

Final Report:

Wisconsin's Direct Certification Planning Grant Project

1. Direct Certification Planning Grant Overview

Summary of Direct Certification

Direct Certification (DC) is the process by which children are deemed “categorically eligible” for free meals under the National School Lunch Program (NSLP). Categorical eligibility is conferred if the child’s household receives benefits through the Federal Supplemental Nutrition Assistance Program (SNAP) and, in some cases, Temporary Assistance for Needy Families (TANF) or the Food Distribution Program on Indian Reservations (FDPIR). Directly certifying categorically eligible children ensures they receive free NSLP and School Breakfast Program meals without further need for the household to submit an application. The components of and processes for direct certification systems vary by State and even by local School Food Authority (SFA) within the State. This contributes to variation in the extent to which all eligible children are actually certified to receive free school meals.

Purpose of Funding For Direct Certification Grants

The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2010 provided \$22 million, in the form of grants issued by the Food and Nutrition Service (FNS), for the purpose of improving state direct certification rates. Grants are required to be distributed to State agencies that administer the NSLP and have the lowest rates of children directly certified for free meals. Per the 2008-2009 USDA Report to Congress, there were twenty-six States with direct certification rates at or below the national median direct certification rate of 71%. Wisconsin was included in this group.

Two grants have been made available by FNS: Planning Grants and Implementation Grants. Per FNS guidelines, “Planning Grants are intended for NSLP Agencies that know they need to improve their State’s direct certification system, but may need to conduct additional research to identify the most effective way of doing so and/or planning to ensure that a chosen approach is actually the most effective approach.” The Wisconsin Department of Public Instruction chose to submit an application for the 2010 Direct Certification Planning Grant.

Wisconsin's Planning Grant Purpose and Structure

Through the FNS Planning Grant, Wisconsin sought to clarify the reasons for the State’s current baseline functioning; to determine why and where there is variance in DC rates; to identify potential reasons for gaps in performance; and to develop solutions and suggested goals for improvement. The intended long-term goal is to allow each SFA to have the capacity to consistently run the direct certification process as efficiently and frequently (at least quarterly) as possible; increase the ability of SFAs to successfully match students; and ultimately increase statewide direct certification rates for both public and private schools. The proposed methods included: a review of available data and information, concentrated quantitative research via

statewide surveys, targeted interviews/focus groups, and discussions with state agency staff, identified partners, and local SFAs.

Grant oversight and management was provided by the Director of the School Nutrition Team at the Wisconsin Department of Public Instruction while project planning, implementation, and research and analysis activities were carried out through an interagency agreement by staff of Covering Kids & Families, at the University of Wisconsin-Madison. To guide planning and strategy under the Planning Grant, Covering Kids & Families (CKF) drew upon its successful work with 16 diverse schools districts across Wisconsin on the Connecting Health Insurance to Lunch Data (CHILD) project. Through that project CKF staff became intimately familiar with direct certification efforts in Wisconsin, experience which served as the basis for working with CKF to complete the research project.

Wisconsin's Direct Certification System

Administration: The State of Wisconsin's direct certification system is primarily supported by the Departments of Public Instruction (DPI) and Children and Families (DCF). Together, these agencies collaborate to assist schools in conducting the direct certification process via a web-based application system. The DPI administers the National School Lunch and School Breakfast Programs and provides support and training on the policies related to direct certification; whereas the DCF provides technical assistance to users and maintains the State's direct certification web-based system.

Data Sources, Processing and Management: In Wisconsin, SNAP and TANF eligibility is determined by each local county agency. The TANF program is administered by the Department of Children and Families; whereas the SNAP program is administered by the Department of Health Services. Once determinations have been made for each program, county workers enter individual case data into the statewide Client Assistance for Re-employment and Economic Support (CARES) income benefits system. To provide regular, timely access to both SNAP and TANF data, the Department of Children and Families direct certification web-based system is updated weekly with the CARES system data. Weekly updates allow newly eligible school-age children to be directly certified throughout the course of the school year.

Role of School Food Authorities: Largely, individual schools and districts make local decisions about how they would like to administer school meal programs. As a result, contracts with the Department of Public Instruction often include School Food Authorities (SFAs) that are comprised of a variety of public school districts, individual private schools, and agencies serving school-age children (i.e. residential child caring institutions, juvenile detention centers). SFAs run direct certification based on their claimant status, as opposed to by site. Thus, when an SFA sends in claims to the DPI for reimbursement, they must run direct certification for all students enrolled at the sites for which they claim.

Data Matching: Wisconsin's direct certification process begins with SFAs creating an aggregate file of all enrolled students—extracted from their own internal data management system. The SFA then logs into the DCF web-based direct certification system and uploads its file. Once uploaded, the file interfaces with the DCF web-based system to begin the matching process—whereby each school's aggregate student file is matched against the database of school-age children that exist in the state's SNAP or TANF programs. Currently, the DCF system uses three identifiers to determine a match: FIRST NAME, LAST NAME and DATE OF BIRTH. In most cases, the matching process occurs immediately and the file is returned directly to the SFA with information identifying which children belong to families who are recipients of state TANF and SNAP programs. If all three of the identifiers match the school's student data—the record is returned with a "Y" (Yes) in the eligibility field. If an exact match is not found, the system then tries to determine if other identifiers are possible matches. In the case of FIRST NAME or LAST NAME, the system first trims the school and state data to the same length. If the names are equal, the record is returned with an "F" (First name) or "L" (Last name) code indicating that there may be a match for this student. If a possible match is not found this way, the system then compares the first three characters of the names. If the characters are equal the record is returned with an "F" (First name) or "L" (Last name) code indicating that there may be a match for this student. The final attempt at finding a match looks for children with the same first name and last name and a date of birth that is similar (transposed month day or year). If a possible match is found this way the record is returned with a "B" (Birth date) code in the eligibility column. All other records are returned with an "N" (No) in the eligibility column. SFAs then have the opportunity to follow up with their local agency to determine if the possible matches ("F", "L", "B" codes) are in fact the same individual. If the appropriate correction is determined, the SFA may resubmit the data. If the SFA is unable to determine the reason for the error, they may encourage parents to submit a paper application. Currently, it is unclear how often SFAs follow up on possible matches to determine reasons for error, nor the percentage of parents who submit paper applications upon receiving notification that their children were not directly certified but seemingly eligible for the free lunch program.

Frequency: The State of Wisconsin's direct certification system allows each SFA to conduct direct certification as often as they want, as long as the process is run, at a minimum, during federally required time periods each year. Thus, the number of times an SFA runs the direct certification process varies widely throughout the state. In order to capture the greatest number of eligible students, SFAs have been instructed to wait to conduct their first direct certification run after July 1 of each year—but before the first day of school.

2. Methodology – GAP Analysis

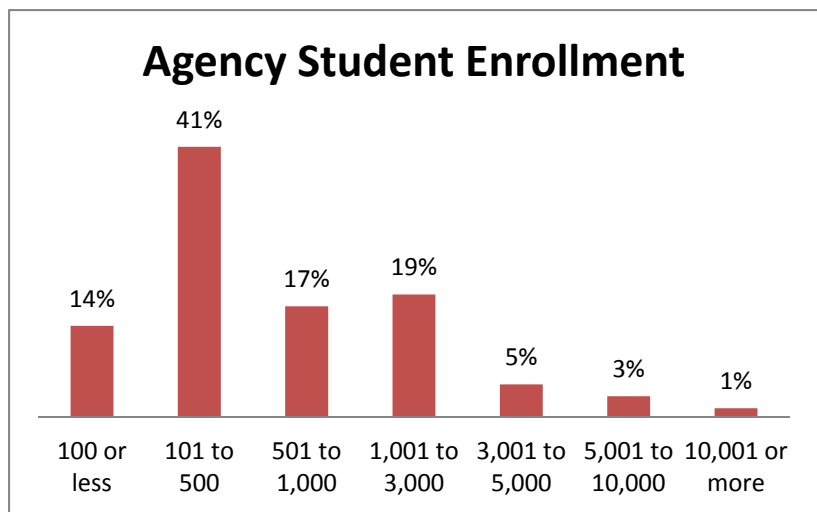
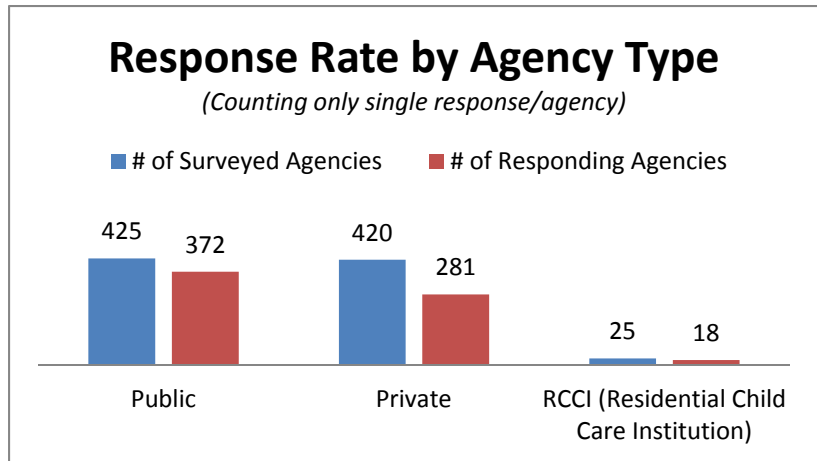
DPI worked with Covering Kids & Families-Wisconsin (CKF) to explore current direct certification practices and challenges experienced by SFAs and state agencies, including DPI and the DCF. In consultation with DPI, CKF determined a methodology for collecting data and information about current direct certification practices as compared to the expected or desired procedures. This gap analysis was informed through the following four data and information collection activities:

