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Final Report

Study of Nonresponse to the School Meals Application Verification Process

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Joshua Leftin, Cassandra Baxter, Katherine Niland, Natalie Larkin, Quinn Moore, Aldo Iturrios, Sarah Lauffer, Juha Sohlberg, and Daniela Golinelli

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Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22315
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Submitted by:

Mathematica
P.O. Box 2393
Princeton, NJ 08543-2393
Telephone: (609) 799-3535
Facsimile: (609) 799-0005
Project Director: Eric Zeidman
Reference Number: 50336.701

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Glossary of Key Terms

Application certification: For students certified for free or reduced price (F/RP) school meals by application, households must either provide detailed information on household size and income, which is used to assess their eligibility, or demonstrate that they are categorically eligible because they participate in one of several public assistance programs, such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance to Needy Families (TANF), or the Federal Distribution Program on Indian Reservations (FDPIR). In addition, students can be categorically eligible for F/RP meals if they are foster children, participate in Head Start, are served by the Migrant Education Program, are defined as homeless under the McKinney-Vento Homeless Assistance Act, or are served by programs under the Runaway and Homeless Youth Act. Students who are not categorically eligible are eligible for free meals if their household income falls at or below 130 percent of the Federal poverty level (FPL). They are eligible for reduced price meals if their household incomes are between 130 percent and 185 percent of the FPL. The district assesses the student's application information to determine whether the household meets the eligibility requirements.

Alternate 1 verification sample: The alternate 1 sample for required verification includes the lesser of 3,000 or 3 percent of all applications approved as of October 1, selected randomly. Districts with a low rate of verification nonresponse or an improved rate of response may use one of the two alternate random sampling approaches.

Alternate 2 verification sample: The alternate 2 sample for required verification includes the lesser of 1,000 or 1 percent of error-prone applications plus the lesser of 500 or 0.5 percent of applications with SNAP, TANF, or FDPIR case numbers, among applications approved as of October 1. Districts with a low rate of verification nonresponse or an improved rate of response may use one of the two alternate random sampling approaches.

Certification: Districts certify students to receive F/RP meals by application or direct certification. Households can apply at any point during the school year, but applications are typically submitted at the beginning of the school year. Districts conduct direct certification before the school year and then at three or more points during the school year. Typically, districts perform direct certification at least monthly.

Direct certification: Under direct certification, a State agency or school district matches administrative records from public assistance programs (such as SNAP, TANF, and FDPIR) with student enrollment records to identify and automatically certify eligible students for free school meals. Since SY 2012–2013, some States also have participated in demonstrations to use Medicaid records, which contain information on income and household size, to assess income eligibility for F/RP meals.

Direct verification: The first stage in the verification process is direct verification, in which districts verify eligibility for free or reduced price school meals based on administrative records from relevant public assistance programs. If a district cannot directly verify an application, the district contacts the household for documentation.

Economic unit: For the purpose of determining school meal eligibility, an economic unit is defined as a group of related or unrelated individuals who are not residents of an institution or boarding house but who live together and share housing, significant income, and expenses (7 CFR 245.2). The study team constructed the economic unit using information provided in the household survey on family relationships and income support as of October 2018 (the time period for verification), such that it closely aligned with

the definition used for school meals. The economic unit is referred to as "the household" throughout the presentation of the study findings.

Error-prone applications: Error-prone applications are defined as those with household incomes within $100 per month of the applicable income eligibility threshold.

No-change households: No-change households refer to households that were selected for verification, responded to the verification request, and had no change in certification status as a result of the verification process.

Pre-verification certification status: Pre-verification certification status refers to the households' initial certification status as of October 1, before verification is conducted.

Post-verification certification status: Post-verification certification status refers to the households' certification status that resulted from the verification process.

Required verification: Required verification refers to the verification of a sample of applications that were approved for F/RP meals as of October 1. Districts use either a standard verification sample or, if they have a low or improved rate of verification nonresponse, may use one of two alternate random sampling approaches. The report uses "required verification" to distinguish this type of verification from verification for cause.

Standard verification sample: The standard verification sample for required verification includes the lesser of 3,000 or 3 percent of error-prone applications, among applications approved as of October 1.

Ultimate certification status: After verification is complete and a household's post-verification certification status is determined, some households become directly certified and some choose to reapply for free or reduced price school meal benefits. To explore changes in a household's certification status after verification, the study team examined household's certification status as of March 1, 2019, which is referred to as households' ultimate certification status throughout the report.

Verification: Each year districts are required to verify F/RP school meals eligibility (1) for a sample of applications that were approved for school meal benefits by October 1 (required verification) and (2) for all questionable applications (verification for cause). Verification is conducted in October and must be completed by November 15.

Verification for cause: Verification for cause refers to the verification of questionable applications. An example of a questionable application is one that reports a household's income as zero.

Verification nonresponder: Verification nonresponders refer to households whose applications were selected for verification and did not respond to the verification request. Verification nonresponders' F/RP meal benefits are terminated as a result of not responding to the verification request.

Executive Summary

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) provide subsidized lunches and breakfasts to millions of students each school day. These school meal programs are an essential resource for many families, and a cornerstone of the U.S. government's efforts to ensure that nutritious meals are available to schoolchildren. It is therefore important that free and reduced price (F/RP) school meals reach the children who need them. Students are eligible to receive F/RP meals if they (1) participate in one of several public assistance programs, or (2) have household income low enough to qualify. However, errors can occur when determining which students are eligible to receive F/RP meals.

To detect and deter errors, school districts verify a sample of applications for F/RP meals each year.[1] The U.S. Department of Agriculture's Food and Nutrition Service (FNS) contracted with Mathematica to conduct an in-depth case study using school year (SY) 2018–2019 data to examine (1) the accuracy of the current verification process, (2) the reasons why districts may select applications to be verified "for cause," and (3) the ultimate results of the process, including the reasons why households do not respond to verification requests and how many households reapply. This Executive Summary provides background on school meals, certification, and verification, elaborates on the research questions, and summarizes the study design, findings, limitations, and conclusions.

A. The school meal programs and certification

Students are certified to receive F/RP meals either by application or direct certification. For students certified by application, households must either provide detailed information on household size and income, which is used to assess their eligibility, or demonstrate that they are categorically eligible because they participate in one of several public assistance programs, such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR).[2] Students who are not categorically eligible are eligible for free meals if their household income falls at or below 130 percent of the Federal poverty level (FPL). They are eligible for reduced price meals if their household income is between 130 percent and 185 percent of the FPL. The district assesses the student's application information to determine whether the household meets the eligibility requirements.

Under direct certification, a State agency or school district matches administrative records from public assistance programs (such as SNAP, TANF, and FDPIR) with student enrollment records

[1] The Richard B. Russell National School Lunch Act (NSLA) uses two terms to refer to the local entities that operate the school meals programs. The Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) amended NSLA by using the term "*local educational agency"* when referring to the application, certification, and verification functions of the school meals programs. Sections of the NSLA that deal with other aspects of the programs—such as meal pattern requirements, meal counting, and reimbursement claiming—use the term "*school food authority*," which current regulations define as the governing body that has the legal authority to operate the NSLP/SBP in one or more schools. Because nearly all schools in the NSLP/SBP are parts of entities commonly known as school districts, we use the term *district* throughout this report.

[2] In addition to categorical eligibility through SNAP, TANF, and FDPIR, students can be categorically eligible for F/RP meals if they are foster children, participate in Head Start, are served by the Migrant Education Program, are defined as homeless under the McKinney-Vento Homeless Assistance Act, or are served by programs under the Runaway and Homeless Youth Act.

to identify and automatically certify eligible students for free school meals. Since SY 2012–2013, some States also have participated in demonstrations to use Medicaid records, which contain information on income and household size, to assess income eligibility for F/RP meals.

B. Verification of school meal benefit applications

Certification errors for applications may occur because of errors with school district processing or with household reporting. Either type of error can result in improper payments. Congress instituted the verification process for school meal applications as part of the Omnibus Budget Reconciliation Act of 1981. Districts must conduct verifications of a small sample of approved applications by November 15 of each year.

Selecting applications for verification

Households are only subject to verification if they were approved for school meal benefits based on an application. Most districts must use standard verification samples, which comprise the lesser of 3,000 or 3 percent of error-prone applications—defined as those with household incomes within $100 per month of the applicable income eligibility threshold. Districts with a low rate of verification nonresponse or an improved rate of response may use one of two alternate random sampling approaches:

- **Alternate 1 sample** includes the lesser of 3,000 or 3 percent of applications selected randomly.
- **Alternate 2 sample** includes the lesser of 1,000 or 1 percent of error-prone applications plus the lesser of 500 or 0.5 percent of applications with SNAP, TANF, or FDPIR case numbers.

In addition to verifying a sample of approved applications, referred to in this report as required verification, districts must verify all questionable applications. This is known as verification for cause. An example of a questionable application is one on which a household reports zero income.

Verification outcomes

Districts may directly verify the eligibility of applications selected for verification by using administrative records from public assistance programs that confer categorical eligibility. For selected students whose applications are not directly verified, districts contact the families to request documentation of income and household size or of participation in a program that confers categorical eligibility. Based on this information, the district updates students' certification for F/RP meals.

The verification process can result in four types of certification outcomes, shown in Figure ES.1: (1) an **increase** in benefits from reduced price meals to free meals, (2) **no change** in benefits, (3) a **reduction** in benefits from free meals to reduced price meals, or (4) **termination** of F/RP meal benefits. Termination can result from (1) the verification process finding household incomes too high to qualify for F/RP meals or (2) a household not responding to the verification request. Households with terminated benefits can reapply at any time with documentation of income, or they may gain eligibility through direct certification.

Figure ES.1. Overview of possible verification outcomes

C. Overview of study design

The Mathematica study team used an in-depth case study methodology to address five specified study objectives:

- **Objective 1.** Describe the characteristics and verification results of all public school districts and study districts.
- **Objective 2.** Summarize the ultimate results of the verification process, including the verification outcomes and how many households later reapplied or became directly certified for school meal benefits after the verification process had ended.
- **Objective 3.** Assess incomes and characteristics of households initially approved on the basis of income or categorical eligibility with no change in benefits due to verification.
- **Objective 4**. Assess incomes and characteristics of households initially approved on the basis of income or categorical eligibility that did not respond to the verification request.
- **Objective 5.** Examine the process districts use to select applications for cause.

To fulfill the study objectives, Mathematica enrolled a non-random sample of 20 school districts and obtained information about each district's characteristics, procedures, and verification samples in SY 2018–2019 from several sources.

- **School Food Authority (SFA) Verification Collection Report (FNS-742) and other extant data.** These sources, available from FNS or online, contain data on district characteristics and aggregate data on certification and verification totals.
- **Administrative data from study districts.** The study districts provided information on the pre-verification certification status, verification outcomes, and ultimate status of households as of March 1, 2019.

- **Interviews with study district staff.** SFA directors or other key district staff provided data on verification procedures in interviews.

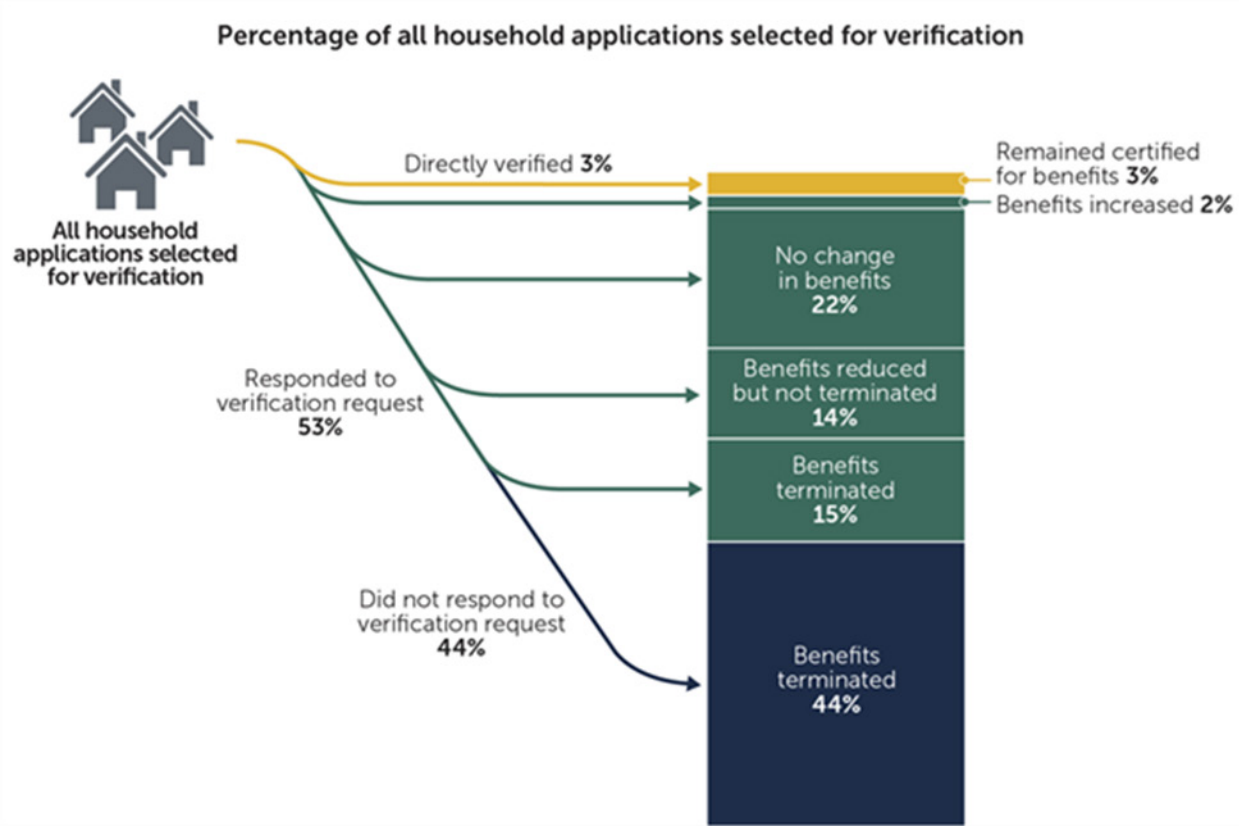
In addition, to independently assess income and categorical eligibility for F/RP meals, and to understand the experiences of households in the verification sample, Mathematica conducted a **household survey in SY 2018–2019**. Two samples of households that were initially approved for school meal benefits on the basis of income or categorical eligibility, and whose applications were selected for verification, were selected for the survey: (1) households that responded to the verification request but had no change in certification status (no-change households) and (2) households that did not respond to the verification request (verification nonresponders). The samples excluded households that did not receive a verification request because the State or district directly verified them. The samples also excluded households that responded to the verification request and subsequently experienced a change in school meal certification status due to verification, because survey data for these households was not required in order to respond to the study's research questions.

D. Summary of key findings by chapter topic

Study district characteristics and verification outcomes (Chapter III). The districts included in the study are not representative of school districts nationwide because they were selected to (1) have relatively large numbers of students with certain verification outcomes and (2) be in several geographic clusters. The study districts had an average enrollment of more than 80,000 students—many more than the average of about 3,500 students in public school districts nationwide—and all were in metropolitan areas. On average, more students in the study districts were certified for school meal benefits by application than was the case in public school districts nationwide, and this is reflected in the large numbers of students subject to verification in this sample. On average, among study districts, almost half of the households did not respond to the verification request, which is about double the percentage for public school districts nationwide. In addition, responses to the verification request resulted in benefit reduction or termination more often in the study districts than in public school districts nationwide.

Detailed account of verification outcomes in study districts (Chapter IV). Among the study districts, the verification process in SY 2018–2019 resulted in direct verification for 3 percent of households, a response to the verification request for 54 percent of households, and a nonresponse for the remaining 44 percent (Figure ES.2). The most common verification outcome for households that responded to the request was no change in school meal benefits.

Figure ES.2. Summary of average household verification outcomes across districts



Source: Administrative data from the study districts, SY 2018–2019.

Note: See Appendix Table C.1 for detailed results.

Although most households in the study districts had their benefits reduced or terminated as a result of the verification process, by March 1, 2019 only 6 percent of all households in the study districts had reapplied for benefits, and an additional 2 percent had become directly certified. While a total of 8 percent of all households in the verification sample reapplied or became directly certified, by March 1, only about 6 percent of all households in the sample saw an increase in benefits due to the reapplication or direct certification. Just under half (nearly 3 percent of all households in the verification sample) changed from paid to free school meal benefits, and close to the same number changed from paid to reduced price school meal benefits.

Characteristics of the household survey samples (Chapter V). Based on data from the household survey, no-change households and verification nonresponders were similar to each other in many of their household and demographic characteristics. The typical household, in both survey samples, had income from employment, two children, a household survey respondent with no more than a high school education, and was initially certified for free meals.

Fewer verification nonresponders were certified to receive free meals (although free certification was still typical), fewer reported that students actually ate school lunch at least once per week, and more were employed, relative to no-change households. These characteristics of

verification nonresponders might have reduced the household's incentive to respond to the verification request because they are associated with a smaller value of school meal benefits to be lost due to verification nonresponse and could indicate greater financial means to withstand benefit termination.

Independent assessment of eligibility for households that had no change in certification status due to the verification process (Chapter VI). To learn more about the accuracy of the determinations districts made in verifying applications, the study team independently assessed the eligibility of households that had no change in certification status due to the verification process. Most of these households were found eligible for either free or reduced price meals based on data provided in the household survey, but their survey-determined eligibility status was often inconsistent with their district-determined certification status. Although 83 percent of households were found eligible for free or reduced price meals based on the survey, only 58 percent were found eligible for the exact level of benefits they were verified by the district to receive (Figure ES.3). Based on the household survey, 6 percent of households were found eligible to receive a higher level of benefits than they were verified to receive (that is, free meals instead of reduced price meals), and 19 percent were certified for free meals but only found eligible for reduced price meals. About 17 percent were found ineligible for free or reduced price meals.

Figure ES.3. Household eligibility based on the survey, among no-change households (averages across districts)

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. See Appendix Table E.1 for detailed results.

