 may have been due to the competing demands of SSIS implementation. The CN agency, however, does not believe that this was a factor.

**Ease of use by SFAs.** DWD acknowledged that setting up the FTP data exchange process was challenging for both large and small SFAs. To upload files, SFAs have to download a Javascript application. This process was initially blocked by the firewall in some large districts, although once DWD understood the problem, it was quickly resolved. DWD provided a good deal of technical support to small SFAs for their first file transfer, because their staffs were not familiar with this type of process and the settings necessary to use it. In addition, some SFAs encountered problems when they did not follow all of the instructions for setting up the FTP process, which had several steps and required some SFAs to obtain two different log-ins and passwords. DWD's view was that once an SFA had the process set up, it ran smoothly and was not a barrier to future use.

Some SFAs had difficulty producing a student file in the format required for direct certification. SFAs using one popular FSIS were unable to upload a student file in the proper format until the vendor made a modification during the summer of 2005. DWD provided instructions for other SFAs on how to create a file in the proper format using Microsoft Excel®.

The mid-size SFA expressed the view that the CN agency has done a "fine" job at encouraging SFAs to use direct certification without pushing too hard. These staff are surprised that many SFAs do not use direct certification, because it reduces the verification sample and benefits students. They also pointed out that most districts use one of a small number of SIS that can easily export a file of student data, so the main challenge is handling the import of data from the direct certification match. IT support for importing these data to the free/reduced-price application database may be a limiting factor. The mid-size SFA is unusual for its size in having in-house programming capability to handle this task.[80]

**Match rate and sibling problem.** Student records are matched to FS/TANF records only when the name and DOB exactly match. Thus, records fail to match if there are differences in spelling or punctuation. DWD notes that part of the problem is that districts do not always use legal names for students.

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[80] The large SFA did not comment on reasons why other SFAs do not use direct certification.

The SFAs in the study viewed the limitations of the matching algorithm as a significant problem. According to the very large SFA, a high percentage of families have a mix of matched and unmatched children. As a result, the SFA asserted, direct certification does not eliminate the mailing of applications, because so few households have all children directly certified.[81] Families with both matched and unmatched children often complain to the SFA. The SFA would like to see a more state-of-the-art method that better handles spelling variants and hyphenated names well. The sibling problem complicates verification, because the SFA staff still have to verify other children, and they have to explain to parents why this has to be done when one child has been directly certified.

Discussions with the CN agency, DWD, and SFAs identified numerous reasons why eligible children are not directly certified:

- Hyphenated names may be entered differently in the FS/TANF and student databases.
- Discrepancies in names occur when the name has characters other than a letter, or unusual spelling or spacing.
- Errors in birth date, even the year of birth, are not uncommon.

Children within the same household may also have a legitimately different direct certification status if some children are excluded from the FS/TANF case because of extra income or other eligibility factors.

The very large SFA noted that another barrier to matching is the fact that it does not have any student SSNs. The policy on collecting SSNs was changed several years ago by a school board decision. The SFA staff suggested that having SSNs would help improve the match rate, although this would require a change to the matching algorithm at the state level.

The very large SFA noted that some false matches had occurred — i.e, match results for children not certified for FS/TANF. The SFA estimated it had 100 false matches in SY2005-2006 (out of over 30,000 total matches). These cases are identified by parents, or by school personnel who are aware that the child was not low-income. The SFA was not sure why these false matches occurred. Based on the available information, it is likely that false matches occurred when a child in the district file had the same name and DOB as a different child in the FS/TANF file. DWD was not aware of problems with false positives. According to DWD, the program will not produce duplicate matches on a given name.

The mid-size SFA noted one group of categorically eligible children who were not included in the direct certification computer match: those receiving benefits from the Food Distribution Program on Indian Reservation (FDPIR). In this SFA, about 3 to 4 percent of students are Native American, and a substantial fraction of them are enrolled in FDPIR. These families have to submit an application. The SFA indicated that it would be desirable to include FDPIR in direct certification.

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[81]  The SFA did not quantify the number of households with matched and unmatched children. This SFA reported that 81 percent of children certified as categorically eligible are directly certified, so it is somewhat surprising that so many households with directly certified children get applications. It is possible that the SFA sends applications to households even when all of their enrolled children are directly certified, given the relatively short time to pull these applications out of the prepared mailing. Another factor could be that households submit applications for children whose direct certification notices did not get delivered due to an address error.

**Timing issues.**  The direct certification process in Wisconsin allows SFAs to do their matches when they need them, using current enrollment data.  Neither SFA in the study indicated any problems due to out-of-date student information.

The very large SFA experienced a timing problem when it tried doing a second direct certification match in mid-October.  This match certified a small number of additional students, but most of the newly matched students had already submitted applications. Thus, the second match primarily changed the type of certification, but records had to be manually reviewed and revised because they could not be automatically changed to direct certification status.  The second match was done after selecting the verification sample, so these additional direct certifications did not affect the sample size. The SFA plans to do a second match for SY2006-2007 in September, before the verification sample is drawn.

**Costs and Benefits of Computer Matching**

The CN and FS agencies were unable to provide information about the original costs to create the direct certification match process.  In SY2005-06, the CN agency paid DWD $13,000 for programming and technical assistance. This included one-time costs to establish the process for data exchange via FTP over the internet, modify the match criteria, and provide school district support for the first year of the new system.[82]  About three-quarters of the billed time was spent on school district support. This figure does not include all of the DWD staff time; the supervisor and other technical staff did not bill their time to this account.  Neither SFA provided estimates of costs or savings attributable to direct certification.

**Future Directions for Direct Certification**

Interview respondents shared their thoughts about possible improvements to the direct certification process, although they have no schedule for implementing improvements at the current time.  They also discussed the feasibility of expanding direct certification to include a match with Medicaid data.

*Plans for Improvement*
The CN agency and DWD are aware of the limitations of direct certification, and they have discussed possible improvements.  One option is to develop a different matching algorithm.  DWD has considered the possibility of adding address information to the direct certification file, and using probabilistic methods to allow inexact name matches.  Another option is to match the SSIS data to the FS/TANF data, in response to SFA concerns about having to send student records separately for the SSIS and for direct certification.  The problem with using the SSIS is that it does not contain student records for private schools, because the SEA has no mandate to collect them.  Thus, if the SSIS were used for direct certification of public school students, DWD would still have to maintain the existing matching system for private school students.  At present, the State does not have resources available for these possible improvements, but at the time of the interviews there had been discussion between CN and DWD about applying for grant under the FNS competitive award process for direct certification and direct verification improvements.

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[82]  FTP had previously been used for a small number of SFAs, using a dial-up process. Resources were needed to convert this to FTP over the internet.

*Feasibility of Computer Matching with Medicaid for Direct Certification*

The interviews identified two main feasibility issues for direct certification using Medicaid/SCHIP data in Wisconsin. One was the problem of different income eligibility criteria for NSLP and Medicaid/SCHIP. The other was whether DHFS could share data for this purpose, even if it were allowed by NSLP rules. DHFS indicated a willingness to share data for direct certification or direct verification if the State received clear direction that the use was allowed. (The section on direct verification provides further discussion of the feasibility of matching student data with Medicaid/SCHIP data for NSLP purposes.)

