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Regional Office Review of Applications (RORA) for School Meals 2013

Final Report



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Regional Office Review of Applications (RORA) For School Meals 2013 Final Report

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Any opinions, findings, conclusions, and recommendations expressed in this report are those of the authors and do not necessarily reflect the views of the U.S. Department of Agriculture.

Executive Summary

This is the ninth in a series of annual reports to examine administrative errors incurred during the local educational agency's (LEA) approval process of household applications for free and reduced-price meals in the National School Lunch Program (NSLP). Until 2009, the Food and Nutrition Service (FNS) staff reviewed the applications to make assessment of administrative errors. Starting in 2010, Westat served as an independent reviewer to assess administrative errors in sampled applications.

This report examines administrative error estimates in student certification for free and reduced-price NSLP meals. Due to the unequal probability of selection of LEA and selection of an application, additional analyses were undertaken to assess the effect of applying sample weights on the error estimates.

A total of 2,800 applications from school year (SY) 2012-13 were available for independent review. LEA determinations had administrative errors in 238 of these applications. This corresponds to an overall administrative error rate of 8.5 percent. This year's rate indicates a 0.8 percentage point increase from an administrative error rate of 7.7 percent in the previous school year. Of the 238 applications with administrative errors, 103 applications resulted in incorrect eligibility determination for free or reduced-price meals.

Among all income-based applications, 96.2 percent of students were certified for the correct level of meal benefits based on information in the application files. Household size and income were accurately calculated for 97.8 and 94.6 percent, respectively.

The rate of certification and benefit status errors were comparable to previous years with 3.6 and 3.8 percent respectively. Adjusting for sample weights indicate slight upward bias in the unweighted error estimates for determination of certification and benefit status. While unweighted estimates indicate 3.68 percent and 4.00 percent errors, "weighted as usual" estimates show a 3.61 percent and 3.78 percent and "revised weight" estimates indicate 3.47 percent and 3.63 percent error rates in determination of certification and benefit status, respectively.

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The National School Lunch Program (NSLP) is a federally funded meal program operating in public and nonprofit private schools and residential child care institutions. There were 30.6 million children in over 100,000 public and non-profit private schools and residential child care institutions receiving meal benefits in SY 2012-13. About 21.5 million of these children received free or reduced-price lunch (FNS, 2012a). The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) administers the NSLP at the federal level. At the State level, State agencies, typically State departments of education operate the program through agreements with local educational agencies (LEA). Federal law, regulations and policies determines eligibility for meal benefits. Based on the federal regulation 7 CFR Part 210, the LEAs have the legal authority to operate the NSLP as well as to certify and verify student eligibility for free and reduced-price benefits under the NSLP. Section 9 of the Richard B. Russell National School Lunch Act and 7 CFR 245 provide the requirements relating to determining free or reduced price meal eligibility including certification and verification requirements and procedures.

FNS is required to report annually on the extent of erroneous payments in its programs under the Improper Payments Information Act of 2002 (IPIA) along with a report on the actions taken or that will be taken to reduce erroneous payments. In the school meal application process, erroneous payments (both under- and over-payments) can occur mainly for two reasons; household misreporting and administrative errors. This report focuses on administrative errors incurred during eligibility determinations. FNS administration has publicly stated the agency's commitment to improving program effectiveness and integrity using the tools provided to them in the Healthy, Hunger-Free Kids Act. Such tools include restructuring the review process to assess LEA operations, strengthening direct certification used to determine eligibility for free school meals by rewarding States for improvement in direct certification rates and establishing additional review requirements for school districts that demonstrate high levels of administrative error (Rowe, 2013). Consistent with the overall efforts to reduce improper payments, FNS awarded Administrative Reviews and Training (ART) grants to State agencies in Fiscal Year (FY) 2013 to support oversight and training efforts to reduce administrative errors. Some uses of these ART grants include training of LEA administrative personnel in application, certification, verification procedures as well as technology improvements to address administrative errors (USDA, 2013).

FNS routinely collects data through the Regional Office Review of Applications (RORA) to track these types of errors. Previously, USDA has issued eight reports examining annual rates of administrative errors (Karakus, Gasper et al., 2013); this ninth report presents findings from an independent assessment of applications from the 2012-13 school year.

Assessment of Administrative Errors

In accordance with changes made to the Child Nutrition and WIC Reauthorization Act of 2004 and policy clarifications issued since 2001, FNS published a revised manual, the *Eligibility Manual for School Meals: Determining and Verifying Eligibility*, in 2008. The manual was revised in October 2011, August 2012 and August 2013¹ and reflects changes made since 2008, as a result of final and interim regulations, and policy clarification. In addition, only those non-discretionary provisions addressed through policy memorandum from the *Healthy, Hunger-Free Kids Act of 2010* are reflected in this updated manual.

There are three categories of eligibility for meal benefits: (1) household income, (2) categorical eligibility, and (3) direct certification. Under the “household income” category students may be eligible for free meals (those with a household income at or below 130 percent of the Federal poverty guidelines), or reduced-price meals (those with a household income between 131 and 185 percent of the Federal poverty guidelines). Households must submit an application to the LEA in order for the student(s) to receive free or reduced-price meal benefits under this category. The LEA staff review these household applications and make determinations of eligibility by comparing the self-reported household size and income information with the guidelines published by the FNS. During the eligibility determination process, administrative errors can occur in determining gross monthly income, household family size, or assignment of benefit level based on household size and income specific (or relevant) information. Per FNS guidelines (FNS, 2012b), approved but incomplete applications (e.g., missing adult signature, missing social security number, etc.) also constitute administrative errors. Inaccurate certifications may result in assignment of higher or lower amounts of benefits than students are entitled to receive. In some instances, administrative errors may not have any impact on the benefit decisions, and therefore do not translate into an error in benefit level.

¹ <http://www.fns.usda.gov/sites/default/files/EliMan.pdf>

“Categorical eligibility” refers to automatic eligibility for free meals with the submission of an application with an appropriate case number or documentation pertaining to one of the following status:

- A member of a household is determined by the administering agency as receiving assistance under the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Programs on Indian Reservations (FDPIR), or Temporary Assistance for Needy Families (TANF);
- Enrollment in a Federally funded Head Start or Even Start program;
- A foster child; or
- A homeless, runaway or a migrant child.

Households participating in Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR) may bypass the standard application process and can be “directly certified” for benefits. Direct certification involves matching SNAP, TANF, and FDPIR records against student enrollment lists, either at the State or LEA level. Parents or guardians of children identified through these matching systems are notified of their children’s eligibility for free school meals. They need to take no action for their children to be certified. No application is necessary if eligibility is determined through the direct certification process. This matching may be manual or through a computerized system.

LEA’s are required to directly certify children from SNAP households for free school meals. LEA’s may also directly certify children from TANF and FDPIR households, but are not required to do so. Also, based on the algorithms used in the matching process and the timing of the direct certification information update, in rare occurrences, it is possible that some students will not be “directly certified” necessitating them to submit an application with their case number to indicate they are “categorically eligible”.

Administrative Errors in Determining Household Income. Common administrative errors in determining gross monthly income may involve computation errors. Such errors include:

- Not converting multiple income sources to annual income;
- Incorrectly determining the frequency of receipt of household income, and/or

- Incorrect addition or multiplication.

Administrative Errors in Determining Household Size. In determining household size, common errors include:

- Not counting the student in the list of all household members; or
- Double counting the student as an adult when the application asks only for the list of adult members of the household.

Administrative Errors Due to Certification of Incomplete Applications. These include:

- Missing signatures;
- Missing last four digits of social security numbers; or
- Other missing information.

Research Questions

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Data abstracted from the review of applications will enable FNS to answer the following questions about administrative errors made by LEAs:

- To what extent did LEAs make the correct meal price status determination during certification?
- What types of administrative errors were made? What was the prevalence of each type of administrative error?
- What percent of applications received the correct meal benefit status? What percent of applications received the incorrect meal benefits at each combination of error (free, reduced-price, paid)?
- Has the accuracy of LEA certification and benefit status determinations changed compared with previous years?

FNS regional staff selected the free- and reduced-price meal applications for independent review, using a randomized sampling procedure. Photocopies of the selected applications were forwarded to Westat for an independent assessment of eligibility and document errors in household size, income, and eligibility determinations. This is the fourth year FNS has sought independent assessment – and to ensure consistency in review with previous studies, Westat reviewed 500 applications and submitted those found to be in error to FNS for verification of the Westat process, and then continued with the review of the remaining applications.

Sampling Design

FNS uses a stratified two-stage cluster sample design to select applications for review. The first stage selects a sample of districts using 28 strata defined by the seven FNS regions and four size categories within each region. This database includes more than 95 percent of all public and private schools participating in the NSLP. Two LEAs are selected from each stratum using probabilities proportional to size (PPS) methods with replacement (eight LEAs are selected from each of the seven FNS regions). The measure of size for each LEA is the number of students approved for free and reduced-price meals obtained from FNS's School Food Authority Verification Summary Report (FNS-742). This selection process is accomplished in the following steps:

1. Sort the LEAs in each region by the number of students approved for free/reduced-price meals, from the smallest to the largest;
2. In each region, calculate the cumulative number of students approved for free/reduced-price meals for the LEAs sorted in (1);
3. Determine the cutoff values to be $\frac{1}{4}$, $\frac{1}{2}$, and $\frac{3}{4}$ of the total number of students approved for free/reduced-price meals in each region;

4. Examine the cumulative frequencies in each region and use the cutoff values to divide the LEAs into four strata (“small”, “medium”, “large” and “very large” school districts); and
5. Randomly select 2 LEAs within each stratum, using probability proportionate to size sampling with replacement with the number of students approved for free/reduced-price meals as the measure of size.