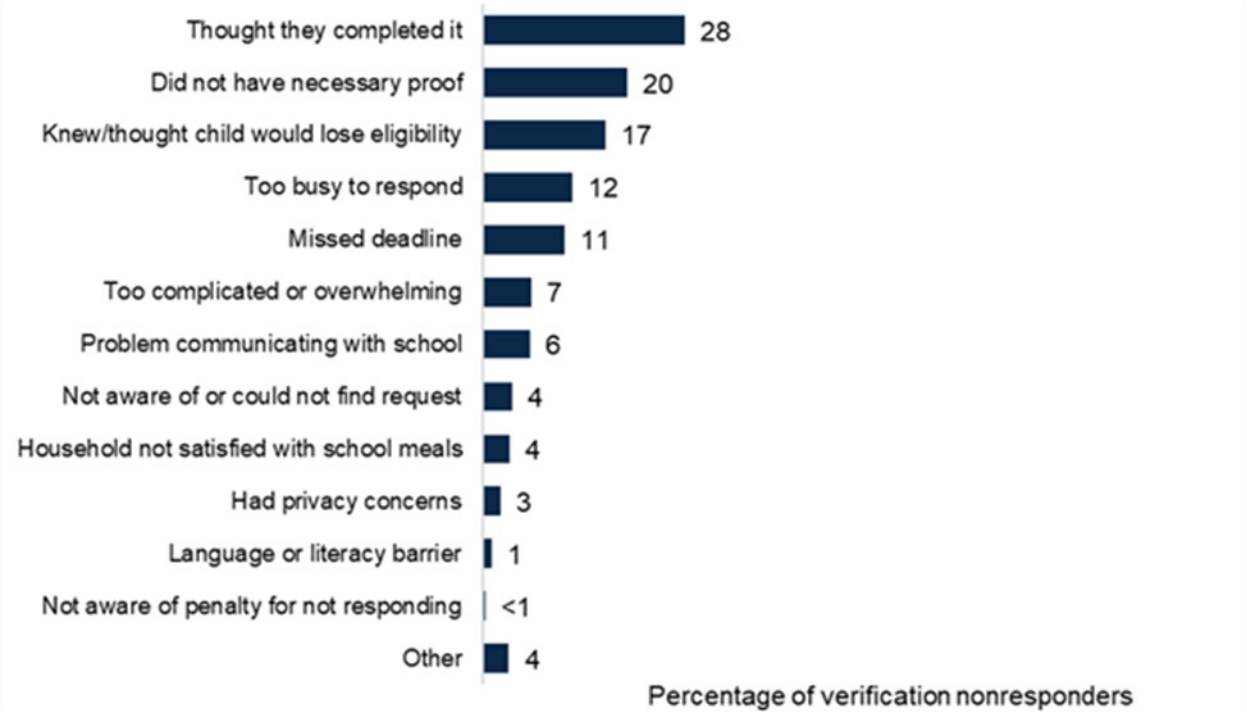
Differences between households' district-determined certification status and survey-determined eligibility status were largely explained by differences in reported income amounts, although differences in household size were also common. Among households whose post-verification certification status differed from their survey-determined income eligibility (but not from their categorical eligibility), almost all (94 percent) had a survey-determined income amount that was different from the amount reported on their school meal application, and 45 percent had a

different household size. For some households, the survey-determined income was far from the eligibility threshold for their certification status.

Independent assessment of the eligibility of verification nonresponders, and reasons for verification nonresponse (Chapter VII). Most verification nonresponders were eligible for free or reduced price meals based on the household survey, but many were ineligible for the level of benefits they were initially certified to receive. About 37 percent were ineligible for free or reduced price meals, with 6 percent having survey-determined income amounts between 186 to 200 percent of the FPL—just above the eligibility threshold for reduced price meals. Overall, 45 percent of verification nonresponders were eligible for at least the level of benefits they were certified to receive; that is, they could have been eligible to either maintain or increase their level of benefits if they had responded to the verification request. The remaining 18 percent of nonresponders were certified to receive free meals but were found to be eligible only for reduced price meals.

Most verification nonresponders reported that they understood the verification request and that they tried to respond. In fact, 28 percent of verification nonresponders in the survey sample thought they had completed the request. However, some reported that it was difficult to gather the information necessary for verification and respond on time. The most common reasons reported for nonresponse included not having the necessary documentation, knowing or thinking that the student would lose eligibility for F/RP benefits, being too busy to respond, or missing the deadline (Figure ES.4).

Figure ES.4. Reasons for not responding to the verification request, among verification nonresponders (averages across districts)



Source: Household survey data, SY 2018–2019.

Note: The reasons for nonresponse are not mutually exclusive. Values were weighted to represent all verification nonresponders. This figure includes all households that were still enrolled in the district on March 1, 2019 and that recalled being contacted for verification, among the survey sample of verification nonresponders (649 households). It excludes 4 households in which all students were identified in the district data identified as no longer enrolled as of March 1, 2019. See Appendix Table F.5 for detailed results

Selecting applications for verification for cause (Chapter VIII). In interviews with the study team, most districts in the study sample reported that they did not regularly verify applications for cause, and many reported that they never did so. Only one-fifth of study districts verified at least one application for cause in SY 2018–2019. The 12 districts that reported ever conducting verification for cause gave various reasons why they selected particular applications. Half reported that they select households that applied multiple times and reported different income amounts each time. Four districts reported that they use information from community members, 3 reported that they use public records on salaries to identify households that appear to be ineligible, and 3 reported that they verify for cause any applications reporting zero income.

E. Limitations

In interpreting study findings, it is important to keep in mind limitations related to the study's sample, data, and methods. The most notable limitations are as follows:

The study findings do not reflect verification outcomes for districts nationwide. The district sample was geographically clustered, and limited to large, urban districts that were willing and able to provide the necessary data. Consequently, the findings are not representative of districts other than those in the study.

The accuracy of the findings is limited by the quality of the data used to produce them. Administrative data and survey data are subject to data quality issues that could affect the findings. District administrative data could have errors if there are issues in recording, storing, or reporting data.

Household survey data are subject to reporting error and missing data. Recall error is an important component of reporting error: in this study, respondents reported their income from October 2018 on a survey conducted between January and June 2019. Reporting error in household survey data could also occur if survey respondents—typically the heads of households—did not have accurate or complete information for all members of the household.

Missing survey data can also complicate analysis. Some respondents to the household survey did not provide a response to all survey questions, especially those about their receipt and amount of income (either because they did not know the information, or they refused to provide it). The study team imputed income receipt and amount when data were missing. Although imputation was not necessary for most households and the amount of data imputed, as well as the imputed amounts, was often small, even a small amount of imputation error could result in an incorrect survey-determined school meal eligibility status.

The reference period across data sources might not align. A key component of the study is comparing household eligibility as determined by the district verification process to eligibility based on household survey data. If these two data sources do not refer to the same time period, there could be differences in the eligibility determinations unrelated to the verification process. The study only collected income data from October 2018. Per Federal regulations, a household may be eligible to receive school meals if it is income- or categorically eligible at any point during the school year. Thus, it is possible that a household would be eligible at the time of initial application (for example, at the beginning of the school year), but be ineligible in October 2018 because of a change in circumstances.

F. Conclusion

This study examined verification processes and outcomes for a sample of districts with large numbers of students with certain verification outcomes and in certain geographic locations.

The report documents verification outcomes in the sample of study districts. The most common verification outcome was termination of benefits due to verification nonresponse. For households that responded to the district's verification request, a majority had changes in certification status due to verification. However, it was common for responding households to have no change to their certification status due to verification; this group comprised 41 percent of households that responded to the verification request. This finding could reflect favorably on the accuracy of the certification process because most applications selected are error prone, and certification error is expected to be more common in error-prone applications than in a broader set of applications.

The independent assessment of household eligibility for school meal benefits found a match between survey- and district-determined eligibility statuses for a majority of no-change households (58 percent). When these eligibility statuses did not match, nearly all the difference was due to discrepancies between income reported on the application and in the study survey.

Most verification nonresponders reported having been contacted about verification, understanding the verification request, and attempting to respond. The independent assessment of eligibility found a majority of verification nonresponders could have been eligible to continue receiving F/RP meal benefits if they had responded. However, some verification nonresponders reported that it was difficult to provide the information necessary for the verification request and to respond on time.

Although the findings presented here are informative about verification processes and outcomes, it is important to keep in mind the limitations of the study in interpreting its findings. The findings came from a case study of districts that were not randomly selected, so they cannot provide information on verification for districts nationwide. The study's data collection also has inherent limitations. Survey recall error, recording errors in administrative records, and differences in the reference periods of data sources could affect the extent to which certain findings reflect the verification process versus the limitations of the data.

Appropriate interpretation of the findings also requires keeping in mind the broader policy context in which the study took place. Only students approved for F/RP school meal benefits based on applications are subject to verification. However, innovations in the school meal benefit certification process have substantially reduced the number of students certified by application, which has increased access to school meals in ways that are less prone to error. Direct certification bases certification for school meal benefits on administrative records from programs that confer categorical eligibility, which enables certification without an application and removes the possibility of reporting error. In addition, the Community Eligibility Provision (CEP) allows all students in participating schools to receive meals free of charge and bases school reimbursements on administrative records. As a result of improvements to direct certification and increasingly widespread adoption of the CEP, only 40 percent of public school students receiving F/RP meals nationwide are now certified by application and thus subject to verification. If these trends continue, the number of students receiving F/RP meals that are subject to verification will continue to decrease.

I. Introduction

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) provide subsidized lunches and breakfasts to millions of students each school day. These school meal programs are the cornerstone of the government's efforts to provide nutritious meals to schoolchildren and an essential resource for many families. Thus, it is important that free and reduced price (F/RP) school meal benefits reach their target population. However, errors in determining which students receive F/RP meals may occur as the result of school district processing or household reporting errors. To detect and deter errors, school districts verify a small sample of applications for F/RP meals each year. [3]

The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) contracted with Mathematica to conduct an in-depth case study to examine (1) the accuracy of the current verification process; (2) the reasons why districts may select applications to be verified "for cause"; and (3) the ultimate results of the process, including the reasons that households fail to respond to verification requests and how many households reapply. This report presents findings for school year (SY) 2018–2019.

A. The school meal programs and certification

Students are certified to receive F/RP meals either by application or direct certification. For students certified through the application process, households must either provide detailed information on household size and income or demonstrate that they are categorically eligible because they participate in one of several public assistance programs, such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program on Indian Reservations (FDPIR), typically by providing a case number for the relevant program.[4]

Under direct certification, a State agency or school district matches administrative records from public assistance programs (such as SNAP, TANF, and FDPIR) with student enrollment records to identify and automatically certify eligible students for free school meals. Since SY 2012–2013, some States also have participated in demonstrations to add Medicaid to the list of programs used for direct certification. Unlike those in SNAP, TANF, and FDPIR, students on Medicaid are not categorically eligible. States use income and household size information from a student's Medicaid record to assess income eligibility for F/RP meals. In SY 2018–2019, 4 States were conducting direct certification with Medicaid for free meals, and an additional 15 States were conducting direct certification with Medicaid for F/RP meals. In these 15 States, students under the demonstration may be directly certified for reduced price meals if they are not income-eligible for free meals.

[3] The Richard B. Russell National School Lunch Act (NSLA) uses two terms to refer to the local entities that operate the school meals programs. The Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) amended NSLA by using the term "*local educational agency"* when referring to the application, certification, and verification functions of the school meals programs. Sections of NSLA that deal with other aspects of the programs—such as meal pattern requirements, meal counting, and reimbursement claiming—use the term "*school food authority*," which current regulations define as the governing body that has the legal authority to operate the NSLP/SBP in one or more schools. Because nearly all schools in the NSLP/SBP are parts of entities commonly known as school districts, we use the term *district* throughout this report.

[4] In addition to categorical eligibility through SNAP, TANF, and FDPIR, students can be categorically eligible for F/RP meals if they are foster children, participate in Head Start, are served by the Migrant Education Program, are defined as homeless under the McKinney-Vento Homeless Assistance Act, or are served by programs under the Runaway and Homeless Youth Act.

Students who are not categorically eligible must show that they meet certain income criteria based on household size. Students are eligible for free meals if their household income falls at or below 130 percent of the Federal poverty level (FPL) and are eligible for reduced price meals if their household income is between 130 percent and 185 percent of the FPL. The school district assesses the student's application information to determine whether the household meets the eligibility requirements.

B. Verification of school meal benefit applications

Certification errors for applications may occur because of errors with school district processing or with household reporting. Either type of error can result in improper payments. Congress instituted the school meal application verification process as part of the Omnibus Budget Reconciliation Act of 1981. Districts must conduct verifications of a small sample of approved applications by November 15 of each year.

Selecting applications for verification

Households are only subject to verification if they were approved for school meal benefits based on an application. Most districts must use standard verification samples, which comprise the lesser of 3,000 or 3 percent of error-prone applications. Error-prone applications are defined as those with household incomes within $100 per month of the applicable income eligibility threshold.

Districts with a low rate of verification nonresponse or an improved rate of response may use an alternate approach that uses random sampling. Specifically, a district is eligible to use an alternate sample size if (1) the verification nonresponse rate for the previous year was less than 20 percent, or (2) the district approved more than 20,000 students by application and improved its verification nonresponse rate in the previous year by achieving a rate at least 10 percent lower than the year before. There are two alternate sample types:

- **Alternate 1 sample** includes the lesser of 3,000 or 3 percent of applications selected randomly from among all approved applications.
- **Alternate 2 sample** includes the lesser of 1,000 or 1 percent of error-prone applications plus the lesser of 500 or 0.5 percent of applications with SNAP, TANF, or FDPIR case numbers rather than income information.

In addition to verifying a sample of approved applications, referred to in this report as required verification, districts must verify all questionable applications. This is known as verification for cause. An example of a questionable application is one that reports zero income for a household. Such verification efforts cannot delay the approval of applications. However, district staff are strongly encouraged to contact the household during the certification process to clarify any unclear or questionable information before certifying the application and proceeding with verification for cause.

Two main groups of students entitled to receive F/RP meals are not subject to verification: (1) those who are directly certified for school meal benefits and (2) those who attend schools operating under special

provisions, such as Provisions 2 or 3 or the Community Eligibility Provision (CEP).[5,6] Other excluded groups include (1) some children in Residential Child Care Institutions (RCCIs); (2) children in schools participating only in the Special Milk Program for Children (SMP) or in non-pricing programs where all children are served with no separate charge for food service and no special cash assistance is claimed; or (3) jurisdictions where FNS has approved special cash assistance claims based on economic statistics regarding per capita income, such as in Puerto Rico and the Virgin Islands. These groups are described in USDA's manual for determining and verifying eligibility for school meals (FNS 2017).

Verification outcomes

Districts may directly verify the eligibility of applications selected for verification by using administrative records from public assistance programs that confer categorical eligibility. For selected students whose applications were not directly verified, districts contact the families to request documentation of income and household size or participation in a program that confers categorical eligibility. Based on this information, the district then updates students' certification for F/RP meals.

The verification process can result in four types of certification outcomes: (1) an increase in benefits from reduced price meals to free meals, (2) no change in benefits, (3) a reduction in benefits from free meals to reduced price meals, or (4) termination of F/RP meal benefits. Termination can result from (1) the verification process finding household incomes too high to qualify for F/RP meals or (2) a household not responding to the verification request. Households with terminated benefits can gain eligibility through direct certification or reapply at any time with documentation of income. Districts must process direct certification matches at least three times per year and typically process matches at least monthly (Moore et al. 2014).

[5] Provisions 2 and 3 allow schools where high percentages of students are income eligible for F/RP meals to use an alternative to the standard certification and meal claiming procedure. In a base year, Provision 2 and 3 schools require that students submit applications to receive F/RP meals and the schools claim Federal reimbursements following standard procedures. In years after the base year, no applications are required. Instead, all students in the school receive free meals and the district claims Federal reimbursement by applying the base year percentages of meals served for free, at a reduced price, and paid to the total number of reimbursable USDA meals served in each year.

[6] The CEP allows the highest poverty schools and districts to provide free meals to all students without collecting household applications. Schools are reimbursed using a formula based on the percentage of students directly certified or approved for free meals based on participation in programs serving homeless, migrant, and runaway children.

Figure I.1. Overview of possible verification outcomes

C. Study objectives and research questions

This analysis of the school meal verification process and its outcomes used an in-depth case study methodology to address five specified study objectives:

- **Objective 1.** Describe the characteristics and verification results of all public school districts and study districts.
- **Objective 2.** Summarize the ultimate results of the verification process, including the verification outcomes and how many households later reapplied or became directly certified for school meal benefits after the verification process had ended.
- **Objective 3.** Assess incomes and characteristics of households initially approved on the basis of income or categorical eligibility with no change in benefits due to verification.
- **Objective 4**. Assess incomes and characteristics of households initially approved on the basis of income or categorical eligibility that did not respond to the verification request.
- **Objective 5.** Examine the process districts use to select applications for cause.

The study addresses each objective through its associated research questions, which are presented in Table I.1.

Table I.1. Study objectives and research questions

Study objectives and corresponding research questions	Relevant chapters
Objective 1: Describe the characteristics and verification results of all public school districts and study districts	
• How did the characteristics of districts included in the study compare with the characteristics of public school districts nationwide?	Chapter III
• How did the verification results of districts included in the study compare with the results of public school districts nationwide?	Chapter III
Objective 2: Summarize the ultimate results of the verification process, including the verification outcomes and how many households later reapplied or became directly certified for school meal benefits after the verification process had ended	
• What were the percentage distributions of all applications selected for verification in the study districts by combinations of pre-verification and post-verification status?	Chapter IV
• How many households reapplied after they were denied for nonresponse or because their documentation did not support their claim for eligibility?	Chapter IV
• What were the number and percentage of reapplicants who fell into various categories defined by combinations of pre-verification status and post-verification/reapplication status?	Chapter IV
• What were the reasons for different eligibility determinations by district and by study?	Chapter VI
Objective 3: Assess incomes and characteristics of households initially approved on the basis of income or categorical eligibility with no change in benefits due to verification	
• What were the October 2018 income levels of households that were initially approved on the basis of income or categorical eligibility (by application), whose applications were selected for verification, and whose benefit levels were unchanged as a result of the verification process?	Chapter VI
• What were the characteristics of households whose benefit levels were unchanged as a result of the verification process?	Chapters V and VI
Objective 4: Assess incomes and characteristics of nonresponding households initially approved on the basis of income or categorical eligibility	
• What were the October 2018 income levels of households that were initially approved on the basis of income or categorical eligibility (by application), whose applications were selected for verification, and did not respond to district requests for documentation of their income?	Chapter VII
• What were the characteristics of all households that failed to respond to verification requests, nonresponders that reapplied, and nonresponders that did not reapply?	Chapters V and VII
• What were the reasons why households failed to respond to verification requests?	Chapter VII
Objective 5: Examine the process districts use to select applications for cause	
• What were the reasons that the applications were selected for cause?	Chapter VIII
• What were the results of the verification for applications selected for cause?	Chapter VIII
• What were the nonresponse rates of households with applications selected for cause?	Chapter VIII
• What were the characteristics of households with applications selected for cause?	Chapter VIII
• If denied, did households reapply?	Chapter VIII

D. Overview of study design

To address the study objectives, Mathematica enrolled a non-random sample of 20 districts willing to participate in the study. Although the study districts were not nationally representative, the district and household samples are large and diverse enough to provide insights about the verification process. The study team then obtained information about each district's characteristics, procedures, and verification samples in SY 2018–2019 from several sources.