The mid-size SFA commented that the feasibility of direct certification with Medicaid data would depend on the data elements provided, how usable they are, and how the process works. If it would be important to get the same data elements provided by the current direct certification process, so the data would be compatible with the district SIS. Using Medicaid data for direct certification would help avoid the situation where some households put a Medicaid number on the free/reduced-price application, and the SFA has to return the application and request income information. Some parents are annoyed or confused by having to apply for free meals if they're already eligible for medical assistance.

# NSLP Application Verification

SFAs in Wisconsin rely primarily on household documents for verification of NSLP applications, including verification of categorical applications. The State implemented an automated direct verification process in SY2005-06, as an extension of the direct certification system.

### SFA Procedures

Both SFAs drew focused verification samples in SY2005-2006. The very large SFA had a sample of 285 applications selected by computer, while the small SFA had a sample of 5 applications selected manually.

In the very large SFA, the FSIS draws the sample and compiles a list with name of household contact and address. The SFA sends a letter with a form highlighting the information needed to verify the application. Verification information is entered into the FSIS, and the computer determines eligibility status. The mid-size SFA manually samples error-prone applications, sends letters to the sample, follows up as needed, reviews documentation, determines the eligibility, and enters the result to the district SIS. (This SFA does not enter income information in the SIS, only free/reduced-price status.)

### Verification of Categorical Applications

The primary method of verifying categorical applications in Wisconsin is requesting documentation from households. Prior to the implementation of direct verification this year, SFAs could contact the FS/TANF office or collect household documentation. The very large SFA had tried calling the local FSP office, but these calls were not returned timely. SFA staff know of other SFAs where the local FSP office was helpful. The mid-size SFA had tried contacting the local FSP office and was told that a written release from the client was needed.

**Direct Verification Process**

An automated direct verification process was made available to SFAs in SY2005-2006, using the same computer matching system (hosted by DWD) that is used for direct certification. SFAs can submit lists of students in the verification sample via the secure FTP process, using the direct certification file format. The DWD system automatically matches the verification sample with the FS/TANF database by name and DOB, and posts the results for the SFAs to download. The CN agency instructed SFAs to submit data on the entire verification sample.

The match process does not use the FS/TANF case number, even when doing verification. DWD explained that the case number is not sufficient to verify that an individual child is approved for FSP or TANF because it is a household-level case number, not a person-level client ID. Therefore, even if the system did a match on case number, it would still need to match the child's name and DOB in order to verify eligibility. SFAs can, however, put the FS/TANF case number in the filler field to facilitate processing of direct verification results at the SFA level.

Limited information is available to SFAs about direct verification. DWD did not provide separate instructions for submitting a verification sample. The CN director told SFAs that they could use the direct certification process for verification.

There are no data yet on use of this method, or its effectiveness. According to DWD, 25 SFAs submitted data more than once to the computer matching system, but DWD has no way of knowing how many of these SFAs used the system for direct verification. Neither of the SFAs we interviewed had used the direct verification process. No cost information was available at the State level, because direct verification processing is indistinguishable from direct certification processing.

Staff at the very large SFA were not aware of the direct verification option. They view it as potentially helpful, given the limited time for verification and the high rate of non-response. This year, 54% of sampled households did not respond by the deadline. (The SFA attributes a large percentage of non-response to households with under-reported income.) The SFA reported that households sometimes respond with a FSP case number on the verification form even if they had submitted an income application, so a way to verify this information would be useful.

The mid-size SFA was aware of the direct verification option, but the staff did not see it as a way to verify income applications. This SFA had only one categorical application to verify. Staff members expressed concern that direct verification results might be inconsistent with full-year eligibility if household circumstances changed since the time of application.

**Feasibility of Direct Verification With Medicaid**

The CN agency is interested in the possibility of using Medicaid data for direct verification, and DHFS indicated a willingness to work on such a system. DHFS identified several feasibility issues.

First, DHFS has not seen any written confirmation that Medicaid information can legally be shared with the CN agency or school districts for NSLP direct verification. DHFS suggested that, to promote direct verification, it would be very helpful for the director of the Center for Medicaid and State Operations (CMSO) to send a letter to all Medicaid directors. The purpose of the letter would be to get the States aware and excited, and to make it clear that it is allowed under law. The DHFS

Medicaid director has not observed any discussion of NSLP direct verification, either at the CMSO eligibility technical advisory group of States or national conferences of Medicaid directors. There is a lot of interest in outreach between NSLP and Medicaid/SCHIP in both directions, and this could be a motivator.

Second, matching is complicated without a unique identifier, and DHFS could not guarantee that a match on name and DOB yields correct information. Having SSNs for children would be a real improvement in the reliability of the match. DHFS has other identifiers in its database that could be used, including the Medicaid card number, eligibility system case number, eligibility system person number, or EBT card number. As described in the Medicaid section, the match for Medicaid Administrative Claiming (MAC) uses a probabilistic approach, but there the goal is to estimate the percentage of students enrolled, not to verify the eligibility of individual students.

Another issue is that Medicaid eligibility determination looks at total family income (parents and children) but also splits the family into fiscal units (e.g., parent and one child). This is a complication but not a "show-stopper." For most Medicaid children, the database has household (or at least family) information. If a household representative completes the joint FoodShare/Medicaid application, he or she provides information on all household members. However, for those who submit the Medicaid-only application, information is collected only on the family, not any unrelated household members. About 54 percent of Medicaid enrolled are only approved for Medicaid; a large percentage apply only for Medicaid because the process is easier and there is a higher income limit. The percentage of Medicaid-only children in multi-family households is not known.

According to the DHFS contacts, HIPAA is not a barrier to sharing Medicaid eligibility data in Wisconsin. DHFS has a State legal opinion that eligibility information is not personal health information (PHI) covered by HIPAA. The eligibility system does not have PHI, such as diagnosis or claims information. This interpretation has not been confirmed or denied by CMSO.

Wisconsin's Medicaid income eligibility limit is 200 percent of the poverty level.[83] Therefore, Medicaid income information is needed to verify eligibility for free or reduced price school meals. DHFS' understanding is that it could provide either (a) household income as a percent of poverty, or (b) household income and size. They would prefer to follow approach (b) and let the SEA make the eligibility determination. DHFS cannot provide detailed income data (sources, employers etc.). DHFS would need a standard data sharing agreement with the SEA, similar to the direct certification agreement.

The SFAs in the study saw direct verification with Medicaid data as potentially helpful in reducing the burden of verification. The very large SFA also saw direct verification as a way to improve the verification response rate. The mid-size SFA indicated that the feasibility of using Medicaid data for verification would depend on the data provided and whether any software is needed. In this SFA, the verification response rate was 100 percent, so direct verification would not affect the response rate. The IT director indicated the ability to use data on household size and income to determine eligibility, viewing this as a simple programming task as long as the data were in a student-level file.