In stage two, FNS regional staff is asked to select students who had applied for meal benefits from the administrative files of the 56 LEAs selected in the first stage using systematic (randomized) sampling. In each of the 56 selected LEAs, applications from about 50 students were selected for review. If a LEA was selected twice (sampling was done with replacement), applications from about 100 students were sampled, so that the sample size in each stratum remained about 100 in all cases. Both approved and denied applications were included in the sample; students directly certified or students in Provision 2 or 3 SFAs schools not in their base year were not included. **Appendix A** includes strata totals of the number of students certified for free and reduced-price meals and direct certifications in each stratum. **Appendix B** presents the number of school districts within each region by the four strata: “small”, “medium”, “large” and “very large” school districts.

Development of Sampling Weights

Sampling weights are required to produce substantially unbiased estimates from the administrative records data by compensating for the unequal probabilities of application selection. The initial component of the sampling weight, called the *base weight*, corrects for the unequal probabilities of selection and is typically the reciprocal of each unit’s probability of selection into the sample. In mathematical notation, if ‘n’ LEAs are sampled with replacement, with probability p_i , on each draw then the base weight, denoted by w_i , is given by

$$w_i = 1 / np_i.$$

This approach to weighting for sampling with replacement and with unequal probabilities has been widely recognized for some time (Hansen and Hurwitz, 1943; Cochran, 1977, pp. 250-255). In this application, $n=2$, and p_i for each LEA is the ratio of the number of students approved for free/reduced-price meals in the school LEA to the total number of such students in the stratum. Hypothetically, if all students approved for free and reduced-price meals in a sampled LEA were reviewed by Westat, then the LEA base weight could be applied to the student data as well. But in

the next stage, about 50 such students were selected from the LEA for review, thereby requiring another weighting component.

For multi-stage designs, the base weights must reflect the probabilities of selection or base weights at each stage. For instance, in the case of a two-stage design in which the base weight for the i -th LEA is $w_i = 1/(2 p_i)$, and the j -th student is selected within a selected LEA with probability $p_j(i)$ at the second stage, then an appropriate weight for each student $j(i)$ in the sample is given by

$$w_{ij} = w_i/p_j(i)$$

The estimates presented in this report are reported in three different ways:²

1. Consistent with the earlier reports prepared by FNS, using no weight adjustment. We note that unweighted estimates are biased since applications were not sampled with equal probabilities. Unweighted estimates describe only the characteristics of the sampled applications.
2. Applying a weight for each application using the same formula that FNS used in earlier years (i.e., LEA base weight/probability of student). The following formula was used to compute this sampling weight (*weight as usual*):

$$\text{Weight as usual} = \frac{\text{Region size}}{2 \times \text{LEA size}} \div \frac{50}{\text{LEA size}}$$

3. After discussions with FNS, we were informed that in the past, while directly certified students were excluded in the selection of students at the sample LEAs, the weighting used for the estimates assumed that the selected applications were randomly selected from all students approved for free and reduced-price meals including those directly certified. However, the weight formula discussed above does not take this information into account. Thus, we compute weights accounting for the exclusion of directly certified students and prepare estimates using these revised weights (*revised weights*).

$$\text{Revised weight} = \frac{\text{Region size}}{2 \times \text{LEA size}} \div \frac{50}{(\text{LEA size} - \text{LEA direct certification size})}$$

² For comparison purposes, we report estimates on all four types of errors among income based applications and the weight computation does not reflect the process of removing categorically eligibles. This would provide good estimates only if the distribution of the categorically eligibles did not affect weights. **Appendix C** presents the mean and standard errors estimates for certification and benefit issuance errors for all applications.

Data File

Under direction from FNS staff, an EXCEL spreadsheet was created with appropriate data fields (Table 1). Each application was input into the spreadsheet along with the reviewer comments.

Table 1. List of variables obtained during application review

Variable name	Variable description	Value labels
Distnum	LEA Number (Region, Strata, LEA)	
LEA	LEA Name	
State	State Abbreviation	
Student	Student Number within LEA (1-50)	
CBIS	Current Benefit Issuance Status	(1) Free (2) Reduced-price (3) Paid
Napps	Number of Benefit Applications on File	
Verify	Was the Student Application Selected for Income Document Verification?	(1) Yes (2) No
VerDoc	Was Documentation Provided for Verification Request?	(1) Yes (2) No
CatElig	Application Categorically Eligible?	(1) Yes (2) No (3) Foster Child
HHSize	Household Size as Determined by Reviewer	
HHIncome	Monthly Household Income as Determined by Reviewer	
SSN	Was Parent's Last Four Digits of Social Security Number provided on Application?	(1) Yes (2) Don't Have SSN (3) No
Signature	Was Adult Signature Provided on Application?	(1) Yes (2) No
SFAHHSize	Household Size as Determined by SFA ³	
SFAHHInc	Monthly Household Income as Determined by SFA	
SFAElig	Eligibility Status as Determined by SFA	(1) Free (2) Reduced-price (3) Paid-Income too High (4) Paid-Incomplete Application
FNSElig	Eligibility Status as Determined by Reviewer	(1) Free (2) Reduced-price (3) Paid-Income too High (4) Paid-Incomplete Application
SFAVer	Eligibility Status by SFA after Verification	(1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request
FNSVer	Eligibility Status by Reviewer after Verification	(1) Remain F (2) Remain RP (3) Change F to RP (4) Change F to P (5) Change RP to P (6) Change RP to F (7) Non Response to Verification Request
ProcErr	Was Processing Error Made in Certification Process?	(1) Yes (2) No

³ SFA stands for "School Food Authority", the governing body administering one or more schools and has the legal authority to operate child nutrition programs approved by USDA to operate the Program. SFA and LEA terms are used interchangeably throughout this report.

Application Review Process

Data Abstraction. The first stage of data abstraction included data entry onto hard copy spreadsheets. Any inconsistencies or inquiries were discussed at internal weekly meetings and documented on problem sheets. Issues that were not resolved internally were submitted to FNS for final resolution. All inquiries, internal or from FNS, were recorded in a Data Decision Log and serve as an historical record for future data abstraction and analysis (**Appendix D**). The second stage of data entry was transferring the data from the hard copy spreadsheet to an electronic database.

Quality Control. A rigorous quality control effort was employed at each stage of data abstraction and entry. Hard copy data abstraction received 100 percent review from a separate abstractor with an additional review of a 10 percent sample performed by project management staff. Electronic data entry also received 100 percent review from alternate data entry staff and a 10 percent sample by project management staff. Each case that was categorically eligible or selected for verification also received 100 percent review from project management staff. Lastly, any application that was considered to be an anomaly or raised any questions was discussed thoroughly among all data abstraction staff and documented accordingly.

Eligibility Determinations

Following the definitions used in the previous FNS reviews, certification status was considered in error in the following situations:

1. If the LEA's certification determination is different than the independent certification determination.
2. For applications selected for verification (e.g., pay stub verification for reported income), if the SFA certification determination after verification was different than the independent certification determination after verification.
3. The computation of household size and income was not recorded on the application for some LEAs. However, regional FNS staff completed a cover page - including information on current benefit issuance status for each applicant selected for this study. For applications with no information on initial certification decision, certification status

was considered in error if LEA certification determination was different than the current benefit issuance status.⁴

In addition, benefit status was considered in error if the current benefit issuance status provided by the LEA was different than the independent certification determination or if the application was selected for verification and the CBIS was different than the eligibility status determined by the reviewer after verification.

Various types of administrative errors can be made by the LEAs in calculating household size and income. Common errors in calculation of household size include:

1. Not counting the student if the applicant inadvertently omitted the child's name in the list of all household members; and
2. Double-counting the student if the application called for a list of all adult household members and the student was included in the list as an adult⁵.

Common errors in the calculation of gross monthly income include:

1. Incorrect determination of the frequency for receiving income (e.g., biweekly instead of monthly);
2. Not using a standard frequency (i.e., annual) when there are multiple income sources with different frequency;
3. Incorrect addition or multiplication; and
4. There can be issues related to inconsistent treatment of income received from child support alimony payments and income from irregular employment (e.g., substitute teacher). While income from such sources should be most often correctly computed and included in the gross household income, there may be cases where such income may be inadvertently excluded from the household income computation.

⁴ In some instances, the applications were scanned and the certification process was completed using computer software. In some cases the FNS Regional staff failed to collect the information from the data files, so we could only assume that the initial certification status matched the current benefit issuance status. To that end, SFAElig should equal CBIS.

⁵ Some applications have a separate place for the listing of all adult members of the household. Sometimes households include the children in that list due to misunderstanding and this may cause the reviewer to double count the number of children.

Data Security

In agreement with the Federal Privacy Act and other regulations to protect individual data, hard copy applications were stored in a locked file cabinet secured with a lock bar. This file cabinet was located in a limited access field room controlled by a key pad door lock (with an alarm) and security cameras. All electronic data files were encrypted and password-protected; only staff working on the project had access to these files. All staff signed a confidentiality agreement, in compliance with Westat's *Electronic Data Storage, Transport, and Security Acceptable Use Policy and Guidelines and Electronic Mail and Internet Acceptable Use Policy and Guidelines* in addition to the required USDA confidentiality agreement.