- Survey of SFA persons responsible for running direct certification
- Site visits and interviews with SFA persons responsible for running direct certification
- Interviews and group discussions with personnel at Wisconsin state agencies responsible for ensuring direct certification requirements are carried out
- Review of other states' direct certification processes

The survey of SFA persons responsible for running direct certification was designed in consultation with the DPI School Nutrition Director and Consultant staff. The survey was distributed by DPI to persons identified as the direct certification contact for all 870 SFAs participating in the National School Lunch Program in Wisconsin. This included 450 public school districts and educational agencies known as Residential Child Caring Institutions, and 420 private schools. The invitation to participate in the survey was distributed by DPI via email and the survey itself was available to be completed and submitted through the Internet. In just two weeks the electronic survey received responses from one or more staff in 671 of the 870 SFAs in Wisconsin, a response rate of 77%. Schools of all sizes were well

represented, though a relatively larger percentage of public school and RCCI representatives responded to the survey compared to private schools.

The survey collected information regarding: type of SFA (public versus private) and size of its student population; number of staff persons involved in running the direct certification process; how often the process is run per school year; software used to organize various aspects of the process; resources and support drawn upon for training or resolving problems; and personal assessment of the purpose of running direct certification as well as the most challenging aspects. It was used primarily as a means of establishing the range of direct certification practices as well as a general baseline of the types of and extent to which SFAs are experiencing challenges with the process.



Following the survey, CKF sent invitations to SFA contacts that had offered to participate in an interview and demonstration of their direct certification process at their location. Using information collected through the survey, additional SFAs were identified and selected for invitation to participate in order to capture an adequate representation of variation in student population size, geographic locality, urban/suburban/rural locality, public/private funding, ability to run direct certification at least once and personal assessment of extent of difficulty experienced with the process. Over a period of seven weeks, CKF conducted 71 site visits with SFAs. An additional 16 SFA contacts were interviewed either over the phone or during the Wisconsin School Nutrition Association conference. Interview questions were similar to those asked during the survey, but with greater emphasis on understanding the step-by-step account of how each SFA representative handles direct certification. Doing so revealed elements of the process that varied widely among SFAs as well as specific challenges and how they were (or were not) addressed.

To put additional context to the challenges faced by SFAs in Wisconsin and to consider solutions implemented by other states seeking to improve their direct certification process, CKF conducted phone interviews with two states, Indiana and Kansas. These states were selected because they have a similar number of SFAs (or LEAs) as Wisconsin as well as a similar procedure for matching student information to SNAP data. In addition, both Indiana and Kansas had higher direct certification matching rates than Wisconsin as of school year 2009-10.

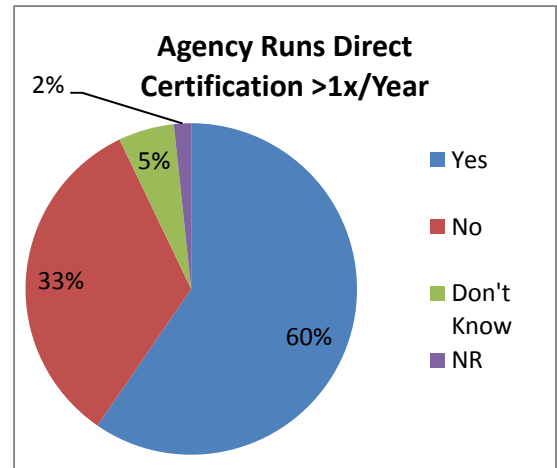
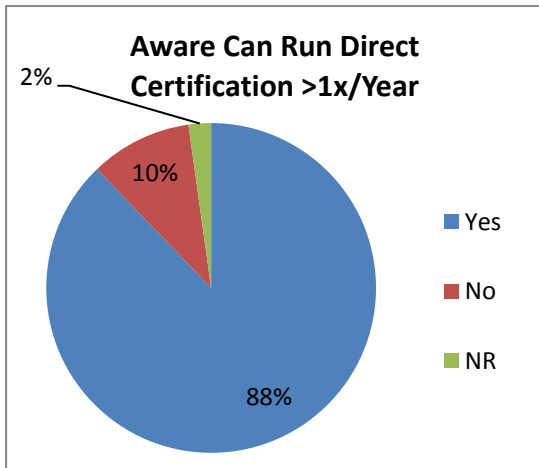
Upon completion of SFA site visits and phone interviews with school nutrition directors from Indiana and Kansas, CKF met with two DCF staff charged with matching SFA student data with state SNAP and TANF participation files to discuss preliminary findings, details of the data match process, and possible solutions to challenges that involve database systems and other technology. CKF additionally met with DPI staff (School Nutrition Director, Public Instruction Supervisor, Office Assistant, and 10 Consultants) to discuss preliminary findings, state agency staff perspectives on challenges faced by SFAs, viability of solutions proposed by SFA staff, and additional solutions not yet considered. Ongoing conversations with the DPI School Nutrition Director and DCF staff informed the final set of solutions proposed in this USDA Implementation Grant proposal.

3. Findings

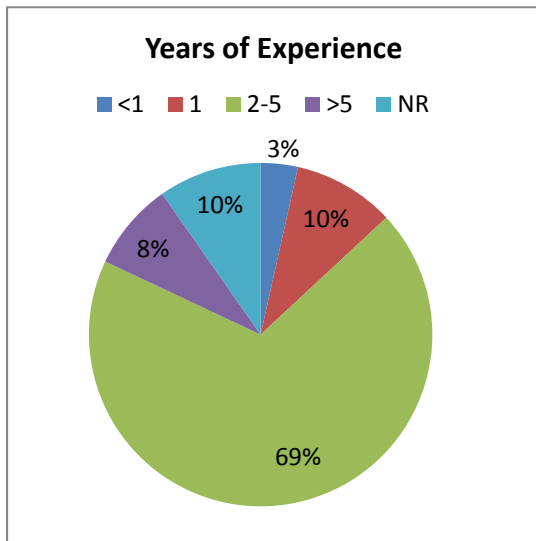
Survey of SFA Persons Responsible for Running Direct Certification

As noted above, the survey of SFAs in Wisconsin resulted in a tremendous response rate from public and private agencies alike, and provided valuable insights into how well SFAs are handling direct certification in Wisconsin. In short, direct certification is relatively well understood and well executed. This is especially notable given that the staff charged with running direct certification are highly varied in terms of both position and experience, and they are working with numerous computer programs. More specifically, the survey revealed:

1. SFA staff are well aware of not only the requirement to run direct certification, but they are also well-versed and supportive of the reasons why the system has been put in place and mandated.
2. Nearly nine in ten respondents were aware that their agency may run direct certification more than once per year, yet at least one-third of SFAs do not currently run the program more than on annually.

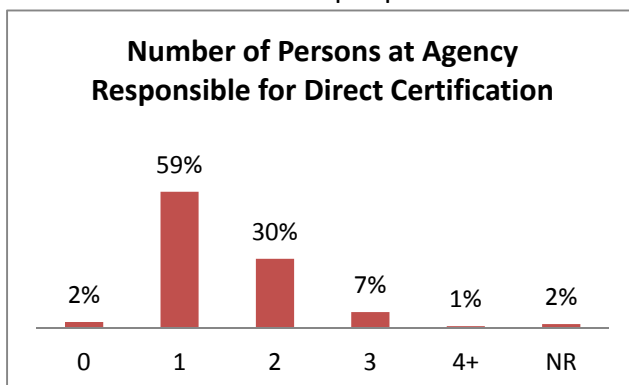


3. More than two-thirds of SFA staff charged with running direct certification have two to five years of experience doing so, with an additional 8% now in their sixth year or more running the program. This increased experience is likely a factor leading to recent improvements in the direct certification rate in Wisconsin as more experience tends to result in fewer problems executing a run.



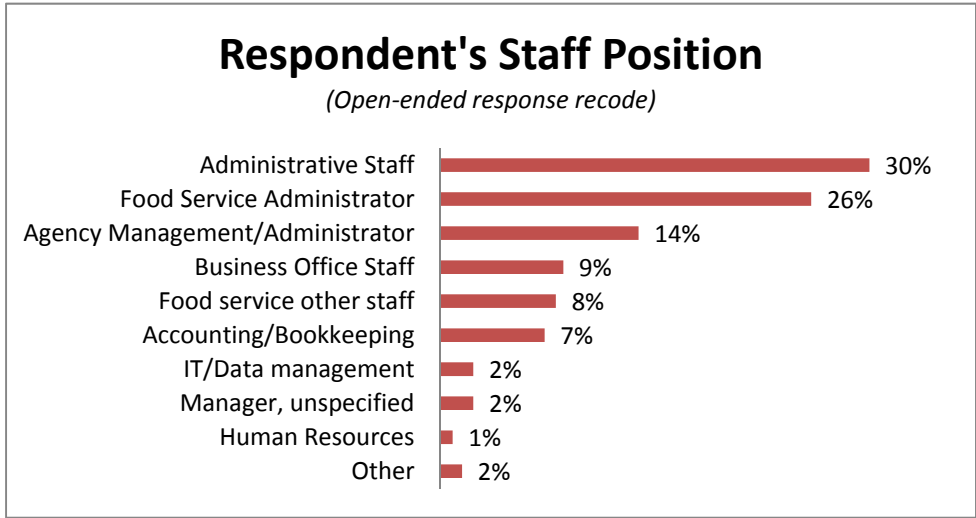
Nevertheless, with smaller schools only somewhat recently being required to run direct certification and with staff turnover, 13% of respondents reported a year or less of experience with the program.