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[83]    Wisconsin implemented SCHIP as a Medicaid expansion, not a separate program.

# Statewide Student Information System

The Wisconsin SSIS was first implemented in SY2004-2005, and became fully operational in SY2005-2006. The SSIS has two components:

- Wisconsin Student Locator System (WSLS) – WSLS is available at all times for real-time submission of new students, transfers, withdrawals, and for assignment or verification of the state student ID number (WSN).

- Integrated Student Enrollment System (ISES) – School districts are required to submit student-level data to ISES for specified "student loads", which are used for official statistics required by State and Federal law.  In addition, ISES is used to create student rosters for statewide standardized tests.

The SEA specifies standard formats and detailed instructions for submitting student data via its secure website, either as file uploads or through on-line entry.  The SEA has a certification process for SIS vendors, to assure data quality and that they can provide the required data in the required formats.  The SSIS has not been used for direct certification.

### Data Collection Schedule

State legislation requires school districts to report enrollment by the third Friday in September.  The SEA is required to publish the aggregate data by January 1.  These are the data that populate the Integrated Student Enrollment System (ISES).  In addition to current (fall) enrollment, the SEA also requires districts to submit data on student entries and exits during the prior school year.  These "year-end" files provide data on attendance, high school completion, dropouts, and retention or promotion.  In SY2005-2006, fall enrollment and year-end student data for 2004-2005 were initially due on October 3, 2005, but the "lock-down" date for final fall enrollment data (after SEA validation and identification of errors) was March 13, 2006.

The SEA has experienced delays in getting data submitted and cleaned.  Districts have competing priorities and heavy workloads for administrative staff during the fall, and school district funding is not tied to the timeliness of data.  Another problem is that work by districts' student information system vendors sometimes delays data submissions. The SEA characterized the effort to get timely data as a "continuing struggle."

### Student Identifiers

Districts use the WSLS to find the state student ID number (WSN) for new students or to obtain a WSN for newly enrolling students (kindergarten or new to the state).  Data are matched using legal names and aliases to check whether a student has been assigned a WSN.  To protect student privacy, identifying information other than the WSN is stored in the WSLS, and the only identifier in ISES is the WSN.

WSLS allows batch upload and online submission. Districts can submit updates to the WSLS at any time.  They are encouraged to do so frequently so that the WSN assignment process is efficient and reliable, avoiding duplicate WSNs for students and assuring that student status information is accurate.

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*SSN policy*
According to the SEA IT director, including the SSN in the SSIS was never an option because of considerations of law, history and culture.  Privacy is a very sensitive issue in Wisconsin.  Even having a statewide student number has been controversial.

*Potential identifiers for matching*
The following identifying and demographic variables are in WSLS and/or ISES:

- Student Name - WSLS
- Gender - WSLS
- Birth date - WSLS
- State Student ID Number - WSLS & ISES
- Local Student ID Number- WSLS
- District submitting data - WSLS & ISES
- District of Accountability - ISES
- District of Residence - ISES
- School - WSLS & ISES
- School in District of Residence - ISES
- School of Accountability - ISES
- Grade Level Placement - ISES
- Birthplace - WSLS
- Economically Disadvantaged - ISES
- Migrant Status - ISES
- Native Language - ISES
- Parent/Guardian Name - WSLS
- Racial Ethnic Group - WSLS

The "Economically disadvantaged" element has values for NSLP-free, NSLP-reduced price, and other types of disadvantaged status.  This information comes from district information systems.

*Validation of district data*
The SSIS is still in its infancy, so information about data quality is likely to change over time. The SEA has encountered errors in all of the data elements, with none notably more prone to errors than others.  With regard to duplicate records, the basic problem is that school staff have a hard time identifying children, entering names correctly (or consistently), and determining whether a child has a student number assigned.  Student mobility, inconsistent reporting of names, and staff time constraints are the main factors underlying errors.

The SEA uses training and automated data checks for quality control and identifying duplicates.  The SEA IT director visited all school districts twice in SY2005-2006 to urge timely and accurate data.  The consistent message that he hears is that districts do not have resources to train staff, and that staff do not have enough time to submit data according to the schedule, particularly during September and October.

**Other Computer Matching of K-12 Data**

The SSIS has not been used for computer matching with external data. Currently, school districts submit data to the SSIS and, separately, to DWD.  DWD conducts two types of computer matches: NSLP direct certification or direct verification, and Medicaid Administrative Claiming (MAC).  The SEA is not involved in these matches, other than the role of the CN division in NSLP policy and oversight.

In collaboration with Minnesota and Michigan, Wisconsin has obtained a grant to build an integrated, longitudinal student data warehouse for policy analysis and research.  This warehouse is expected to link student data over time and across information systems, including pre-K through 12th grade and post-secondary data.  The project may include CN program data.[84]

# Medicaid Data Availability and Use

In Wisconsin, Medicaid includes mandatory coverage plus the BadgerCare Medicaid waiver program covering children and parents up to 200 percent of the FPL, with a premium required at certain income levels.  There is no separate SCHIP program.

**Relationship of Medicaid To Food Stamp Program**

DHFS administers both the FSP (known in Wisconsin as FoodShare) and Medicaid.  The state agency supervises the county social services offices that administer eligibility for both programs.  DHFS took over administration of Medicaid in 1997 when eligibility was delinked from AFDC and the state's TANF program (Wisconsin Works or W-2) was created.

Wisconsin uses a single computer system to determine eligibility for FSP, TANF, and Medicaid. DWD operates this system under an agreement with DHFS.  No other programs use this system for certification.  Medicaid has a separate information system for provider and claims data.

There are two current options for submitting a medical assistance application:
- In-person at county human service offices (FSP and medical)
- Mail-in application for medical assistance only (Medicaid, BadgerCare, or Family Planning Waiver).

The medical assistance application can be requested by phone, picked up or completed at an outreach site, or completed on-line and printed using DHFS' website.  The applicant completes a phone interview with the county office if applying only for Medicaid or BadgerCare.

An on-line application system called Wisconsin ACCESS was in development at the time of the interview.[85]  It was operating as a self-assessment and referral tool, and it included FoodShare, medical, school meals, summer food, TEFAP, EITC, long term care, SeniorCare prescription drug

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[84] Wisconsin's grant proposal is provided on-line at the U.S. Department of Education website: http://www.ed.gov/policy/gen/leg/foia/grants/iesstatewide/wisconsin.pdf.

[85] The Web address is https://access.wisconsin.gov.  ACCESS does not appear to be an acronym, although it is capitalized in usage.

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program, Medicare Part D, and WIC.  Child nutrition programs were included as part of the one-stop concept for ACCESS.  DHFS hopes that by providing screening for many programs, they will spread information and improve access to all programs. The low-income home energy assistance program (LIHEAP) is a priority to add next to ACCESS, and DHFS is trying to get child care added. The system also allows approved clients to check the status of benefits.