Data Review Key Findings

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A total of 2,800 household applications for free or reduced-price meal benefits from the 2012-13 school year were selected for review. Of these 2,800 applications, 265 (9.5 percent) were categorically eligible applications and 2,533 (90.5 percent) were income-based applications. The remaining two applications could not be located and only cover pages prepared by the regional office staff were submitted. LEAs must have documentation that the household of a student receiving benefits has submitted an application or that the student was directly certified for free meals. Of the two missing applications, both had a current benefit issuance status of paid, resulting in an administrative error (not a certification error) and were included in the analysis.

Categorically eligible students are eligible for free meals. In order to process the application, a household must provide the name of the child, a SNAP, TANF, or the FDPIR case number, or indicate other categorically eligible designation (e.g., homeless, migrant, foster child) and a signature of an adult household member on the application. In order to process an income based application, a household must provide the number of children and adults in the house, names of the household members, household income and frequency of receipt, an adult signature and the last four digits of the social security number.

In the following section we first present error estimates and then examine the effect of applying sample weights on the error estimates. The samples under examination include (1) categorically eligible applications (n=265), (2) income based applications (n=2,533), and (3) all approved/denied applications (sample 1+ sample 2+ 2 missing applications with n=2,800).

Among categorically eligible applications the prevalence of certification error during processing was 2.3 percent. All applications were considered categorically eligible if a number was provided in the space for SNAP, TANF, or FDPIR number. The accuracy of the SNAP, TANF, or FDPIR number listed on the application was not verified for this study.

Six of the 265 categorically eligible applications resulted in an eligibility determination of reduced-price or paid status rather than free status which indicates a certification error. Thus, the certification error rate was 2.3 percent (6/265). The remaining applications included the student name, case number and adult signature, and were processed correctly. All of the certification errors resulted

from an LEA proceeding to make an income based assessment of an application when a SNAP, TANF, or FDPIR number was included on the application. If LEA staff determined that these students were not on a public subsidy program as indicated on the application, then all six eligibility determinations based on household size and income would have been correct.

Among income-based applications LEAs made more errors in determining gross monthly income than in determining household size. Among the 2,533 income based applications, 536 of them (21.2 percent) had no indication of what household size or income levels the LEA staff had used in making its eligibility determination. The majority of such applications did not have the information, most likely because the applications were scanned and computer software output was not clear as to what information LEA actually used to make the determination. Occasionally the regional staff collecting the information failed to obtain the screen shots from the computer system indicating what information the LEA actually used to make the eligibility determination. It was also possible that the application lacked space for LEA staff to enter their computation of household size and income. Thus, the sample size for the household income and size error rates is 1,997. School year 2012-13 had a relatively larger percentage of applications with no indication of LEA household size or income (21.2 percent) compared with last year (10.9 percent).

In school year 2012-2013, household size and household income were accurately calculated for 97.8 and 94.6 percent of the applications, respectively. Table 2 details the accuracy of household income and household size from income-eligible applications. In terms of household size determination, there were almost an equal number of under-counts and over-counts of the correct household size, 1.2 percent and 1.0 percent respectively. In calculating household income, there were more under-counts than over-counts. While 4.0 percent of applications had gross income under-counted, only 1.4 percent of applications had income over-counted.

Table 2. Accuracy of LEA determination of household income and household size from income-eligible applications (unweighted data for SY 2004-05 to 2012-13)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13
	%	%	%	%	%	%	%	%	%
Household size									
Correct	97.9	97.1	96.5	98.1	97.8	98.0	97.2	98.3	97.8
Not correct	2.1	2.9	3.5	1.9	2.2	2.0	2.8	1.7	2.2
Under-count	0.9	1.9	2.1	0.8	1.1	1.0	1.4	0.8	1.2
Over-count	1.2	1.0	1.4	1.1	1.0	1.0	1.3	0.9	1.0
Number of applications	2,222	2,293	2,252	2,315	2,118	2,314	2,384	2,192	1,997
Household income									
Correct	91.9	92.1	94.0	90.1	96.2	96.3	95.7	96.3	94.6
Not correct	8.1	7.9	6.0	9.9	3.8	3.7	4.3	3.7	5.4
Under-count	4.4	3.5	3.5	7.6	2.4	2.3	3.0	2.5	4.0
Over-count	3.7	4.4	2.5	2.3	1.4	1.4	1.2	1.2	1.4
Number of applications	2,222	2,293	2,252	2,315	2,118	2,278	2,366	2,192	1,997

Note: Table presents unweighted percent of cases with information recorded on the application. Household size and household income are considered incorrect only if the household size and income recorded on the application by the LEA are not equal to the value calculated by the independent reviewer from the data provided on the application. Numbers may not exactly sum to total due to rounding.

LEA determinations had administrative errors in 8.5 percent of applications *approved or denied on the basis of an application*. This indicates a slight increase of 0.8 percentage point from the previous year’s administrative error rate of 7.7 percent. Among the 238 administrative errors, 103 applications resulted in incorrect eligibility determination (six categorically eligible applications⁶, and 97 from income based applications). As seen on Table 3, there were 73 applications with more benefits and 30 applications with fewer benefits than were justified. This year’s rate is more consistent with the average values observed in the previous years.

Administrative errors do not always result in incorrect eligibility determination. For example, a household size may be incorrectly assessed as four and the student may qualify for free meal. If the correct household size was three, this would indicate an administrative error, but if the student still qualifies for free meal, it does not affect the eligibility determination.

Table 3. Administrative errors and incorrect certification determinations on the basis of an approved/denied application (n=2,800), (Unweighted data for SY 2012-13)

Administrative errors	N	Percent
All administrative errors	238	8.5
Administrative errors that resulted in incorrect certification determination	103	3.7
Higher benefits	73	2.6
Lower benefits	30	1.1

Note: Certification status is considered an administrative error if the LEA’s certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification, certification status is considered an administrative error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer).

The percentage of eligibility determinations in error was 3.8 percent for students *approved or denied on the basis of income based assessment*. As seen in Table 4, there were 97 applications (3.8 percent) with incorrect certification out of 2,533 income-based applications. Of these 97 applications with certification error, 73 applications (75 percent) were certified for more benefits, and 24 applications (25 percent), were certified for fewer benefits than justified based on the documentation available.

⁶ These six applications had “reduced-price” or “paid” status instead of “free” status.

Table 4. Certification status determination for income-based applications (n=2,533), (Unweighted data for SY 2012-13)

Certification status determination	N	Percent
Correct determination	2,436	96.2
Incorrect determination	97	3.8
Higher benefits	73	2.9
Lower benefits	24	0.9

Note: Certification status is considered incorrect if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer).

Accuracy of benefit issuance status was a little lower compared to the accuracy of certification determination. As discussed earlier, benefit status was considered in error if the current benefit issuance status was different than the independent certification determination or the eligibility status determined by the independent reviewer after verification. Meal benefits issuance status was correct on about 96 percent of the applications approved or denied on the basis of income based assessment. As seen in Table 5, there were 103 students (4.1 percent) out of 2,533 income-based applications approved for the incorrect level of benefits. Of the 103 students with benefit determination error, 80 students (78 percent) were certified for a higher level of benefits, and 23 students (22 percent) were certified for a lower level of benefits than justified based on the documentation available.

Table 5. Benefit issuance status determination for income-based applications (n=2,533), (Unweighted data for SY 2012-13)

Benefit issuance determination	N	Percent
Correct determination	2,430	95.9
Incorrect determination	103	4.1
Higher benefits	80	3.2
Lower benefits	23	0.9

Note: Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification.

Table 6 presents a comparison of errors estimates for certification and benefit status determinations for all applications. Consistent with the previous reports, we present weighted estimates because sampling weights are required to produce substantially unbiased estimates from the administrative records data by compensating for the unequal probabilities of application selection.

Table 6. Comparison of certification and benefit status determinations for all applications approved or denied on the basis of an application, (Weighted data for SY 2004-05 to SY 2012-13)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13
	%	%	%	%	%	%	%	%	%
Certification status determination									
Correct determination	96.5	97.0	96.1	96.1	98.0	97.7	96.3	97.1	96.4
Incorrect determination	3.5	3.0	3.9	3.9	2.0	2.3	3.7	2.9	3.6
Higher benefits	2.9	2.5	3.0	3.2	1.3	1.5	2.8	2.1	2.6
Lower benefits	0.6	0.5	0.9	0.7	0.7	0.9	0.9	0.8	1.0
Benefit status determination									
Correct determination	95.7	96.2	95.8	95.4	97.0	97.0	95.5	96.5	96.2
Incorrect determination	4.3	3.8	4.2	4.6	3.0	3.0	4.5	3.5	3.8
Higher benefits	3.4	2.8	3.3	3.5	1.9	1.5	3.3	2.6	2.8
Lower benefits	0.9	1.0	0.9	1.1	1.1	1.5	1.2	0.9	1.0

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification, certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification. We use "Weights as usual" in weighting. Numbers may not exactly sum to total due to rounding.

The percentage of applications incorrectly approved or denied for NSLP free or reduced-price meal benefits was higher than SY 2011-2012, but still comparable to, the previous years.

The percentage of student households applying for meal benefits that were incorrectly certified due to administrative errors varied from 2.0 to 3.9 percent during the previous 8-year span. As seen in Table 6, in school year 2012-13 administrative error in certification status determination was at 3.6 percent. The percentage of over-certified was 2.6 percent and the percentage of under-certified was 1.0 percent.