4. By and large, running direct certification is a one or two person affair at a given SFA. In 8% of SFAs three or more people are involved with the process. A wide variety of

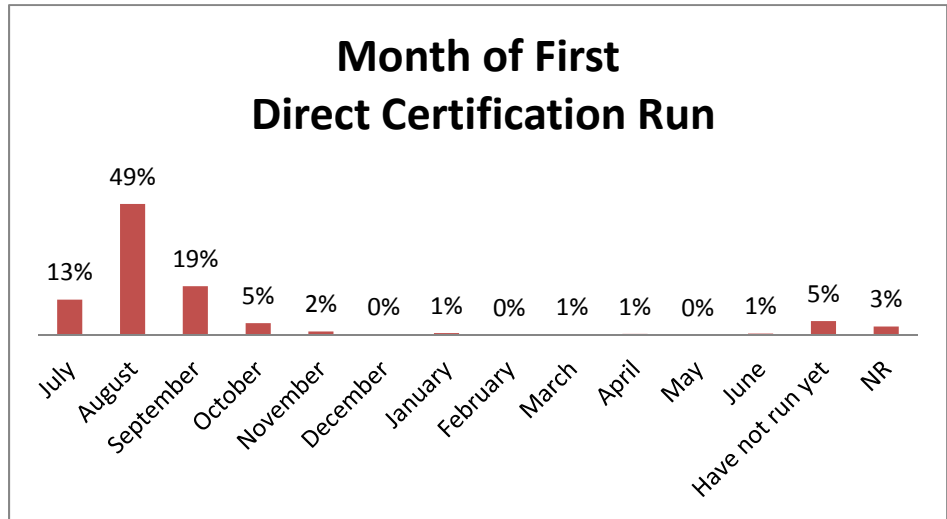


positions – from administrative staff to management and even district administrators, from food service staff to those in charge of information technology – are tasked

with executing a direct certification run.

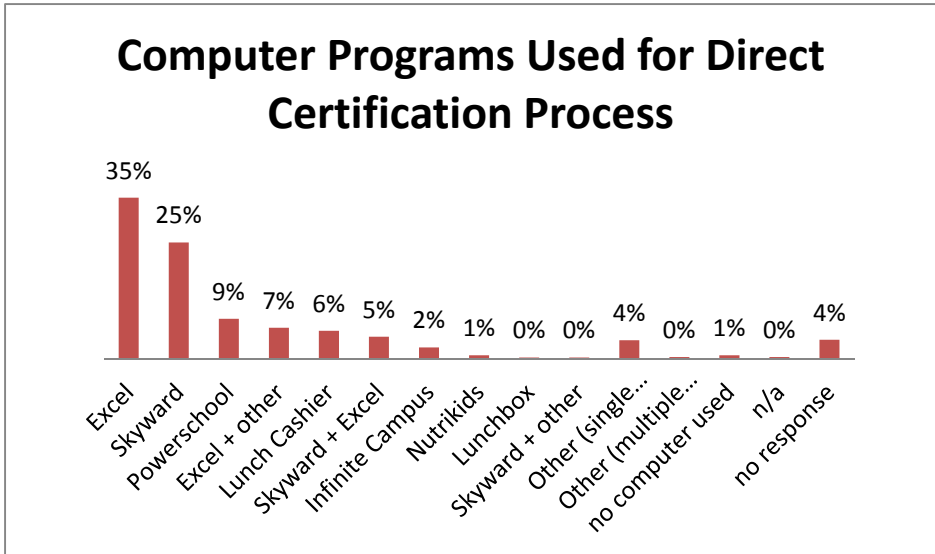


5. Overwhelmingly the first direct certification run occurs as SFAs prepare for and work through the beginning of the school year in July through September.



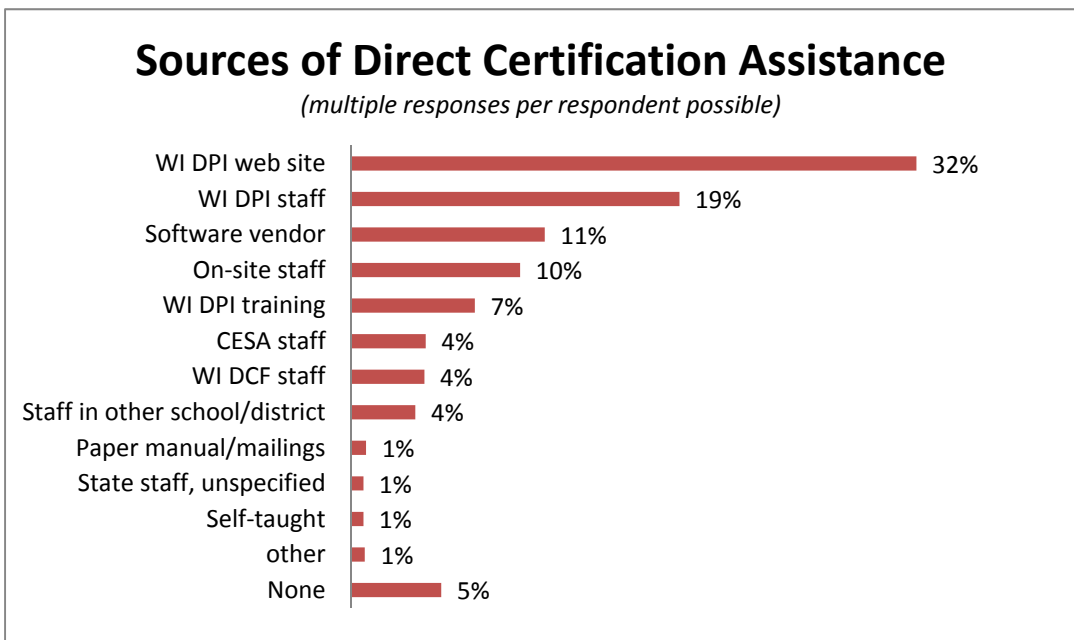
6. A wide variety of computer programs are used across SFAs in Wisconsin. Among programs designed specifically for schools, Skyward is the most frequently used program, followed by Powerschool and Lunch Cashier. Close to half (47%) of respondents indicated they use Microsoft Excel exclusively or in combination with a school-specific software package in order to run direct certification.

Just under half of the respondents provided specific areas they find most confusing or problematic about direct certification. Many were software and technology related, from



working through the initial set up or logging in, to formatting files for submission, to general discomfort with technology. One in six of those noting specific problem areas cited confusion over resolving near-matches and one in ten mentioned extending categorical eligibility to other members of the household. Finally a number of respondents simply noted “the overall process”, that there are frequent changes to the process, and/or that they don’t run direct certification often enough to become fully comfortable with the process.

- When SFA staff seek to learn about direct certification or to troubleshoot issues they are having, nearly 40% mentioned the Department of Public Instruction’s web site and/or a DPI training as their source for information. Another one in five consult with their software vendor.



8. When asked what kinds of training or assistance they would like or other improvements they would like to see, respondents offered many thoughts. The single most frequently mentioned (by 91 respondents) request was to have in-person trainings and/or webinars available to SFA staff. Many also asked for detailed manuals and/or tutorials to be made available, while others are eager for a simple “cheat sheet” to guide them through the process. Some would like regular reminders about running direct certification. Others are looking for improved personal assistance from the state, their county agencies or their software vendors. Finally, several SFA staff used the survey to indicate they would like guidance on resolving “near-matches.”

The survey responses enabled CKF staff to get a relatively clear picture of how direct certification was working overall in Wisconsin and areas where more details would be needed to fully understand where things were working well and where improvements were needed.

Site Visits and Interviews with SFA Persons Responsible for Running Direct Certification

To further understand the processes and software being used by SFAs to execute their direct certification runs and to understand areas consistently showing up as either going well or needing improvement, CKF staff visited personally with 19 private schools and 52 public school districts located in 11 of 12 regional CESAs (Cooperative Educational Service Agencies) in the spring of 2011. Student enrollment in these schools and districts ranged from a low of 44 to a high of 80,000.

Overwhelmingly, interviewees said that direct certification is:

- worthwhile,
- much less time consuming than if they had to process the equivalent of paper applications, and
- much improved since the introduction of the online submission process (which replaced an FTP process from prior years).

CKF staff were frequently told that the support received from both DPI and DCF was very helpful; few had any specific criticisms of assistance from either agency (though some were unaware of its availability). And despite any challenges agencies have faced successfully completing the process, many believed that it was going well and were surprised that Wisconsin wasn't achieving a higher certification rate.