In June 2006, ACCESS is scheduled to support application for the FSP and Medicaid.  DHFS will promote ACCESS with marketing in the spring and summer of 2006. ACCESS is designed to collect application information and route it to the appropriate office.  Medicaid-only applications will go to the central office for determination; joint FSP/Medicaid applications will be sent to local offices. Offices can do a face-to-face interview, or this may be waived. Completed ACCESS screens will speed up the interview and help the applicant understand the information needed to complete the process.

For the NSLP, the ACCESS on-line screener checks whether children may be eligible for free/reduced-price lunches and provides information on where to apply.  DHFS and the CN agency have not discussed adding an on-line NSLP application, but DHFS could and would like to do this if there were a lead agency coordinating the process at the state level.  DHFS expects that an on-line NSLP application will likely come in 12-18 months, after the initial programs for on-line applications (FSP and Medicaid) and the next priorities (particularly LIHEAP).

**Referrals from NSLP To Medicaid**

The CN agency provides SFAs with sample documents to be used for NSLP application. The application packet includes two optional forms:

- Sharing Information With Medicaid/Badger Care
- Sharing Information With Other Programs

These forms allow households to "opt-out" of data sharing activities conducted by SFAs.  Thus, SFAs can share NSLP information if the household provides passive consent. Households may opt-out by checking a box indicating that "No! I do not want information from my free and reduced price school meals application shared …".

SFAs use the Medicaid/Badger Care data sharing form if they establish an agreement with the local health or social services department for information sharing.  Neither the CN agency nor DHFS had information on how many SFAs have this type of arrangement.

The very large SFA indicated that they use a checkbox to authorize information sharing with Medicaid (i.e., active consent).  Checkbox information is captured when applications are scanned, and a list of children with parent consent could be compiled.  However, the SFA indicated that the Health Department has not used this information for outreach in the last 2 years; prior to that, outreach was conducted based on NSLP application information.  The mid-size SFA does not share information with BadgerCare.  There has not been a demand from parents.

The Medicaid program tried an outreach effort using electronic data exchange in the late 1990's. Medicaid matched its data with data from the very large SFA on children approved for free/reduced-price meals;  tens of thousands of applications were mailed to children who were not enrolled in

Medicaid.  This process cost a lot of money, and the State viewed it as a failure because only 100 applications were returned.  One reason for the failure was lack of coordination between the county social service office, the public schools, and the State – information was "lost in the shuffle". Another factor was that the outreach was not timed and presented well, so parents ignored it.  The outreach was at the start of school when parents received too much information at the same time. DHFS concluded that it would be better to either integrate outreach with the NSLP application or do outreach at a different time.

**Computer Matching for Medicaid Administrative Claiming and School-Based Health Services Claims**

The Wisconsin Medicaid program currently works with school districts to facilitate computer matching of student records with Medicaid eligibility records. School districts can submit student rosters to DHFS via a secure website for two matches:

- Medicaid Administrative Claiming (MAC):
    - o  All enrolled students are matched to determine the percentage of Medicaid-eligible students in the district.
    - o  The match is by name, address, date of birth, and gender using a probabilistic algorithm; the level of certainty for accepting matches is 98 percent.  The only student data uploaded in the rosters are the fields used for matching.
    - o  The district receives only the Medicaid-eligible percentage of the students, not the eligibility of individual students.
    - o  About 200 public schools districts (47%) participate in MAC.

- School-Based Services (SBS):
    - o  Students receiving special education services are matched to identify eligible students for whom the district can claim reimbursement of the costs of school-based medical services.
    - o  The district downloads a file of matched students and uses this eligibility information to submit Medicaid claims for the school-based services.
    - o  About 390  (92%) of public schools districts participate in SBS.

The current computer matching system became operational in March 2006.  Social security numbers are not used in these matches because they are not consistently available in student records.  In addition, the approach relies only on student information that is defined by Wisconsin statute as directory information and thus available for release without active consent (provided that the district has followed FERPA rules regarding opt-out of release of this information).  Medicaid data privacy is protected in that districts only receive eligibility information for students receiving school-based medical services, and this information is restricted under the rules for Medicaid providers.

The possibility of using the SSIS for the MAC match has been discussed between DHFS and the SEA.  DHFS determined that the approach of using district roster uploads is more feasible.  DHFS viewed the district data as more current than the SSIS data, and the district upload approach was more efficient from DHFS' perspective.

# Income Eligibility Verification System

Income eligibility verification was discussed with interview respondents from the State Medicaid Agency, and the feasibility of using IEVS for NSLP was discussed with several respondents.

**Use of Computer Matching for Income Verification in Medicaid**

In Wisconsin, Medicaid applicants are not required to provide documentation of income, but DHFS uses a number of computer matches to verify what applicants report. DHFS describes this as "streamlined verification".

There is a lot of overlap with computer matching for FSP income verification.[86] The same computer system (CARES) and generally the same data sources are used for both programs. There is an important difference, in that for Medicaid, the approach to eligibility determination is "pass-fail". The person is either eligible or not, so minor errors in income below the eligibility threshold do not matter. Also, Medicaid is more concerned with eligibility errors for the elderly and disabled than for children, because of the large differences in benefit costs.

The CARES computer system pulls up employer wage data (as reported to DWD) through an on-line query at application and recertification, and eligibility workers review the data. Workers can do an inquiry whenever they think its needed. However, CARES does not access wage data in real time; there is a monthly batch matching process "behind the scenes." These data are not viewed as a strong source for verification due to the timing of employer reports.

DHFS uses a large number of automated data exchanges for income verification: wages, unemployment insurance compensation (UIC), New Hires, and child support enforcement (CSE) (which provides on-line, direct access). IRS data were used in the past, but DHFS found it was not effective because county and tribal offices were overwhelmed by the volume of data, and the data were too old. DHFS is working now on a more targeted approach. CARES does a match with the Social Security Administration (SSA) two times a month to obtain updated Social Security benefit information; a similar update with SSI is done monthly.

The best sources for verification are those that provide real-time income information: SSA, UIC, and CSE. DHFS finds the New Hires data to be very useful for verifying employment. DHFS also uses the Work Number commercial employment verification database, but it has provided a substantial amount of incorrect information.

Wisconsin recently began participating in the U.S. Department of Health and Human Services' Public Assistance Reporting Information System (PARIS) interstate match, and the early experience show that it has been useful. The savings from this match pay for the person who investigates the match results. DHFS has found useful the information on Federal pensions, participation in multiple states, and military pay. Investigations focus on the more expensive cases: the Medicaid cost for elderly/blind/disabled persons is $500-900 per person per month, while it is $60 for a child and $200 for a parent.

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[86]    The DWD FSP contact could not respond to questions about computer matching for FSP income verification.

**Feasibility of Using IEVS Sources for NSLP Verification**

The CN agency recognized the appeal of matching with wage and other income data as a way to reduce the burden of the NSLP application verification process. This agency also stated that the confidentiality issues would be very important and that a well-developed Federal policy and regulations would be needed. States would be taking on a great deal of work and risk to set up a system of this sort without a clear model at the national level.