The overall percentage of students with incorrect meal benefits issuance status was slightly higher than last year. The benefit status determination error varied from 3.0 to 4.6 percent during the previous 8-year span. In school year 2012-13, among the 2,800 applications, 3.8 percent had incorrect benefit status determination. The percent of students receiving higher benefits than they were entitled increased to 2.8 percent from 2.6 percent in the previous year. The percentage of students receiving lower benefits due to benefit issuance error has slightly increased to 1.0 percent from 0.9 percent in the previous year. However, the t-test results indicate that there is no statistically significant change in certification and benefit errors between SY 2011-12 and SY 2012-13.

Adjusting for sample weights indicate a slight upward bias in the unweighted error estimates for determination of certification and benefit status. As seen in Table 7, unweighted estimates for certification and benefit status determination are higher than the weighted estimates. While unweighted estimates indicate 3.68 percent and 4.00 percent errors, “weighted as usual” estimates show a 3.61 percent and 3.78 percent and “revised weight” estimates indicate 3.47 percent and 3.63 percent error rates in determination of certification and benefit status, respectively⁷.

⁷“Weighted as usual” refers to applying a weight for each application using the same formula that FNS used in earlier years (i.e., LEA base weight/probability of student). “Revised weights” refers to accounting for the exclusion of directly certified students in the LEA listing and prepare estimates using these revised weights (*revised weights*).

Table 7. Comparison of weighted and unweighted estimates: administrative errors in determination of certification and benefit status among all applications approved or denied on the basis of an application (n=2,800), SY 2012-13

	Incorrect determination		Fewer-Benefits		More-Benefits	
	N	Percent	N	Percent	N	Percent
Certification status determination						
Unweighted	103.00	3.68	30.00	1.07	73.00	2.61
Weighted as usual	101.08	3.61	29.12	1.04	71.96	2.57
Revised weights	97.16	3.47	28.00	1.00	69.16	2.47
Benefit status determination						
Unweighted	112.00	4.00	31.00	1.11	81.00	2.89
Weighted as usual	105.84	3.78	28.00	1.00	77.56	2.77
Revised weights	101.64	3.63	27.16	0.97	74.48	2.66

Note: Certification status is considered in error if the LEA's certification determination (SFAElig) is different than independent certification determination (FNSElig). For those students selected for verification certification status is considered in error if the eligibility status determined by the LEA after verification (SFAVer) is different than the eligibility status determined by the independent reviewer after verification (FNSVer). Benefit status was considered in error if the current benefit issuance status provided by the LEA (CBIS) was different than the independent certification determination (FNSElig) or the eligibility status determined by the independent reviewer after verification (FNSVer) for those students selected for verification.

FNS implemented regional office reviews of household applications of students approved for free or reduced-price meal benefits through the National School Lunch Program (NSLP) between 2005 and 2009. Beginning in 2010, Westat served as an independent reviewer to examine administrative errors incurred by the Local Educational Agencies in their approval process of applications for free and reduced-price meals.

A total of 2,800 applications from SY 2012-13 were available for independent assessment to determine administrative errors. In SY 2012-13, LEA determinations had administrative errors in 8.5 percent of these applications. This is a 0.8 percentage point increase from the previous school year, and a 2.2 percentage point decrease compared to SY 2010-2011. Of the 238 applications with administrative errors, 103 applications (or 3.6 percent of total applications reviewed) resulted in incorrect eligibility determination for free or reduced-price meals. Overall, the administrative error rates have stayed within the expected range that has been observed in the last nine years.

Among all income-based applications, 96.2 percent of students were certified for the correct level of meal benefits based on information in the application files. Household size and income were accurately calculated for 97.8 and 94.6 percent of the applications, respectively. Adjusting for sample weights indicate a slight upward bias in the unweighted error estimates for determination of certification and benefit status. Unweighted estimates for certification and benefit status determination are higher than the weighted estimates. While unweighted estimates indicate 3.68 percent and 4.0 percent errors, “weighted as usual” estimates show a 3.61 percent and 3.78 percent and “revised weight” estimates that take the number of students directly certified into consideration, indicate 3.47 percent and 3.63 percent error rates in determination of certification and benefit status, respectively.

Recommendations for Future Studies

6

This report presents findings of the ninth annual RORA review. Westat reviewed the applications selected by FNS, entered data, implemented quality control procedures, and conducted data analyses. We recommend that future RORA studies will benefit from the following two recommendations.

More LEAs are moving towards a computerized application management system. There is a need for more guidance in the events when there is only a computer screen shot provided by the LEA. Most often, when the LEA enters information electronically they may not keep the original application and/or they may prefer to send only the electronic print out for review. A proper review of such applications may not be possible because of the inability to see the information that would be included in the original applications submitted by families.

In some applications it was hard to make an assessment because of the unclear time lag or lack of notation when the LEA updates information after hard copy submission. While some of the paperwork issues may be due to electronic applications themselves, we noticed that there were discrepancies between what was written or typed on some applications and the LEA documentation provided as backup. For example, sometimes CBIS would be different and we would not quite determine how things changed from the screen shot that would be attached to the hard copy. It is hard to make an assessment with no clear linking path through a paper trail as to why there were differences. We believe better documentation including all relevant information must be provided for reviewing the application.

References

- Cochran W.G. 1977. Sampling Techniques. Wiley; 3rd edition. New York.
- Endahl, John. “Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2005.” USDA, Food and Nutrition Service, Alexandria, VA: 2005.
- Endahl, John. “Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2006.” USDA, Food and Nutrition Service, Alexandria, VA: 2007.
- Endahl, John. “Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2007.” USDA, Food and Nutrition Service, Alexandria, VA: 2008.
- Endahl, John. “Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2008.” USDA, Food and Nutrition Service, Alexandria, VA: 2010.
- Endahl, John. “Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2009.” USDA, Food and Nutrition Service, Alexandria, VA: 2010.
- Karakus M.C., Roeser A., Dixit-Joshi S., Eaker E. “Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2010.” A report prepared under contract to USDA, Food and Nutrition Service, Alexandria, VA: 2011.
- Karakus M.C., Roeser A., Frey W. “Accuracy of LEA Processing of School Lunch Applications – Regional Office Review of Applications (RORA) 2011.” A report prepared under contract to USDA, Food and Nutrition Service, Alexandria, VA: 2012.
- Karakus M.C., Gasper J., Roeser A. “Accuracy of LEA Processing of School Lunch Applications-Regional Office Review of Applications (RORA) 2012.” A report prepared under contract to USDA, Food and Nutrition Service, Alexandria, VA: 2013.
- FNS (Food and Nutrition Service at the USDA). 2012a. “NSLP Fact Sheet”. Available at <http://www.fns.usda.gov/pd/slsummar.htm>
- FNS (Food and Nutrition Service at the USDA). 2013. Eligibility Manual for School Meals: Determining and Verifying Eligibility. Available at <http://www.fns.usda.gov/sites/default/files/EliMan.pdf>
- Hansen, M.M. and Hurwitz, W.N. (1943). On the theory of sampling from finite populations. *Annals of Mathematical Statistics*: 14; 333-362.

- Long, J. S. (1997). *Regression models for categorical and limited dependent variables*. Sage Publications: Thousand Oaks, CA.
- Moore, Q., Cole, N., Potamites, E. “Modeling high risk indicators of certification error in the National School Lunch Program.” A report prepared under contract to USDA, Food and Nutrition Service, Alexandria, VA: 2012.
- Ponza, M., Gleason, P., Hulsey, L., and Moore, Q. “NSLP/SBP Access, Participation, Eligibility, and Certification Study: Erroneous Payments in the NSLP and SBP.” *Special Nutrition Program Report Series*, No. CN-07-APEC. USDA, Food and Nutrition Service, Alexandria, VA: 2007.
- Rowe, A. “Statement Before the Subcommittee on Agriculture, Rural Development, Food and Drug Administration and Related Agencies, March 14, 2013” Available at: <http://appropriations.house.gov/uploadedfiles/hhrg-113-ap01-wstate-rowea-20130314.pdf>
- U.S.D.A. “Letter to State Directors on ART Grants” Available at: http://www.fns.usda.gov/sites/default/files/2013ART2_letter.pdf



Appendix A

The Strata Totals of the Number Students Approved for Free and Reduced-price Meals and Direct Certifications in Each Stratum

LEA number	LEA size	LEA direct certification size	Strata size
111	255	0	459,647
112	446	132	459,647
121	1,844	567	459,705
122	2,471	792	459,705
131	12,435	4,709	435,045
132	15,682	6,401	435,045
141	55,635	24,769	485,871
142	174,650	78,332	485,871
211	639	155	527,148
212	228	37	527,148
221	3,935	1,356	527,255
222	4,979	1,717	527,255
231	18,987	8,374	518,255
232	12,336	4,602	518,255
241	89,099	17,593	536,667
242	60,825	18,891	536,667
311	2,273	615	1,374,177
312	1,942	722	1,374,177
321	9,085	2,290	1,376,639
322	19,371	7,615	1,376,639
331	50,748	17,081	1,337,804
332	63,496	25,757	1,337,804
341	76,662	28,654	1,413,845
342	75,417	25,907	1,413,845
411	811	285	931,868
412	618	215	931,868
421	1,664	712	931,325
422	1,808	546	931,325
431	6,775	2,237	932,754
432	3,836	1,386	932,754
441	46,025	16,332	932,388
442	15,814	4,706	932,388
511	1,747	561	1,085,306
512	532	122	1,085,306
521	10,332	3,039	1,075,730
522	5,150	1,664	1,075,730
531	17,058	5,342	1,080,404
532	24,518	5,298	1,080,404