- **SFA Verification Collection Report (FNS-742) and other extant data.** These sources, available from FNS or online, contain data on district characteristics, as well as district-level data on certification and verification totals.
- **Administrative data from study districts.** The study districts provided information on the pre-verification certification status, verification outcomes, and the ultimate status of households as of March 1, 2019.
- **Interviews with study district staff.** School food authority (SFA) directors or other key district staff provided data on verification procedures via interviews.

In addition, to independently assess income and categorical eligibility for F/RP meals under Objectives 3 and 4 and to understand the experiences of households in the verification sample, Mathematica conducted a **household survey in SY 2018–2019.** Two samples of households that were initially approved for school meal benefits on the basis of income or categorical eligibility and whose applications were selected for verification were selected for the survey: (1) households that had no change in certification status due to the verification process (also referred to in this report as no-change households) and (2) households that did not respond to the verification request (verification nonresponders). No change in certification status and nonresponse were the most common outcomes of the verification process. Analysis of these groups provides important insight into the verification process. No-change households had their original certification status confirmed by the verification process. Analysis in this study helps assess the accuracy of districts' verification efforts by independently assessing the eligibility status of these households. The verification process provides no information on households who did not respond to the verification request. This study examined the characteristics of these households, described their reasons for nonresponse and assessed whether these households were likely to have been eligible for F/RP meals. The two samples excluded households that did not receive a verification request because the State or district directly verified them. The samples also excluded those households that responded to the verification request and subsequently experienced a change in school meal certification status due to verification.

The study team conducted analyses to produce six key sets of results, organized into three sections.

- **Section I. Verification outcomes in study districts.** This section is broken out into two chapters:
  - **Chapter III: Study district characteristics and verification outcomes (Objective 1).** The districts participating in the study are not representative of all public school districts nationwide. The study team compared the 20 study districts to public school districts nationwide across characteristics and verification outcomes to quantify the differences. The comparisons were made at both the district level and the student level, aggregated across all districts in the study and nationwide.
  - **Chapter IV: Detailed account of verification outcomes in study districts (Objective 2).** The study team used administrative data from the study districts to examine the percentage of

applications selected for verification by their certification status before and after verification, as well as the number and percentage of students who were directly certified or who reapplied after their benefits were reduced or terminated.

- **Section II: Verification experiences and outcomes for no-change households and verification nonresponders.** This section is broken out into three chapters:
  - **Chapter V: Characteristics of the household survey samples (Objectives 3 and 4).** The study team used household survey data to examine the characteristics of households initially approved by application on the basis of income or categorical eligibility and whose applications were selected for verification that (1) responded to the verification request but had no change in certification status or (2) did not respond to district verification requests.
  - **Chapter VI: Independent assessment of eligibility for households that had no change in certification status due to the verification process (Objectives 2 and 3).** This analysis used household survey data to examine eligibility for school meal benefits among households that had no change in certification status due to the verification process. It also used household survey data and verification data from the districts to provide insights into which factors may have contributed to differences in districts' eligibility determinations versus the study team's determinations.
  - **Chapter VII: Examination of households that did not respond to the verification request (Objective 4).** The study team used household survey data to examine eligibility for school meal benefits among households that did not respond to district verification requests. The analysis also used the household survey data to examine reasons why households did not respond to verification requests.
- **Section III: Verification for cause.** This section contains one chapter:
  - **Chapter VIII: Verification for cause (Objective 5).** The final component of the analysis used information acquired through interviews with SFA directors or their designees to examine why districts select applications for cause and how the process works.

This study addresses some of the same research questions as a previous study, the Case Study of National School Lunch Program Verification Outcomes in Large Metropolitan School Districts, which was based on SY 2002–2003 data (Burghardt et al. 2004). Like the current study, the previous study selected districts for the case study, described their verification outcomes, and compared district-determined certification status to survey-determined eligibility status for no-change households and verification nonresponders. While the current study was designed to update the findings from the Burghardt et al. study, differences in the policy environment and methodology limit comparability.

A key difference in the national context around verification is that a far smaller share of students was subject to verification in SY 2018-2019 compared to SY 2002-2003. Students who are directly certified for F/RP school meals or who attend schools operating under special provisions are not subject to verification. Direct certification was not universally required for schools operating the NSLP until 2008 (established under the Child Nutrition and WIC Reauthorization Act of 2004). In addition, the CEP was not available nationwide until SY 2014–2015. By 2018, the time of the present study, both changes were in place. That year, 60 percent of students receiving F/RP school meals in public school districts conducting verifications were not subject to verification, due to either direct certification or special school meal provisions such as the CEP and Provisions 2 and 3 (Appendix Table B.1).

The 2004 study and the current study also used different methodological approaches and did not address the same set of research questions. A few examples of methodological differences were as follows:

- FNS-742 verification outcomes data were not available at the time of the earlier study and thus could not be used for comparisons of study districts with public school districts nationwide.
- A different set of sample districts were selected for the 2004 study relative to the current study, limiting the study team's ability to assess whether differences in study outcomes can be attributed primarily to changes over time or to different circumstances in the sets of study districts.
- In the 2004 study, households' eligibility for school meals was assessed based on their income two to three months after completing the verification process, whereas in the current study respondents reported their income from October 2018 on a survey conducted between January and June 2019.

In terms of the research questions, the 2004 study did not examine reasons for verification nonresponse or processes used by districts for selecting applications for cause.

Due to the limited comparability of the two studies, this report does not include in-depth comparisons of findings across the two reports. Instead, a broad summary is given in the report's conclusion.

E. Overview of report

The chapters that follow describe the study team's analytic approach in more detail and present the key results. Chapter II explains the methods used to select the samples, collect the data, and conduct the analyses, as well as the study limitations. Sections I through III, containing Chapters III through VIII, summarize findings from the analyses described above. Chapter IX discusses the conclusions and limitations of the analysis, and the appendices provide additional detail on the study methodology as well as supplemental tables.

II. Methods

This study used school district administrative data, household survey data, interviews with school districts, and FNS-742 and other extant data to examine the school meal application verification process and the results of verification. This chapter summarizes the sampling, data collection, analysis, and weighting methods that were used, as well as the study limitations. Appendix A provides additional details on how the household survey data were cleaned and edited for analysis.

A. Samples

The study team drew two types of samples: (1) a sample of 20 school districts for the case study and (2) two samples of households from those 20 districts with particular verification outcomes for the household survey.

School district sample

Using FNS-742 data, the study team identified a set of districts with verification samples of sufficient size to support the planned analyses. From this group, the team selected a sample that was diverse in terms of geographic region and student population, but also geographically clustered to facilitate data collection. The team contacted 37 districts and enrolled 20 of them based on their willingness and ability to provide the data.

The study team collected two types of data from the study districts: (1) administrative data for the full district verification sample and for households that reapplied later in the school year or became directly certified and (2) information on verification processes in district interviews.

Household survey samples

The study team conducted a household survey to obtain detailed information on (1) households that had no change in certification status due to verification (referred to in this report as no-change households) and (2) households that did not respond to the verification request (referred to in this report as verification nonresponders). Using administrative data on their verification samples provided by the 20 study districts, the team identified households with the verification outcomes of interest and, in households with multiple students, randomly selected a target student to ask the interview respondent about. The sample did not include households that did not receive a verification request because they were directly verified by the State or district; households that responded to the verification request and had a change in verification status (none of the study objectives required surveying these households); or a small number of households that had insufficient data or unresolved internal inconsistencies in the district verification data.

The target sample sizes for each district were 41 no-change households and 61 verification nonresponders. In some districts, the sample frames were smaller than the targeted number of households. For those districts, including all districts for the sample of households that had no change in certification status, the entire frame was included in the sample. That is, all the no-change households were included in the sample in each district. In districts with larger populations of verification nonresponders, the study team conducted simple random sampling to select households for the survey. The sampling was conducted independently for each district and for each of the two verification outcomes. To reach the study's overall sample target and compensate for districts without large enough sample frames, the

number of households sampled in the districts with larger populations exceeded the original targets, when necessary.

B. Data collection

In SY 2018–2019, Mathematica collected four types of data from the 20 participating school districts or from the household verification samples within those districts: (1) administrative data on school meal applications and verification for all applications selected for verification in the study districts, (2) follow-up administrative data from districts for households that had reapplied for school meal benefits after verification and households that were later directly certified, (3) household survey data to independently determine eligibility for F/RP meals and answer other research questions, and (4) data from interviews with SFA directors or their designees about the process for conducting verification for cause and the reasons why the district selected applications for this type of verification. Mathematica also collected extant data from the FNS-742 for SY 2018–2019, the 2018 Census Small Area Income and Poverty Estimates (SAIPE), and the USDA Economic Research Service (ERS) 2013 Rural-Urban Continuum Codes. Table II.1 presents an overview of the data collection activities.

Table II.1. Overview of data collection

Instrument	Source	Purpose	Number of respondents	Timing
Verification data request	District	Collect household characteristics and verification results for all households whose applications were selected for verification	20	November–December 2018
Reapplication data request	District	Collect information on post-verification reapplications and direct certifications as of March 1, 2019, and certification status as of that date	20	March 2019
Household survey	Household	Collect (1) income information to independently assess eligibility and (2) information on household characteristics and perceptions of the verification process	1,203[a]	January–June 2019
District interview	SFA director or designee	Collect information about the process of and reasons for selecting applications to verify for cause	20	February–March 2019

[a] The household survey was completed with 778 verification nonresponders and 425 households with no change in certification status due to verification. However, these totals include (1) five verification nonresponders and one no-change household that did not report enough information to be included in the study analysis; (2) two verification nonresponders that were dropped from the analysis because they had a post-verification certification status of free or reduced-price meals in the district administrative data; and (3) six households that were dropped from the analyses because the respondent did not report living with the target student in October 2018. The resulting analysis sample included 767 verification nonresponders and 422 verification responders with no change in certification status (a total of 1,189 households).

SFA = School food authority.

District administrative data

The study required the collection of verification and reapplication data from districts for two purposes: (1) to create the sample frames of the households in the two household survey groups described in the previous section and (2) to address research questions that involve verification outcomes and the ultimate certification status of households as of March 1, 2019.

After receiving Office of Management and Budget (OMB) clearance and enrolling the 20 study districts, the study team worked with district staff to obtain administrative data for all households in each district's SY 2018–2019 verification sample. The requested data included background characteristics of households whose applications were selected for verification, initial household certification status prior to verification, information related to verification outcomes, and household contact information to be used for the household survey. All districts provided the requested data between November and December 2018.

In March 2019, the study team asked every enrolled district for an updated administrative data set with information on (1) reapplications and direct certifications; (2) ultimate certification statuses as of March 1, 2019 for households that reapplied or were directly certified; and (3) student enrollment status as of March 1, 2019, for any household whose students withdrew enrollment since the verification file was submitted to Mathematica in November or December 2018. The reapplication data were then combined with the verification data to assess the number of households whose certification status changed after the verification process was completed in the fall. All districts provided the requested data.

Household survey data

The study team conducted a household survey to (1) obtain information necessary to determine the characteristics of households in the two groups with verification outcomes of interest; (2) assess eligibility for households that had no change in certification status due to verification; and (3) investigate research questions about nonresponse to the verification request, including the reasons for not responding and whether households that did not respond could have been eligible for free or reduced price meals if they had responded.

The study team contacted one adult in the household to respond to the survey, typically the head of household. The survey respondent provided information about the relationship, age, and other characteristics of other people in the household, as well as their own perceptions of, and experiences with, school meal programs and the verification process. The survey respondent also provided information about income received by each household member, covering the income types, listed in Appendix A, that pertain to eligibility for F/RP school meal benefits.

The household surveys were conducted either in person or by telephone from January through June 2019. The study team completed 1,203 surveys—425 households that had no change in certification status due to verification and 778 households that did not respond to the verification request. Of the households that completed surveys, 1,189 households satisfied the requirements for analysis.

District interview data

To obtain information on each district's processes and reasons for selecting applications for verification for cause, the study team conducted semi-structured telephone interviews with the SFA director or the director's representative in each of the enrolled districts. The interviews also gathered some information

on the required verification process, but the emphasis was on verification for cause. Sixteen of the 20 SFA directors reported that their district had not selected any applications to be verified for cause in SY 2018–2019, including some that reported that they never select applications for verification for cause. In these circumstances, interviewers asked follow-up questions to learn more about why these districts decided against selecting applications to verify for cause. All interviews took place in February and March 2019.

Extant data

To compare the characteristics of study districts to those of public school districts nationwide, the study team acquired data from the following sources:

- **FNS-742 data.** These district-level data provide information on school district enrollment totals, certification outcomes, and verification outcomes. The data pertained to October of SY 2018–2019.
- **Census SAIPE data.** To obtain information on poverty rates and median household income in districts, the study team acquired 2018 Census SAIPE data from the U.S. Census Bureau website.[7]
- **ERS Rural-Urban Continuum Codes.** The study team used 2013 ERS Rural-Urban Continuum codes to identify the metropolitan status of districts.[8]

C. Analysis methods

To address the study objectives, the study team conducted analyses to produce six key sets of results, organized into three sections.

Study district characteristics and verification outcomes (Section I, Chapter III)

The study team used the extant data to compare characteristics and verification outcomes in the 20 study districts to all public school districts nationwide. Information on most characteristics and all verification outcomes presented in the chapter came from the FNS-742 data.[9] For results based on this data source, public school districts nationwide were restricted to those that conducted verification in the 50 States and the District of Columbia, as well as those without internal data inconsistencies in key elements from the FNS-742 data.[10] To supplement the results generated from the FNS-742 data, the team used data on poverty rates and median household income from the Census SAIPE and identified the metropolitan status of districts using the ERS Rural-Urban Continuum codes.

Results were averaged across districts and students. To obtain averages across all study districts and public school districts nationwide for each verification outcome, the study team first calculated the value of the outcome for each district and then calculated the mean across these district-level estimates of the outcome. To obtain estimates of aggregate student-level characteristics (for example, the percentage of students across all study districts certified for free meals in Appendix Table B.1), the team multiplied the percentage of students with that specific characteristic in each district by the proportion of all study

[7] Data available at https://www.census.gov/programs-surveys/saipe/data/datasets.html.
[8] Data available at https://www.ers.usda.gov/data-products/rural-urban-continuum-codes.aspx.
[9] For reporting purposes, the team slightly modified the FNS-742 data to mask districts' identity; findings from the unmasked data were qualitatively similar.
[10] A small number of SFAs had internal inconsistencies in key elements from the FNS-742 data that were central to the study's analyses; the excluded SFAs reflect 1 percent of SFAs, 0.6 percent of schools, and 0.4 percent of students in the study's FNS-742 sample.

students who resided in the district and summed the products. Averages across all study districts are also calculated in other chapters.

Detailed account of verification outcomes in study districts (Section I, Chapter IV)

The verification process can result in an increase in school meal benefits, no change in benefits, or a reduction or termination of benefits. After the verification process, household certification status can change further through reapplication or direct certification. To address research questions related to verification outcomes and the ultimate certification status of households, the study team used household-level administrative data from the study districts for their full verification samples, reflecting October 2018, as well as household-level data as of March 2019 that identified which students reapplied or became directly certified after verification. The team combined these data; resolved internal inconsistencies with additional information from districts to the extent possible; and removed a small number of households that could not be used for analysis, such as those with no student enrolled in October 2018, those whose initial certification status before verification was for paid meals, and those with essential information missing from their records. The post-verification analyses excluded households in which all students were no longer enrolled in district schools as of March 1 because those households would have no incentive to reapply for school meals or become directly certified.[11]

Characteristics of the household survey samples (Section II, Chapter V)

Using household survey data combined with district administrative data to identify whether the household was initially certified for free or reduced price meals, the study team examined the distribution of characteristics for the two study groups: (1) verification responders who had no change to their certification status due to verification (no-change households) and (2) verification nonresponders. The team conducted several steps to clean and validate the data; more detail on these steps is provided in Appendix A. The team also constructed the economic unit, which was used to determine household size, household composition (for example, single-parent and two-parent households), other household characteristics, and the survey-determined income eligibility status for school meals.

For the purpose of determining school meal eligibility, the economic unit is defined as a group of related or unrelated individuals who are not residents of an institution or boarding house but who live together and share housing, significant income, and expenses (7 CFR 245.2). The study team constructed the economic unit using information provided in the household survey on family relationships and income support as of October 2018, such that it closely aligned with the definition used for school meals. The economic unit is referred to as "the household" throughout the presentation of the study findings.

Independent assessment of eligibility for households that had no change in certification status due to the verification process (Section II, Chapter VI)

In addition to examining characteristics, the study also used household survey data combined with district administrative data to independently assess F/RP school meal eligibility for no-change households. To determine eligibility using the household survey data, the study team first assessed whether a household was categorically eligible on the basis of reported receipt of SNAP, TANF, FDPIR during SY 2018–

[11] Appendix Table C.6 details the percentage of households where all students were no longer enrolled, by characteristic.

2019, or foster care.[12] Categorically eligible households were found eligible for free meals. For households not identified as categorically eligible, the team calculated countable income amounts for each household, imputing income receipt and/or amounts when those data were not reported. The team then used income and economic unit size to calculate income as a percentage of the FPL. The team compared that percentage to the income eligibility criteria for F/RP school meals. Appendix A provides details on the income determination method and the imputation approaches.

For no-change households, the study team then compared the survey-determined eligibility status to the household's certification status according to the data reported by the district. For households with differences, the team compared categorical eligibility, household size, and household income data across the two data sources to determine the source of the discrepancy. Household income was considered to differ if the difference between the sources was in excess of $100.

Examination of households that did not respond to the verification request (Section II, Chapter VII)

The analysis presented in Chapter VII is based on the same data as those used for Chapter VI, but Chapter VII presents detailed findings for verification nonresponders rather than for no-change households. The economic unit, household income, and school meal benefits were determined the same way as they were in the examination of no-change households.

The study team also examined survey reports of reasons for nonresponse. The team categorized open-ended responses from the household survey into the discrete groups used in the tables.