Other interviews provided additional perspective on this topic. The FSP contact at DWD indicated that a change in Wisconsin statute would be required to allow access to UI wage information for NSLP verification.

The very large SFA had two concerns about using wage matching for NSLP verification. First, many parents will not show up in the UI wage database because they are self-employed, work odd jobs that don't report wages, or don't have SSNs. Second, parents might have privacy concerns. However, the very large SFA noted that it now has the SSNs of parents signing NSLP applications in its database. The SFA did not capture this information when it key-entered the data, but now the SFA scans applications and captures this information.

The mid-size SFA indicated that a verification system based on wage matching would be "great" if it responded with a confirmation of eligibility. These respondents had a mixed response to the idea of a system that provided raw income information. The feasibility of this approach might depend on how much information and in what format it was provided, but they thought that it would be feasible to use income information to determine eligibility for the verification sample. They suggested that some parents would prefer this approach, some wouldn't care or wouldn't notice, and others would object. Also, this SFA noted the potential problem of frequent job changes.
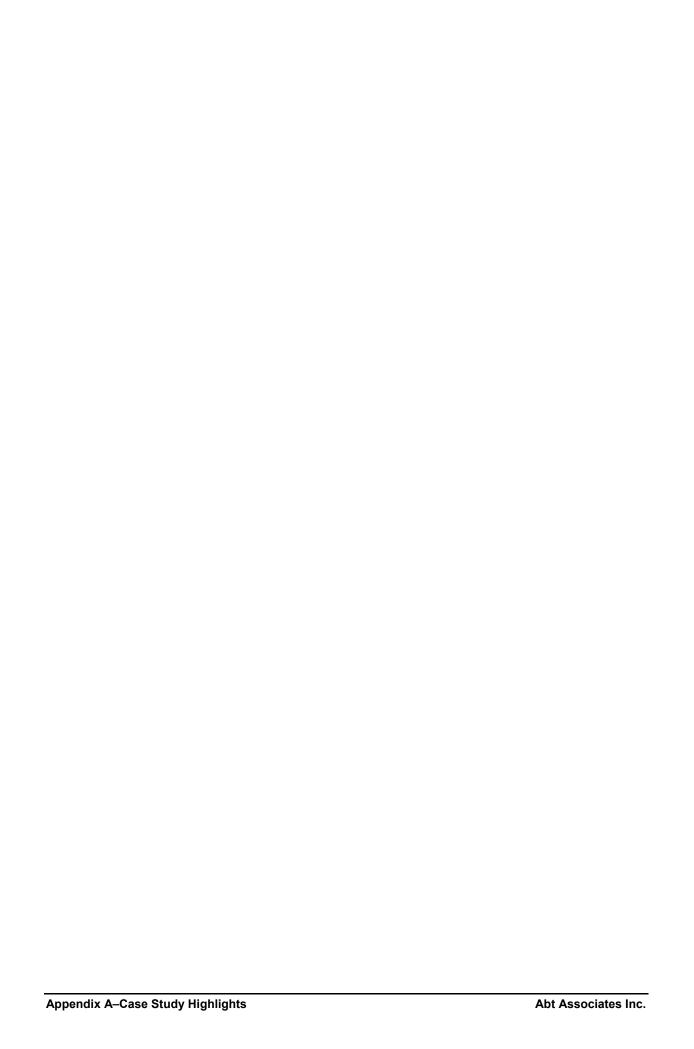
DHFS Medicaid contacts stated that computer matching for income verification requires two key elements: a unique ID and full-time eligibility workers to use the information. Matches often provide only a starting point, indicating a possible discrepancy and a trigger for conversation with the client. Workers need training and experience to follow up effectively. This is particularly true of wage information; there is often a change in hours, jobs, or pay rates between the reporting period and the time of the application. DHFS has had a difficult time implementing a state mandate for employers to provide verification of earnings and insurance for BadgerCare; it's "complicated and cumbersome". Problems include: getting employers to respond, employer error, multiple pay scales, overtime etc. Using pay stubs to verify earnings is much simpler.

# Appendix A

# Highlights of Case Studies

# Georgia Case Study

## NSLP Direct Certification

**Methods**
■ State-level computer match by the Dept. of Education Information Systems Division

■ SFA on-line access to look up FS/TANF eligibility

**Coverage**
■ All public SFAs

**History**
■ 1992 – Implemented State-level computer match based on SSN, done by SFSA

■ Late 1990s – SFAs given access to FS/TANF eligibility system

■ 1997 - SSIS implemented

■ 2005 - Moved match to SEA, added match by name and date of birth

**Effectiveness**
■ The State matches 57% of FS/TANF children, age 1-19, to students in public schools

■ VSR data show that all public SFAs directly certify more children than they approve by categorical application

■ Statewide, 63% of categorically approved children in public schools are directly certified (Source: VSR)

**Strengths**
■ 100% participation by public SFAs

■ Three-prong approach – computer match; county files of unmatched FS/TANF children; individual look-ups

**Limitations**
■ Student data are 9 months old

■ Exact match is required, with no tolerance for data errors

■ Unmatched lists of FS/TANF children do not correspond precisely to SFA catchment area

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**State-level Computer Match Procedures**

**Timing**
■ June – SFSA provides FSP/TANF data to SEA
■ June/July – SEA extracts SSIS data and does the match
■ Mid-July – Match results posted on SEA secure website

**File Specifications**
■ FSP/TANF data
  - Active caseload as of May
  - Children ages 1-19
  - Identifiers: Name, SSN, date of birth, mother's name, mother's SSN, address, county
  - Approximately 531,000 records in 2005

■ Student enrollment data from SSIS
  - Student information from prior October
  - Unique students ID is SSN or alternate ID
  - Identifiers: Name, SSN, date of birth, district name, district number, school name, school number, race, gender, graduation status
  - Approximately 1,553,000 records in 2005

**Matching Algorithms**
■ Primary match: Exact match by SSN
■ Secondary match: Exact match by name and DOB

**Files provided to SFAs (via SEA secure website)**
1. Match results
2. Unmatched FSP/TANF children age 6-19*
3. Unmatched FSP/TANF children age 4-5*

* Unmatched files contain children residing in the county where the SFA is located.

