NSLP/SNAP: Questions and Answers on the Computation of the Direct Certification Performance Rate with SNAP

The new formula, the data elements, and the reporting of these data elements on the revised FNS-742 and on the new FNS-834

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v.2

Assessing the performance of States to directly certify children for free school meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) who live in households receiving assistance under the Supplemental Nutrition Assistance Program (SNAP).

Contents

I. New Formula to Compute Direct Certification Performance Rates

The same three data elements have been utilized since school year (SY) 2008-2009 to assess the effectiveness of State and local efforts to directly certify children for free school meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP), if they live in households receiving assistance under the Supplemental Nutrition Assistance Program (SNAP). Beginning with SY 2013-2014, however, the three data elements will be collected and reported in a different way and will be used to compute direct certification performance rates using the following new formula:

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

These changes are meant to increase the accuracy of the direct certification performance rates and to give States the tools to monitor their own performance.

II. Data Element Reporting Requirements

	Data Element	Who Reports	How Report	Reporting Requirements
#1	# SNAP children directly certified for free school meals	SFA	FNS-742	SFA to NSLP SA - Feb 1 NSLP SA to FNS - Mar 15
#2	# School-aged SNAP children in the state in July, Aug, and Sept	SNAP SA	FNS-834	SNAP SA to FNS - Dec 1 SNAP SA to NSLP SA - Dec 1
#3	# SNAP children in non-base year special provision schools	NSLP SA	FNS-834	NSLP SA to FNSHQ - Dec 1

SFA = School Food Authority, SA = State agency

III. Data Element #1 – SNAP Children Directly Certified for Free School Meals

This data element will come from the revised FNS-742, the *School Food Authority (SFA) Verification Collection Report*, where, on Line 3-2, the SFAs will report the count of the number of children eligible for free school meals who were, as of the last operating day in October, directly certified using SNAP data.

[**NOTE:** The former version of the FNS-742, the *Verification Summary Report* (note the name change), collected this information on line 4-1, but line 4-1 also included other certifications—those based on categorical eligibility, such as direct certifications with other programs and the certifications via the "letter method"—and this resulted in an overstatement of the number of children directly certified with SNAP. The revised FNS-742, on the other hand, separates out this SNAP data element to give a more accurate computation of direct certification performance rates **with SNAP**.]

1. QUESTION: *Who is responsible for collecting Data Element #1, and how is it reported?*

ANSWER: It is the National School Lunch Program School Food Authorities that are responsible for collecting and reporting the number of students in their schools who, **by the last operating day in October**, were directly certified for free school meals based on receipt of SNAP assistance. The SFAs complete their verification activities no later than November 15th (or up to December 15th if the State has granted an extension due to natural disaster, civil disorder, strike or other circumstances that prevent the SFA from timely completion of verification activities). Then, by February 1st, they report to the NSLP State Agency (or to the Regional Office in the case of SFAs where the NSLP and SBP are administered by the Regional Office) the count of SNAP direct certifications on line 3-2 of the form FNS-742, the *School Food Authority (SFA) Verification Collection Report*. [NOTE: some SAs have an earlier due date and some have a State version of this form, so the equivalent line number may be different for the SFAs in some States]. The NSLP State agency submits the FNS-742 data from each of its SFAs to FNS no later than March 15th.

2. QUESTION: *What counts are included on line 3-2 of the FNS-742?*

ANSWER: The count for line 3-2 of the FNS-742 is the sum of the counts of all <u>direct certifications based on SNAP</u>. This would include:

- All SNAP direct certifications based on matching children from the SNAP database with children from the student enrollment database (including any "adjudicated" matches—those matches made after determining that non-matches or partial-matches from the unmatched list actually represent solid matches, often done by hand by looking at other available data elements outside of the primary match criteria, such as address information or names of other family members).

- All SNAP direct certifications that are based on SNAP-combo matches—that is, based on the matching of children who appear on the SNAP database who are also eligible for direct certification with some other categorically eligible program (such as on SNAP <u>and</u> on the Temporary Assistance for Needy Families Program (TANF)). If, for example, a child is matched with both SNAP and TANF, the SNAP designation takes precedence, so call it a SNAP direct certification (SNAP-DC). [NOTE: See 7 CFR 245.6(b)(2) for the list of the other programs for which a child may be directly certified for free school meals.]

- All SNAP direct certifications based on eligibility extended to other children of the household in which a SNAP directly-certified child resides. [NOTE: See 7 CFR 245.6(b)(7) for the list of the programs for which eligibility must be extended to other household members. Also see FNS policy memorandum SP 25-2010, *Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household found at http://www.fns.usda.gov/cnd/governance/Policy-Memos/2010/SP_25_CACFP_11_SFSP_10-2010_os.pdf* .]