LEA number	LEA size	LEA direct certification size	Strata size
541	61,748	20,150	1,101,009
542	53,227	17,853	1,101,009
611	291	97	433,439
612	341	39	433,439
621	1,246	486	434,086
622	3,505	1,244	434,086
631	8,518	2,741	428,044
632	12,881	3,274	428,044
641	16,037	4,482	439,926
642	54,829	18,817	439,926
711	99	7	1,332,715
712	2,048	0	1,332,715
721	6,116	1,802	1,327,565
722	7,128	2,631	1,327,565
731	14,864	3,608	1,334,436
732	15,808	3,254	1,334,436
741	245,956	76,400	1,339,711
742	57,273	15,368	1,339,711

Appendix B

The Number of School Districts Within Each Region by the Four Strata



The Number Of School Districts Within Each Region By The Four Strata⁸

Strata	FNS REGIONS							TOTAL
	NERO	MARO	SERO	MWRO	SWRO	MPRO	WRO	
1	1,957	1,669	1,212	4,288	2,159	2,688	2,119	16,092
2	280	239	212	726	213	295	198	2,163
3	49	73	59	235	62	74	80	632
4	6	17	16	31	21	22	18	131
Total	2,292	1,998	1,499	5,280	2,455	3,079	2,415	19,018

NERO: Northeast Regional Office
 MARO: Mid-Atlantic Regional Office
 SERO: Southeast Regional Office
 MWRO: Midwest Regional Office
 SWRO: Southwest Regional Office
 MPRO: Mountain Plains Regional Office
 WRO: Western Regional Office

⁸ LEAs are divided into four strata (“small”, “medium”, “large” and “very large” school districts) based on the cumulative frequencies in each region.

Appendix C

Mean and Standard Errors Estimates for Certification and Benefit Issuance Errors for All Applications Approved or Denied on the Basis of an Application

Mean and Standard Errors Estimates for Certification and Benefit Issuance Errors for all applications approved or denied on the basis of an application

Unweighted statistics, n=2,800

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0367857	0.0035579
CERTMOREB	Certification error – receiving more benefits?	0.0260714	0.0030119
CERTLESSB	Certification error – receiving less benefits?	0.0107143	0.0019460
BENERROR	Is there a benefit issuance error?	0.0400000	0.0037039
BENMOREB	Benefit issuance error – receiving more benefits?	0.0289286	0.0031680
BENLESSB	Benefit issuance error – receiving less benefits?	0.0110714	0.0019778

Statistics using weights as usual, n=2,800

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0360781	0.0035249
CERTMOREB	Certification error – receiving more benefits?	0.0256950	0.0029907
CERTLESSB	Certification error – receiving less benefits?	0.0103830	0.0019160
BENERROR	Is there a benefit issuance error?	0.0377569	0.0036028
BENMOREB	Benefit issuance error – receiving more benefits?	0.0277401	0.0031042
BENLESSB	Benefit issuance error – receiving less benefits?	0.0100169	0.0018823

Statistics using adjusted weights, n=2,800

Variable	Label	Mean	Standard Error
CERTERROR	Is there a certification error?	0.0346571	0.0034573
CERTMOREB	Certification error – receiving more benefits?	0.0246966	0.0029335
CERTLESSB	Certification error – receiving less benefits?	0.0099605	0.0018770
BENERROR	Is there a benefit issuance error?	0.0363082	0.0035357
BENMOREB	Benefit issuance error – receiving more benefits?	0.0266207	0.0030426
BENLESSB	Benefit issuance error – receiving less benefits?	0.0096875	0.0018514



Appendix D
Data Management Decision Log

1 Student Number	TOPIC: What to use for Student Number Variable	PROBLEM: Can you clarify where we should be pulling the "Student" number variable from? Is it the number listed as item #3 on the cover sheet? We originally thought that each district would have assigned student number of 1 to 50.	RESOLUTION: 1. Student number is not pulled from any place. For your purposes the numbering system should simply go from 1 to 50. <i>There may be some SFAs with fewer than 50 students.</i> The SFAs typically are including the random numbers associated with the selected student. However it would be nice to record 1- 50 on the applications to match up with the database in case one wants to go back and locate a specific application for a given SFA. 2. ADDENDUM: We will add 1-50 on the applications (upper right hand corner).
	DATE INITIATED: 08/24/2010		
	DATE DECIDED: 8/24//2010 ADDENDUM: 8/24/2010		
	REFERENCE: Dist 111 and 112 All applications		
	Decided by: John Endahl ADDENDUM: Margaret Pacious		

2 Application	TOPIC: Duplicated applications	PROBLEM: There have been a few instances where the same application (with sibling students) will have a cover sheet for each individual student. Would you like the single application reviewed twice and documented under each separate student number?	RESOLUTION: Because student applications are selected at random, it is entirely possible that two students from the same household may be selected into the sample. The application should be reviewed as many times as necessary to match the selected students.
	DATE INITIATED: 08/24/2010		
	DATE DECIDED: 08/24/2010		
	REFERENCE: Multiple districts		
	DECIDED BY: Westat Team		

3 Application	TOPIC: No application submitted. NAPPS =0	PROBLEM: 1. There have been several cases when there is a cover sheet indicating Current Benefits Issuance is "Paid" and that no applications were submitted. Is this included in the total number of reviewed applications? 2. ADDENDUM 1a or 1b: Coding structure 3. ADDENDUM 2: In addendum 1 CBIS = 3. Would the variable for ProcErr = 1, X or 2?	RESOLUTION: 1. When you find a Current Benefits Status as paid, these are typically cases when the regional staffer did not get a correct listing of students to randomly select students from. These lists should only include students that had submitted applications and subsequently approved for free or reduced price meals or were denied such benefits. For these cases, I would indicate in the Notes section that "No application submitted" and not include these in the analysis of certification error. 2. ADDENDUM 1a: We will give the student ID and code CBIS = 3 and NAPPS = 0, X's in the remaining fields and a note "No application Submitted". 3. ADDENDUM 2: These are not included in the analysis for certification of error so I would say X and not 2. 2 would indicate that no mistake was made when in actuality we can't make an assessment. If on the other hand, a student has a current benefits issuance of free or reduced price and there is no indication that an application was submitted or no application could be found, then this is a certification error because the SFA must have documentation that a student receiving benefits submitted an application or was directly certified for free meals. 4. ADDENDUM 1b: Coding in this case would be CBIS = 1 or 2 and NAPPS =0 then ProcErr = 1.
	DATE INITIATED: 08/24/2010 ADDENDUM 2 : MP 08/25/2010		
	DATE DECIDED 08/24/2010 ADDENDUM 1: 08/25/2010 ADDENDUM 2: 08/25/2010		
	REFERENCE: Dist 112 St 6, 10,16, 17, 18		
	DECIDED BY: John Endahl ADDENDUM 1a and 1b: Margaret Pacious and Allison Roeser ADDENDUM 2: Allison Roeser		

4 HHIncome	TOPIC: No frequency for income	PROBLEM: If the family does not give a unit for their income (i.e. weekly, monthly, etc.) do we assume the calculation by the SFA is correct?	RESOLUTION: If the family does not give a frequency of receipted income, I generally try to get a feel for the typical income levels of the other households. If the application asks for monthly income then assume that it is monthly income. If the application doesn't ask for monthly income and no frequency is identified, one could assume it is the most frequent occurrence (weekly).
	DATE INITIATED: 08/24/2010		
	DATE DECIDED: 08/24/2010		
	REFERENCE: Dist 111 St 50		
	DECIDED BY: John Endahl		

5 HHIncome & HHSIZE	TOPIC: Error in HHIncome or HHsize	PROBLEM: If there is an error in the income amount or number of household members but the eligibility is the same, this discrepancy is still documented as an error, correct?	RESOLUTION: If there is an error in the calculation of the household income or household size, but the eligibility status is unaffected, you should still indicate that a processing error occurred. This is an administrative error that did not lead to a certification error.
	DATE INITIATED: 08/24/2010		
	DATE DECIDED: 08/24/2010		
	REFERENCE: Dist 111 ST 20 Dist 112 ST 1,2,23		
	DECIDED BY: John Endahl		

6 HHIncome & SFAHHSIZE & SFAHHinc	TOPIC: No SFA variables available.	PROBLEM: One district so far has not provided an SFA worksheet. We have been pulling the SFA information from the “For School Use Only” at the bottom of the application. 1. This section does not include total number in household—should SFAHHSIZE be left blank on the spreadsheet? How to verify eligibility? 2. In one instance, the income was not provided by the family but the SFA listed a total monthly income amount 3. Similarly, one district didn’t seem to ever answer yes or no to if the household was categorically eligible (in some instances they were). Would you like us to note that the SFA portion of the application was not answered in full?	RESOLUTION: 1 & 3. In instances where there is no information about how the SFA calculated household size or income, leave the SFAHHinc and SFAHHSIZE variables blank (X) and assume that the current benefit status from the cover sheet reflects the SFAs determination of eligibility at the time of certification (SFAElig). 2. For the instance that no household income was reported on the application but in the section reserved for the SFA there is a household income amount, this probably suggests that the SFA contacted the household and obtained additional information. The SFA should have noted on the application that such a contact was made, but often times this is not noted on the application. I would assume that the SFA has the correct household income in that case.
	DATE INITIATED: 08/24/2010		
	DATE DECIDED: 08/24/2010 ADDENDUM: 08/24/2010 meeting		
	REFERENCE: Dist 111 ST 25 for #3. Dist 111 ST 4 Dist 112 ST 28,2, 23		
	DECIDED BY: John Endahl		