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**SFA Access to SUCCESS**

■ SUCCESS is the Georgia eligibility determination system for the FSP, TANF and Medicaid

■ SFAs have secure but limited access to SUCCESS through Georgia Online (GO)

■ For **direct certification**, SFAs may use the system to query FS/TANF eligibility data by:
  - SSN
  - Case number (e.g., to identify FSP household membership when all siblings are not directly certified)

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# Georgia Case Study (continued)

## NSLP Verification

### Methods of Verifying Categorical Applications

1. Direct verification
2. Request documentation from household

### Direct Verification with FSP Data

■ Available since late 1990s

■ SFAs need more training to understand that the system can be used for the entire verification sample

### Feasibility of Direct Verification with Medicaid Data

■ Implemented in SY2005-2006 through the SUCCESS online system

■ Adding Medicaid was feasible because the FSP, TANF, Medicaid eligibility systems are integrated

■ SCHIP is not included because SCHIP eligibility information resides in a separate system

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**Direct Verification via SUCCESS**

■ FSP, TANF, and Medicaid data are available for direct verification

■ SFAs may use the system to query:
  - FSP/TANF/Medicaid eligibility data by SSN
  - FSP/TANF eligibility data by case number

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## Other Computer Matching with K-12 Student Data

■ Medicaid School Health and Related Services – Not used
■ Medicaid Administrative Claiming – Not used

## Agencies Interviewed

| State Agencies | SFAs |
|---|---|
| ■ Department of Education<br>  - School and Community Nutrition Division<br>  - Information Systems Division | ■ Cobb County<br>  - Large SFA with over 10,000 students<br>  - 32 % Free/RP NLSP in SY2004-05<br>  - Approximately 1,700 direct certifications |
| ■ Division of Family and Children's Services, Dept. of Human Resources (DHR) – Food Stamp/TANF programs | ■ Crisp County<br>  - Mid-size SFA with about 4,500 students<br>  - 70% Free/RP NLSP in SY2004-05<br>  - Approximately 1,200 direct certifications |
| ■ Department of Community Health (DCH) – Medicaid/SCHIP programs | |

# Kansas Case Study

## NSLP Direct Certification

**Methods**
■ District-level computer match in six districts

■ Letters sent to all FS/TANF children statewide (including those attending districts that use district-level match)

**Coverage**
■ All SFAs by letter method; 6 SFAs receive data

**History**
■ 1990 –Implemented letter method

■ Mid 1990s – Implemented district matching

■ 2005 – Implemented SSIS

■ 2006 – Planning for State-level computer match begins

**Effectiveness**
■ 86% of public SFAs directly certify more children than they approve by categorical application (Source: VSR)

■ Statewide, 81% of categorically approved children in public schools are directly certified (Source: VSR)

**Strengths**
■ High rate of direct certification

**Limitations**
■ Most SFAs must manually process letters, rather than electronic data

■ Computer matching procedures are not standardized across SFAs

■ Letter method duplicates electronic data in SFAs using computer matching

■ State-level match methods may be limited because SSIS contains SSN for only 47% of students

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**District-level Computer Matching Procedures**

**Participating Districts**
■ Wichita, Shawnee Mission, Kansas City, Topeka, Leavenworth, Seaman
■ These districts account for 24 percent of enrollment and 27 percent of Free/RP certifications

**Timing**
■ Mid-July – SFSA emails data files to districts
■ July to mid-August – Districts complete match and mail notification letters to households
■ End of August – School starts

**FS/TANF File Specifications**
■ Two files to each district containing FS/TANF children residing in counties served by the district:
    1) Children ages 3-4 (pre-K and CACFP)
    2) Children ages 5-18 (K-12)
■ Active caseload as of end of July

■ Identifiers: Name, SSN, date of birth, head of household name, address, and FS/TANF case number

**Matching Algorithms**
■ Determined by each district
   ▪ Most matches are by name and DOB
   ▪ Use of SSN is limited because district records do not contain SSN for all students

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**Letter Method**

■ Mid-July
   ▪ SFSA mails letters to all households with FS/TANF children
   ▪ SFSA sends hard-copy printouts to all districts containing list of FS/TANF children in counties served by the district
■ Approximately 32,000 letters mailed

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# Kansas Case Study (continued)

## NSLP Verification

### Methods of Verifying Categorical Applications

1. Request documentation from household
2. Contact local FSP office
3. Contact State FSP office

### Direct Verification with FSP Data

■ No system for direct verification with FSP data

■ Respondents questioned usefulness, given high rate of direct certification and use of focused verification samples

■ Reluctant to provide SFAs with direct access to FS/TANF eligibility data; prefer centralized system

### Feasibility of Direct Verification with Medicaid Data

■ No current plans

■ Perceived as technically feasible, but legal issues must be resolved.

■ State has an integrated eligibility system for FSP, TANF, Medicaid, and SCHIP

■ Direct verification is likely to be effective only if SCHIP is included. Income eligibility limits are:
- Medicaid - 100% FPL
- SCHIP  - 200% FPL

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**Direct Verification Procedures**

■ Method #1 - SFA submits FSP/TANF case numbers to local FSP office using a standard form, or by telephone (large SFAs may use electronic methods).

■ Method #2 – SFA telephones the State FSP office and State does a look-up of case numbers

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## Other Computer Matching with K-12 Student Data

■ Medicaid Administrative Claiming (MAC)
- Medicaid agency contracts with MAXIMUS to administer the program; SEA has no involvement;
- County estimates of Medicaid-eligible children are used for reimbursement calculations.

## Agencies Interviewed

### State Agencies

■ Department of Education
  - Child Nutrition and Wellness Division
  - Planning and Research Division

■ Department of Social and Rehabilitative Services (SRS) – Food Stamp/TANF programs

■ Division of Health Policy and Finance, Department of Administration – Medicaid/SCHIP programs

### SFAs

■ Wichita Public Schools
  - Large SFA with 45,000 students
  - 46% Free/RP NLSP in SY2004-05
  - Approximately 1,500 direct certifications

■ Shawnee-Mission Public Schools
  - Large SFA with 29,000 students
  - 17% Free/RP NLSP in SY2004-05
  - Approximately 1,000 direct certifications

# Massachusetts Case Study

## NSLP Direct Certification

**Methods**
- State-level computer match by the Dept. of Education, Data Collection Division
- Letters sent to unmatched FSP/TANF children
- Two largest SFAs (Boston and Springfield) do their own match

**Coverage**
- All public SFAs

**History**
- 2002 – Pilot of computer match with FSP/TANF data in Boston and Springfield Public School Districts
  - Districts developed match
  - Project Bread initiated pilot
- 2003 – Expanded pilot to 12 additional districts
- 2004 – Implemented State-level match using SSIS

**Effectiveness**
- The State matches 80% of FS/TANF children, age 0-19, to students in public schools
- Data not available about direct certification as a percent of categorically approved

**Strengths**
- Multiple rounds of matching result in high match rate
- Match is supplemented by letter method

**Limitations**
- Match results were not available to SFAs until after school started; too late to be useful

**State-level Computer Match Procedures**

**Timing**
- August – SFSA provides FSP/TANF data to SEA
- August – SEA extracts SSIS data and does the match
- Mid-Sept – Match results posted on SEA web portal

**File Specifications**
- FSP/TANF data
  - Active caseload as of July
  - Children ages 0-19
  - Identifiers: Name, date of birth, city of residence
  - Approximately 120,000 records in 2005
- Student enrollment data from SSIS
  - Student information from March 2005
  - Identifiers: State student ID, name, date of birth, gender, city of residence, district ID, school code, last reported NSLP status
  - Approximately 975,000 records in 2005

**Matching Algorithms**
- 1. Exact match on Name and DOB
- 2. Exact match on Name and DOB (month and day switched)
- 3. Match on first initial of first name, exact match on last name, DOB, city of residence