Verification for cause (Section III, Chapter VIII)

The study team interviewed staff from each study district to learn about the processes for selecting applications for cause. The team organized the data in a spreadsheet, categorized open-ended responses into the groups used in the tables, and calculated means and medians based on the interview responses as needed for table construction.

To assess differences between households contacted for verification for cause and those contacted for required verification, the study team used district administrative data to identify which households had been contacted for verification for cause and household survey data for information on household characteristics. Only three study districts conducted verification for cause during the period covered in the study's SY 2018–2019 administrative data, and only these three districts were included in the analysis.[13] These three districts selected a combined total of 102 applications for verification for cause during this period; however, two of these three districts selected only six applications each. Due to the small number of households with applications selected for cause and the small number of districts containing any such households, these results (shown in Appendix G) should be interpreted with caution and are not discussed in the report chapter.

[12] The analysis only considered a household to be categorically eligible on the basis of foster care if the target student was a foster child. Categorical eligibility based on foster care does not extend to other children in the household.

[13] A fourth district reported in the district interview that it verified one application for cause in SY 2018–2019. However, this verification took place in December 2018, after the reference period for the study's administrative data, and therefore it is not included in this analysis.

D. Survey-nonresponse and analysis weights

All study districts provided the requested administrative records. Therefore, the analysis of administrative data did not have to account for data missing due to nonresponse. However, as noted in Section A, the study team identified districts non-randomly based on their characteristics. Because the district sample was not randomly selected, the study findings related to administrative data are not generalizable to the broader population.

Some households selected for the household survey sample did not respond to the survey request. Response rates in districts varied widely, ranging from 25 percent to 79 percent for no-change households and from 28 percent to 67 percent for verification nonresponders.[14] Because the district sample was not randomly selected, the study findings related to survey data are also not generalizable to the broader population.

To account for potential differences between survey respondents and nonrespondents, the study team assessed the extent of these differences and calculated analysis weights to reduce the chance that survey nonresponse would lead to bias in the findings. The nonresponse bias analysis revealed that none of the considered characteristics differed between survey respondents and nonrespondents except for the study district.[15] Because response rates varied considerably across the 20 districts in each of the two verification outcome groups, the team assigned equal weights to respondents within a particular district but weighted respondents across districts proportionally to the number of students eligible to be included in each study group. That is, the team combined data from all the districts and gave more weight to households in those districts with larger study-eligible populations.

E. Limitations

In interpreting the study findings, it is important to keep in mind limitations related to the study's sample, data, and methods.

The study findings do not reflect verification outcomes for districts nationwide. As discussed in Section A of this chapter, the district sample was geographically clustered and limited to large districts that were willing and able to provide the necessary data. As such, the findings are not representative beyond the 20 study districts. In addition, while the household survey samples were selected randomly, they were constrained by the number of study-eligible households in the district verification samples. Furthermore, although the study team found little evidence of nonresponse bias aside from differing response rates among the districts, it remains possible that responding households differed from nonresponding households in other unobserved ways.

The accuracy of the findings is limited by the quality of the data used to produce them. It is possible that both the administrative data and survey data are subject to data quality issues that could affect the interpretation of findings.

District administrative data could have errors if there were issues in recording, storing, or reporting the data. Although the quality of the data overall appeared to be strong, the study team identified some internal inconsistencies pertaining to household size and income, certification status, and verification

[14] The average response rate across the 20 districts was 54 percent for no-change households and 45 percent for verification nonresponders.

[15] The characteristics considered were district, household size, income, number of students in the household, school grade of the target student, and eligibility status.

outcome. Where there was a pattern of inconsistent data that affected several records, the team attempted to contact district staff for clarification. If the district was unable to provide information to resolve the inconsistency, the team either addressed the inconsistency to the extent possible or excluded the data from the analysis. It is possible that these strategies did not fully address the identified issues. It is also possible that some administrative records could be incorrect without generating an internal inconsistency. The team would not be able to identify and correct such issues.

Household survey data are subject to reporting errors and missing data. Recall error is an important component of reporting error. The study team asked respondents to report their income from October 2018, but the survey data were collected between January and June 2019, by which time the survey respondent might no longer remember the household income from that month. When income documentation was provided in the survey, the time period on the documentation often did not overlap with October 2018, the month of analysis. For example, the documentation available was often for time periods closer to the time of the survey interview. For these reasons, the study team did not use the documentation. Reporting error in household survey data could also emerge from survey respondents—typically, the head of household—not having accurate or complete information for all members of the household. Further, it could emerge if the survey respondent is unwilling to provide accurate data to the data collector.

Missing survey data can also complicate the analysis. This is particularly relevant for household income, which is based on a large number of data items that capture whether each household member received each income source relevant to calculating eligibility for school meal benefits and the amount of income received.[16] Some household survey respondents did not provide a response to certain survey questions, especially for receipt and amount of income (because they either did not know the requested information or refused to provide it). As detailed in Appendix A, the study team imputed income receipt and amount when data were missing. Although imputation was not necessary for most households and the amount of information imputed as well as the imputed amounts were often small, even a small amount of imputation error could result in incorrect survey-determined eligibility.

The reference period across data sources might not align. A key component of the study was comparing household eligibility determined by districts through verification to eligibility based on the survey data. If these two data sources do not refer to the same time period, there could be differences in the eligibility determinations unrelated to the verification process. The study only collected income data from October 2018. Per Federal regulations, a household may be eligible to receive school meals if it is income or categorically eligible at any point during the school year. Thus, it is possible that a household would be eligible at the time of initial application (for example, at the beginning of the school year) but due to changes in circumstances not be eligible by the time of the survey data collection reference month (October).

[16] Respondents were asked about receipt and amount of income from employment and 24 other income sources for each adult, and three income sources for each child.

SECTION I: VERIFICATION OUTCOMES IN STUDY DISTRICTS

In interpreting findings from the in-depth analyses of verification outcomes, it is important to first understand how the characteristics and verification outcomes of the 20 districts included in the study compare to public school districts nationwide. This section first summarizes findings from this comparison, based on FNS-742 and other extant data (Chapter III). While these data sources can be used to describe verification outcomes in study districts and in public school districts nationwide, the data are at the district level and cannot be used to track detailed household-level circumstances over time. To conduct a more detailed examination of pre-verification certification statuses, verification outcomes, and ultimate certification outcomes of the verification sample, the study team used SY 2018–2019 administrative data provided by the study districts for the full verification sample (Chapter IV). The analysis of the full verification sample in Chapter IV provides some context for the more detailed analyses of no-change households and verification nonresponders in Section II.

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III. Study District Characteristics and Verification Outcomes

In interpreting findings from the in-depth analyses of verification outcomes, it is important to understand how the characteristics of the 20 districts included in the study compare to public school districts nationwide. The study team did not select districts at random. Rather, to be included in the study, districts needed to have relatively large numbers of students with certain verification outcomes and needed to be geographically clustered. Therefore, the study districts are not representative of school districts nationwide.

This chapter describes district characteristics and verification results of both the districts chosen for the study and all public school districts nationwide. The analysis is based on SY 2018–2019 FNS-742 data, 2018 data from the Census SAIPE, and 2013 ERS Rural-Urban Continuum Codes. These data sources contain information on district size, metropolitan status, poverty levels, certification for school meal benefits, and verification outcomes.

Most of the findings in this chapter focus on averages across districts, which reflect the experience of a typical district in the study sample or nationwide by weighting each district equally. However, in some cases it is also instructive to examine averages across students, which reflect the experience of a typical student by weighting districts by their number of enrolled students. This distinction can be important because large districts represent a relatively small share of public school districts nationwide, but they enroll a large share of the nation's students. For example, based on calculations from the FNS-742 data, districts enrolling 10,000 students or more comprise only about 7 percent of districts nationwide, but they enroll more than half of students in all public school districts.

Overview of key findings

- The study districts had an average enrollment of more than 80,000 students, many more students than the average for public school districts nationwide.
- On average, a higher percentage of students were certified for school meal benefits by application in the study districts than in public school districts nationwide.
- Nearly half of households in the study districts did not respond to the verification request, on average, about double the percentage for public school districts nationwide.
- Response to the verification request resulted in benefit reduction or termination more often in the study districts than in public school districts nationwide.

A. District administrative and local characteristics

The selection criteria for study districts favored districts with large numbers of students enrolled and those with many students subject to verification because they were certified for school meal benefits based on an application. These selection criteria are reflected in the characteristics of the study districts. For example, we found that the study districts were much larger, on average, than districts nationwide.

Administrative characteristics

Study districts had an average of 94 schools and 80,000 enrolled students, while public school districts nationwide averaged 6 schools and about 3,500 students (Table III.1). All 20 study districts had at least 10,000 enrolled students; 12 of these districts had at least 50,000 students (Figure III.1). As mentioned

previously, only 7 percent of districts nationwide had at least 10,000 enrolled students. Less than 1 percent of districts nationwide had at least 50,000 enrolled students.

Table III.1. Average administrative characteristics across districts

	Characteristics averaged across districts	
	Study districts	Public school districts nationwide
Number of schools (mean)	94	6
Number of students (mean)	80,200	3,520
School meal benefit status (percentage of students):		
Attending schools using special provisions not subject to verification[a]	3	4
Directly certified for free meals[b]	27	25
Certified for F/RP meals by application	24	18
Certified for free meals	17	11
Certified for reduced price meals	7	6
Neither certified for F/RP meals nor in schools using special provisions not subject to verification	47	54
Number in sample	**20**	**11,037**

Source: FNS-742 data, SY 2018–2019.

Note: Public school districts nationwide include only districts that conducted verification. Subgroups may not sum to 100 percent due to rounding. See Appendix Table B.1 for detailed results.

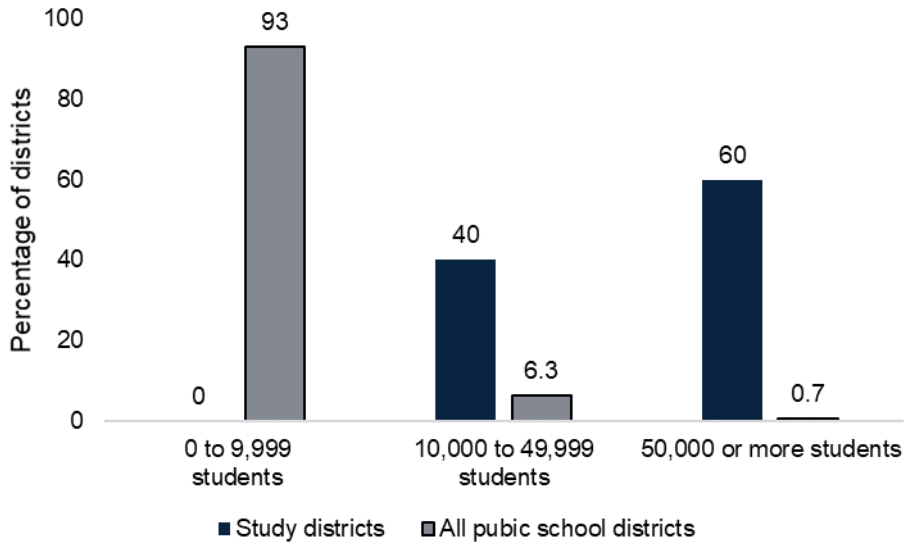
[a] This includes students in schools operating under the CEP and Provisions 2 and 3 in a non-base year.

[b] This does not include students directly certified for reduced price meals based on Medicaid information; these students are not identified from the FNS-742 data.

The percentage of students certified for F/RP meals, either by direct certification or by application, was higher in study districts than in public school districts nationwide. Only students certified by application are subject to verification. Nearly 25 percent of students in study districts were certified for F/RP meals by application, relative to 18 percent nationwide (Table III.1).

Applications are not subject to verification if the students are directly certified for school meal benefits or attend schools operating special school meal provisions that are not subject to verification (either CEP or Provisions 2 or 3 in a non-base year). Slightly more students in study districts were directly certified than in districts nationwide (27 percent versus 25 percent) (Table III.1). The percentage of students in schools operating special school meal provisions not subject to verification was small (3 percent on average) and similar to districts nationwide (4 percent on average).

Figure III.1. Average student enrollment across districts



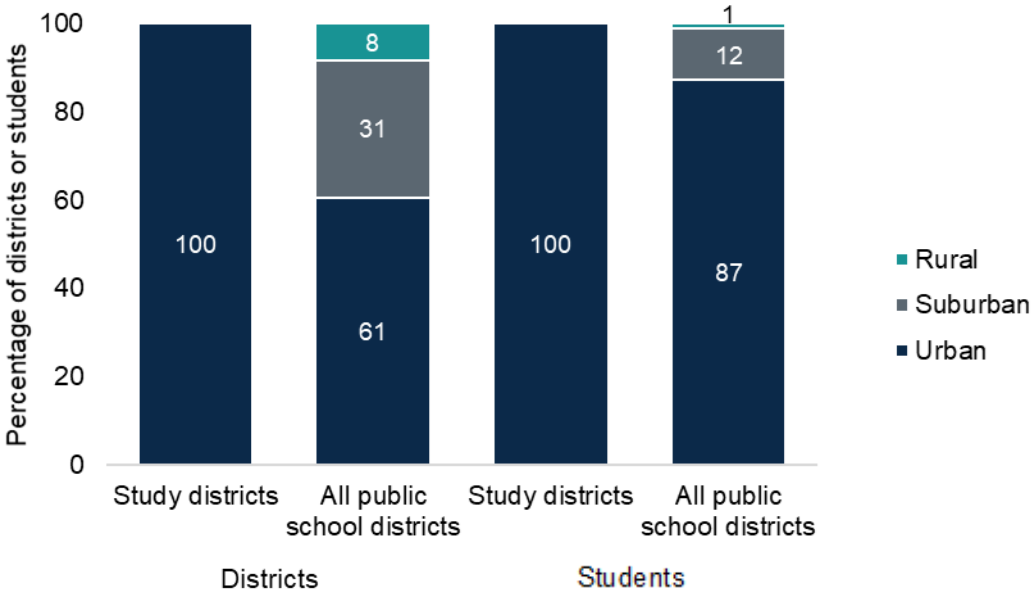
Source: FNS-742 data, SY 2018–2019.

Note: Public school districts nationwide include only public school districts that conducted verification. See Appendix Table B.1 for detailed results.

Local characteristics

All 20 districts included in the study were in urban areas, compared to 61 percent of public school districts nationwide (Figure III.2). However, because urban school districts tend to be larger, in terms of student enrollment, than rural and suburban school districts, the contrast in the metropolitan status distribution is less stark at the student level: 87 percent of public school students nationwide attended school in an urban district.

Figure III.2. Metropolitan status across districts and students



Source: FNS-742 data, SY 2018–2019, and ERS 2013 Rural-Urban Continuum Codes.

Note: Public school districts nationwide include only districts that conducted verification. Results averaged across students weight districts by enrollment size. See Appendix Table B.2 for detailed results.

All FNS geographic regions were represented in the study except for the Northeast Region, which represented 12 percent of public school districts nationwide (Table III.2). The largest concentration of study districts was in the Southwest Region, where 7 of 20 study districts, or 35 percent, were located, compared to 16 percent of school districts nationwide. Because districts chosen for the study were geographically clustered to facilitate data collection, matching the regional distribution of study districts to public school districts nationwide was not a priority.

Table III.2. Average local characteristics across districts

	Characteristics averaged across districts	
	Study districts	Public school districts nationwide
FNS region (percentage)[a]		
Mid-Atlantic	15	11
Midwest	10	26
Mountain Plains	15	15
Northeast	0	12
Southeast	15	7
Southwest	35	16
Western	10	13
Percentage of school-age children in poverty	15	17
Median household income in district	$69,850	$58,901
Number in sample	**20**	**11,037**

Source: FNS-742 data, SY 2018–2019, and 2018 SAIPE data.

Note: Public school districts nationwide include only districts that conducted verification. See Appendix Table B.2 for detailed results.

[a] Region is defined based on the FNS regions as of October 2019. Region breakouts by State can be accessed at https://www.fns.usda.gov/fns-regional-offices.

The average economic status of study districts was somewhat more favorable than that of public school districts nationwide. Median income was $69,850 in study districts, on average, compared to $58,901 in districts nationwide (Table III.2). On average, 15 percent of school-age children lived in households with incomes below the poverty line in study districts, which was about 2 percentage points lower than the average rate of 17 percent in districts nationwide.

B. District verification outcomes

As with other characteristics, the verification outcomes reflect the criteria used to select the study districts. Specifically, the study enrolled districts with large verification samples and those with large numbers of households that did not respond to the verification request, because assessing the latter group was a key study objective. Consequently, relative to districts nationwide, the study districts had more students in their verification sample and more households that did not respond to the verification request. They were also less likely to use alternate methods for selecting verification samples, which districts qualify for when more households respond to the verification request.

Selection for verification

Districts with very low or decreasing rates of verification nonresponders are eligible to use alternate methods for selecting their verification samples, in which they use random, rather than error-prone, samples of students (Alternate 1) or smaller samples of students (Alternate 2). Because the study districts were chosen for higher-than-average levels of household nonresponse to verification, most (90 percent) used standard sampling to select applications for verification (Table III.3). Only 2 of 20 study districts used Alternate 2 sampling, while none of the study districts used Alternate 1 sampling. The rate of

standard sampling in the study districts was 20 percentage points higher than the nationwide rate of 70 percent.

Table III.3. Summary of districts' verification sample size and sampling method across districts

	Characteristics averaged across districts	
	Study districts	Public school districts nationwide
Total number of students in households selected for verification[a]	340	14
District verification sampling method (percentage)		
Standard	90	70
Alternate 1	0	26
Alternate 2	10	5
Number in sample	**20**	**11,037**

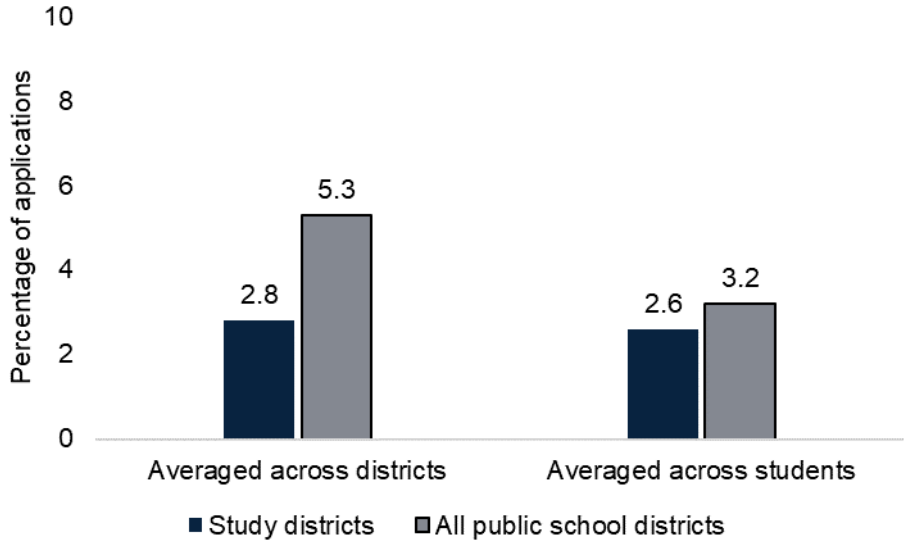
Source: FNS-742 data, SY 2018–2019.