The site visits allowed CKF to identify a number of commonly experienced barriers which likely delay or prevent students from being appropriately directly certified for free school meals.

1. **Challenge:** Small/Private schools that don't view DC as a priority or otherwise lack the resources to run DC

Smaller districts and private schools have unique and often multiple challenges running Direct Certification. Many are unfamiliar with the Direct Certification process and only run Direct Certification infrequently, once, or not at all. Smaller schools/districts often have minimal staff members spread out over many areas and are unable to have a specific person focus on Direct Certification. They often have little or no onsite IT personnel to guide them through the Direct Certification process and often the task of Direct Certification is put into the hands of a principal or other administrator. There is little motivation to run Direct Certification due to the time it takes and only a few students matching state TANF and SNAP records. Many private schools in particular instead urge their families to turn in paper applications and feel that they have a very good handle on who is eligible for free meals. In addition, some private schools rely on public districts for food and billing services and do not have a staff member focused on the National School Lunch program. With public districts in charge of the food and billing services, there is some confusion among private schools as to who is in charge of Direct Certification and there remains a misunderstanding about Direct Certification and what it is.

During site visits we found that food services staff understand the importance and necessity of Direct Certification, but overall they did not feel as comfortable or tech-savvy administering Direct Certification and prefer to spend their time feeding the kids. Business Services or Administrative Assistants tended to be more comfortable with technology associated with Direct Certification as well as the process of organizing large student data, and generally seemed to have more time to devote to the process, though running DC was one among many responsibilities for such staff.

2. **Challenge:** Lack of training for new staff

Staff turnover in schools/districts can hinder the Direct Certification process. Often new staff is unaware of DPI and DCF resources available to them and must rely on previous staff notes for guidance on the Direct Certification process. To the extent guidance is available from the State, it is only as good as the new staff person's ability and willingness to find and follow it.

3. **Challenge:** Multiple persons at SFA involved at running DC

This concerns SFAs – typically moderate sized ones – where there are multiple persons charged with running DC. Usually, each person has a well-defined role such as one handles exporting the full student enrollment file while another handles downloading and updating the lunch database. In some SFAs the system seems to work easily and the relationships and communication among staff persons is good. It is clear in others, however, this multiple person endeavor leads to communication breakdowns, loss of information and/or loss of efficiency. In one SFA, one person received software vendor communications while the other received DPI letters, but they did not necessarily share the information; the SFA staff person was unaware of the move to a web-based system that so many other SFA staff lauded as turning their

experience from a “nightmare” to a “pleasure.” No specific, systemic improvements have been identified for this issue and it may not be reasonable for the state to specifically discourage the involvement of multiple staff persons in the process. There may be benefits to the involvement of many persons and likely a decision each SFA must come to.

4. **Challenge:** Running DC perceived to be too time consuming

A frequently cited concern among SFA staff is the amount of time it takes to conduct a DC run. These concerns arose primarily in SFAs (often small ones) who only run it once per year, and larger SFAs (with several thousand students). The primary challenges for those who run it infrequently were: 1) having to re-learn (or at least re-familiarize) the process each time, 2) having largely part-time staff who are stretched across many tasks, 3) not having technical or other support to assist them. The larger districts who struggle with DC face the same challenges that other districts do in terms of understanding software capabilities, the DC process as a whole, resolving near-matches, etc., but those challenges are magnified by the sheer number of students involved. These districts are more likely than others to use different software for student information versus lunch service, software that does not often “talk well” between platforms. Many use a manual process of reviewing results of subsequent runs, a process that can entail lining up results (that run dozens of pages) of two matches side by side and looking for differences. Many also report spending a great deal of time using categorical eligibility to (largely manually) to enroll siblings and other household members of DC’d children.

5. **Challenge:** Time intensive process to extend eligibility to all children in household

SFAs seem to be aware of the requirement to extend eligibility to all kids in a household, but there is a wide variety of methods for doing so, with variable success and time commitments. Some rely on built-in software mechanisms (either provided by a vendor or written by IT staff at the SFA) while others must coordinate across multiple databases or even staff persons within the SFA to determine if there are other children in a household of a directly certified student. Especially in larger districts the process would often involve securing verification/confirmation from the parents, adding another layer of complexity simply in reaching them. Districts large enough to that staff did not know their families as intimately as smaller SFAs and, by their very nature, were dealing with hundreds to thousands of records, and yet small enough that administrative and other staff are stretched very thin, seemed to be particularly frustrated by the process of extending categorical eligibility to children in families of children directly certified.

6. **Challenge:** Resolving near-matches

Many SFAs indicate challenges resolving near matches. Some SFAs were aware of them, but not sure what to do to resolve them either at all or beyond checking their own records for spelling or last or first names and date of birth errors. Other challenges with resolving near matches include SFA staff alerting parents and leaving it to them to resolve the issue, SFA staff feeling there are too many near-matches to resolve, and SFA staff not being aware there are near

matches (many of these staff use software so automated they never encounter the near matches). An additional concern related to Wisconsin's DC rate is that children eligible, but not matching, are often enrolled via paper applications, categorical eligibility, or through an extension of eligibility to other siblings in household. In all instances the child is enrolled in free lunch, the main concern of the SFAs, but is not counted toward the DC rate.

SFAs are provided with a memo explaining the coding in the file that is returned via the DC process. The memo indicates near matches, but not what can be done to resolve them.

7. **Challenge:** Misunderstanding DC versus paper application; not understanding that run can/should be run more than once per year

A number of issues surfaced related to properly utilizing and recording direct certification for children when paper applications are also involved:

1. Some SFAs still distribute (and sometimes collect) paper applications before running DC and notifying parents of DC'd children that they do not need to fill out a paper application; a paper application is submitted and the child is noted as eligible for free lunch via the paper application even if s/he is subsequently matched via DC.
 2. Some SFAs still "trust" the paper application more than the DC results and record children who are determined eligible through both processes as via paper application rather than via DC.
 3. Some SFAs, particularly very small ones, continue to rely solely on paper applications, despite DC being required.
 4. Conversely, some SFAs rely entirely on the DC process and do not make paper applications available.
 5. Some SFAs do not code children receiving free meals differently based on their eligibility determination method (DC versus paper). It is unclear how these SFAs determine the number of DC'd kids to report to DPI.
 6. It is unclear whether all SFAs are properly tallying all of children who have been directly certified and reporting that number to DPI through the verification report.
8. **Challenges:** Multitude of software vendors used by SFAs, inadequate support from vendors, and range of functionality available to run DC even within same software packages

Throughout the state there are a significant number of software packages used by SFAs to run DC. The range of software functionality, sophistication, and customer service responsiveness are highly variable and undocumented. Even SFAs using the same software may have or be aware of differing capability of that software to most efficiently run DC. SFAs are generally left on their own to deal with any software concerns, including errors that may occur in the DC process as a result of incorrect software coding. Neither DPI nor DCF has a complete or necessarily up-to-date list of all software vendors conducting business with SFAs for the purposes of running DC. There is no standard method of communicating with vendors regarding USDA policy changes, nor method of training or assessing software ability to correctly process DC. Some SFAs are keen

to the fallibility of software and hand-check results while others assume the software has run DC without error.

9. **Challenges:** Frequent changes to USDA policy, particularly those that are not communicated until the beginning of the school year

Many SFAs indicated that the policy modifications from USDA were often communicated at the beginning of the school year – at time when their schedules are extremely busy and it is difficult to implement any new changes to their procedures. Additionally, as policy seems to be frequently changing, some are confused about where current policy stands. Most were very aware of the DPI web site and received the memos, though many indicated that emailed memos would be appreciated. Not all were aware of DCF User Guide and some felt it could be simplified even more. Many felt trainings about DC would be very useful, though it would difficult if not impossible to find time to attend them during the school year.

Discussions with Personnel at Wisconsin State Agencies Responsible for Direct Certification

Prior to and throughout the project, CKF staff consulted regularly with June Paul, DPI School Nutrition Director, to assess project progress and preliminary findings as well as plan appropriate next steps. Paul was instrumental in identifying the list of SFA survey contacts, securing use of the DPI Vovici software for electronic survey distribution and collection, coordinating assistance from Kathy Addie (DPI Information Technology Technical Support staff), contributing a portion of Rek Kwawer's (DPI School Nutrition Office Assistant) time for troubleshooting, data sharing, and responding to SFA inquiries resulting from the project, providing project meeting space at DPI, and offering up time during regular staff meetings to discuss project implementation and impacts with DPI School Nutrition team consultants.

CKF staff met with DPI School Nutrition Team consultants three times over the course of the project. These individuals are charged with – among other things – ensuring that schools and districts participating in school nutrition programs are running direct certification correctly. They regularly answer calls from school personnel wanting to resolve direct certification difficulties. Meetings with the consultant team members were a critical element of the project, allowing CKF to craft a more relevant SFA survey, using language and addressing aspects of the direct certification process familiar to school staff charged with running direct certification. Additionally, these meetings were a time for consultants to review and reflect upon SFA survey and site visit findings and augment those data with their own experiences of trouble spots and possible solutions. It was also an opportunity to discuss specific direct certification practices that were highly variable across SFAs and even introduce some practices that were not known to the consultants.