**Matching Hardware/Software**
- Match is done on PC using FoxPro

**Files provided to SFAs (via SEA secure website)**
- Match results provided in MS-Excel format, with indicator of applicable match criteria

**Letter Method for Unmatched FSP/TANF Children**

- Mailing done by SFSA in September
- Letters mailed to children age 4-19
- 16,000 letters mailed in SY2004-05

# Massachusetts Case Study (continued)

## NSLP Verification

### Methods of Verifying Categorical Applications

1. Request documentation from household
2. Request documentation from local FSP office

### Direct Verification with FSP Data

■ No current plans

### Feasibility of Direct Verification with Medicaid Data

■ No current plans

■ Potential barriers:

- Establishing legality under HIPAA
- Collecting verification sample data from SFAs

■ Medicaid/SCHIP data are in same eligibility system; but separate from FSP/TANF

■ Direct verification can be effective even if limited to Medicaid. Income eligibility limits are:
- ▪ Medicaid - 150% FPL
- ▪ SCHIP – 200% FPL

## Other Computer Matching with K-12 Student Data

■ Medicaid School Health and Related Services – Not used

■ Medicaid Administrative Claiming
- 320 districts participated in 2005 (nearly the entire State)
- State Medicaid Agency provides eligibility records to school districts each quarter (Name, SSN, DOB, gender, recipient ID)
- Districts (or their vendors) do a quarterly computer match of Medicaid records with student records, and submit quarterly claims

## Agencies Interviewed

| State Agencies | SFAs |
|---|---|
| ■ Department of Education<br> - School Nutrition and Health<br> - Finance and Operations, Data Collection Processing and Reporting | ■ Boston Public Schools<br>  - Large SFA with about 58,000 students<br>  - 73% Free/RP NLSP in SY2004-05<br>  - Approximately __ direct certifications |
| ■ Dept. of Transitional Assistance (DTA) – Food Stamp/TANF programs | ■ Orange Public Schools<br>  - Small SFA with about 800 students<br>  - Almost 50% Free/RP NLSP in SY2004-05<br>  - Approximately __ direct certifications |
| ■ Dept. of Health and Human Services, Office of Medicaid (MassHealth) – Medicaid/SCHIP programs | |

# Oregon Case Study

## NSLP Direct Certification

**Methods**
■ State-level computer match by the Dept. of Education Office of Assessment and Information Services

■ SFAs can receive files of unmatched FSP/TANF children for manual look-up or computer match with district student data

**Coverage**
■ All public SFAs

**History**
■ 2001-2003– Pilot of computer match with FSP/TANF data in Portland Public School District

■ 2003 – Quarterly statewide computer match implemented

■ 2004—Sibling match added

■ 2005 – Monthly match implemented

**Effectiveness**
■ The State matches 65% of FS/TANF children, age <1-21, to students in public schools

■ 86% of public SFAs directly certify more children than they approve by categorical application (Source: VSR)

■ Statewide, 66% of categorically approved children in public schools are directly certified (Source: VSR)

**Strengths**
■ Combines SSN match of children with sibling match using parent name and address

■ Uses student identifier subsystem to minimize lag in enrollment data

■ Monthly matches allow direct certification throughout the year

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**State-level Computer Match Procedures**

**Timing – Monthly**
■ SFSA provides FSP/TANF data to SEA
■ SEA extracts SSIS data and does the match
■ Match results sent by secure e-mail to SFAs

**File Specifications**
■ FSP/TANF data
 - Active caseload as of end of month
 - Children ages <1-21
 - Identifiers: Name, SSN, date of birth, sex, head of household name, address
 - Approximately 93,000 records in 2005

■ Student enrollment data from SSIS
 - Student information from student identifier subsystem, updated at least 2 times/year and more often in large districts
 - Identifiers: Name, SSN, state student ID, date of birth, sex, ethnicity, grade, district, school
 - Approximately 552,000 records in October 2004

**Matching Algorithms**
■ Primary match: Exact match by SSN
■ Secondary match: Unmatched FSP/TANF children matched to head of household name and address of matched children

**Files provided to SFAs (via CN secure e-mail)**
4. Match results with SSN (and state student ID if matched by SSN)
5. Unmatched FSP/TANF children with address in district (upon request)

**Limitations**
■ Little time for SFAs to process direct certification before start of school; will be available sooner for SY2006-2007

■ Monthly matches do not separate new vs. previously matched records

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# Oregon Case Study (continued)

## NSLP Verification

**Methods of Verifying Categorical Applications**

1. Request documentation from household
2. Request documentation from local FSP office with household consent
3. Direct verification

**Direct Verification with FSP Data**

■ Implemented in SY2005-2006
■ Used by 10-15 SFAs
■ One in five applications matched
■ SFAs need more training to understand what the system can do to help

**Feasibility of Direct Verification with Medicaid Data**

■ Currently operational, but process not automated

■ Direct verification is likely to be effective only if SCHIP is included. Income eligibility limits are:
  ▪ Medicaid - 100% FPL
  ▪ SCHIP – 185% FPL

■ Shared data system for TANF, Medicaid and SCHIP; interface with FSP allows unduplicated list of children

**Direct Verification Process**

■ SFA creates list, in Word document, of applicants to be verified
■ SFA sends list to SFSA using secure e-mail
■ SFSA liaison contacts local FSP office to determine if applicants are approved for FSP, TANF, or Medicaid
■ Medicaid information indicates if eligible for free or reduced-price
■ SFSA returns list with verification results to SFA by secure e-mail

*Advantages*
■ Simple and inexpensive to implement

*Disadvantages*
■ Takes several days to get response, so SFA has less time to get verification from household if needed

## Other Computer Matching with K-12 Student Data

■ Medicaid School Health and Related Services – Not used
■ Medicaid Administrative Claiming – Not used

## Agencies Interviewed

**State Agencies**

■ Department of Education
  - Child Nutrition and Food Distribution
  - Office of Assessment and Information Services

■ Department of Human Services, Div. of Children, Adults, and Families
  - Office of Self Sufficiency Programs (FSP)
  - Medicaid Policy Unit

**SFAs**

■ Beaverton School District
  - Large SFA with 36,000 students
  - 29% Free/RP NLSP in SY2004-05
  - Approximately 3,100 direct certifications

■ McMinnville School District
  - Mid-size SFA with 6,000 students
  - 44% Free/RP NLSP in SY2004-05
  - Approximately 850 direct certifications

# Texas Case Study

## NSLP Direct Certification

**Methods**
■ State-level computer match by the Dept. of Education Information Services Division

**Coverage**
■ All public SFAs

**History**
■ 1992 – Implemented State-level computer match based on SSN

■ 1990s – Electronic distribution, web access to results introduced

■ 2005 – TANF match added, match moved to server environment

**Effectiveness**
■ The State matches 57% of FS/TANF children, age <1-21, to students in public schools

■ Statewide, 41% of categorically approved children are directly certified (Source: VSR)

■ 60% of public SFAs directly certify more children than they approve by categorical application (Source: VSR)