Note: Public school districts nationwide include only districts that conducted verification. Subgroup percentages may not sum to totals due to rounding. See Appendix Tables B.1 and B.3 for detailed results.

[a] Includes applications selected for cause.

The study districts had substantially larger verification samples than districts nationwide did. The average number of students selected for verification in the study districts was 340 students, compared to 14 students for districts nationwide (Table III.3). However, the share of district applications selected for verification was lower for the study districts, on average, at 3 percent, compared to 5 percent for districts nationwide. The difference is largely related to the fact that the study districts are much larger than the typical district nationwide and that verified applications tend to represent a larger share of students in smaller districts. The percentage of students verified was about 3 percent in both study districts and districts nationwide.

Figure III.3. Average percentage of applications selected for verification across districts and students



Source: FNS-742 data, SY 2018–2019.

Note: Public school districts nationwide include only districts that conducted verification. Results averaged across students weight districts by enrollment size. The totals presented here reflect the sum from the FNS-742 data of applications with verification results, excluding those selected for cause. For a small percentage of districts (2.3 percent), this number differs from the district report from the FNS-742 data of the total number of applications selected for verification. See Appendix Table B.3 for detailed results.

Verification outcomes

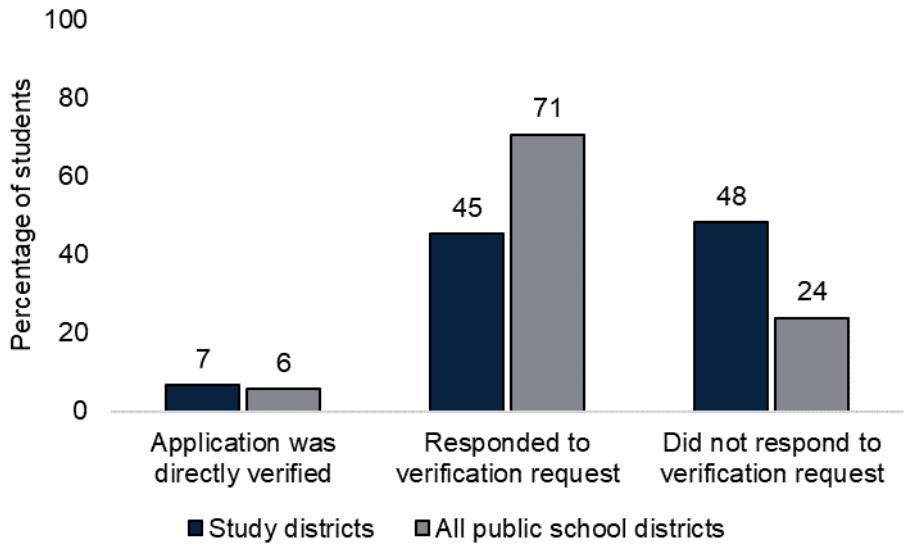
The first stage in the verification process is direct verification, in which districts verify eligibility based on administrative records from relevant public assistance programs. In both the study districts and public school districts nationwide fewer than 1 in 10 applications were directly verified (Figure III.4). In the study districts, an average of 7 percent of applications selected for verification were directly verified; nationwide, the rate was 6 percent.

Verification outcomes among applicants who were not directly verified differed substantially between study districts and districts nationwide. These differences were driven by two distinct factors: (1) differing verification outcomes among households that responded to the verification request and (2) higher rates of households that did not respond to the verification request in the study districts.

The rate of responding households that had no change in certification status due to verification was 20 percentage points lower in study districts (39 percent) than in public school districts nationwide (59 percent) (Figure III.5). More than half of the households that responded to the verification request in the study districts had their benefits reduced or terminated: 58 percent on average, compared to 37 percent nationwide. This 58 percent was split roughly evenly between benefit reduction (from free to reduced price) and benefit termination (from free or reduced price to paid). It was uncommon for benefits to increase as a result of the verification process. In both the study districts and public districts nationwide, only 3 percent of households that responded to the verification request had their certification status changed from reduced price to free meals.

In the study districts, nearly half (48 percent) of households whose applications were selected for verification did not respond to the verification request (Figure III.4). This rate was nearly twice as high as the rate for public school districts nationwide, in which nearly a quarter (24 percent) of households did not respond to the request.

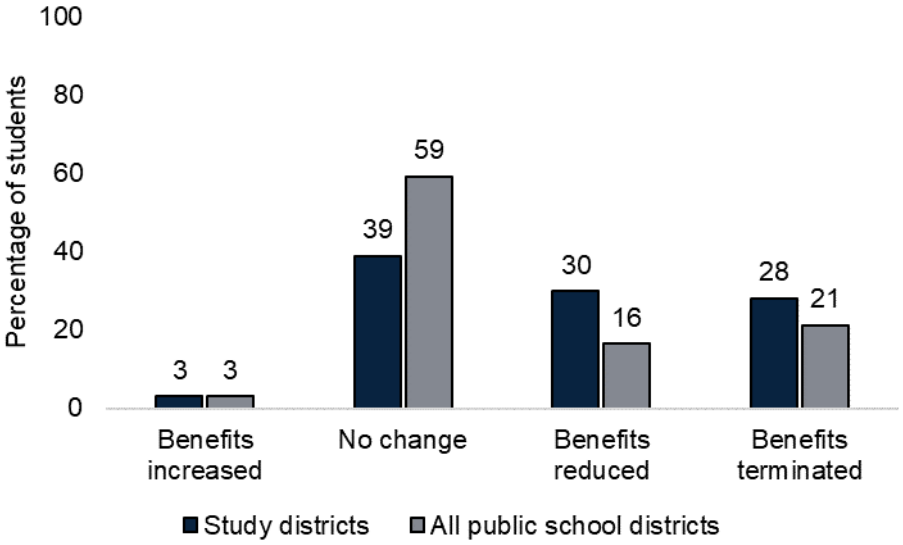
Figure III.4. Average verification outcomes across districts



Source: FNS-742 data, SY 2018–2019.

Note: Public school districts nationwide include only districts that conducted verification. Subgroup percentages may not sum to totals due to rounding. These numbers include applications selected for cause. See Appendix Table B.3 for detailed results.

Figure III.5. Average verification outcomes among responders to the verification request across districts



Source: FNS-742 data, SY 2018–2019.

Note: Subgroup percentages may not sum to totals due to rounding. These numbers include applications selected for cause. See Appendix Table B.4 for detailed results.

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IV. Detailed Account of Verification Outcomes in Study Districts

This chapter uses household-level data from the study districts to provide a detailed account of verification outcomes and to address research questions on the ultimate certification activities and outcomes of households in these study districts in the months following verification. It begins with a summary of the verification outcomes using SY 2018–2019 administrative data provided by the study districts for the full verification sample. This analysis is analogous to the verification outcomes analysis using FNS-742 data presented in Chapter III.

After the verification process, household certification status can change further through reapplication or direct certification. Household-level data on pre-verification certification status, verification outcomes, and post-verification outcomes are not included in FNS-742 data, so this exploration can only be done with household-level administrative data from the study districts. This chapter details the extent to which households whose benefits had been reduced or terminated as a result of the verification process reapplied for school meal benefits or experienced changes in certification status from direct certification.[17]

The analysis of the full verification sample in this chapter provides context for the more detailed analyses of no-change households in Chapters V and VI and of verification nonresponders in Chapters V and VII.

Overview of key findings

- Among the study districts, nearly half of households whose applications were selected for verification in SY 2018–2019 had their benefits terminated because of nonresponse to the verification request.
- Although most households in the study districts had their benefits reduced or terminated due to verification, only 6 percent reapplied for benefits and only 2 percent became directly certified by March 1, 2019.
- Most household reapplications resulted in an increase in school meal benefits.

A. Verification outcomes based on district administrative data

Outcomes for the full verification sample

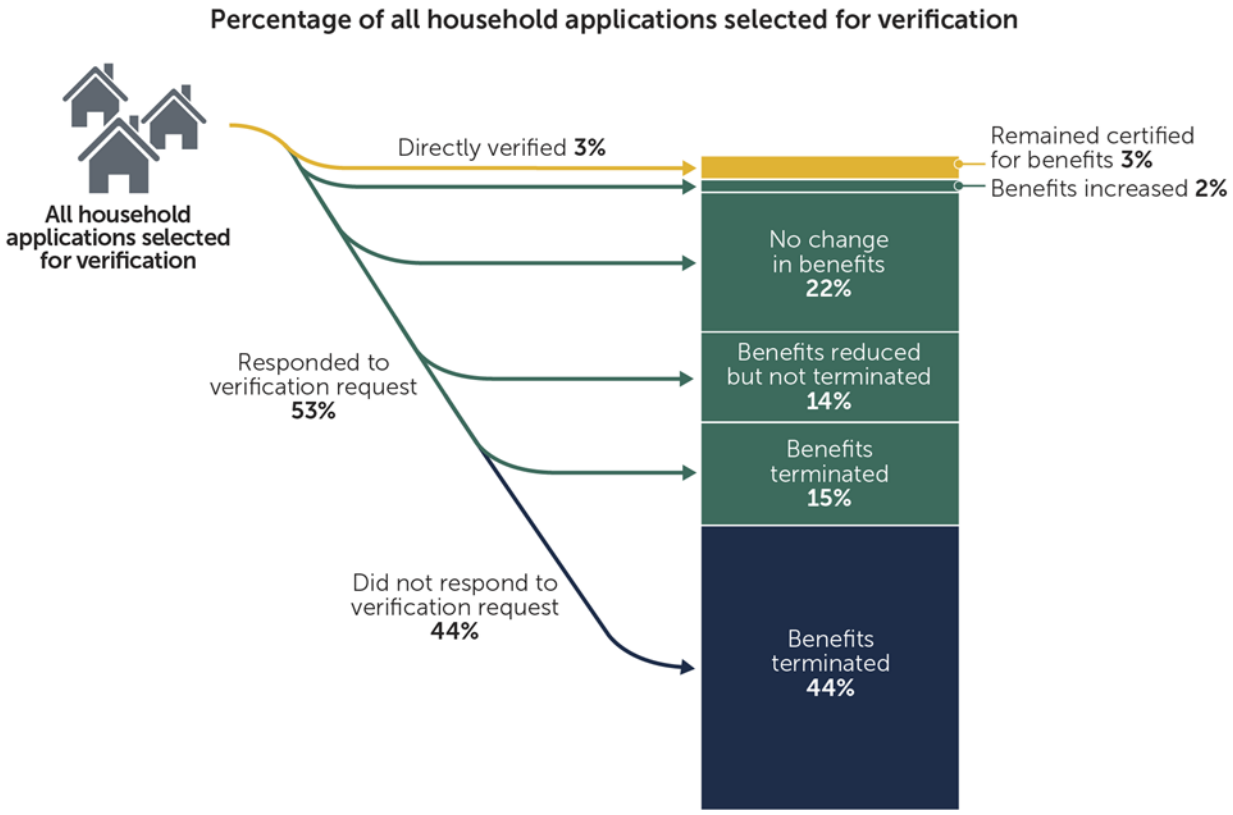
The distribution of verification outcomes in the study districts based on the districts' administrative data generally aligns with the distribution from the FNS-742 data presented in Chapter III. The results were expected to align because the two data sources measure the same outcomes, with the difference in the sources being that the district administrative data were disaggregated at a household level so that they could be used for additional analyses. For example, as with FNS-742 data, the district administrative data indicate that close to half of households did not respond to the verification request and that households that responded to the request commonly had no change to certification status (Figure IV.1).[18]

Where small differences between the data sources arose, they were likely due to (1) differences in the timing of the districts' data submissions or (2) data cleaning conventions. For example, the study team

[17] Direct certification matches must be processed at least three times per year.
[18] Verification nonresponse rates were higher than average for the largest study districts and for those with more than half of students certified for F/RP meals prior to verification. See Appendix Tables C.2 and C.3 for more details.

grouped households that were reported as both directly verified and responding to the verification request with the verification responders, rather than those that were directly verified.

Figure IV.1. Summary of average household verification outcomes across districts



Source: Administrative data from the study districts, SY 2018–2019.

Note: Subgroup percentages may not sum to totals due to rounding. See Appendix Table C.1 for detailed results.

B. Summary of ultimate certification status in March

After the verification process, some households choose to reapply for free or reduced price school meals. Others could become directly certified following verification, either for free meals on the basis of SNAP, TANF, or FDPIR receipt or for free or reduced price meals on the basis of information used to determine Medicaid eligibility (in States that participated in a direct certification with Medicaid demonstration in SY 2018–2019). Direct certification, like reapplication, could result in a certification status with a higher level of benefits or could keep a household certified at its current benefit level.

The districts' administrative data indicated that most households did not reapply for school meal benefits after verification, even if their benefits were reduced or terminated. Only 6.1 percent of all households contacted for verification and that had students who were still enrolled in the district on March 1, 2019

reapplied (Table IV.1).[19] Reapplication rates (the percentage that reapplied) were highest for households that had their benefits terminated because they did not respond to the verification request (11.1 percent). Within this group, the reapplication rate was 13 percent for households initially certified for free meals and 8.3 percent for households initially certified for reduced price meals. The reapplication rate was only 3.7 percent for households that responded to the verification request but had their benefits terminated. Few households that either (1) maintained their reduced price benefits or (2) had their benefits decreased from free to reduced price meals reapplied—a little over 1 percent for both groups.[20] All reapplicants were initially certified on the basis of income, rather than categorical eligibility (Appendix Table C.8).

Table IV.1. Post-verification reapplication and direct certification rates, as of March 1, 2019 (average outcome across districts)

Verification outcome	Percentage of households in verification sample that:	
	Reapplied	Became directly certified
All households	**6.1**	**1.7**
Directly verified	0.7	0.3
Responded to verification request	1.6	1.4
Increase in benefits	n.a.	2.0
No change in benefits	0.4	1.2
Benefits reduced but not terminated	1.4	1.6
Benefits terminated	3.7	0.9
Did not respond, benefits terminated	11.1	2.0
Initially certified for free meals	13.0	1.8
Initially certified for reduced price meals	8.3	1.9

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes all households that were still enrolled in the district on March 1, 2019, among the full verification samples for the study districts (4,706 households). It excludes 43 households in which all students were no longer enrolled on March 1, 2019. The two columns are mutually exclusive; households that both reapplied and became directly certified were classified only as becoming directly certified. See Appendix Table C.7 for detailed results.

n.a. = not applicable.

The small number of households that reapplied usually reapplied successfully. Among reapplications with a known outcome, more than four out of five household reapplications resulted in an increase in school meal benefits (Table IV.2). Reapplication was more often successful for households initially certified for free meals than for those initially certified for reduced price meals, though both groups usually regained benefits. About 85 percent of households initially certified for free meals prior to verification reapplied successfully. That is, the reapplication resulted in the household becoming either (1) newly eligible and certified for free meals (45 percent), (2) newly eligible and certified for reduced price meals (39 percent), or (3) previously certified for reduced price meals but newly certified for free meals (1 percent). About 70

[19] Some students in some households may unenroll from school due to a move or for other reasons. Those households would not have any reason to reapply or to become directly certified; thus, they were excluded from the analyses presented in this chapter.

[20] For more detailed findings, see Appendix Table C.7.

percent of households initially certified for reduced price meals prior to verification reapplied successfully. Most of those successful reapplicants (42 percent of all reapplicants) became newly eligible and certified for reduced price meals. Reapplications were most often successful for verification nonresponders, regardless of whether they were initially certified for free or reduced price meals; that is, households that did not respond to the verification request and decided to apply for benefits after having them terminated had the smallest percentage of household reapplications denied among all households that reapplied after verification.

Table IV.2. Reapplication outcomes, by certification status before and after verification (average outcome across districts)

Verification outcome, by initial certification status	Mean number of households that reapplied	Reapplication result among those who reapplied (percentage of households)			
		Newly eligible and certified for free meals	Newly eligible and certified for reduced price meals	Already certified for reduced price meals, changed to free meals	Household reapplication denied
All households	**14.8**	**38**	**39**	**4**	**19**
Households initially certified for free meals	**11.1**	**45**	**39**	**1**	**15**
Directly verified	0.1	n.a.	n.a.	50	50
Responded to verification request	1.2	36	24	6	34
Responded, benefits reduced but not terminated	0.4	n.a.	n.a.	25	75
Responded, benefits terminated	0.8	42	32	n.a.	26
Did not respond, benefits terminated	9.8	43	44	n.a.	13
Households initially certified for reduced price meals	**3.7**	**22**	**42**	**6**	**30**
Directly verified	0.0	n.a.	n.a.	n.a.	n.a.
Responded to verification request	0.6	29	7	14	50
Responded, no change in benefits	0.2	n.a.	n.a.	33	67
Responded, benefits terminated	0.4	33	11	n.a.	56
Did not respond, benefits terminated	3.1	17	56	n.a.	27
Number of households in verification sample that reapplied	**281**				
Number of districts	**19**				

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the 281 households in 19 districts that reapplied among the full verification samples for the study districts, excluding 5 households that reapplied but whose reapplication status is unknown. One of the 20 districts did not report any reapplications. Subgroup percentages may not sum to totals due to rounding. See Appendix Table C.9 for detailed results.

n.a. = not applicable.

Relatively few households were directly certified after verification. Of the nearly 2 percent that became directly certified, most changed from paid to free certification status, though some were already certified

for free or reduced price meals by application prior to the direct certification and did not have a change from their post-verification certification status (Table IV.3). Most of the households that became directly certified did so on the basis of SNAP or Medicaid (Figure IV.2).