- All SNAP direct certifications that are based on finding the child in the SNAP database—<u>even if the child was originally certified in some other way</u>, such as with an application or through some other eligible program—so long as the conversion to "SNAP directly certified" occurs before the last operating day in October.

3. QUESTION: *What counts are **not** to be included on line 3-2 of the FNS-742?*

ANSWER: Since it is <u>only</u> the sum of the counts of all SNAP direct certifications that is to be included on line 3-2 of the FNS-742, NSLP State agencies and SFAs must ensure that the following are **not** included on line 3-2, since these are **not** considered to be SNAP direct certifications:

- Certifications based on the use of the SNAP "letter method." "Letter method" refers to the procedure whereby the SNAP State agency sends the household a letter indicating SNAP eligibility and directs the household to bring the letter to the school so the children in the household can receive free meals. With the implementation of the Healthy, Hunger-Free Kids Act of 2010, such certifications with SNAP are no longer to be considered as direct certifications since they require some action by the household. [SNAP "letter method" certifications should be reported instead on line 3-4.]

- Certifications based on a SNAP case number entered on an application. This is not direct certification. [SNAP case number certifications should be reported instead on line 4-1.]

- Certifications based on participation in any of the other allowable programs that confer categorical eligibility—these are also <u>not</u> to be included on line 3-2 unless the child was also matched with SNAP or was extended eligibility because of another household member's receipt of SNAP benefits. [Certifications based on participation in any of the other allowable programs other than SNAP that confer categorical eligibility should be reported instead on line 3-3.]

4. QUESTION: *How does the SFA know whether or not a certification was a SNAP direct certification when it comes time to complete the FNS-742?*

ANSWER: It is vitally important that the School Food Authority (SFA) retain information as to the basis and the timing of when each certification is made. For instance:

- If the SNAP-to-Student-Enrollment match is made at the State level, some sort of coding for the SNAP match would need to accompany the match information sent to the local level so that the local level would know the basis by which a direct certification for free school meals could be made. Additionally, the local system would need to be able to retain this coding designation (SNAP direct certification through SNAP matching in this case) and be able to record and retain the timing of when the certification was made. This is important because the SFA needs to be able to query for and to retrieve all records with a **<u>SNAP direct certification designation</u>** where the certification was made **<u>by the last operating day in October</u>** in order to include those certifications in the count for line 3-2 of the FNS-742.

- If a SNAP-to-Student-Enrollment match is conducted at the local level, either through local level matching, "adjudication" of the unmatched list from the State, or from a "lookup" match, the SFA would need to designate the match as a **<u>SNAP direct certification</u>** and to retain the date of such certification to ensure that only those that were made by the last operating day in October would be included on line 3-2 of the FNS-742.

- For SNAP direct certifications based on a SNAP-combo match—that is, a SNAP-to-"Student Enrollment" match as well as a "Some Other Program"-to-"Student enrollment" match—then the SFA would need to be able to code and access the record as a **<u>SNAP direct certification</u>** match and to later retrieve this certification as a SNAP direct certification (if the certification occurs before the last operating day in October) when it comes time to complete line 3-2 of the FNS-742. [NOTE: If a State/SFA prefers to give it a SNAP-combo designation (like SNAP-TANF) instead of just SNAP-DC, ensure that the system can retrieve the SNAP-combo designations along with the SNAP-DC designations so that the pool for the counts for line 3-2 of the FNS-742 will include these SNAP-combo counts as well.]

- For SNAP direct certifications based on extended eligibility that occurred by the last operating day in October, the SFA would need to be able to retrieve these counts and include them in the total count for line 3-2 of the FNS-742.

- For SNAP direct certifications based on converting a child to SNAP direct certification by the last operating day in October, the SFA would need to be able to retrieve these counts and include them in the total count for line 3-2 of the FNS-742.

- Additionally, the SFA would need to be able to compute the total count of children directly certified with SNAP (summing up the SNAP direct certifications such as those listed above) and to report this total in line 3-2 of the FNS-742.

5. QUESTION: *If the State has not sufficiently prepared for separate reporting of the SNAP-only counts on line 3-2 of the FNS-742, what should it do?*

ANSWER: The expectation is that the direct certification data reported on line 3-2 of the FNS-742 for each school year—including this first school year, SY 2013-2014—will be SNAP-DCs, not other certifications. Certifications that are not SNAP direct certifications should not be included on this line. The NSLP State agency should take whatever steps necessary to ensure that this is the case. States/LEAs should follow through with conducting direct certification without delay at the beginning of the school year to ensure that all eligible children receive free meals as early in the school year as possible regardless of any potential issues in separating the SNAP data when reporting on the FNS-742.