**Strengths**
■ Match uses both SSN and Name+DOB

■ Distribution of match results through CN website

**Limitations**
■ Student data are 9 months old

■ Exact match is required, with no tolerance for data errors

■ Match results are not easily imported into district databases because they don't have the district student ID

■ No direct certification method for unmatched FSP/TANF children

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**State-level Computer Match Procedures**

**Timing**
■ June – SFSA provides FSP/TANF data to SEA
■ June/July – SEA extracts SSIS data and does the match
■ Mid-July – Match results posted on CN secure website

**File Specifications**
■ FSP/TANF data
   - Active caseload as of May
   - Children ages <1-21
   - Identifiers: Name, SSN, date of birth, ethnicity, sex, address, client number, TANF case number, FSP case number, head of household name
   - Approximately 1.3 million records in 2005
■ Student enrollment data from SSIS
   - Student information from prior October
   - SSIS has unique student ID, but not used for direct certification
   - Identifiers: Name, SSN, date of birth, sex, grade, street address, city, zip
   - Approximately 4.4 million records in 2005

**Matching Algorithms**
■ Primary match: Exact match by SSN
■ Secondary match: Exact match by name and DOB

**Files provided to SFAs (via CN secure website)**
6.  Match results

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# Texas Case Study (continued)

## NSLP Verification

### Methods of Verifying Categorical Applications

1. Request documentation from household
2. Request documentation from local FSP office with household release

### Direct Verification of Categorical Applications

■ Initial discussions among CN agency, SEA, and FSP agency have occurred - possible State-level match of LEA verification samples to FSP/TANF data

### Feasibility of Direct Verification with Medicaid Data

■ Direct verification is likely to be effective only if SCHIP is included. Income eligibility limits are:
  - Medicaid - 100% FPL
  - SCHIP – 200% FPL

■ Limitations of using SCHIP data:
  - Eligibility system is not integrated with Medicaid and is operated by a contractor
  - SSN disclosure is not mandatory; data missing for 30% of children

## Other Computer Matching with K-12 Student Data

### Medicaid Administrative Claiming (MAC)

■ HHSC provides file of all children ages 3 to 21 enrolled in Medicaid during school year (August to May)
■ SEA matches to current student data by SSN or name and DOB; names are truncated
■ 30 percent of students are matched to Medicaid data
■ SEA computes percentage of students enrolled in Medicaid for each district and sends percentages to all public LEAs and to HHSC
■ 700 LEAs submit claims for reimbursement of Medicaid administrative costs

### Medicaid School Health and Related Services

■ LEA or its vendor sends a file of student records to HHSC monthly via secure website
■ HHSC matches student file to current Medicaid database by SSN
■ HHSC returns student file with Medicaid eligibility indicator to LEA or its vendor via secure website
■ LEA can also check individual student eligibility via automated telephone system
■ 1,000 LEAs submit claims for reimbursement of costs for school health and related services

## Agencies Interviewed

### State Agencies

■ Department of Agriculture, Food and Nutrition Division

■ Department of Education, Information Systems Division

■ Health and Human Services Commission– Information Technology, Policy Analysis & Program Coordination, Special Nutrition Programs, Medicaid/CHIP

### SFAs

■ Hurst-Euless-Bedford ISD
  - Large SFA with 19,000 students
  - 37% Free/RP NLSP in SY2004-05
  - Approximately 850 direct certifications

■ Victoria ISD
  - Large SFA with 14,000 students
  - 56% Free/RP NLSP in SY2004-05
  - Approximately 2,000 direct certifications

# Wisconsin Case Study

## NSLP Direct Certification

**Methods**
■ State-level computer match by the State Food Stamp Agency (SFSA)

**Coverage**
■ All public and private SFAs may participate; participation is voluntary

**History**
■ 1992 – Implemented State-level computer match

■ 2005 – Automated the system; SFAs may match data multiple times during the year

■ 2005 – Implemented SSIS (not used for direct certification)

**Effectiveness**
■ Information is not available on percent of FS/TANF children matched to student records

■ Statewide, 51% of categorically approved children in public schools are directly certified

**Strengths**
■ System is completely automated; no action required at the State level

■ SFAs may obtain matches when they wish and as often as they wish

■ Private SFAs may participate

**Limitations**
■ Estimates suggest that only about 20% of all SFAs, and 34% of public SFAs, use the system

■ Exact match is required, with no tolerance for data errors

■ SFAs need technical expertise to set up data exchange and process match results

■ There is no direct certification method for unmatched FS/TANF children

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**State-level Computer Match Procedures**

**Process**
■ SFAs initiate the match by uploading student records via secure FTP
■ District data are matched against a statewide file of FS/TANF children; FS/TANF file is updated monthly
■ Match results are available in 24 hours for download via FTP

**Timing**
■ Peak times for system use are the last 3 weeks in June, and mid-August through late September

**File Specifications**
■ FSP/TANF data
  - Active caseload, updated monthly
  - Identifiers: Name, SSN, date of birth,
  - Approximately 114,000 school-age children in 2005

■ Student enrollment data
  - Districts use current student records
  - Unique students ID is SSN if available
  - Data fields: Name, SSN, date of birth, district code, filler (for SFA use)

**Matching Algorithms**
■ Exact match by name and DOB

**Files provided to SFAs (via SEA secure website)**
7. Match results: SFA data file is updated to include an eligibility indicator

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# Wisconsin Case Study (continued)

## NSLP Verification

### Methods of Verifying Categorical Applications

1. Request documentation from household
2. Direct verification

### Direct Verification with FSP Data

- Implemented in SY2005-06
- Same system as direct certification
- SFAs can submit their entire verification sample: categorical and income applications

### Feasibility of Direct Verification with Medicaid Data

- State Medicaid Agency concerned about lack of SSNs in SSIS, and potential for error with name/DOB match

- HIPAA not considered a barrier; State does not consider eligibility information to be Personal Health Information (PHI)

- Medicaid income eligibility limit for children is 200% FPL (State does not have a separate SCHIP program)

### Direct Verification Procedure

- Same as direct certification

- SFAs initiate the match by uploading student records via secure FTP

- District data are matched against a statewide file of FS/TANF children; FS/TANF file is updated monthly

- Match results are available in 24 hours for download via FTP

- Match is by Name and DOB; match does not use FS/TANF case numbers

## Other Computer Matching with K-12 Student Data

- Medicaid School Health and Related Services – Not used
- Medicaid Administrative Claiming – Not used

## Agencies Interviewed

### State Agencies

- Department of Public Instruction
  - School Nutrition Team
  - Information Technology Team

- Department of Workforce Development (DWD), Bureau of Workforce Programs, Automated Operations Section – Food Stamp/TANF programs

- Department of Health and Family Services (DHFS) – Medicaid/SCHIP programs

### SFAs

- Milwaukee Public Schools
  - Large SFA with 97,000 students
  - 74 % Free/RP NLSP in SY2004-05
  - Approximately 24,000 direct certifications

- Tomah Area School District
  - Mid-size SFA with about 3,000 students
  - 30% Free/RP NLSP in SY2004-05
  - Approximately 180 direct certifications