In preparation for submission of the Implementation Grant proposal, CKF staff met with Paul and as well as DCF staff to review all identified challenges to successfully running direct

certification and potential solutions to pursue. Through these meetings, Paul's experience with the direct certification system allowed her to offer valuable insight into which solutions would likely provide the greatest impact on number of students directly certified while not unduly burdening existing DPI or SFA staff or introducing processes that would be difficult to sustain in the long term.

CKF staff additionally consulted with Jim Perry and Diana Gleichauf of Wisconsin Department of Children and Families (DCF) a number of times in the course of the project. Perry and Gleichauf both work as Programmer Analysts within the Bureau of Information Technology and manage and ensure the accuracy of the state administrative SNAP and TANF participant files against which schools match their student enrollment data. This includes overseeing the technical aspects of the matching process.

The challenge of unresolved near-matches is one of the most common problems identified during CKF's site visits with SFAs. Conversations with Perry and Gleichauf focused on identifying possible methods for minimizing near-matches. CKF drew upon ideas gleaned through communication with and documentation of procedures implemented to handle the issue in other states. CKF and DCF staff discussed the feasibility of offering additional fields on which to find likely matches, a web-based individual student look-up that could be accessible to school staff, and Soundex, a program add-on which allows names to be tagged as potential matches based on sound rather than spelling.

While additional fields offered in SNAP and TANF participant data such as school code, address, and social security number (SSN) would seem ideal as fields for increasing likely matches, Perry and Gleichauf advised that school code and address are highly unreliable and SSN has been specifically prohibited by federal officials. However they suggested that fields such as county, city, parent/guardian names and sibling are reasonable alternatives that can be used to narrow down matches in situations where the primary fields (first name, last name, and date of birth) lead to uncertain results. Many other states have also implemented web-based individual student look-up systems - in part for resolving near-matches - allowing school staff to view and select from a list of all potentially matching SNAP or TANF participants. However, both Perry and Gleichauf expressed concern over lack of confidentiality with this process. It was decided that the method should be pursued through discussions with DHS and DCF administration. Finally, Soundex is a program option that Perry indicated is already available within the DCF software and would require minimal resources to employ.

Discussions with Perry and Gleichauf additionally allowed CKF to better understand the content and extent of communication with software vendors in the state as well as the aspects of training and documentation for SFAs that DCF has traditionally handled regarding direct certification. Communication with software vendors is sporadic and more typically in response to vendor contact (rather than DCF reaching out to them). This is in part because the number of software vendors used is constantly shifting it is impracticable for DCF to maintain a comprehensive contact list for all. DCF maintains the base manual describing procedures for SFAs to run direct certification and produced the regional in-person trainings when the process

was rolled out to all districts. Perry and Gleichauf's expertise would be drawn upon for any updated trainings and manual modifications that would occur in an Implementation Grant though there is interest in having long-term updates to and maintenance of the manual content turned over to the DPI direct certification team.

Review of other states' direct certification processes

The final activity of the planning grant included identifying promising direct certification practices used in other states and the benefits of implementing any of those practices in Wisconsin to boost certification rates. CKF staff compared Wisconsin direct certification practices to those carried out in nine other states: Idaho, Illinois, Indiana, Iowa, Kansas, Maryland, Minnesota, Nevada, and North Carolina. States for comparison were identified according to similarities in region, number and type of school districts, and process for matching student names to state SNAP data, while also having direct certification rates higher than Wisconsin, particularly if significant improvements had recently been made to generate those rates. Information on state practices was collected from the 2007-08, the 2008-09, and the 2009-10 Report to Congress (Direct Certification in the National School Lunch Program: State Implementation Progress); instruction manuals, memos, and reports available from state NSLP web sites; and, for Kansas and Indiana, phone communication with state school nutrition directors.

Many of the direct certification enhancements found in other states were often also suggestions generated through the project survey of Wisconsin SFA's, SFA site districts, or meetings with DPI and DCF staff. The three Reports to Congress and various online materials and manuals were used to better understand the variation in implementation for improvements such as the fields and algorithms used in determining a successful match or ensuring more frequent matches submitted by SFAs. To supplement this material and to better understand technical details of improvements, CKF staff conducted phone interviews with school nutrition directors in two states: Kansas and Indiana. The conversations covered questions surrounding overall process of generating matches between school and state administrative data; division of labor and workload (e.g., to what extent schools or the state are responsible for ensuring data is submitted for match); the amount of training and technical assistance provided by the state; and which improvement(s) might be most responsible for boosting overall state direct certification rates.

From the Kansas State Department of Education, CKF staff spoke with Cheryl Johnson, Child Nutrition & Wellness Team Director. Kansas has a similarly large number of school districts as Wisconsin (300 and over 400, respectively). Between 2007 and 2010, Kansas increased its direct

certification rate over 10 percentage points (73% to 84%). Johnson attributes much of the rate increase to switching from a matching system based on paper forms to one that is computer-based. Kansas, unlike Wisconsin, prepares the match for schools each month – rather schools being responsible for submitting and receiving data files. Nonetheless, SFAs must investigate near-matches of birthdates or names. Johnson was also able to speak to the benefit of having an online look-up directory. This directory allows schools to query individual names within the state SNAP participation system which can be useful for resolving near-matches. The online-look up option, according to Johnson, has also been especially attractive to private schools particularly as their roster of eligible students is much smaller and submitting individual names for data match is much less time consuming than preparing formal matches. Johnson also shared that the state has made a commitment to offering annual direct certification training sessions each July and providing an extensive and comprehensive manual of direct certification procedures.

CKF staff also spoke with John Todd, Coordinator of School and Community Nutrition at the Indiana Department of Education. Indiana has 352 school districts and between 2007 and 2010, experienced significant increases in its direct certification rate, rising from 56% to 74%. Of particular interest, Indiana uses two methods in its matching system that Wisconsin does not use: a multi-tiered matching process across a number of fields, and SoundEx software.

Indiana, like many states, begins with attempting a match on the first and last name of the applicant, along with his/her date of birth. When matches occur on one or more fields, but not all three, Indiana not only flags these “near matches” as is done in Wisconsin, but it then queries its system to see if matches occur on other fields sufficient to confidently determine a child in the school nutrition system is the same child as that in its SNAP system. It also employs SoundEx software that can identify names with multiple common spellings as matching.

To bolster the ability of its SFAs to determine accurate matches, Indiana provides an online look up system whereby data are provided about each near match so an SFA can determine which, if any, children nearly matching are in fact the children in their system and suitable for direct certification.

Indiana also recently added children in foster care to its state-based list of eligible children, a list Todd says enables as many as 22,000 additional potential matches.

Finally, Todd attributes much of its recent improvement in its DC rate to investing in reviewing Verification Summary Reports from individual SFAs for completeness and accuracy. It found many instances of under-reporting and trained its SFA staff in how to properly account for all children directly certified.

8. Summary of Findings

Barrier	How Barrier Affects Running Direct Cert	# of SFAs Affected			Possible Solution(s)
		Few	Some	Many	
Not appropriately aware of DC benefits and requirement	<ul style="list-style-type: none"> • Running only kids new to school (rather than all kids potentially new to SNAP) • Worry that kids no longer on SNAP taken off free lunch too • Running only once/infrequently/not at all • Not a familiar process due to infrequency • Perceived as time consuming • Must re-learn each time • Process feared 		X		<ul style="list-style-type: none"> • Requirement to run 3x/year <i>should</i> help to make process more familiar • Establish specific deadline dates for SFAs to run DC in Wisconsin • Remind agencies that students may become eligible at any point (as join SNAP) • Communicate benefits to state and SFAs of DC (vs. free based on paper application) • Individual contact with those who have not run successfully; offer assistance • Make sure info getting to right people; use more email communications and follow-up on undeliverables
Near matches	<ul style="list-style-type: none"> • Some completely unaware of near-matches • Software can “hide” presence of near-matches • Don’t resolve/Little priority given to resolving • Ask families to do the work: fix name/DOB at County or School • Assume ineligible • Ask families to complete paper application • Some can see all children located within geographic boundaries. Adds time and length to near-match list. 			X	<ul style="list-style-type: none"> • Enhanced communication from state about ways to resolve • DCF provide exact text of near-match fields • State phone hotline or online look-up to resolve individual situations • Require the families use only legal names on school registration forms • SFAs provide additional fields to indicate likely match (county, city, parent name) • Ask SFAs to share best practices on how they accomplish this (represent variety of software, district sizes) • DCF to use Soundex to match • Assist SFA’s with limiting upload list to only those in district schools (rather than “800” status)