7 CatElig	TOPIC: Category eligible variables	PROBLEM: 1. What variables are required for categorically eligible students? 2. If the Social Security number is missing, is this an error?	RESOLUTION: 1. Including the cover sheet variables, the required variables are CATELIG = 1, Signature = 1, SFAELIG and FNSELIG both = 1 and PROCERR = 2. 2. NO. On page 16 of the Eligibility Manual for School Meals, for categorically eligible students only the names of the children, a Food stamp, FDPIR, or TANF case number or other FDPIR identifier and the signature of an adult household member are required for a complete application.
	DATE INITIATED: 08/23/2010 meeting		
	DATE DECIDED: 08/30/2010		
	REFERENCE: Eligibility Manual Pg 16.		
	DECIDED BY: Allison Roeser		

8 CatElig	TOPIC: Category eligible variables	PROBLEM: If the applicant is categorically eligible, which variables should we populate? For example, sometimes the applicant will also provide income information, however it will take us time to do the calculations if we want to include this additional information. Apart from income, should we also be documenting HHSize, etc.?	RESOLUTION: Populate all variables for which we have data. This will include income information.
	DATE INITIATED: 08/30/2010		
	DATE DECIDED: 09/10/2010		
	REFERENCE: None.		
	DECIDED BY: John Endahl		

9 SSN	TOPIC: SSN variable for categorically eligible students.	PROBLEM: Currently, the value labels for the SSN variable are 1= yes 2 =) Don't Have SSN and 3= No. However, one district seems to only require a social security number if the household income portion of the application was completed (i.e., not categorically eligible, income eligible only). So, an SSN may not be provided and using "3=No" may not be appropriate by our current definition. Would you like to add a 4th value such as: 4= Not Required or still use "3= No" with a comment in the notes section?	RESOLUTION: MK -For the categorically eligible ones, you do not need SSN for any of the districts. All you need is an adult signature. If not, I like your idea of assigning value of 4 for not required. 1. For applications that are categorically eligible, using 3= No when the applicant does not provide an SSN number is sufficient. (We may also have 1 = yes because some may still provide it). 2. And 3 = No" can then either indicate "not applicable" in situations of categorical eligibility or "an incomplete application" in cases of income eligibility.
	DATE INITIATED: 08/30/2010		
	DATE DECIDED: 08/30/2010		
	REFERENCE: Decision 7 Q 2.		
	DECIDED BY: Allison Roeser Margaret Pacious & Mustafa Karakus (agreed 8/30/2010)		

10 SFA data	TOPIC: Blank or missing SFA data. Or no SFA section.	PROBLEM: Are SFA Blank areas processing errors? Addendum: Change for applications where no SFA documentation is available, either on the application or in the form of computer documentation.	RESOLUTION: No. We will put Xs in all fields SFA left blank. Addendum: If a district uses an application that does not have a section for SFA to mark their income, SFA HHSIZE, or eligibility assessment (or they do not attach a computer printout with the same information), we will continue to use an "X" for the SFAHHInc and SFAHHSIZE but will use "99" for the SFAElig.
	DATE INITIATED: 09/02/2010 Meeting Addendum 1: 11/05/2010		
	DATE DECIDED: 09/02/2010 Addendum 1: 11/05/2010		
	REFERENCE: General Addendum Dist 722 , 741, 742 ALL		
	DECIDED BY: Allison Roeser & Margaret Pacious Addendum: Mustafa Karakus		

11 SFAHHInc	TOPIC: SFA HHInc calculation error.	PROBLEM: SFA recalculated monthly income to a weekly figure by dividing by 4, then recalculated annual income and monthly from that level. This process created an error in the SFA income.	RESOLUTION: Documented monthly income should not be recalculated, just add it to the recalculated weekly, bi-weekly, annual etc. incomes. This is a SFAHHInc error and ProcErr = 1.
	DATE INITIATED: 09/02/2010		
	DATE DECIDED: 09/02/2010		
	REFERENCE: Multiple cases		
	DECIDED BY: Allison Roeser & Margaret Pacious		

12 SSN & Signature	TOPIC: Missing SSN or signature on application.	PROBLEM: If an applicant has received a current benefit issuance of "paid" based on income being too high (correct decision), and the SSN# and/or signature of an adult was not provided, would that be considered an error since the application should have not been reviewed due to missing SSN#?	RESOLUTION: If the SFA has determined that the household is not eligible for free or reduced price meal benefits based on income, then not providing a social security number should not be considered an error. Not including a SSN# should only be considered an administrative error if the household has been approved for free or reduced-price meal benefits based on income. A household approved for free meals based on categorical eligibility need not have a SSN# on the application. Similarly, if the application is not signed by an adult, this would only be considered an administrative error if the household was approved for free or reduced-price meals.
	DATE INITIATED: 09/08/2010		
	DATE DECIDED: 09/14/2010		
	REFERENCE: Dist 112 ST 3		
	DECIDED BY: John Endahl		

13 SSN	TOPIC: Acceptable indication of "No SSN"	PROBLEM: When the applicant doesn't have a SSN and there is no box to check or instructions to write "none", would either a dash or "N/A" in the SSN section be interpreted as "don't have" or "no" (meaning it would not be considered an incomplete application)?	RESOLUTION: If there is no place to check or instructions to write "none", I would consider a dash or N/A as an adequate indication that the individual did not have a social security number and therefore the application should not be considered incomplete.
	DATE INITIATED: 09/08/2010		
	DATE DECIDED: 09/14/2010		
	REFERENCE: Dist 112 ST 3		
	DECIDED BY: John Endahl		

<p>14 SSN</p>	<p>TOPIC: Partial SSN</p>	<p>PROBLEM: Some applicants only provided the last four numbers of their SSN - is this considered complete?</p> <p>Addendum: Is there a policy change now requiring only the last four digits of the social security number for a complete application?</p>	<p>RESOLUTION: The entire social security number, not just the last four digits, need to be included on the application in order to be considered complete</p> <p>Addendum: Yes. Page 21 of the October 2011 Eligibility Manual states that a complete application must include:</p> <ul style="list-style-type: none"> . Names of all household members; . Amount and source of current income for each member and the frequency of the income; . Signature of an adult household member and; . Last four digits of the social security number of the adult who signed the application or an indication that the Household member does not have one.
	<p>DATE INITIATED: 09/08/2010 ADDENDUM: 09/2012</p>		
	<p>DATE DECIDED: 09/14/2010 Addendum: 09/2012</p>		
	<p>REFERENCE: Multiple Applications Addendum: Oct 2011 EM pg. 21</p>		
	<p>DECIDED BY: John Endahl Addendum: Policy change</p>		

15 Adults	TOPIC: Calculation of adults in household	PROBLEM: How do we reliably calculate adults in household?	RESOLUTION: We are actually going to eliminate the “adult” variable. It has been confusing and not necessary for our analysis. The reviewers will not enter any data related to number of adults on the application.
	DATE INITIATED: 09/08/2010 Meeting		
	DATE DECIDED: 09/14/2010		
	REFERENCE: 09/14/2010		
	DECIDED BY: Westat Team John Endahl		

16 HHIncome &FNSElig	TOPIC: No space in Part 2 Student list to enter child's income.	PROBLEM: (Applies to several applications) Application instructions for part 4, is not to list students from Part 2. Part 2 has no space for child's income and instructions to only include students attending the same school and make separate applications for other students. This application has only 1 student and there is an income of \$60.00 in the Foster Child section. Computer sheet shows SFA making an income based status (including the \$60). Should we assume the applicant had no other way of indicating the child's income and make an income based status or should we treat this as a "Foster Child" application?	RESOLUTION: Treat this as an income based application not a foster child application. It is correct to include the \$60.
	DATE INITIATED: 09/15/2011		
	DATE DECIDED: 09/21/2011		
	REFERENCE: Dist 132 St 01		
	DECIDED BY: Westat Team		

17 VerDoc	TOPIC: Cover sheet variable (meaning)	PROBLEM: Does the VER DOC variable refer to whether the school has simply asked for verification or if the family provided the documentation in full? ADDENDUM Referred to JE: The VERDOC variable is (1) if the family submitted all the requested documentation, (2) if the family did not submit all the requested documentation, correct?	RESOLUTION: VER DOC variable refers to whether or not the family has provided all documents associated with the verification process. ADDENDUM/CORRECTION In past years I have been using this variable to indicate if the household file contains sufficient information to make a decision about the appropriateness of the SFA's determination as a result of verification. If the household failed to respond to the verification request and the file provides documentation to this effect, I would code this variable as a "1" indicating that the information was there to make an appropriate decision. It does not mean that the household had necessarily responded to the verification request and provided all the information requested.
	DATE INITIATED: 09/06/2010 meeting		
	ADDENDUM: MK TO JE 09/14/2010		
	DATE DECIDED: 09/08/2010 ADDENDUM: 09/14/2010		
	REFERENCE: All Verification applications		
DECIDED BY: Mustafa Karakus & Allison Roeser ADDENDUM/CORRECTION John Endahl			