If any NSLP State agency anticipates difficulty complying with the requirement to report SNAP-DCs separately from other certifications—perhaps because of data programming timing issues or because it needs more cooperation with its SNAP State agency partners—it should ask for FNS assistance. If the problem is with data programming timing issues, the State may be able to come up with a way to determine the number of SNAP-DCs in retrospect (i.e. when the State does not have systems in place at the beginning of the school year to code and retain SNAP-DC designations but later is able to do a "look-back" once the necessary system changes are in place) so long as the NSLP State agency is able to identify SNAP-DCs that were made as of the last operating day in October.

If, by February 1, 2014, when it is time for the NSLP State agency to submit the FNS-742 to FNS for this first school year, the NSLP State agency is not able to affirm that the data on line 3-2 is indeed SNAP-DC data only, the NSLP State agency will need to inform FNS that this is the case, noting that it is a source of inaccuracy in the data. Such sources of inaccuracy will be noted in the Direct Certification Report to Congress and other appropriate follow-up actions may be initiated.

IV. Data Element #2 – School-aged Children in SNAP Households during the Months of July, August, and September

This data element will come from the new FNS-834, the *State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report*, and will be the unduplicated count of the number of children ages 5 to 17 years at any time during the months of July, August, or September of the given school year who were receiving assistance under SNAP at any time during the months of July, August, or September of the same school year.

1. **QUESTION:** *Who is responsible for computing Data Element #2 and for reporting it on the FNS-834?*

   ANSWER: The SNAP State agency is responsible for computing Data Element #2 and reporting it on the FNS-834. The SNAP State agency is also responsible for submitting the completed FNS-834 both to FNS and to the NSLP State agency (or NSLP State agencies, if there is more than one NSLP State agency in the State) by December 1st each school year.

2. **QUESTION:** *How is the SNAP State agency to compute Data Element #2?*

   ANSWER: To get Data Element #2, the SNAP State agency is to:

   - **QUERY THE DATABASE** - Query the SNAP database to identify those children in households receiving SNAP benefits (not including households receiving zero benefits) at any time during the target months of July, August, and September who are aged 5 through 17 years at any time during these months and to sum up the number of such children in the State.

     To ensure that the SNAP State agencies use the proper birth date range for the query, guidance is provided in the following chart:

Example 1: Determining the proper "birth date range" for the SNAP Data Element #2 query of the SNAP database, by school year.

School Year (SY)	First Part of SY (FP*) (from which to subtract the 18 or the 5)	Beginning birth date July 1 of (FP minus 18)	Ending birth date Sept. 30th of (FP minus 5)	Birth date range for the query
Any SY	"FP"	July 1, (FP - 18)	Sept. 30, (FP - 5)	Children born July 1, (FP - 18) through Sept. 30, (FP - 5)
(Example 1) SY 2013-2014	2013	July 1, 1995 (since 2013 - 18 =1995)	Sept. 30, 2008 (since 2013 - 5 = 2008)	July 1, 1995 through Sept. 30, 2008
(Example 2) SY 2014-2015	2014	July 1, 1996 (since 2014 - 18 =1996)	Sept. 30, 2009 (since 2014 - 5 = 2009)	July 1, 1996 through Sept. 30, 2009
(Example 3) SY 2020-2021	2020	July 1, 2002 (since 2020 - 18 =2002)	Sept. 30, 2015 (since 2020 - 5 = 2015)	July 1, 2002 through Sept. 30, 2015

*FP = Calendar year when the school year begins

- **ENSURE UNDUPLICATED COUNTS** - Ensure that the count is an **unduplicated count of these children**. A child in a household that received SNAP benefits at any time during the target three months of July, August, or September must be counted only once. If the query of the database using the "birth date range" (see above) shows, for example, that children who receive SNAP benefits in each of the three months are listed more than one time, then the SNAP State agency will need to deduplicate the file when the query is run. [NOTE: Deduplication is usually accomplished via a data fusion process whereby records that have been classified as matches within a single database are merged. In this way, if a person is listed in a database more than one time, he/she is counted only once.]