Barrier	How Barrier Affects Running Direct Cert	# of SFAs Affected			Possible Solution(s)
		Few	Some	Many	
Misunderstanding direct certification vs paper appl.	<ul style="list-style-type: none"> • Not correctly distinguishing between direct cert and free (via paper application) in database or verification report • Relying solely on paper applications rather than running direct cert • Not distributing or making paper applications available; assuming direct cert will account for all eligibility • Fewer reported as directly certified than should be (impacting overall state rate) • Not realizing that students may become eligible under DC at any time during year • Not realizing financial impact of accurate DC rate for schools/state 		X		<ul style="list-style-type: none"> • Remind agencies that students may become eligible at any point (as join SNAP) • Communicate benefits to state and SFAs of DC (vs. free based on paper application) • Individual contact with those who have not run successfully; offer assistance
Inadequate support from software vendors	<ul style="list-style-type: none"> • Delays in completing process • Add'l costs to school/district due to errors • Mistrust software to run correctly; rely on manual checks (more time-intensive process) • Software updates assumed to account for current USDA/DPI policy (e.g., Skyward template letter may not offer an opportunity to decline benefits) 		X		<ul style="list-style-type: none"> • State oversight of private vendors • Yearly vendor training organized by state (opportunity for vendor fair as well as hands-on technical assistance) • Language offered to SFAs to include in contract with vendors that holds vendor liable for errors • Annual survey for SFAs to rate their software provider; available for view by all SFAs • Move to single vendor, or defined subset of vendors
Variety of software used to run DC throughout state	<ul style="list-style-type: none"> • Training/support provided highly variable • Time/process involved to run DC via highly variable • Each software must be up-to-date on current DC policy 			X	<ul style="list-style-type: none"> • Centralized oversight of vendors/coding used in software for running process • Increased efforts to communicate new policies with vendors • Move to single vendor, or defined subset of

Barrier	How Barrier Affects Running Direct Cert	# of SFAs Affected			Possible Solution(s)
		Few	Some	Many	
	<ul style="list-style-type: none"> Over-reliance on software to run DC correctly could result in errors 				vendors
Within same software, range of proficiency/understanding of how to run DC process	<ul style="list-style-type: none"> Not all agencies use software in the same way. Skyward, IC, etc., may have different levels of functionality that not everyone is aware of, have access to, have purchased. Some can see all children located within geographic boundaries. (Though is there a potential benefit to this?) 		X		<ul style="list-style-type: none"> Yearly vendor training organized by state (opportunity for vendor fair as well as hands-on technical assistance) Ask SFAs to share best practices on how they run DC using their software; may reveal new functionality available to others Assist SFA's with limiting upload list to only those in district schools (rather than "800" status)
Changing or late communication of DC policy from USDA/DPI/DCF	<ul style="list-style-type: none"> Confusion about current requirements Difficult to integrate into workload at beginning of school year (very busy) Near impossible for private school staff to get away to attend trainings during year 			X	<ul style="list-style-type: none"> Offer training during late spring/early summer and evenings Provide advance notice of anticipated changes for next school year Provide email reminders of current policy requirements and/or "to do" list Offer webinar in Fall in order to bring training to SFAs Suggest modification to USDA via implementation grant
Time intensive process to extend eligibility to all children in household (and now foster children)	<ul style="list-style-type: none"> Reason to not run DC more frequently Unsure if capturing all kids in a household Over-reliance on software to successfully capture Refer to several databases and/or personnel to resolve 			X	<ul style="list-style-type: none"> Guidance on connecting children in a household (from state or software) Ask families to list other HH members on certification letter (other states do this) Ask SFAs to share best practices on how they accomplish this (represent variety of software, district sizes) Interface with foster kids system
Multiple persons involved at SFA	<ul style="list-style-type: none"> Must coordinate each time DC is run Can impede running DC more than 1x/yr 	X			<ul style="list-style-type: none"> Make sure info getting to right people; use more email communications and follow-up

Barrier	How Barrier Affects Running Direct Cert	# of SFAs Affected			Possible Solution(s)
		Few	Some	Many	
	<ul style="list-style-type: none"> • Communications from state, software vendor not rec'd or read by each person • Each has separate expertise in process; problematic if that person leaves 				on undeliverables
Position of staff person(s) responsible for running	<ul style="list-style-type: none"> • Principals/Superintendents have little time to devote – will run only once • Food Services understand importance but tend not to be tech savvy and would rather spend time actually feeding kids, tho for this reason may be inclined to run often • Business Services/Administrative Assistants are often the most organized, thorough, aware of money aspect, available (time-wise), and likely to run DC often even just to pick up small number of new kids 		X		<ul style="list-style-type: none"> • Use language in communications to SFAs that frames DC as a billing issue and not simply about food
Very small schools/districts	<ul style="list-style-type: none"> • Few students eligible • Running only once/infrequently/not at all • Have well-developed process for getting high return rate on paper apps • Unfamiliar with DC process • Little motivation to run DC (large time but little payoff) • Little or no onsite IT (or other tech-savvy) personnel; overwhelmed by technology • Typically put in hands of principal • No one at private school focused on NSLP • Ongoing, unresolved issues • Large misunderstandings about DC • Rely on public districts for food/billing 			X	<ul style="list-style-type: none"> • More frequent on-site visits from DPI consultants • Better times for trainings (mid-summer, late spring, evening) • Better locations for trainings • Encourage pulling resources under large structure (diocese, other existing cooperative). Example of Xavier ACES Educational System • Individual contact with those who have not run successfully/are struggling; offer assistance • Make sure info getting to right people; use more email communications and follow-up on undeliverables

Barrier	How Barrier Affects Running Direct Cert	# of SFAs Affected			Possible Solution(s)
		Few	Some	Many	
Lack of training for new staff	<ul style="list-style-type: none"> • Rely on previous staff notes, guidance • May perpetuate misunderstandings • Unaware of DPI, DCF resources • “Understanding” based on past staff experiences with FTP 		X		<ul style="list-style-type: none"> • More frequent on-site visits from DPI consultants • Better times for trainings (mid-summer, late spring, evening) • Better locations for trainings
Verification reports	<ul style="list-style-type: none"> • Number listed in report may not reflect actual directly certified • Formatted/organized in such a way that data gathered from SFAs may not be accurate or best represent true DC rate 		?		<ul style="list-style-type: none"> • Suggest report format improvements to USDA • Assess discrepancy to determine true magnitude of issue • Communicate benefits to state and SFAs of accurate reporting of DC rate

Additional Notes:

- Some have simply had trouble getting username/password to work correctly
- Problematic when a group of private schools works in collaboration but submit under only 1 school name (such as, ACES Xavier Educational System submitting under Xavier HS or St. Pius X or St. Joseph MS). The remaining schools would be flagged as not completing process.
- DPI consultants may not be fully knowledgeable/comfortable with how to run DC.

9. Process of identifying final recommendations for implementation

From the full list of challenges to address and possible solutions, a smaller subset was identified for inclusion in the Implementation Grant proposal to USDA. This was achieved through a series of meetings with DCF and DPI staff. Upon the conclusion of SFA on-site visits and interviews, CKF staff presented a draft list of challenges and solutions to both DCF staff as well as DPI food and nutrition consultants and administration. Discussions with DCF staff, Jim Perry and Diana Gleichauf focused on issues surrounding technology, potential improvements, and the resources required to implement each of them. The meeting with DPI staff addressed each of the challenge areas and solution suggestions offered by SFAs. DPI staff provided feedback, additional challenges not yet enumerated, and modifications to solutions that would likely make implementation more feasible. From this set of meetings, a final, comprehensive list of challenges and solutions was developed for review by June Paul of DPI and Jim Perry of DCF. This final list stimulated further discussion of the resource-intensiveness, feasibility, and overall impact of each solution proposed. The result was a scaled back set of recommendations which was still further delineated in to yes/no/maybe implement subsets during a final review by Paul. Before submission of the Implementation Grant proposal to USDA, the proposed improvements underwent additional fine tuning and assessment of viability once timing and finances were finalized.

10. Recommendations for Implementation

Broadly, solution recommendations can be categorized under the following three objectives:

- Objective 1)** Develop, modify, and implement informational trainings, resources and support that better address existing direct certification challenges experienced by SFAs as well as be able to more quickly respond to new challenges as they emerge.
- Objective 2)** Explore, test, and integrate new technology that can address existing direct certification challenges by simplifying the workload of SFAs.
- Objective 3)** Develop or more fully implement means by which to provide additional support and accountability to SFAs

Specific activities included in each Objective are:

- Objective 1) Informational trainings, resources, and support**
 - a. Offer annual training on Direct Certification basics and updates (also archived online)
 - b. Create Back to School packet reminding SFAs of direct certification purpose, support available, current requirements, and frequently asked questions to assist in problem resolution

- c. Provide enhanced guidance for SFAs regarding resolving near-matches (including the potential options to investigate discrepancies by using an online look-up system, or contacting county SNAP agencies or families)
- d. Provide enhanced materials/documents for SFAs regarding extending eligibility to all children in a household (including modifying the certification letter to allow for households to add names of other children living there)
- e. Create opportunities for software vendors to provide demonstrations and troubleshooting during existing state educational trainings for SFAs.
- f. Improve communication mechanisms between the DPI and SFA staff

Objective 2) New Technology

- a. Integrate student placement data from state foster care system (WI SACWIS) into existing state direct certification SNAP and TANF participant database to assist with extending categorical eligibility to foster children
- b. Expand list of fields that SFAs can submit for direct certification match (e.g. county, city, address, parent name, sibling name)
- c. Implement Soundex technology for reducing overall number of near-matches.

Objective 3) SFA Support and Accountability

- a. Conduct survey of SFAs regarding their satisfaction with software vendors and consider opportunity for establishing survey as annual event
- b. Establish/clarify guidelines for, and consider appropriate courses of action (e.g. specific types of corrective actions) for SFA non-compliance with successfully running direct certification three times/year

11. Future challenges

There are several challenges related to some or all of the recommendations in this report, none of which are insurmountable, but each of which should be closely tended to as implementation of those recommendations is pursued.