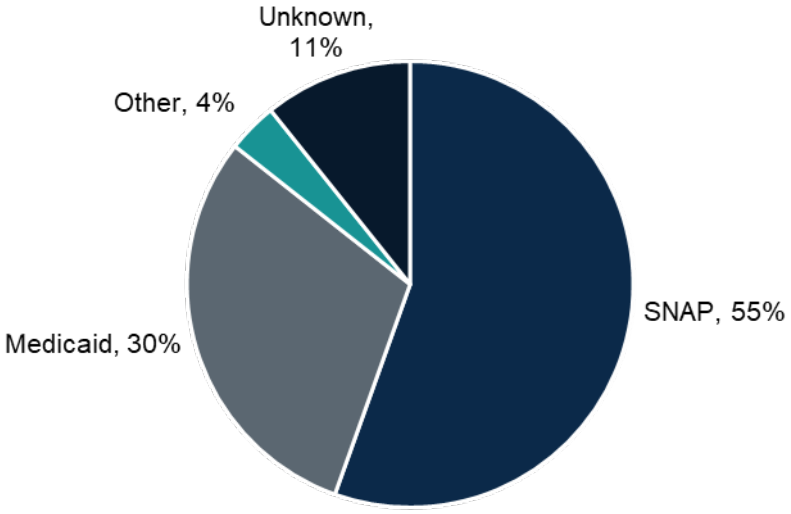
Table IV.3. Changes to household certification status from post-verification to March 1, 2019, for households that became directly certified (averages across districts)

Change in household certification status from post-verification to March 1, 2019	Percentage of all households in verification sample
Directly certified after verification	1.7
No change from post-verification status	0.4
Change from post-verification status	1.3
Paid to free meals	1.0
Paid to reduced price meals	0.1
Reduced price to free meals	0.2
Number of households in verification sample that were still enrolled in the district on March 1, 2019	**4,706**
Number of districts in verification sample	**20**

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes all households that were still enrolled in the district on March 1, 2019, among the full verification samples for the study districts, including both households selected for the household survey and those not selected. It excludes 43 households in which all students were no longer enrolled on March 1, 2019. Subgroup percentages may not sum to totals due to rounding. See Appendix Table C.4 for detailed results.

Figure IV.2. Basis of direct certification, among households directly certified after the verification process ended (averages across districts)



Source: Administrative data from the study districts, SY 2018–2019.

Note: This figure includes the full verification samples for the study districts, including both households selected for the household survey and those not selected. See Appendix Table C.10 for detailed results.

By March 1, 2019, about 6 percent of all households in the verification sample had a change in their certification status relative to their post-verification status due to reapplication or direct certification (Table IV.4). Just under half of those households (nearly 3 percent of all households in the verification sample) changed from paid to free meal benefits. Close to the same number changed from paid to reduced price meal benefits. A small percentage (0.3 percent of all households) changed from reduced price to free meal benefits, while a nominal percentage had a reapplication status that was not recorded in the data.[21]

Table IV.4. Summary of changes to household certification status from post-verification to March 1, 2019 (averages across districts)

Change in household certification status from post-verification to March	Percentage of all households in verification sample
All households	
No change from post-verification status	93.9
Change from post-verification status	6.0
Paid to free meals	2.9
Paid to reduced price meals	2.8
Reduced price to free meals	0.3
Reapplication certification status not recorded	0.1
Number of households in verification sample that were still enrolled in the district on March 1, 2019	**4,706**
Number of districts in verification sample	**20**

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes all households with students who were still enrolled in the district on March 1, 2019, among the full verification samples for the study districts, including both households selected for the household survey and those not selected. It excludes 43 households in which all students were no longer enrolled on March 1, 2019. Subgroup percentages may not sum to totals due to rounding. See Appendix Table C.4 for detailed results.

[21] The study team also examined changes to household certification status from post-verification to March 1, 2019, by initial certification status and verification outcome (Appendix Table C.5). This analysis showed that households with a change in certification status were most commonly certified for the level of benefits they were initially certified to receive prior to verification. More detail is shown in the appendix table.

SECTION II: VERIFICATION EXPERIENCES AND OUTCOMES FOR NO-CHANGE HOUSEHOLDS AND VERIFICATION NONRESPONDERS

As shown in Section I, no change in certification status and verification nonresponse were the most common outcomes of the verification process. Analysis of these groups provides important insight into the verification process. An analysis of households that had their original certification status confirmed by the verification process, including an independent assessment of the eligibility status of these households, helps assess the accuracy of districts' verification efforts. An examination of verification nonresponders, including their characteristics, reasons for nonresponse, and whether they likely would have been eligible for F/RP meals had they responded to the verification request, provides information that is not otherwise revealed about these households during verification.

This section uses household survey data and district administrative data to explore the surveyed households in more depth.

- Chapter V provides context for the analyses contained within this section by presenting an overview of the characteristics of the surveyed households, including information about their household composition, income, demographics, and participation in the school meal programs. It includes comparisons of no-change households and verification nonresponders to provide insight into factors that may be driving their nonresponse.
- Chapter VI provides an independent assessment of the eligibility status of no-change households. This chapter begins by presenting the percentage of no-change households whose district-determined certification statuses were confirmed by the household survey and the percentage for which the district and survey determinations differed. Then, it presents findings from an analysis of the reasons for the differences between district- and survey-based determinations. The chapter concludes by examining household characteristics for households that have differences between their district- and survey-based determinations, relative to those without differences.
- Chapter VII examines verification nonresponders. It begins by presenting the percentage of verification nonresponders who were found to be eligible for free or reduced price meals; that is, the percentage who might have retained benefits if they had responded to the verification request. Then it explores the reasons for verification nonresponse, including commentary on how verification nonresponders' experiences with the verification process compared to those of the no-change households. Finally, it compares the characteristics of verification nonresponders who were reapproved for school meal benefits later in the school year (after verification and before March 1) to those of verification nonresponders who were not reapproved.

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V. Characteristics of the Household Survey Samples

To better understand the characteristics of verification responders and nonresponders, the study team surveyed two groups of households in the 20 study districts: (1) households that responded to the verification request and had no change in certification status due to the verification process (no-change households) and (2) households whose benefits were terminated because they did not respond to the verification request (verification nonresponders).[22]

This chapter presents an overview of the characteristics of the surveyed households, including information about their household composition, income, demographics, and participation in the school meal programs. First, the chapter describes the characteristics of no-change households. Then, it describes the characteristics of verification nonresponders, with comparisons to no-change households to provide insight into factors that may be driving their nonresponse.[23] The chapter provides context for the analysis of the accuracy of the verification outcomes for no-change households in Chapter VI and the analysis of the circumstances of verification nonresponders in Chapter VII.

Overview of key findings

- No-change households and verification nonresponders were similar along many household and demographic characteristics. The typical household, in both survey samples, had income from employment, two children, and a household survey respondent with no more than a high school education.
- Verification nonresponders differed from no-change households in ways that might suggest a reduced incentive to respond to verification: verification nonresponders were less often certified for free meal benefits, students in these households less frequently ate school lunches at least once per week, and the survey respondents in these households were more commonly employed than those in no-change households.

The typical no-change household was initially certified for free meals; had two children; had income from a job; and was not receiving public assistance that confers categorical eligibility for school meals (SNAP, TANF, or FDPIR) (Table V.1). Most (71 percent) were initially certified for free meals. Half were single-parent households and 66 percent had a survey respondent who was employed—indicating that some no-change households were headed by working, single parents. No-change households typically had one employed adult. Receipt of public assistance that confers categorical eligibility for school meals was rare (6 percent), which indicated that no-change households typically needed to provide earnings documentation to the district for verification.

[22] The survey sample excluded households that did not respond to the verification request but experienced no change in certification status because they were directly verified by the district.

[23] Comparing the characteristics of verification nonresponders to all verification responders, including those who experienced a change in their certification status as a result of verification, instead of no-change households, would yield different results.

Table V.1. Characteristics of the household survey samples (average outcome across districts)

Characteristics	No-change households	Verification nonresponders
Characteristics related to initial certification status (based on district administrative records)		
Initial certification status (percentages)		
Free	71	64
Reduced price	29	36
Characteristics related to eligibility or employment (based on survey reports)[a]		
Household size (mean)		
Number of household members	3.6	3.5
Number of children in household	1.9	1.8
Household composition (percentages)		
Single-parent household	50	52
Two-parent household	46	46
Other household composition	4	2
Employment status of household members		
Survey respondent is employed (percentage)	66	75
Number of employed adults in household (mean)	1.1	1.2
Receipt of public assistance (percentages)[b]		
Receiving SNAP	6	3
Receiving TANF	0	0
Receiving FDPIR	0	0
Demographic characteristics (based on survey reports)		
Survey respondent's educational attainment (percentages)		
Less than high school degree	19	20
High school or GED	38	34
Some college[c]	23	28
Bachelor's degree or higher	19	17
Race and ethnicity (percentages)		
Hispanic or Latino	53	51
Black or African American, non-Hispanic	16	15
White, non-Hispanic	18	26
Other or multiple races, non-Hispanic	12	8
English is the primary language spoken at home (percentage)	54	63
At least one child in: (percentages)[d]		
Pre-K to grade 5	62	54
Pre-K to kindergarten	16	12
Grades 1 to 2	24	18
Grades 3 to 5	36	31
Grades 6 to 8	37	38
Grades 9 to 12	42	48

Table V.1 *(continued)*

Characteristics	No-change households	Verification nonresponders
Characteristics related to school meal program experiences and perceptions (based on survey reports)		
Days per week student usually eats school lunch (reported by parents)		
None	6	22
Some, but not every day	24	30
Every day	71	48
Parents' views on administration of school meal programs (percentages)		
Satisfied with the NSLP overall[e]	88	76
Satisfied with the SBP overall[e]	94	87
Believes the application process to receive F/RP meals is fair	94	77
Parents' reports of students' perceptions of quality/taste of school lunch (percentages)[e]		
Satisfied with amount of food	84	79
Satisfied with quality/taste	83	76
Number of households with no change in certification status due to verification	**422**	**767**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification and that did not respond to the verification request. Percentages may not sum to totals due to rounding. See Appendix Tables D.1 and D.2 for detailed results.

[a] Eligibility-related information—including household size, composition, employment, and income, and participation in programs that confer categorical eligibility—was reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported that their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

The survey respondent for the no-change households, usually the head of household, typically had no more than a high school education. About 20 percent had less than a high school degree while 38 percent had a high school diploma or General Education Development (GED) certification. Although most respondents (81 percent) had less than a bachelor's degree, 23 percent had attended some college and another 19 percent had a bachelor's degree or higher.

Survey respondents were racially and ethnically diverse. A slight majority of respondents (53 percent) were Hispanic/Latino; 18 percent were white, non-Hispanic; and 16 percent were Black or African American, non-Hispanic. Slightly more than half (54 percent) spoke English as a primary language at home.

No-change households commonly had young children; 62 percent had children in pre-K through grade 5. Over one-third (36 percent) had children in grades 3 to 5, 24 percent had children in grades 1 or 2, and 16 percent had children in kindergarten or pre-K. Older children were somewhat less common; 37 percent of households had children in grades 6 to 8, while 42 percent had children in grades 9 to 12.

Most no-change households regularly participated in the school lunch program and were generally satisfied with the services provided. About 70 percent of the no-change households reported that their child ate school lunch every day and 24 percent reported that they participated some but not all days. Among families whose children ate school lunch, most parents (88 percent) were satisfied with the program and reported that their children were satisfied with the amount (84 percent) and quality (83 percent) of the food served.

Verification nonresponders and no-change households were similar in many of their household characteristics, with a few notable exceptions that may provide insight into the factors and circumstances that lead to verification nonresponse. Specifically, verification nonresponders were less often certified to receive free meals, students in these households less frequently ate school lunches, and the survey respondents in these households were more commonly employed than in no-change households. These characteristics might have reduced the incentive to respond to the verification request because they would lessen the amount of benefits lost due to verification nonresponse and would indicate greater financial means to withstand benefit termination.

While the typical verification nonresponder was initially certified for free meals, the percentage of households that were initially certified for reduced price meals was higher among verification nonresponders compared to no-change households (36 percent versus 29 percent; Table V.1). Households that were initially certified for reduced price meals, compared to those initially certified for free meals, may be less inclined to respond to the verification request because they were receiving (and thus, forfeiting) a lower level of benefits relative to those receiving free meals.

Verification nonresponders were similar in household size and composition to no-change households, but they more commonly had a respondent who was employed. Like no-change households, the typical verification nonresponder had two children, income from a job, and did not receive public assistance that confers categorical eligibility for school meals. Around half of the nonresponders (52 percent) were single-parent households. However, verification nonresponders more often had a survey respondent who was employed (75 percent versus 66 percent) and less often received SNAP (3 percent versus 6 percent)—indicating that verification nonresponders, on average, likely had less financial need and required more earnings documentation to complete the verification request relative to no-change households.

The demographic characteristics of survey respondents in verification nonresponder households were similar to those of no-change households, with a few notable differences. About half (54 percent) had no more than a high school education. Survey respondents were racially and ethnically diverse, with 51 percent Hispanic/Latino and 15 percent Black or African American, non-Hispanic. However, relative to no-change households, verification nonresponders more commonly spoke English as a primary language (63 percent versus 54 percent). They also more commonly had children in grades 9 to 12 (48 percent versus 42 percent) and less commonly had children in pre-K to grade 5 (54 percent versus 62 percent).

Children in households that did not respond to the verification request frequently participated in the school lunch program and their parents (the household survey respondents) were generally satisfied with the services it provided, but to a lesser degree than those in no-change households. The children of

verification nonresponders ate school lunch less frequently than the children of no-change households: 48 percent of verification nonresponders reported that their child ate school lunch every day compared to 71 percent among no-change households, while 22 percent reported that their child typically did not eat school lunch compared to only 6 percent among no-change households. Among verification nonresponders whose children ate school lunch, most parents were satisfied with the program (76 percent) and reported that their children were satisfied with the amount (79 percent) and quality (76 percent) of the food served. However, children and parents were not as commonly satisfied as those in no-change households, which had reported satisfaction rates of 88 percent, 94 percent, and 83 percent, respectively. Most (77 percent) of the verification nonresponders believed that the school meal application process was fair but, again, less commonly so than the no-change households (94 percent).

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VI. Independent Assessment of Eligibility for Households that Had No Change in Certification Status Due to the Verification Process

A key goal of this study is to independently assess eligibility for school meal benefits for no-change households, thereby assessing the accuracy of districts' verification determinations. This chapter presents an examination of the eligibility status of no-change households based on information from the household survey and compares households' survey-determined eligibility statuses to the certification statuses determined by the district.[24]

This chapter begins by presenting the percentage of no-change households whose district-determined certification status was confirmed by the household survey and the percentage for which the district and survey determinations differed. Such differences can occur because of inaccuracies in either a district's verification process or the information reported on the survey.

In addition, the chapter presents findings from an analysis of the reasons for the differences between district- and survey-based determinations of household eligibility status. That is, to assess what specific type of eligibility-determination information drove the differences, this analysis compared the information that households reported on the survey about their categorical eligibility and income eligibility (household size and income) to the information they reported on their school meal applications (as recorded in the study districts' administrative data). Information from households' school meal applications may differ from the information that districts used for verification. Therefore, differences between the information that households reported on their application versus on the survey may reflect inaccuracies in the application data, inaccuracies in the information reported on the survey, or changes in household size or income between the application time period and the verification effort (October 2018). However, to the extent that these differences are strictly due to changes in households' circumstances, a household's certification status and survey-determined eligibility status should be the same, because both determinations would be based on the household's circumstances as of the verification effort (October 2018) rather than at the time of the application.

The chapter concludes by examining household characteristics for households that have differences between their district- and survey-based determinations of household eligibility status, relative to those without differences.

[24] The study team compared each household's survey-determined eligibility status to its initial certification status as recorded in the districts' administrative data. Since the analysis was of no-change households, a household's initial certification status and certification status after verification were the same.

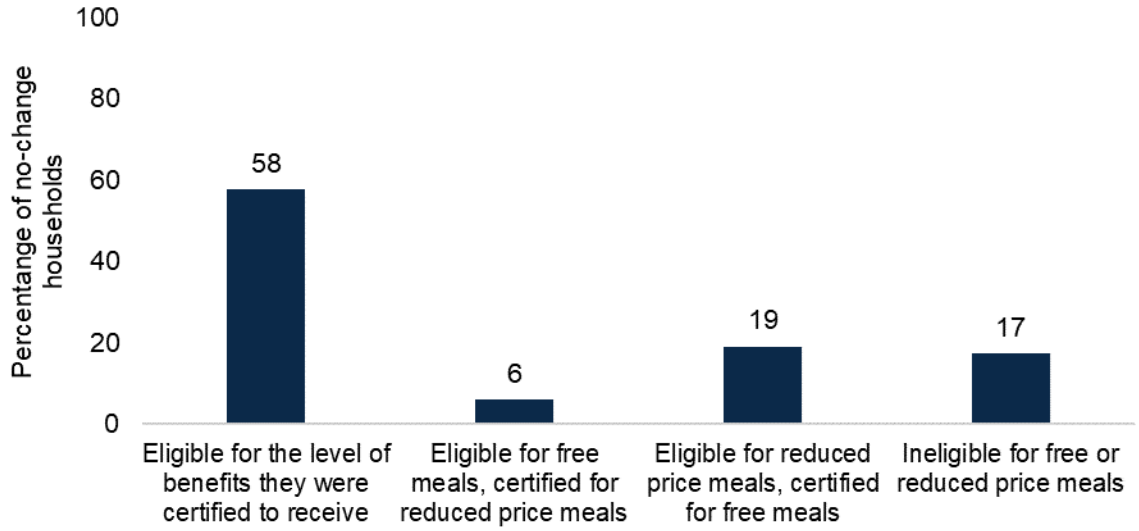
Overview of key findings

- Most households that had no change in certification status due to the verification process were found eligible for either free or reduced price meals based on the household survey. However, households' survey-determined eligibility statuses were often inconsistent with their specific district-determined F/RP certification statuses.
- Among households found to be ineligible for F/RP meals based on the household survey, some had survey-determined incomes far from the eligibility threshold for their district-determined certification status.
- Differences between households' district-determined certification status and survey-determined eligibility status were largely explained by differences in reported income amounts, although differences in household size were also common.

A. Accuracy of certification status

Most no-change households were found to be eligible for free or reduced price meals based on the household survey. However, households' survey-determined eligibility status was often inconsistent with their specific district-determined certification status. Although 83 percent of households were eligible for free or reduced price meals based on the survey, only 58 percent were eligible for the exact level of benefits that the districts had verified them to receive (Figure VI.1). Based on the household survey, six percent of households were eligible to receive a higher level of benefits than they were verified to receive (that is, free meals instead of reduced price meals). Conversely, 19 percent were verified to receive free meals but only found eligible for reduced price meals based on the survey.