- **RECORD THE COUNT** - Record in the appropriate box on the FNS-834 the count of the number of children whose birth dates fall in the "birth date range" who lived in households receiving benefits at any time during July, August, or September, after making sure that it is an unduplicated count. It is only the count of these children that must be reported on the FNS-834, although the SNAP State agency is to retain for review the documentation that supports this count.

3. QUESTION: *If the query is supposed to be selecting for children ages 5 through 17, why does the formula to calculate the beginning birth date range say "the first part of the school year (FP) minus 18," why not minus 17?*

ANSWER: A child is "17 years old" all the way up until his/her 18th birthday. Having the query set to "FP minus 18" keeps children who are still 17 in the count.

4. QUESTION: *If a child turns 18 years of age on July 1st or July 2nd, should the child still be in the select query?*

ANSWER: Yes. Any child born within the dates of the "birth date range" for the given school year should be included in the query, even if they are in the age range for only a day or two.

5. QUESTION: *Since Data Element #2 is based on the 5-17 age range, shouldn't the SNAP-to-Student-Enrollment match criteria for Data Element #1 also be using the 5-17 age range?*

ANSWER: No. The query that is run for Data Element #2 is based on the 5-17 age range because this data element provides FNS with the "universe" of school-aged children to which the State's direct certification count is to be compared (the denominator of the new formula to compute direct certification performance rates). The Data Element #2 age range is narrower than the age range with which the SNAP-to-Student-Enrollment match is conducted to get Data Elements #1 or #3. In fact, when performing the match for Data Elements #1 and #3, the State is <u>required</u> to run the match across a wide enough age range that would be able to include all its students enrolled in schools through high school, and so the NSLP State agency has latitude for setting the age range to whatever makes sense for the State. [NOTE: some States choose 3-21, 4-18, 0-22, but it is up to the NSLP State agency to ensure that the age range for Data Elements #1 and #3 will include all of its students.] The age range for the Data Element #2 query, however, **must** be set as defined in the chart (in Example 1, above) to yield the "universe" that will be used in the rate calculation to reflect the number of children who could be directly certified with SNAP in the State.

V. Data Element #3 – SNAP Children in Special Provision Schools Operating in a Non-Base Year

This data element is a more accurate way to estimate the number of children from households receiving SNAP benefits that attend schools operating in a non-base year under the special assistance provisions of section 11(a)(1) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1759a(a)(1)) and 7 CFR 245.9. The final rule, *National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, requires that a special match be run between SNAP records and student enrollment records from such schools and would allow the NSLP State agency to count all such "Special Provision Matches" (in addition to the counts of **actual** SNAP direct certifications from all other schools that are included in Data Element #1) when determining State direct certification rates. The count from the "Special Provision Match" is reported by the NSLP State agency on the new form FNS-834 as Data Element #3.

1. **QUESTION:** *Why do we need Data Element #3?*

   ANSWER: Special provision schools operating in a <u>base</u> year take applications and conduct direct certification just as other schools do, so the counts of children directly certified with SNAP during base years would routinely come in through Data Element #1 counts, and no special adjustment would need to be made. When a special provision school is operating in a <u>non-base</u> year, however, applications are <u>not</u> taken and direct certification is <u>not</u> conducted, so although children living in households receiving SNAP benefits would show up in the "universe" of those school-aged children who should be directly certified for free school meals (Data Element #2), these children would NOT show up in the counts for Data Element #1 during a non-base year. If no adjustment is made, the direct certification performance rates for States with special provision schools operating in a non-base year would be understated, and this understatement would be increasingly more significant as the number of these children increases. To more accurately account for these children, the "Special Provision Match" is offered to provide a count for Data Element #3 that can be added in the numerator with Data Element #1 before comparing to Data Element #2 in the denominator, thus giving a truer picture of a State's direct certification performance rate with SNAP. (Please see additional discussion, beginning with "QUESTION 10" of this section, about the special provision schools operating under Community Eligibility, which do not technically use the terms "base year" and "non-base" years.)

2. **QUESTION:** *Is the "Special Provision Match" something new? What was used in the past for Data Element #3?*

   ANSWER: Yes, the "Special Provision Match" is something new. In the past, FNS estimated a value for Data Element #3 and subtracted it, in the denominator, from the "universe" of those school-aged children living in households receiving SNAP benefits. This value for

Data Element #3 was an estimate based on the number of free students reported in special provision schools on the FNS-742, adjusted to estimate the SNAP portion using general adjustment factors. The estimate had limitations, particularly where the number of SNAP-participant children had changed significantly since a school's most-recent base year. [NOTE: See the sections entitled *"Estimate of SNAP Participants in Provision 2 and 3 Schools"* in *"Appendix C - Estimation of Component Statistics"* in the Reports to Congress for 2009 through 2012 for more information on the estimations, and *"Appendix D - Data Limitations"* of these same Reports for descriptions of these limitations.]