If adding additional fields to determine a match and especially if an online look-up function is pursued, it will be important to adequately protect the privacy of TANF/SNAP recipients who show up as near-matches. Enough information needs to be provided to ensure a proper match while at the same time not disclosing information that is sensitive or otherwise protected by privacy and disclosure laws. Several other states provide an online look-up and should be consulted for advice on not only their software and processes, but also the legal and technological protections they have put in place.

Cross-agency coordination is critical, of course, and will become more critical as the potential for adding fields to match, other data (such as foster care children) are added to the matching system, and the expectations (federally and locally) rise for improved DC rates.

In order for improvements to be sustainable, each must be pursued as systems changes within – rather than on top of – current capacity. An Implementation Grant would allow for an increase in resources available to improve Wisconsin’s DC rate, but those resources should be considered temporary and able to be maintained well into the future without additional funding from USDA, the state or SFAs.

It will be important for the entire system to become and remain nimble, able to absorb changes in state, local and federal policies and resources. Staff turnover at the state and SFA levels will be a constant challenge and may become even worse in the face of budget challenges yet to come. Additionally, the state is pursuing a statewide student information system; the DC process must be able to adapt to whatever system is chosen.

As was done through the Planning Grant that produced this report, stakeholders from DPI, DCF, SFAs, and others must be involved in the involved in designing and providing feedback on each of the specifics of each improvement pursued.

12. Acknowledgements

Covering Kids & Families wishes to thank the U.S. Department of Agriculture for its dedication to an efficient and effective direct certification process, most recently evident in its granting of this planning grant to pursue improvements to Wisconsin’s DC process. We also want to offer deep gratitude to the many individuals who participated in this project, generously providing their time and sharing their experiences regarding direct certification. Contacts representing SFAs, whether through the survey or for on-site visits, were overwhelmingly conciliatory and welcoming of CKF staff inquiries. Cheryl Johnson and John Todd, directors of the Kansas and Indiana food and nutrition programs, respectively, willingly offered their perspectives on successes and challenges of direct certification in their states. We very much appreciate the thoroughness and thoughtfulness of the feedback and recommendations given by DCF staff Jim Perry and Diana Gleichauf; DPI consultants, Loriann Knapton, Linda Krueger, Cindy Loechler, Erin Lorang, Emily Montemurro, Helene Pesche, Katherine Pike, Barbara J. Pratt, Sara Saye, Julie Shelton, Laura Sime, Lynne Slack, Ellen Snowdon, Victor J. Taugher, and Kelly Williams; and DPI Public Instruction Supervisor Jessica Sharkus. Their input helped to confirm and bolster the challenges experienced by SFAs and begin the process of identifying viable solutions to overcoming them. And special thanks to Rek Kwawer, DPI Office Associate, for helping to organize the SFA survey distribution and responding to concerns brought forth during SFA on-site visits, Kathy Addie, DPI Technical Support Team staffperson, for ensuring that the distribution of the survey and collection of responses was efficient and nearly effortless. Finally, we thank June Paul, DPI Director of School Nutrition Programs for generously giving her time, knowledge, and dedication to DPI staff and the direct certification process.

Appendix A: SFA Survey Instrument

Direct Certification Survey

PII-001976 (New 03-11)

This survey asks questions about Direct Certification. It should take approximately 10-15 minutes to complete.

Direct Certification is the process by which schools use a web-based system to send a list of all enrolled students to Wisconsin's Department of Children and Families (DCF). Schools get back a list of those students who should be automatically certified as eligible for free meals. Schools throughout Wisconsin implement the Direct Certification process differently and some struggle to efficiently and effectively complete it each year. Responses to this survey will be used to improve the Direct Certification process such that agencies like yours can ensure that more eligible students receive free meals.

It is important that someone from your agency who has a role in the Direct Certification process responds to this survey. It has been sent to all Wisconsin schools' food service directors and other authorized representatives. If you do not have a role in the Direct Certification process, please forward the e-mail you received about the survey to any person(s) in your agency who does.

Please complete the survey no later than Friday, May 6. You will receive reminder e-mails between now and then reminding you of this due date. Once someone from your agency completes the survey, the system should discontinue sending the reminder e-mails. We thank you for your assistance and insights.

For questions about this survey contact

Allison Espeseth
608-261-1455
aehales@wisc.edu

General Information

Indicate the position of the person completing this survey.

Position:

Type of School/District or Agency

Public

Private

RCCI (Residential Child Care Institution)

Size of Student Enrollment

100 or less

101 to 500

501 to 1,000

1,001 to 3,000

3,001 to 5,000

5,001 to 10,000

10,001 or more

Indicate the county of your agency:

A. Describe the direct certification tasks for which someone is responsible in your agency

<u>Task</u>	<u>Person Responsible</u>		
	Me	Someone Else	Don't Know

Create database
Submit database
Receive database/matches
Verify matches received
Send certification letters to households
Complete verification report
Other:

B. About how long have you, personally, been involved in direct certification?

Months:

Years:

C. Including yourself, what is the total number of persons in your agency responsible for direct certification?

Number Responsible:

D. What is your understanding of the purpose and importance of direct certification?

E. What computer program(s) does your agency use to prepare a file for direct certification? Check all that apply.

Skyward
Excel
Nutrikids
Lunchbox
Powerschool
Other:
Don't know

F. What month did you first run direct certification for the 2010-11 school year?

G. Are you aware that you can run direct certification more than once per year?

Yes
No

H. Does your agency usually run direct certification more than once per year?

Yes
No
Don't Know

I. From what sources have you received training, assistance, information, or other support to understand how to conduct direct certification? (Check all that apply)

WI Department of Public Instruction in-person training
WI Department of Public Instruction staff

WI Department of Public Instruction web site
WI Department of Children and Families staff
County Economic Support Services staff
CESA staff
Software vendor
Staff person(s) in school/district
Staff located in another school/district
None
Other:

J. Do you feel you have the information and resources necessary to run direct certification as often as you would like?

Yes

No

K. What aspects of direct certification do you find problematic or confusing?

L. What type of training, assistance, or other improvements do you think would help you with the direct certification process?

All Wisconsin schools/districts and agencies who do direct certification are invited to participate in a short site visit as part of this project. The site visit will be an opportunity to expand on information provided through this survey. The site visit will consist of a brief interview and an opportunity to demonstrate aspects of the direct certification process at your location. Visits will begin in April and will mostly conclude before the end of the school year, though some may be conducted during the summer months or at the annual Wisconsin School Nutrition Association conference, if necessary. Please contact Mary Unmuth at Covering Kids and Families, to express interest in or availability for a site visit: mjunmuth@wisc.edu, 608/261-1455

Appendix B: SFA Site Visit Interview Instrument

1. **Cluster:**
2. **Trip:**
3. **Date of interview:**
4. **Time of interview:**
5. **Address:**
6. **Name of Agency:**
7. **Agency Code:**
8. **CESA #:**
9. **Type of School/District or Agency (Public, Private, RCCI):**
10. **Student Enrollment**
 - 100 or less
 - 101 to 500
 - 501 to 1,000
 - 1,001 to 3,000
 - 3,001 to 5,000
 - 5,001 to 10,000
 - 10,001 or more
11. **Free/Reduced Price Meals Enrollment**
 - # Free
 - # Reduced
12. **Interviewer:**
13. **Interview site notes (atmosphere, materials, other physical demonstration used, etc.):**
14. **Key Findings:**
15. **Names and Positions of those being interviewed:**
16. **About how long has your agency been involved in direct certification?**
17. **About how long have you personally been involved in direct certification?**
18. **How did you get introduced to and trained on direct certification?**

19. How many times during the year does your agency usually run direct certification?

a. Would you like to run it more often?

20. What month did you (first) run direct certification for the 2010-11 school year?

a. How did you decide when to first run DC?

21. DC process.

a. Create list of names:

- a. Software used
- b. Steps involved to create list

b. Submit list of names to DCF:

- a. Software used
- b. Steps involved to submit list

c. Receive matches from DCF:

- a. Software used
- b. Steps involved to pull list from DCF back to school software
- c. # of kids with code Y (first run of year)

d. Verify matches:

- a. Software used
- b. Steps involved to update school records

c. What if:

DC	Paper App	Action (Send letter? Update database?)
Y	none	
Y	Elig: free	
Y	Elig: reduced	
N	Elig: free/red	

d. Siblings in HH: How do you connect siblings to ensure all can be directly certified?

e. Near- Matches.