<p>18 SFAHHInc</p>	<p>TOPIC: Irregular income calculation</p>	<p>PROBLEM: When an applicant lists income that is irregular, is the SFA supposed to include the given figure in their monthly/yearly calculations? For example, we have an applicant who has listed income (2 days/week) from being a substitute teacher though did not include this amount in her total monthly income. She does not work 2 days a week for the whole year, she only works when there is a need. SFA did include this income in the total (by multiplying the given amount by 52). Is this correct?</p>	<p>RESOLUTION: When the income of an applicant is irregular, the household has the option of providing annual household income information. In this case the substitute teacher, the SFA could have contacted the household to get clarification on the typical annual income received from substitute teaching. Without this information, if the SFA knows that the school district operates on a 9-month school year rather than year-round, instead of multiplying by 52 weeks, I would probably multiply by 39 weeks (3/4 of a year)..</p>
	<p>DATE INITIATED: 09/10/2010</p>		
	<p>DATE DECIDED: 09/10/2010</p>		
	<p>REFERENCE: Dist 212 ST 28</p>		
	<p>DECIDED BY: John Endahl</p>		

19 SFAHHInc & Verification Apps	TOPIC: Income calculation on verified applications. ADDENDUM: Variables from verified applications	PROBLEM: Should the new income listed on the verification sheet be used for both HHIncome and SFAHHInc? ADDENDUM: Variables for verified applications	RESOLUTION: Use income from verification sheet. ADDENDUM/CORRECTION: Use income from verification sheet for determination of agreement between SFAVer and FNSVer variables only. All variables up to SFAVer are to be pulled from the original application. For example HHIncome comes from the original application, not the amount you might find on one of the paystubs that are submitted as part of the verification process. SFAElig and FNSElig are from the original application also. The SFAVer and FNSVer (in addition to the Verify and VerDoc) columns are those that we populate based on the verification process. If we didn't agree with the SFA after the verification process, any type of error would be documented through these two variables (i.e. they wouldn't match.)
	DATE INITIATED: 9/3/2010 ADDENDUM: 10/11/2010		
	DATE DECIDED: 09/08/2010 Addendum: 11/05/2010		
	REFERENCE: Dist 122 ST 16 Addendum: Dist 511 ST 48 to 50		
	DECIDED BY: John Endahl		

20 CatElig	TOPIC: SSN in SNAP/ TANF Section of application.	PROBLEM: Historically, we have assumed that if there is a number in the location for TANF or SNAP case numbers that the number is legitimate (decision log 19). However, in this case, 45 of the 50 applications in this district have what seems to be SSN#s in this box. Please see Alabama 2, 3, 26, 28 for multiple variations of this scenario.	RESOLUTION: I would agree that, for this school district, the numbers that appear in the SNAP/TANF case numbers do appear to be SSNs. Given, that in all instances, the household didn't skip section 4 and provided household income and that the district has processed these applications on the basis of household income, I would review these applications as if they were income-based applications, NOT categorically eligible applications.
	DATE INITIATED: 09/22/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 322		
	DECIDED BY: John Endahl		

21 Homeless	TOPIC: No SFA Information Marked Homeless	PROBLEM: This application is marked as Homeless. There is no SFA documentation presented by this district and we cannot verify how the SFA Reviewer Status was =1.	RESOLUTION: Use income based determination. Note: Homeless. Pg. 53 of the Eligibility Manual states that acceptable documentation that the children are homeless is obtained from the LEA homeless liaison or directors of homeless shelters where the children reside. Documentation to substantiate free meal eligibility must consist of the child's name or a list of names; effective date (s), and signature of the local educational liaison or the director of the homeless shelter.
	DATE INITIATED: 09/28/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 212 St 42		
	DECIDED BY: Westat Team		

22 SSN redacted	TOPIC: Redaction of SSN on applications: full or partial	PROBLEM: The boxes or lines used for SSN are partially or fully redacted. Should we assume that the SSN is present on the application?	RESOLUTION: Consider any type of redaction (full or partial) as a complete SSN. Please include a note for these applications that says: "SSN redacted".
	DATE INITIATED: 10/05/2011		
	DATE DECIDED 10/05/2011		
	REFERENCE: Dist 221 all Dist 332 all		
	DECIDED BY: Westat Team		

23 Incomplete application (missing required information)	TOPIC: Comment for FNSElig = 4 Incomplete Application	PROBLEM: Clarification on the Comment variable when FNSElig = 4.	RESOLUTION: When FNSElig = 4, instead of writing “incomplete application” we will write “Required SSN missing” or Required signature missing”.
	DATE INITIATED: 09/27/2010		
	DATE DECIDED: 09/27/2010		
	REFERENCE: Multiple cases		
	DECIDED BY: Allison Roeser Westat Team		

24 Application	TOPIC: Blank Applications	PROBLEM: CBIS = 1. Comment by SFA reviewer on coversheet "Nothing on Application. No explanation". Student name and number but the rest of the application is blank. Variation St 39 CBIS = 2 with the same note and the application is blank except Student name and number, ethnicity and SFA Status and signature in SFA section. Should we treat these as "No Application Submitted", or X's for all variables except the cover sheet, FNSElig and ProcErr?	RESOLUTION: X's for missing variables. NOTES: CBIS different than FNSElig. Application incomplete.
	DATE INITIATED: 9/26/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 312 St 28,29,30 & 39 variation		
	DECIDED BY: Westat Team		

25 CatElig	TOPIC: Zeros in the middle of Case numbers.	PROBLEM: Seven applications with 00 in the middle of the case numbers. SFA processed Apps 20, 25, 45, 49 as Income based Status = 2. SFA processed Apps 4, 5, 21 as income based Status = 1. On App 20 SFA circled the 2 zeros then proceeded to make an income based status. Do we assume SFA knows #'s are incomplete?	RESOLUTION: All should be considered categorically eligible. ProcErr = 1. Per DL#19 decided by John Endahl: Assume that if there is number in the location for TANF or SNAP case numbers that the number is legitimate. As independent reviewers, we have no knowledge of what the format of a legitimate case number might look like for a specific locale. To that end, we assume that SFA has done due diligence and made sure that the number conforms to the format of a legitimate case number.
	DATE INITIATED: 09/29/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 412 St 20, 45, 25, 49 Variant St 4, 5, 21		
	DECIDED BY: Westat Team John Endahl		

<p>26 Duplicated Applications</p>	<p>TOPIC: Duplicate applications with differing SFA Status determinations</p>	<p>PROBLEM: SFA sent duplicate applications with entire HH information. On one application SFAElig based on Income and full HH. On the other application SFAElig based on Foster child and Foster Inc.</p> <p>Please review cover sheet note and advise which application to use.</p> <p>Additional Question: Foster child income of \$1596.00 makes income based status = 2 for HHSIZE = 1.</p>	<p>RESOLUTION: Consider Foster Child. Decision remains free and no error.</p> <p>JE: I would have processed this based on household income, not that of a Foster child. Regardless of how it was processed, the district reached the correct decision in terms of eligibility (free).</p> <p>It is unclear why some of the information is typed while the name and address is hand-written. It appears that the district may have preloaded some information from somewhere. While it is OK to preload student names, school names, grade, etc., it is not OK to load income information. To that end, I would indicate that a processing error had occurred.</p>
	<p>DATE INITIATED: 09/29/2011</p>		
	<p>DATE DECIDED: 10/05/2011 11/10/2011 JE</p>		
	<p>REFERENCE: Dist 412 St 34</p>		
	<p>DECIDED BY: Westat Team JE 11/10/2011</p>		

27 Expired Application	TOPIC: Expired application	PROBLEM: Application shows students and adult signature and SSN. Computer print-out shows free then "Expired" notations.	RESOLUTION: It looks as though the applicant didn't provide the necessary income information. As a result, their application expired. FNSElig = 4 with a note "Incomplete application".
	DATE INITIATED: 10/05/2011		
	DATE DECIDED: 10/05/2011		
	REFERENCE: Dist 541 St 44		
	DECIDED BY: Westat Team		

28 SFAHHInc & SFAHHSize	TOPIC: Electronically filled/ produced applications with no SFA section	PROBLEM: A copy of an electronically filled or produced application is supplied with no SFA section. SFA Status and possibly SFA name are in a line superimposed over the top of the application. We have no indication of how SFA calculated status unless we use the information from the application. We have an SFA Status so we can't use SFAelig=99. Should we use the information from the application or just put X's for the missing SFAHHSize and SFAHHInc variables? Addendum1 Changes	RESOLUTION: Assume SFA presented document as SFA information. Use data on application to fill in SFAHHInc, SFAelig and use Household count as SFAHHSize. Addendum 1. See Decision Log item 10 for abstraction instructions.
	DATE INITIATED: 10/06/2011		
	DATE DECIDED: 10/06/2011 631 10/26/2011 741		
	REFERENCE: Dist 631 and 741 Multiple applications Addendum:		
	DECIDED BY: Westat Team		

<p>29 FNS variables</p>	<p>TOPIC: Multiple Online applications with missing or redacted information</p>	<p>PROBLEM:</p> <p>1. Some online applications show indications that names, incomes and frequencies have been covered over with correction tape or white out. This inhibits our ability to gather FNS variable information from the applications</p> <p>Do you think that this is a redaction of some sort by the SFA?</p> <p>2. Some of these also have 2 applications, however they have not carried over names, income from the other application (i. e., a frequency correction for a child's income is all that is on the second application).</p> <p>In all cases the SFA computer activity printout shows the information needed to fill in FNS variables to allow FNS status determinations. Should we use both applications and the printout to populate the missing FSN variables?</p>	<p>RESOLUTION:</p> <p>1. Yes, redaction must have occurred.</p> <p>2. Use both information on the applications then printout to populate the variables.</p>
	<p>DATE INITIATED: 09/30/2011</p>		
	<p>DATE DECIDED: 10/19/2011</p>		
	<p>REFERENCE: Dist 342 St 28, 31, 36, 41</p>		
	<p>DECIDED BY: Westat Team</p>		