The new "Special Provision Match" gives maximum credit to the States for these students, and encourages States to develop matching systems that can account for these students during base years and non-base years, especially as States add Provision/Community Eligibility schools.

3. QUESTION: *What is the "Special Provision Match," and with which schools must it be conducted?*

ANSWER: The "Special Provision Match" is a match run between the SNAP database and school enrollment database(s) from special provision schools operating in a <u>non-base</u> year for the given school year. This includes Provision 1 schools, Provision 2 schools, Provision 3 schools, and schools utilizing the Community Eligibility provision, as well as any other schools that may operate under the special provisions outlined in the legislation and regulations cited in the first paragraph of Section V, above. (Please see additional discussion, beginning with "QUESTION 10" of this section, about the special provision schools operating under Community Eligibility, which do not technically use the terms "base year" and "non-base" years, and which have certain accommodations available to them regarding the "Special Provision Match.")

4. QUESTION: *Since special provision schools are not required to conduct direct certification when the schools are operating in a non-base year, how is <u>performing a match</u> for these schools different from <u>conducting direct certification</u>?*

ANSWER: Although direct certification involves matching, it goes beyond matching. For instance, to directly certify a student for free school meals based on SNAP, action needs to be taken after the match has been found. For example, if a match is made at the State level but it is never sent down to the local level or if the local level never processes it or enters it into its Point of Service (POS) system, then the child may have been matched, but he or she is not actually directly certified for free meals. The "Special Provision Match" does not require any of the processing or entry into POS system that comes with direct certification; the match is just performed and the number of matches counted. States are allowed to count in Data Element #3 all matches they find in the "Special Provision Match."

5. QUESTION: *When you say the State is allowed to count all matches found in the 'Special Provision Match,'" what does this mean?*

ANSWER: If there is a match between the SNAP database and the student enrollment database for special provision schools operating in a <u>non-base</u> year—and this "match" is the result of an exact match, an acceptable probabilistic match, or an adjudicated match that meets the State's criteria (or LEA's criteria, if the match is at the local level) for a match that limits/excludes false positives—then the match can be included in the count for Data Element #3. This is in contrast to the counts for Data Element #1, where only those students who are <u>directly certified</u> with SNAP for free school meals may be counted (i.e., for Data Element #1, it is <u>not</u> the "matches" that are counted, it is the <u>direct certifications</u> that are counted). Allowing all "matches" to be counted for Data Element #3 gives the State an advantage, since ordinarily, even in base years, not all "matches" end up as direct certifications.

6. QUESTION: *Must the match between SNAP data and student enrollment data for this "Special Provision Match" be run at the State level? Must it be run at the district (or local) level?*

ANSWER: There is no prescribed methodology for performing this "Special Provision Match." It is the NSLP State agency's responsibility to ensure that the match is conducted, yet that does not mean that it is the NSLP State agency <u>itself</u> that must conduct the match, <u>nor</u> does it mean that the SFA/LEA must conduct the match. Additionally, even though the State may have one methodology for conducting the matching for the regular SNAP direct certification process, it does not mean that the NSLP State agency must utilize the same methodology for the "Special Provision Match"—the NSLP State agency may decide to use a different approach or a combination of approaches.

For some State-level matching States, it may be that the NSLP State agency is already running the matches for <u>all</u> the schools in the State—just not sending the match results down to the local level for those special provision schools operating in a non-base year, since in a non-base year no direct certification efforts are required for these schools. Getting the count for Data Element #3 for these States would mean just totaling the number of such matches and reporting the count on the FNS-834 after making sure that students are not counted more than once.

There may be some other States where the NSLP State agency uses State-level matching for its regular direct certification process, but some of their special provision schools may not be represented in its statewide student enrollment database—so, the regular match might not be sufficient. In this case, the NSLP State agency may decide to use a combination approach— using the established statewide system and supplementing it by uploading enrollment data

directly from such schools and running the match or using the statewide system for some of the schools and a local-level match for others.

Still other States may use local-level matching for the regular direct certification process, but decide for the "Special Provision Match" to run a combination of local-level matching for some of its special provision schools and a State-level match for the rest of its special provision schools operating in a non-base year.

FNS encourages the NSLP State agency to determine what methodology makes the most sense for its State from a business-practice standpoint—making sure that the count includes only those cases where an acceptable match was found between the SNAP database and student enrollment records from children attending special provision schools operating in a non-base year and making sure that the count of such children is not repeated in Data Element #3 and is not already represented in Data Element #1.