- i. Do you ever get near-matches?
- ii. What do you do with those? (If nothing, reason?)
- iii. # of kids (first run of year)

e. Send cert letters to HHs:

- a. Software used
- b. Steps involved to create and send letters

22. From start to finish (a.-e.), how long would you say it takes you to run the process:

- At the beginning of the year (first DC run):
- (Subsequent runs):

23. When you need help, where do you go for help?

- DPI memos/DPI User Guide
- DPI web site
- DPI consultant**
- DCF (Diana Gleichauff)
- County Economic Support
- IT staff within agency
- Other staff within agency
- Other schools/districts
- Software vendor(s)
- other:

24. Have you ever provided DC assistance to other schools/districts?

25. Do you feel you have the information and resources necessary to run direct certification as often as you would like?

- No, not at all
- Not really
- Yes, pretty much
- Absolutely

26. Which tasks are most difficult, confusing or time-consuming?

27. Do you have ideas for what would make this process better/easier?

28. Is there anything else that would be useful for us to communicate to the state or USDA?

Appendix C: Interview Instrument for Other States

Purpose: Augment knowledge gained through the literature review by conducting detailed interviews with staff in states that have similar or higher direct certification rates to determine additional best practices, procedures, technology, communication, training and technical assistance provided.

1. Walk me through DC in your state
 - a. Do schools run it or does the State?
 - b. What's the process for matching school and state records?
 - c. Are student records matched against TANF and/or FDPIR data in addition to SNAP?
 - d. Are private schools, Head Start, or RCCI's submitted for match?
 - e. What fields are matched? Are exact matches on all fields required?
 - f. Are near matches identified and what can/should be done to determine if they are in fact a match?
 - g. How is categorical eligibility for all children in a household handled?
 - h. When is DC run?
 - i. Do you have DC guideline and other info on your web site I can review?
2. How often do districts/schools run direct certification? Are there set dates by which it must be run?
3. What is the process when an issue or concern related to direct certification is identified to you or your agency?
4. Do you see a difference in the way public/private, urban/rural, small/large etc run DC? What have you done to close the gap (if any)?
5. What types of training and technical assistance do you provide?
 - a. How often do you provide training?
 - b. Do you require the training?
 - c. What percentage of districts/schools have used your training/tech assistance?
6. Do all schools use the same software for DC or do they choose the software?
7. Who is in charge of investigating near matches, potential matches, etc?
8. Communication with districts/states: How often? How? Only when there is a problem? Do you check in?
9. To what do you attribute your general success? To what extent have your recent process improvements affected the DC rate?
10. For what reasons do you feel your overall state rate increased?
11. What resources do you have available for administering the direct certification process? How do you distribute resources appropriately statewide?

Appendix D: SFA Survey Results – Summary Statistics

VARIABLE	N (%)	VARIABLE	N (%)
Staff Position*		Agency County	
Administrative Staff	229 (30)	Adams	1 (0.1)
Food Service Administrator	198 (26)	Ashland	3 (0.4)
Agency Mngmnt/Administrator	106 (14)	Barron	11 (1.4)
Business Office Staff	66 (9)	Bayfield	5 (0.6)
Food service other staff	62 (8)	Brown	25 (3.2)
Accounting/Bookkeeping	56 (7)	Buffalo	6 (0.8)
IT/Data management	18 (2)	Burnett	3 (0.4)
Manager, unspecified	18 (2)	Calumet	7 (0.9)
Human Resources	7 (1)	Chippewa	10 (1.3)
Other	12 (2)	Clark	12 (1.6)
Total	772 (100)	Columbia	9 (1.2)
		Crawford	5 (0.6)
Agency Type		Dane	30 (3.9)
Public	440 (57)	Dodge	17 (2.2)
Private	310 (40)	Door	6 (0.8)
RCCI	22 (3)	Douglas	4 (0.5)
Total	772 (100)	Dunn	5 (0.6)
		Eau Claire	6 (0.8)
Student Enrollment		Florence	1 (0.1)
100 or less	107 (14)	Fond du Lac	16 (2.1)
101 to 500	318 (41)	Forest	4 (0.5)
501 to 1000	130 (17)	Grant	14 (1.8)
1001 to 3000	144 (19)	Green	7 (0.9)
3001 to 5000	38 (5)	Green Lake	9 (1.2)
5001 to 10000	24 (3)	Iowa	4 (0.5)
10001 or more	10 (1)	Iron	1 (0.1)
No response	1 (0)	Jackson	6 (0.8)
Total	772 (100)	Jefferson	19 (2.5)
		Juneau	6 (0.8)
Years of DC Experience		Kenosha	14 (1.8)
<1	27 (3)	Kewaunee	9 (1.2)
1	74 (10)	La Crosse	13 (1.7)
2-5	532 (69)	Lafayette	9 (1.2)
>5	64 (8)	Langlade	3 (0.4)
NR	75 (10)	Lincoln	8 (1.0)
Total	772 (100)	Manitowoc	13 (1.7)
		Marathon	21 (2.7)
No. Responsible in Agency		Marinette	8 (1.0)
0	19 (2)	Marquette	2 (0.3)
1	452 (59)	Menominee	0 (0.0)
2	229 (30)	Milwaukee	104 (13.5)
3	52 (7)	Monroe	6 (0.8)
4 or more	8 (1)	Oconto	8 (1.0)
No response	12 (2)	Oneida	2 (0.3)
Total	772 (100)	Outagamie	26 (3.4)
		Ozaukee	8 (1.0)
Software Used*		Pepin	3 (0.4)
Excel	270 (35)	Pierce	7 (0.9)
Skyward	195 (25)	Polk	9 (1.2)
Powerschool	67 (9)	Portage	8 (1.0)

Excel + other	52 (7)	Price	5 (0.6)
Lunch Cashier	47 (6)	Racine	23 (3.0)
VARIABLE	N (%)	VARIABLE	N (%)
Software Used (cont.)		Agency County (cont.)	
Skyward + Excel	37 (5)	Richland	4 (0.5)
Infinite Campus	19 (2)	Rock	10 (1.3)
Nutrikids	6 (1)	Rusk	5 (0.6)
Skyward + other	2 (0)	Saint Croix	13 (1.7)
Lunchbox	2 (0)	Sauk	10 (1.3)
Other (single program)	31 (4)	Sawyer	4 (0.5)
Other (multiple programs)	3 (0)	Shawano	9 (1.2)
no computer used	6 (1)	Sheboygan	16 (2.1)
n/a	3 (0)	Taylor	6 (0.8)
no response	32 (4)	Trempealeau	9 (1.2)
Total	772 (100)	Vernon	8 (1.0)
		Vilas	5 (0.6)
Month of First Run		Walworth	21 (2.7)
January	7 (1)	Washburn	5 (0.6)
February	2 (0)	Washington	18 (2.3)
March	4 (1)	Waukesha	28 (3.6)
April	5 (1)	Waupaca	14 (1.8)
May	1 (0)	Waushara	3 (0.4)
June	6 (1)	Winnebago	12 (1.6)
July	104 (13)	Wood	11 (1.4)
August	381 (49)	Total	772 (100.0)
September	143 (19)		
October	36 (5)	Aware Can Run >1x Per Year	
November	12 (2)	Yes	678 (88)
December	3 (0)	No	77 (10)
Have not run yet	42 (5)	No response	17 (2)
No response	26 (3)	Total	772 (100)
Total	772 (100)		
		Training/Assistance Sources*	
Usually Run >1x Per Year		WI DPI web site	437 (32)
Yes	460 (60)	WI DPI staff	254 (19)
No	257 (33)	Software vendor	150 (11)
Don't know	42 (5)	On-site staff	131 (10)
No response	13 (2)	WI DPI training	96 (7)
Total	772 (100)	CESA staff	58 (4)
		WI DCF staff	57 (4)
Have Necessary Info/Resources		Staff in other school/district	50 (4)
Yes	613 (79)	Paper manual/mailings	12 (1)
No	146 (19)	State staff, unspecified	10 (1)
No Response	13 (2)	Self-taught	10 (1)
Total	772 (100)	Other	11 (1)
		None	70 (5)
Confusing/Problematic Aspects*		Total	1346 (100)
Formatting files (upload or download)	53 (7)		
Resolving mismatches	45 (6)	Training/Changes Desired*	
Overall process	34 (4)	In-person training/Webinar	91 (12)
Software difficulties	33 (4)	Detailed manual/Tutorials	39 (5)
Extending to other HH members	27 (3)	Improve personal assistance (state, county, vendor)	19 (2)
Initial set up/Logging in	23 (3)	Software specific assistance	19 (2)

Process changes every year	17 (2)	Regular reminders/updates	17 (2)
Results layout	14 (2)	Simple instructions "cheat sheet"	14 (2)
Uncomfortable with technology (rely on others)	14 (2)	Simplify matching process	13 (2)
Resolving questions of eligibility/parent refusal	13 (2)	Guidance on resolving mismatches	11 (1)
VARIABLE	N (%)	VARIABLE	N (%)
Confusing/Problematic Aspects (cont.)		Training/Changes Desired (cont.)	
Don't run frequently/Forget process	12 (2)	Anything	9 (1)
Time consuming	11 (1)	Results enhancements	9 (1)
Little or no assistance from state	10 (1)	State provides list of eligible students	7 (1)
Small school: few eligible students	8 (1)	Alternative solutions for small schools	6 (1)
Uncertain if running correctly	8 (1)	Guidance on extending eligibility to HH	5 (1)
DC process not Mac computer-friendly	5 (1)	other	18 (2)
Don't know what DC is/Haven't ever run	4 (1)	Don't know	35 (5)
other	20 (3)	None: praise	9 (1)
None: Praise	129 (17)	NR	451 (58)
NR	292 (38)	Total	772 (100)
Total	772 (100)		

*Some or all categories developed from open-ended responses