Figure VI.1. Household survey-determined eligibility among no-change households (averages across districts)



Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. See Appendix Table E.1 for detailed results.

Among no-change households that were initially certified for free meals, most had their verification result confirmed by the household survey; among those whose status was not confirmed, most were found eligible for reduced price meals. Sixty percent of no-change households that were initially certified for free meals were found eligible to receive free meals based on the survey; 28 percent were found eligible for reduced price meals; and 12 percent were found ineligible for F/RP meals (Table VI.1).

Table VI.1. Eligibility status of no-change households based on the household survey (average percentages across districts)

Survey-determined eligibility	No-change households	District-determined certification status	
		Free[a]	Reduced price
Eligible for free meals	50	60	26
Eligible for reduced price meals	33	28	44
Ineligible for F/RP meals	17	12	30
Number of no-change households	**422**	**308**	**114**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. See Appendix Table E.1 for detailed results.

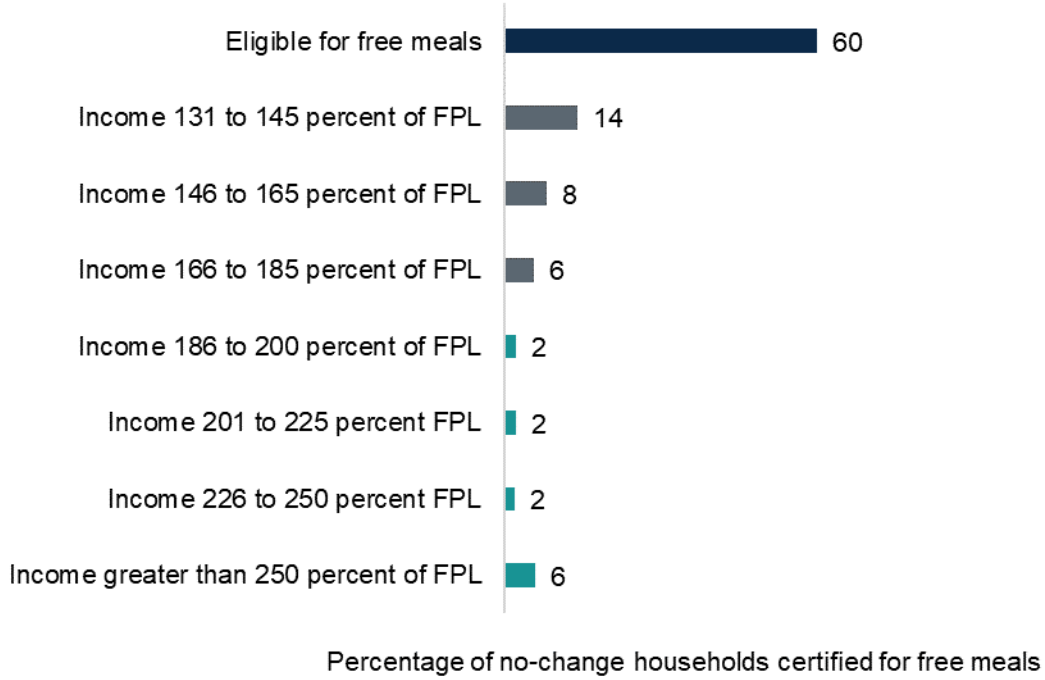
[a] Includes households certified for free meals based on income and categorical eligibility. In the survey sample of no-change households, only 6 households were certified for free meals based on categorical eligibility; all were found eligible for free meals based on the household survey.

When households have incomes that are close to the eligibility thresholds for F/RP meals (130 percent of the FPL for free meals and 185 percent of the FPL for reduced price meals), slight changes in circumstances or minor errors in reporting could change their eligibility determination. Some households certified for free meals had incomes clustered just above the eligibility threshold, according to the survey. Among the 40 percent of households that were initially certified for free meals but found ineligible for free meals based on the survey, slightly more than one-third (or 14 percent of all no-change households certified for free meals) had incomes just above the eligibility threshold, between 131 percent and 145 percent of the FPL (Figure VI.2).[25] However, around one-quarter (or about 10 percent of all no-change households certified for free meals) had incomes exceeding 200 percent of the FPL, according to the survey, which corresponds to a monthly income that is more than $1,000 above the eligibility threshold.[26]

[25] The difference between an income at 145 percent of the FPL and the eligibility threshold for free meals (130 percent of the FPL) is approximately $260 in monthly income for a family of three and approximately $314 for a family of four.

[26] The difference between an income at 200 percent of the FPL and the eligibility threshold for free meals is approximately $1,212 in monthly income for a family of three and approximately $1,464 for a family of four.

Figure VI.2. Survey-determined income as a percentage of the FPL for no-change households certified for free meals (averages across districts)

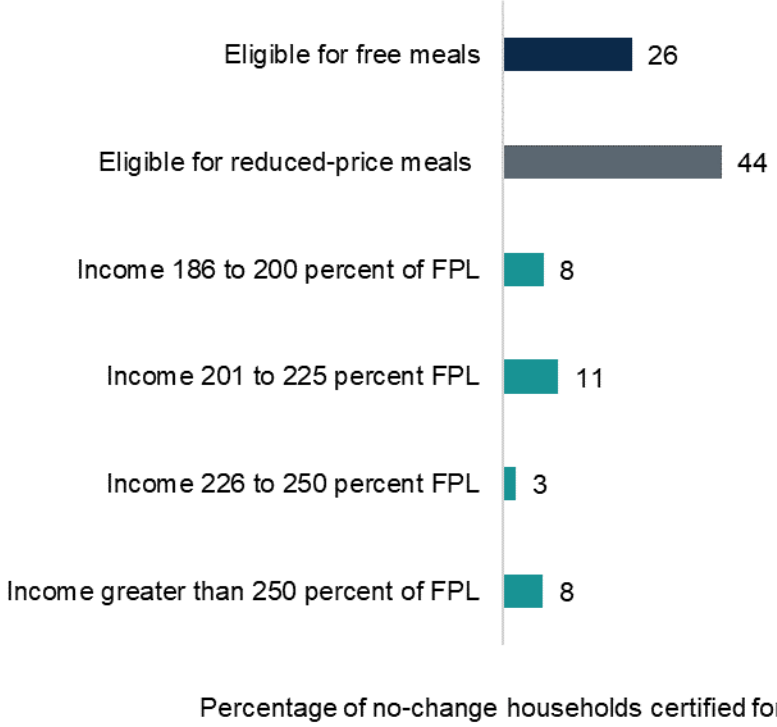


Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. See Appendix Table E.2 in for detailed results.

No-change households that were initially certified for reduced price meals had their verification result confirmed by the household survey less often than those initially certified for free meals. Fewer than half (44 percent) of households certified for reduced price meals were found to be eligible for reduced price meals based on the household survey (Table VI.1). About 26 percent of the households were found to be eligible for free meals, while 30 percent were found to be ineligible for either free or reduced price meals.

Figure VI.3. Survey-determined income as a percentage of the FPL for no-change households certified for reduced price meals (averages across districts)



Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. See Appendix Table E.2 for detailed results.

According to the household survey, households certified for reduced price meals were less often clustered just above the eligibility threshold for reduced price meals (185 percent of the FPL) than the households certified for free meals were. Eight percent of all households certified for reduced price meals had incomes just above the eligibility threshold, between 186 percent and 200 percent of the FPL (Figure VI.3)[27], and another 8 percent had survey-determined incomes exceeding 250 percent of the FPL, which is a monthly income that is more than $1,000 above the eligibility threshold.[28]

B. Reasons for differences between district- and survey-determined eligibility

Differences between a household's district-determined certification status and its eligibility status based on the household survey can occur due to differences in a household's categorical eligibility or income eligibility, based on district data versus survey data. For example, differences in categorical eligibility could occur if a household applied for school meals on the basis of income and was approved for reduced price meals, but in the survey the household reported receiving public assistance that confers categorical eligibility for free meals (SNAP, TANF, or FDPIR). Differences in income eligibility occur when the

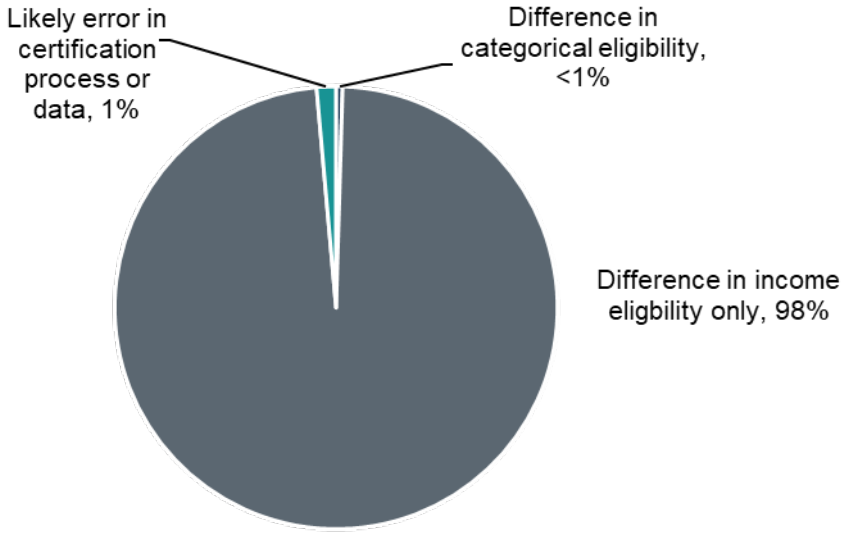
[27] The difference between an income at 200 percent of the FPL and the eligibility threshold for reduced price meals (185 percent of the FPL) is approximately $260 in monthly income for a family of three and approximately $314 for a family of four.

[28] The difference between an income at 250 percent of the FPL and the eligibility threshold for reduced price meals is approximately $1,126 in monthly income for a family of three and approximately $1,360 for a family of four.

income amount or household size on the school meal application differs from the income amount or household size reported on the household survey.

Among the 42 percent of no-change households whose district-determined certification status differed from their eligibility status based on the household survey, nearly all (98 percent) differed based on income eligibility alone, rather than on information related to categorical eligibility (Figure VI.4). That is, the income amount and/or household size reported on the household's school meal application differed from the information reported on the household survey, and those differences were large enough to yield different income eligibility determinations. Differences in categorical eligibility[29] along with possible certification errors or data entry errors in the district data[30] explain the remaining small percentage of differences between households' certification status and their eligibility status based on the household survey.

Figure VI.4. Reasons for differences between survey-determined eligibility status and district-determined certification status for no-change households (averages across districts)



Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. The figure includes households with a difference between their survey-determined eligibility status and district-determined certification status. Subgroups may not sum to 100 percent due to rounding. See Appendix Table E.4 for detailed results.

Differences in income eligibility determinations were largely explained by differences in income amounts, although differences in household size were also common. Among households whose district-determined certification status differed from their income eligibility (but not categorical eligibility) based

[29] One household had a difference in both categorical eligibility determination and income eligibility determination. This household is categorized as having differences in categorical eligibility in the report tables.

[30] Two households had a district-determined certification status that differed from what was implied by their household income and household size in the district administrative data but had a survey-determined eligibility status that aligned with the certification status implied by the district-recorded household income and size. These cases may reflect either certification errors or data entry errors in the certification status or income eligibility information in the district data.

on the household survey, almost all (94 percent) had a survey-determined income amount that differed from the amount reported on their school meal application, while 45 percent had a different household size (Table VI.2). Specifically, around half (51 percent) had a difference in income alone, two percent had a difference in household size alone, and 43 percent had a difference in both.[31] These patterns were consistent regardless of certification status. Among households certified for free meals, 95 percent differed on income amount and 45 percent differed on household size, compared to 91 percent and 46 percent, respectively, for those certified for reduced price meals.

Table VI.2. Reasons for differences in income eligibility determinations for no-change households with survey- and district-determined statuses that differ (average percentages across districts)

Reasons for differences in income eligibility determinations[a]	Total	District-determined certification status	
		Free	Reduced price
Difference in household size but not total income amount	2	0	5
Difference in total income amount but not household size	51	50	50
Differences in both total income amount and household size	43	45	41
No difference in total income amount or household size	3	5	5
Number of no-change households with a difference in income eligibility determination only	**168**	**111**	**57**

Source: Household survey data and study district administrative data, SY 2018–2019.

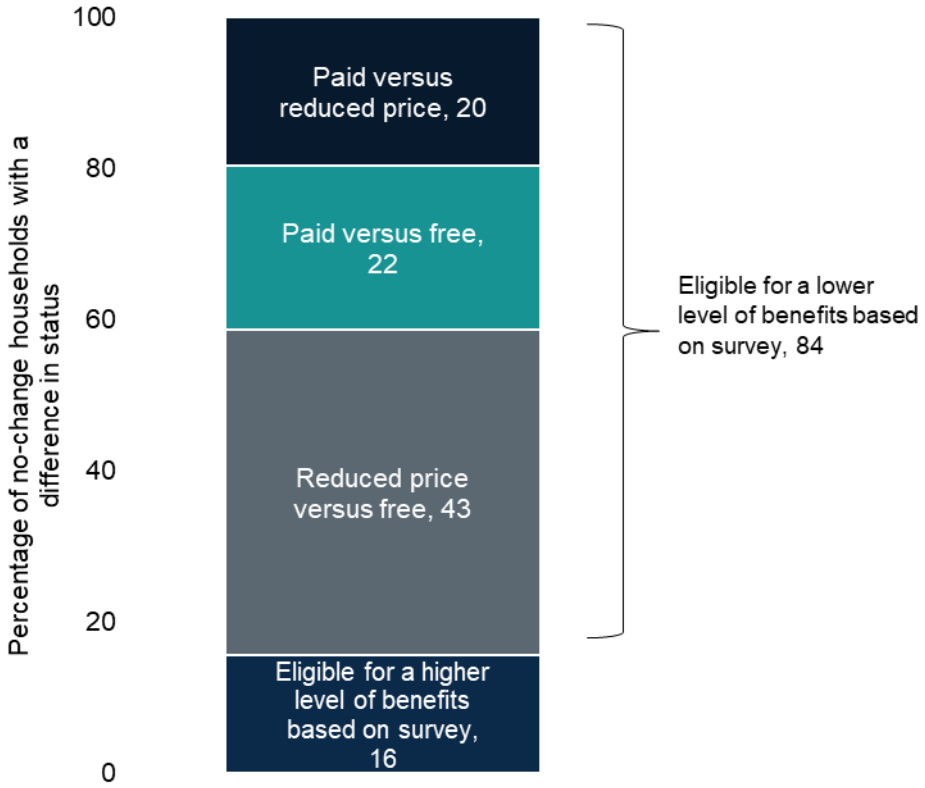
Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. The table includes households with a difference between their survey-determined eligibility status and district-determined certification status that have a difference in their income eligibility determination but no difference in their categorical eligibility determination. Subgroups may not sum to totals due to rounding. See Appendix Table E.5 for detailed results.

[a]Income amounts are counted as different if the difference in monthly income exceeds $100.

Among no-change households whose district-determined certification status differed from their survey-determined eligibility status, most (84 percent) were found to be eligible for a lower level of benefits based on the household survey, relative to their certification status (Figure VI.5). Among those found eligible for a lower level of benefits based on the household survey, around half (or 43 percent of all no-change households with a difference in status) were found eligible for reduced price meals instead of free meals, while the other half (or around 42 percent of all no-change households with a difference in status) were found ineligible for F/RP meals. For 16 percent of households, eligibility status based on the household survey indicated a higher level of benefits than the household's certification status (that is, eligibility for free instead of reduced price meals).

[31] A small percentage (3 percent) of households were identified as having no difference in household size or income amount. For the analysis, a difference in income was defined as a difference in monthly income exceeding $100, to allow for minor differences in reporting across the two sources. Households identified as having no difference in income or household size represented the small percentage of cases where this subtle difference in monthly income changed the eligibility determination.

Figure VI.5. Differences in survey-determined eligibility and district-determined certification status for no-change households (averages across districts)



Sources: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. This figure includes households with differences between their survey-determined eligibility status and district-determined certification status. Subgroups may not sum to totals due to rounding. See Appendix Table E.6 detailed results.

Households whose survey eligibility status indicated a higher level of benefits than their district-determined certification status typically reported less income in the survey, whereas households with a lower level of benefits based on the survey typically reported more income but also differences in household size, relative to their application. When households were found to be eligible for a higher level of benefits based on the survey, it was generally due to households reporting less income (but the same household size) relative to their application (65 percent) (Table VI.3). For 23 percent, the survey identified a smaller household size and less income. Most commonly, households that were found to be eligible for a lower level of benefits based on the survey reported more income with the same household size (47 percent). For 36 percent of the households found to be eligible for a lower level of benefits based on the survey, households reported more income and different numbers of household members. This group was evenly divided between those reporting more household members and those reporting fewer household members, relative to their application.

Table VI.3. Reasons for differences in survey-determined eligibility status and district-determined certification status for no-change households, by whether household survey eligibility status indicates a higher or lower level of benefits (average percentages across districts)

Reason why survey-determined eligibility is not the same as the district-determined certification status	Survey-determined eligibility status is:		
	Different from certification status	Higher level of benefits than certification status	Lower level of benefits than certification status
Difference in income eligibility determination; no difference in categorical eligibility determination[a]	98	98	99
Survey income is higher, household size is same	39	0	47
Survey income is lower, household size is same	11	65	1[b]
Survey income is higher, household size is larger	16	0	18
Survey income is higher, household size is smaller	15	0	18
Survey income is lower, household size is larger	1	10	0
Survey income is lower, household size is smaller	10	23	8
Other (household income and/or household size is the same)	3	0	4
Difference in categorical eligibility or no difference in income or categorical eligibility determination	2	2	1
Number of no-change households with a household survey status that is different than the district-determined certification status	**171**	**24**	**147**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. Subgroups may not sum to totals due to rounding. See Appendix Table E.8 for detailed results.

[a] Income amounts were counted as different if the difference in monthly income exceeded $100.

[b] Reflects one household that had a certification status in the district administrative data that differed from the certification status that was implied by the household's income and size. The survey-determined eligibility status was lower than the certification status recorded in the district data but higher than the certification status that was implied by the district-recorded household income and household size. This case may reflect data entry errors in the district data, in either the certification status or income eligibility information.