7. QUESTION: *If the NSLP State agency is unable to ensure a "Special Provision Match" for every special provision school in the State that is operating in a **non-base** year, what will the impact be on the direct certification rate?*

ANSWER: First, it is important to realize that providing an accurate count from each non-base-year special provision school in the State benefits the State. If a particular non-base-year special provision school's match count is <u>not</u> included in the total number that the NSLP State agency reports on the FNS-834, then the State's direct certification rate will be lower than it otherwise would be. The larger the population of children living in households receiving SNAP benefits attending non-base-year special provision schools that are not represented in the "Special Provision Match," the greater the negative impact on the direct certification rate for the State. [See QUESTION 13 for the expectations for SY 2013-2014.]

8. QUESTION: *What about special provision schools operating in a **base** year? Is the "Special Provision Match" to be conducted with these schools as well?*

ANSWER: No, it is not. Remember, special provision schools operating in a **base** year are already processing applications and conducting direct certification with SNAP to establish the percentages that will be used for reimbursement in future, non-base years. The counts for these schools during the base year would naturally be included with the counts the School Food Authorities (SFAs) are reporting on line 3-2B of the Form FNS-742 – *School Food Authority (SFA) Verification Collection Report,* which will roll up into Data Element #1 in the above formula. As such, the counts from schools operating in a **base** year **must not** be included on the FNS-834 Data Element #3, since the count from Data Element #3 (the "Special Provision Match" count from the FNS-834) will be added to the count from Data Element #1 (the SNAP direct certification count rolled up from the SFAs on the FNS-742) in the formula to compute direct certification performance rates, and the same child must not be

represented in both data elements. [NOTE: Please see, in the questions and answers below, additional discussion about the special provision schools operating under Community Eligibility, which do not technically use the terms "base year" and "non-base" years and which have certain accommodations available to them regarding the "Special Provision Match."]

9. **QUESTION:** *When must the "Special Provision Match" be run each year?*

    ANSWER: In those States with special provision schools, the "Special Provision Match" must be run in or close to October each year, but no later than the last operating day in October. (However, for those special provision schools operating under Community Eligibility, the NSLP State agency may choose instead to use counts from the identified students matched with SNAP conducted by April 1—see more about the Data Element #3 options allowed for special provision schools operating under Community Eligibility in the questions below.)

10. **QUESTION:** *Special provision schools operating under Community Eligibility do not have base years and non-base years. How does this affect Data Element #3?*

    ANSWER: Special provision schools operating under Community Eligibility may run a match by April 1 each year to establish claiming percentages for Community Eligibility. Even if the match is run by April 1, a school may elect not to reestablish claiming percentages in a given year. This affects Data Element #3 if the school/NSLP State agency elects to use this data in lieu of the "Special Provision Match." (See the following question that also addresses this topic.)

11. **QUESTION:** *What are the data options for special provision schools operating under Community Eligibility with regard to Data Element #3?*

    ANSWER: Comments received on the proposed rule, "*National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010,*" recommended that FNS allow special provision schools operating under Community Eligibility to use the results of the match with SNAP that must be completed by April 1 for adjusting claiming percentages, in lieu of running a match again for Data Element #3 in or near October. In the final rule, FNS allows States that have special provision schools operating under Community Eligibility to establish the Data Element #3 count for these schools in one of three ways:

    1. **Performing the "Special Provision Match" in or near October (as for the other special provision schools operating in a non-base year)** [For example, if the current school year is SY 2015-2016, then the count for Data Element #3 would come from the "Special Provision Match" conducted in or near October 2015, but no later than the last operating day in October 2015]; **or**

2. **Using the count of identified students <u>matched with SNAP</u> used in determining the Community Eligibility claiming percentage for that school year** [For example, if the current school year is SY 2015-2016, and the first year of the 4-year cycle was SY 2012-2013, then the count used in lieu of the "Special Provision Match" for Data Element #3 for SY 2015-2016 would be the count of identified students <u>matched with SNAP</u> by April 1, 2012]; **<u>or</u>**

3. **Using the count from the identified students <u>matched with SNAP</u> conducted by April 1 of the same calendar year the FNS-834 is due, whether or not it was used in the claiming percentages** [For example, if the current school year is SY 2015-2016, the FNS-834 would be due by December 1, 2015, and the count used in lieu of the "Special Provision Match" for Data Element #3 for SY 2015-2016, would be the count of identified students <u>matched with SNAP</u> by April 1, 2015, whether or not the school elected to update its claiming percentages that year].