30 SFA Computer Information	TOPIC: Use of SFA Application Activity tracking list.	PROBLEM: Along with screen shots of the SFA Data Base interface that has data that usually doesn't match the application, we sometimes receive an application activity tracking log. Using the data from the activity tracking log gives a more accurate set of SFA variables for calculations at the time of the application. This would make a different status finding from CBIS. May we use the activity log to make our comparisons for the time of application? Should we make it a ProcErr =1 Note: "SFAElig and FNSElig different that CBIS?	RESOLUTION: Yes, it is appropriate to use the earlier SFA variable data for the SFA Status calculations. There should be no ProcErr. ProcErr= 2 and note "SFAElig and FNSElig different that CBIS".
	DATE INITIATED: 10/06/2011		
	DATE DECIDED: 10/14/2011		
	REFERENCE: Several Districts		
	DECIDED BY: Westat Team		

31 No Income Frequency	TOPIC: Income Frequency missing for both applicant and SFA	PROBLEM: No income frequency is noted by either the applicant or the SFA. The SFA denied certification on the grounds that the family makes too much. I am assuming they used a frequency more often than "Monthly". If they did use monthly, the certification should be reduced-price. On situations where no income frequency is provided, what would you like us to do?	RESOLUTION: For cases such as Wilkes-Barre where the household has failed to include income frequency, one can't make an eligibility determination....this should be viewed as an incomplete application. The district should have attempted to contact the household to determine what the income frequency should be.
	DATE INITIATED: 08/29/2012		
	DATE DECIDED: 10/17/2012		
	REFERENCE: Dist 231 app 12		
	Decided by: John Endahl		

32 SFAElig VS Coversheet notation	TOPIC: SFA Income based certification VS Notation of later Direct Certification	PROBLEM: District 411 has several applications where the SFA proceeded to use income calculations for their determination of status. We have only provided a few examples and can provide additional examples. The reviewer has placed comments on the cover sheet stating that student was later found to be eligible through direct certification. On the application someone has written Direct certification some with dates that are after the SFA made their determination and some without any date at all. We have no activity sheet to examine for a timeline. Should we continue as if the DC status was not in effect at time of application? IF you decide these are Direct Certification based on the cover sheet comments, how do you want us to treat the applications? Do they belong in the sample?	RESOLUTION: For Lena-Winslow CUSD #202 (District 411) I don't see a problem... The sample was supposed to include any student that had applied for meal benefits and was approved for free or reduced-price benefits or was denied benefits. It appears that these households submitted applications for benefits and subsequently were identified as directly certified. I would process the application as if the household was not directly certified at the time of certification and determine if eligibility determination was correct at the time of certification. However, when examining benefit issuance status, assume these households were eventually identified as directly certified and the thus should be receiving free meals (regardless of the date or non-date associated with the notation "Directly Certified").
	DATE INITIATED: 10/08/2012		
	DATE DECIDED: 10/17/2012		
	REFERENCE: Dist 411 Several Applications		
	DECIDED BY: John Endahl		

33 Other Categorical determinations	TOPIC: Application column for other Categorical types	PROBLEM: The District has added a column next to the House hold list column. Its purpose is to indicate whether any or all of the household members are Migrants, Homeless, Foster child or Runaway. The instructions are for the applicant to circle the letter that would make that indication. Several applicants have circled M or F for each member in their household. There is no evidence of categorical eligibility, and the SFA has done an income based status assessment. Upon closer examination, it appears that the applicants are attempting to indicate the gender of each household member.	RESOLUTION Regarding cases when the individual who completed the application marks "M" and "F" for several members of the family: If the "M" and "F" correspond with male and female family members, and the SFA used income to determine the applicant's eligibility, we can assume that the individual got confused and did NOT mean to designate "migrant" and/or "foster" for these family members.
	DATE INITIATED: 09/27/2013		
	DATE DECIDED: 09/30/2013		
	REFERENCE: Dist 211 & 212 Several Applications		
	DECIDED BY: Westat Team AR		

34 Applications: out of state residents	TOPIC: Five residents of Vermont applying to a school district in the state of New Hampshire.	PROBLEM: There are five applications from this NH district that indicate a residence in Vermont. (Applications 35 and 36 are from the same household). Is this a problem?	RESOLUTION The eligibility manual does not discuss an analysis of address. Address isn't part of the requirements for a complete application (pages 17 & 18 of the eligibility manual) so we will assume that these students are properly part of the intended district sample.
	DATE INITIATED: 09/24/2013		
	DATE DECIDED: 9/24/2013		
	REFERENCE: Dist 111 Apps 3,12,35,36, & 46		
	DECIDED BY: Westat Team AR		

35 SFA HHInc	TOPIC: Large differences between SFAHHInc and FNS calculated HHIncome.	PROBLEM: Several applications: (FNSElig = 3). The Applicant has provided their income, the SFA chooses to round the annual income down to significantly lower amount than the actual salary and puts a + (plus sign) next to it. Ex: application income is approx. \$103800 but SFA writes \$80000+. This normally leaves a ProcErr = 1 for income differences (we can't factor a "+" so I'm using their base rate to calculate SFAHHInc). <u>Monthly</u> income differences range from \$1000.00 to \$3000.00. The SFA does not use standard amount. (For an HHSIZE of 3 or 4 they report 80K+ or 90K+ when 35K or 42K would put them into paid). Status is the same but would this be an Administrative error?	RESOLUTION I would not consider a ProcErr because the SFA knows they are way into the "Paid" territory and they are using a shorthand calculation. Per AR: Use notation: SFA truncated income
	DATE INITIATED: 09/25/2013		
	DATE DECIDED: 09/26/2013		
	REFERENCE: Dist 112 Apps 1,3,6,7,9,25 Multiple applications		
	DECIDED BY: Westat Team MK		

36 SFA Sections Blank	TOPIC: SFA Sections Blank and no SFAHHSIZE or HHIncome variables available.	PROBLEM: The SFA has been leaving the SFA section at the bottom of application blank for the majority of applications in this district. The SFA has included an unsigned handwritten notification letter that states the certification status. Can the notification letter be used as a proxy for SFA eligibility? If so, is there still a processing error due to SFAHHInc and SFAHHSIZE missing?	RESOLUTION In this Scenario, it appears that there is information available about the eligibility status determination but not the elements that led to that determination. One can't determine if the LEA correctly calculated household size and household income, but can assess the correctness of the final eligibility determination. I would use the notification letter that states the certification status as the final eligibility status determination by the SFA. I would not view the lack of data in the SFA only box indicating the SFA determination of household size and household income as a processing error.
	DATE INITIATED: 10/28/2013		
	DATE DECIDED: 12/03/2013		
	REFERENCE: Dist 232 App 16 & multiple applications.		
	DECIDED BY: John Endahl		

<p>37 No SFA Sections or documentation with SFA variables or status</p>	<p>TOPIC: No available information for SFA Variables. Electronic notation in upper left corner "PAID: on every application.</p>	<p>PROBLEM: This district uses electronic applications and there is no space for SFAInc and SFAHHSIZE. However, at the very top left hand side of the page, there is a notation of "Paid," along with someone's name (perhaps an SFA official). Does this status notation serve as SFA Elig? CBIS matches FNSElig in every case, but the SFAElig (i.e. "Paid" for EVERY app) does not match every application. Some applications that actually should be "Paid" would match, but the vast majority are actually "Reduced" or "Free," which means the SFAElig at the corner that says "Paid" is wrong.</p>	<p>RESOLUTION: With regard to this scenario, I have no idea what "paid" means in the first line of the application. Given that the current benefit issuance status is consistent with the eligibility determination made by Westat I would not consider any of these applications in error. Note: Treated as missing SFA section SFAElig Coded as 99. ProcErr = 2.</p>
	<p>DATE INITIATED: 10/28/2013</p>		
	<p>DATE DECIDED: 12/03/2013</p>		
	<p>REFERENCE: Dist 411 All</p>		
	<p>DECIDED BY: John Endahl</p>		

<p>38 No SFA Information</p>	<p>TOPIC: Blank SFA sections electronic applications</p>	<p>PROBLEM: This district has two types of electronic applications (both have space for SFA determinations). One type of application is computer generated with hand written sections by the applicant but the SFA section is blank. The other type is entirely computer generated (including applicant information). The entire district has no SFA information on the application. The SFA made reference to using "Rocket Scan", their on-line system.</p>	<p>RESOLUTION: In this Scenario, it appears that there is information available about the eligibility status determination but not the elements which led to the determination. One can't determine if the LEA correctly calculated household size and household income, but can assess the correctness of the final eligibility determination. It appears that the final eligibility determination appears at the top of the application. Comparison of these SFA determinations with the independent assessment by Westat is all that can be done. I would not view the lack of data in the SFA only box indicating the SFA determination of household size and household income as a processing error.</p>
	<p>DATE INITIATED: 10/28/2013</p>		
	<p>DATE DECIDED: 12/03/2013</p>		
	<p>REFERENCE: Dist 212 all apps Dist 221</p>		
	<p>DECIDED BY: John Endahl</p>		