The NSLP State agency does not need to use the same option for every one of its Community Eligibility schools—it can use one option for some schools and another option (or options) for the other Community Eligibility schools each year. In any case, it is important that the count used represents students in Community Eligibility schools matched against <u>SNAP records</u>, without the inclusion of any letter method or non-SNAP matches. In other words, if either of the latter two options is selected, the NSLP State agency must ensure that the count includes only the <u>SNAP matches</u> from the matching efforts performed by April 1. The NSLP State agency also must ensure that students are not double counted.

12. **QUESTION:** *When do the requirements to conduct the "Special Provision Match" and to report the count for Data Element #3 on the new form FNS-834 go into effect?*

    ANSWER: The requirement for conducting the "Special Provision Match" and reporting Data Element #3 on the FNS-834 goes into effect for SY 2013-2014, and the first FNS-834 must be submitted by December 1, 2013.

13. **QUESTION:** *What are the expectations for SY 2013-2014 for the utilization of the "Special Provision Match" to provide Data Element #3 for the FNS-834?*

    ANSWER: The expectation for SY 2013-2014 is that States will perform the "Special Provision Match" to the extent possible, even in this first year of using the FNS-834, as this match will provide the most accurate estimate of the number of children in special provision schools operating in a base year. For those States with special provision schools that cannot properly compute Data Element #3 for this first school year, the NSLP State agency may use the alternative phase-in procedures (discussed in the questions below) for the "Special Provision Match" for the schools for which matching cannot yet be performed.

14. QUESTION: *For those States <u>not</u> geared up to run the "Special Provision Match," what is the school year where alternative phase-in procedures will be allowed?*

> **ANSWER:** The preamble to the final rule, *National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010*, states that there will be alternative phase-in procedures for SY 2012-2013 for those States that are not geared up to run the "Special Provision Match," the first year of the FNS-834. However, the final rule was not published until February 22, 2013, and the FNS-834 was not approved until April 30, 2013, so the form was not even in effect for SY 2012-2013. As such, alternative phase-in procedures will be allowed for **<u>SY 2013-2014</u>**—the first year of the form FNS-834—instead of SY 2012-2013.

15. QUESTION: *What <u>are</u> the alternative phase-in procedures for the "Special Provision Match" for Data Element #3 for the FNS-834 for SY 2013-2014?*

> **ANSWER**: For any special provision school operating in a non-base year for which the NSLP State agency cannot ensure that a "Special Provision Match" can be performed, the NSLP State agency, for SY 2013-2014 only, may use the following "Base Year Percentage Option" to get some credit for these schools:

>> *The NSLP State agency may elect to use the most recent **<u>base-year</u>** SNAP direct certification percentage free rates for such schools in lieu of running the "Special Provision Match" for these schools. To do this, compare the number of children **<u>directly certified as free in the base year</u>** to the **<u>total number certified as free in that same base year</u>**, and apply that percentage to the number reported as free by the school in SY 2013-2014. This will yield the count that may be attributed to this school's portion of Data Element #3 for the first year, SY 2013-2014.*

This "Base Year Percentage Option" is available only for SY 2013-2014. To use this option, the school would have to have conducted direct certification in the base year and still have access to this data. To get the total count for Data Element #3 **this first year**, the NSLP State agency may use a combination of:

- "Special Provision Match" counts—from whatever special provisions schools operating in a non-base year where the match can be run; and
- "Base Year Percentage Option" counts—from those special provision schools operating in a non-base year for which direct certification data during the base year is available and that are not in the "Special Provision Match" counts

In the example below, the sample State had 13 special provision schools operating in a non-base year for SY 2013-2014. Of these, the State was able to run the new "Special Provision Match" (or ensure that matches are run) with student enrollment data from 10 of the

schools—and got a total count of 9,475 matched students from these 10 schools—but was not able to run the "Special Provision Match" with the other three of its non-base-year special provision schools. Of these remaining three, two schools were able to provide the needed information for the calculation (Special Provision Schools A and B), but the third school (Special Provision School C) was neither able to be included in the "Special Provision Match" nor had the appropriate data available for utilizing the "Base Year Percentage Option." See the chart below to see how the sample State determined the count of "9,642" to report as Data Element #3 on the FNS-834 for SY 2013-2014.

Example 2: How to compute NSLP Data Element #3 in a State utilizing the first year "Base Year Percentage Option," an alternative phase-in option for SY 2013-2014 only, for some of its special provision schools operating in a non-base year.

Which Schools	Base Year # directly certified as FREE	Base Year total # certified as FREE	Percentage Factor	SY 2013-2014 # reported as Free	Apply Percentage Factor	Total
Special Provision Match Results	The total count of matched children from the 10 non-base-year special provision schools where the "Special Provision Match" was able to be performed.					9,475
Special Provision School A	102	271	$\dfrac{102}{271}$	343	343 x $\dfrac{102}{271}$	129
Special Provision School B	32	57	$\dfrac{32}{57}$	68	68 x $\dfrac{32}{57}$	38
Special Provision School C	Did not conduct direct certification in the base year, or no access to data					0
Total to report for Data Element #3 on the FNS-834						**9,642**

Of course, an NSLP State agency may need to use the **"Base Year Percentage Option"** for each of its schools this first year and not just for some of them for SY 2013-2014. [NOTE: After SY 2013-2014, the NSLP State agency's reporting of Data Element #3 is to come from the "Special Provision Match" counts only.]

The NSLP State agency must retain the documentation to account for the determination of the count for Data Element #3.

16. QUESTION: *What is the expectation for the "Special Provision Match" to provide Data Element #3 for the school years __after__ SY 2013-2014?*

ANSWER: For the school years **after** SY 2013-2014 (that is, for SY 2014-2015 and beyond), the NSLP State agency is expected to have a system fully phased in to do the "Special Provision Match," without the use of the alternative phase-in procedures described above. The alternative phase in procedures may be used by NSLP State agencies for SY 2013-2014 only.

17. QUESTION: *Is the count from the "Special Provision Match" for Data Element #3 on the FNS-834 supposed to be reported by the individual SFA/school?*

ANSWER: No, the FNS-834 is a State agency form, not an SFA-level form, and the NSLP State agency completes the form providing Data Element #3 for the **entire** State—that is, the total number of matches made between SNAP data and student enrollment data from every special provision school in the State that is operating in a non-base year (plus, for SY 2013-2014 only, the count determined from the use of the alternative phase-in "Base Year Percentage Option" procedures). The NSLP State agency may need to get input from the schools, but the reporting to FNS comes from the State only—one number for Data Element #3 on the FNS-834 for the entire State.

VI. FNS-834 Form-Specific Questions for NSLP and SNAP State agencies

1. QUESTION: *Do the SNAP State agency and the NSLP State agency fill out the same FNS-834?*

ANSWER: Yes and No. The FNS-834 is an interagency form, so both the SNAP State agency and the NSLP State agency are to use the FNS-834, but they **do not** jointly submit the form;

The SNAP State agency is to complete the FNS-834 to report Data Element #2 and, by December 1st, submit the FNS-834 to FNS (and also to the NSLP State agency by the same date, so that the NSLP State agency will be able to know the denominator of the formula— the "universe" to which their State will be compared).

The NSLP State agency is to complete and submit directly to FNS, also by December 1st, a separate FNS-834 (not the one forwarded to the NSLP State agency by the SNAP State agency) providing Data Element #3. So, there will be two FNS-834s submitted for each State (three if there are two NSLP State agencies in the State, since each NSLP State agency would submit a separate form).

2. QUESTION: *What is the purpose of the check box on the new FNS-834?*

ANSWER: The check box on the new form FNS-834 is there for either the NSLP State agency or the SNAP State agency to indicate that the State has special circumstances that may affect the State's direct certification performance rate calculation in a quantifiable way. If the box is checked, FNS will contact the appropriate State agency and ask for a description of the circumstance, the count of the number of children affected by the circumstance, the methodology for estimating the count, and the source(s) of published State or Federal data used to support that methodology. FNS will consider these circumstances on a case-by-case basis, and will examine how the effect of such special circumstances could help keep FNS's own methodology dynamic and better able to adapt to improved data sources. This check box was added in an effort to improve data sources to more closely approximate the data elements needed to accurately compute direct certification performance rates.

3. QUESTION: *How is the FNS-834 to be submitted to FNS?*

ANSWER: The intent is for the FNS-834 to be incorporated into the Food Programs Reporting System (FPRS), but FNS does not expect this to be in place for the December 1, 2013, submission. Until reporting through FPRS is established, the NSLP State agency and the SNAP State agency are to submit their completed forms to FNS by email. To do so, each State agency should attach its form to an email (naming the file "FNS-834 – [State's Name] Submission from the [NSLP or SNAP] State agency" and using the same filename in the subject line of the email) and send it to CNStatesystems@fns.usda.gov by December 1st.