In addition to differences in income amounts and household size that resulted in different eligibility determinations, households with consistent eligibility determinations also often had differences between the detailed income eligibility information reported on the application (as indicated in the district administrative data) and on the household survey. Although differences between the income eligibility information reported on the application and on the household survey were widespread, these differences typically did not result in different eligibility determinations for no-change households. More than half of all no-change households had their certification confirmed by the household survey and had the same income eligibility status based on the survey and district data, even though only 8 percent reported the same household size and income amount on their application and on the survey (Appendix Table E.3). As noted above, these differences could reflect changes in household size or income between the date of the application and the verification effort (October 2018).

C. Characteristics of households with differences between district- and survey-determined eligibility determinations

In terms of their characteristics and perceptions of the school meal programs, no-change households with differences between their survey-determined eligibility status and district-determined certification status were mostly similar to households whose statuses were the same. However, there were a few notable differences between the two groups. A higher proportion of households with differences between their survey-determined and district-determined statuses were initially certified for reduced price meals compared to those with the same statuses (35 percent versus 25 percent) (Table VI.4). Households with different statuses also had higher rates of employed respondents (75 percent versus 59 percent).[32]

Table VI.4. Characteristics of surveyed no-change households by whether the survey- and district-determined statuses differed (average outcome across districts)

Characteristics	All no-change households	Survey-determined eligibility status is:	
		Same as certification status	Different from certification status
Characteristics related to initial certification status (based on district administrative records)			
Initial certification status (percentages)			
Free	71	75	65
Reduced price	29	25	35
Characteristics related to eligibility or employment (based on survey reports)[a]			
Household size (means)			
Number of household members	3.6	3.7	3.6
Number of children in household	1.9	1.9	1.9
Household composition (percentages)			
Single-parent household	50	48	52
Two-parent household	46	49	44
Other household composition	4	4	4
Employment status of household members			
Survey respondent is employed (percentage)	66	59	75
Number of employed adults in household (mean)	1.1	1.0	1.2

[32] See Appendix Table E.10 for a comparison of district characteristics across no-change households with and without differences in survey- and district-determined statuses.

Table V1.4 *(continued)*

Characteristics	All no-change households	Survey-determined eligibility status is:	
		Same as certification status	Different from certification status
Receipt of public assistance (percentages)[b]			
Receiving SNAP	6	9	0
Receiving TANF	0	0	0
Receiving FDPIR	0	0	0
Demographic characteristics (based on survey reports)			
Survey respondent's educational attainment (percentages)			
Less than high school degree	19	18	21
High school or GED	38	42	34
Some college[c]	23	23	23
Bachelor's degree or higher	19	17	22
Race and ethnicity (percentages)			
Hispanic or Latino	53	58	46
Black or African American, non-Hispanic	16	15	18
White, non-Hispanic	18	15	20
Other or multiple races, non-Hispanic	12	11	16
English is the primary language spoken at home (percentage)	54	53	53
At least one child in: (percentages)[d]			
Pre-K to kindergarten	16	16	19
Grades 1 to 2	24	25	23
Grades 3 to 5	36	36	36
Grades 6 to 8	37	37	36
Grades 9 to 12	42	39	44
Characteristics related to school meal program experiences and perceptions (based on survey reports)			
Days per week student usually eats school lunch (reported by parents)			
None	6	6	5
Some, but not every day	24	23	27
Every day	71	70	68
Parents' views on administration of school meal programs (percentages)			
Satisfied with the NSLP overall[e]	88	85	89
Satisfied with the SBP overall[e]	94	94	93
Believes the application process to receive F/RP meals is fair	94	95	94

Table V1.4 *(continued)*

Characteristics	All no-change households	Survey-determined eligibility status is:	
		Same as certification status	Different from certification status
Parents' reports of students' perceptions of quality/taste of school lunch (percentages)[e]			
Satisfied with amount of food	84	84	85
Satisfied with quality/taste	83	84	81
Number of households with no change in certification status due to verification	**422**	**251**	**171**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. Percentages may not sum to totals due to rounding. See Appendix Table E.9 for detailed results.

[a] Eligibility-related information—including household size, composition, employment, income, and participation in programs that confer categorical eligibility—was reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported that their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

VII. Examination of Households that Did Not Respond to the Verification Request

A key objective of this study is to examine verification nonresponse. This chapter presents findings from an analysis that examined the eligibility status and verification experiences of households that did not respond to the verification request (verification nonresponders), based on information from the household survey, and that compared households' survey-determined eligibility status to the initial certification status determined by the district. Using the study districts' administrative data, the analysis also determined how many verification nonresponders were reapproved for benefits later in the school year.

This chapter begins by presenting the percentage of verification nonresponders who were found to be eligible for free or reduced price meals; that is, the percentage who could have retained benefits if they had responded to the verification request. Then it explores the reasons for verification nonresponse, including an analysis of how verification nonresponders' experiences with the verification process compared to those of the no-change households (that is, households that responded to the verification request and had no change in their certification status as a result). Finally, it examines the characteristics of verification nonresponders who were reapproved for school meal benefits later in the school year (after verification and before March 1) relative to those who were not reapproved.

Overview of key findings

- Most verification nonresponders were found to be eligible for free or reduced price meals based on the household survey, but many were found to be ineligible for the level of benefits that they were initially certified to receive.
- Most verification nonresponders understood the verification request, but some reported that it was difficult to gather the necessary information and respond on time.
- Most verification nonresponders reported that they attempted to respond to the verification request. Their reported reasons for not completing it varied. For example, some believed that they did not have necessary proof, and others thought or knew they would lose eligibility.
- A minority of verification nonresponders were ultimately reapproved for benefits. Compared to those not reapproved, those reapproved were more often initially certified for free meals and they reported more frequent use and more common satisfaction with the program.

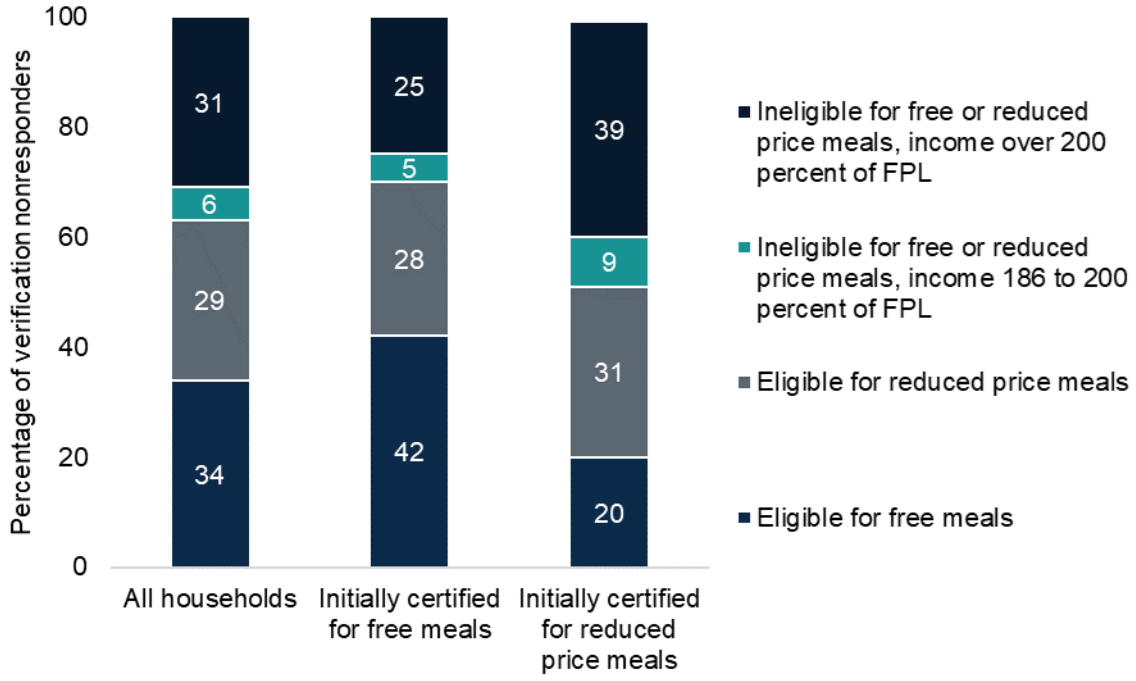
A. Eligibility status of verification nonresponders

Districts are required to terminate free or reduced price school meal benefits when households do not respond to the verification request; however, some households do not respond despite these consequences. Some verification nonresponders may have been ineligible for free or reduced price meals, in which case their benefits could have been terminated even with a response. For others, a response to the verification request may have resulted in their benefits being confirmed (no change), increased (from reduced price to free), or decreased (from free to reduced price) but not terminated.

Most verification nonresponders were found to be eligible for free or reduced price meals, based on data from the household survey. About 34 percent were found to be eligible for free meals and 29 percent were found to be eligible for reduced price meals (Figure VII.1). About 37 percent were found to be ineligible for free or reduced price meals, with 6 percent having survey-determined income amounts just above the

eligibility threshold—that is, between 186 percent and 200 percent of the FPL.[33] As noted in Chapter VI, when households are close to the eligibility threshold, slight changes in circumstances (for example, a reduction in work hours) or minor errors in reporting could change the eligibility determination. Overall, 45 percent of verification nonresponders were found to be eligible for at least the level of benefits they were certified to receive (Appendix Table F.1)—that is, they could have been eligible to either maintain or increase their level of benefits if they had responded to the verification request.

Figure VII.1. Eligibility status of verification nonresponders, based on the household survey, by initial certification status (averages across districts)



Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that did not respond to the verification request. Subgroups may not sum to 100 percent due to rounding. See Appendix Table F.1 for detailed results.

FPL = Federal poverty level.

Eligibility by initial certification status

Most verification nonresponders who were initially certified for free meals were found to be eligible for free or reduced price meals; the largest share was found to be eligible for the benefits that they were certified to receive. Based on the household survey, 42 percent of verification nonresponders who were initially certified to receive free meals were found to be eligible for these benefits (Figure VII.1). Another

[33] The difference between an income at 200 percent of the FPL and the eligibility threshold for reduced price meals (185 percent of the FPL) is approximately $260 in monthly income for a family of three and approximately $314 for a family of four.

28 percent were found eligible for reduced price meals and, thus, could have had their benefits reduced rather than terminated if they had responded to the verification request. About 30 percent were found to be ineligible to receive free or reduced price meals based on the household survey and therefore would likely have had their benefits terminated even if they had responded to the request.

Verification nonresponders who were initially certified for reduced price meals were less commonly found eligible for the benefits that they were certified to receive, relative to those initially certified for free meals, but a substantial portion could have retained (or increased) their benefits if they had responded to the verification request. About 31 percent of verification nonresponders who were initially certified to receive reduced price meals were found to be eligible for these benefits, while another 20 percent were found to be eligible for free meals, based on the household survey (Figure VII.1). In other words, about half were found eligible for at least the level of benefits that they were initially certified to receive, while half were found ineligible for free or reduced price meals.

B. Reasons for nonresponse to verification request

Households that know or think they are ineligible for the benefits that they were initially certified to receive may be unmotivated to respond to the verification request. However, as discussed in the previous section, the study found that many verification nonresponders were eligible for at least the level of benefits that they were certified to receive, and the majority were eligible for free or reduced price meals. Other factors or circumstances could be responsible for these households not responding to the verification request.

Most verification nonresponders recalled being contacted about verification, and more than half reported that the district used multiple methods to contact them. No-change households more often recalled being contacted than did verification nonresponders (96 percent versus 88 percent), but the rate was high for both groups, and the percentage that reported multiple contact methods was similar across the two groups (55 percent versus 59 percent) (Table VII.1).

Table VII.1. Household verification process experiences (averages across districts)

Verification process experience	All households[a]	Verification nonresponders	No-change households
All households			
Household recalled being contacted about verification	90	88	96
Household moved since first day of school	8	8	7
Phone usage[b]			
Currently owns an active cell phone	98	99	98
Has a landline	16	16	18
Households that recalled being contacted for verification			
Contact method[b]			
Letter	93	92	96
Phone	43	45	41
Email	43	41	46
Text message	10	10	9
Multiple methods	56	55	59
Unable to recall method	1	1	1
Household found the instructions in the letter and form accompanying the request to be clear or somewhat clear	91	89	95
Household reported that responding to the request on time was, or would have been, easy or somewhat easy	78	73	86
Household reported that providing the requested eligibility information was, or would have been, easy or somewhat easy	74	68	85
Number in sample	**1,189**	**767**	**422**
Number of households in sample that recalled being contacted for verification	**1,047**	**653**	**394**

Source: Household survey data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that did not respond to the verification request and that had no change in certification status due to verification. See Appendix Table F.2 for detailed results.

[a] Includes all households in the study districts that did not respond to the verification request and that responded and had no change in certification status due to verification.

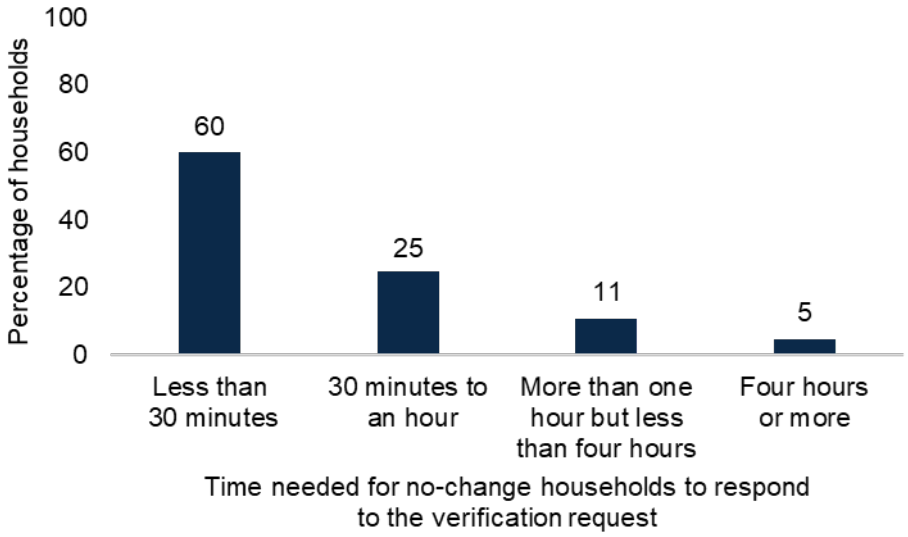
[b] These rows are not mutually exclusive.

Although most verification nonresponders reported that they understood the verification request, some said that they struggled to provide information before the deadline, either because of difficulty in gathering the information or time constraints. Among verification nonresponders who recalled being contacted, most (89 percent) thought the instructions were clear or somewhat clear (Table VII.1). A smaller percentage reported that it would have been easy or somewhat easy to respond on time (73 percent) or to provide the necessary information (68 percent). In comparison, a slightly higher percentage of no-change households thought the request was clear or somewhat clear (95 percent versus 89 percent)

and substantially more no-change households said it was easy or somewhat easy to respond on time (86 percent versus 73 percent) or to provide the requested information (85 percent versus 68 percent).

The survey also asked no-change households about the amount of time it took them to complete the verification request, and most reported that they were able to complete it quickly. Most no-change households (85 percent) completed the request in one hour or less, with 60 percent completing it in less than 30 minutes (Figure VII.2). A small share (5 percent) said that it took more than four hours. Given that verification nonresponders more commonly than no-change households reported that it would be difficult to provide the requested information and to respond on time, their perceived or actual level of effort to complete the verification request may have been greater.

Figure VII.2. Time to complete the verification request, among no-change households (averages across districts)



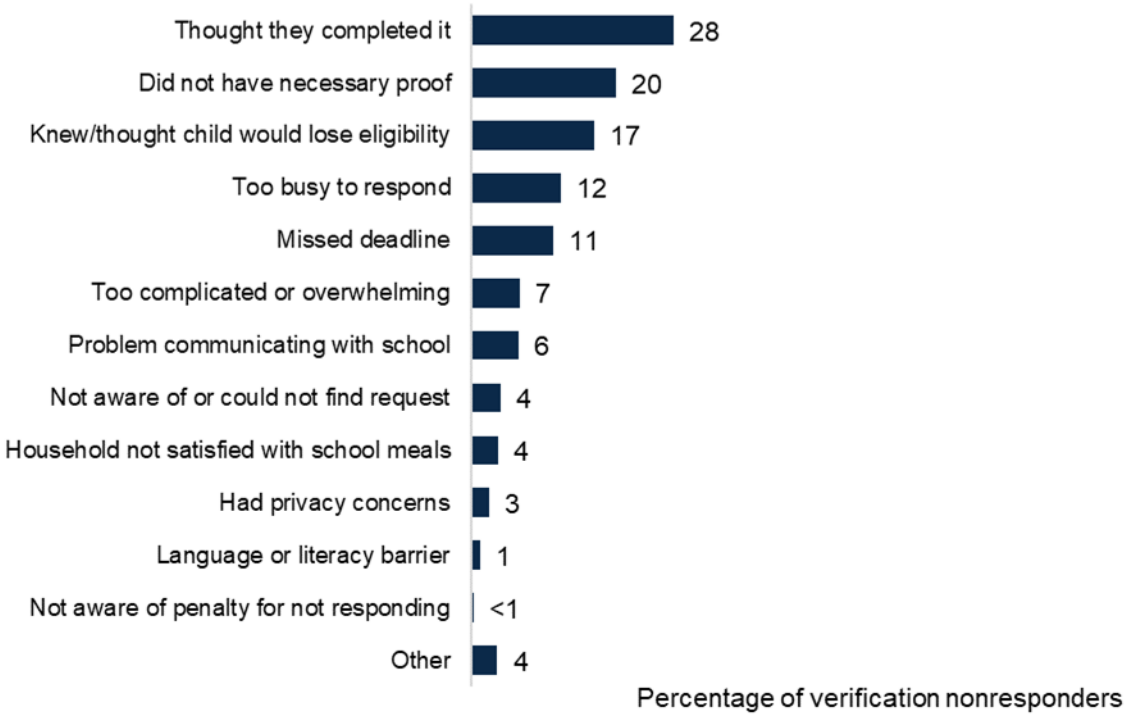
Source: Household survey data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that had no change in certification status due to verification. Categories may not sum to 100 percent due to rounding. See Appendix Table F.4 for detailed results.

Nonresponders' reasons for not responding to the request varied. The most common reason, cited by 28 percent of households, was that they thought they had completed the request (Figure VIII.3). In these instances, households may have responded to the verification request but may have not provided all the necessary information. From the household's perspective, it had responded to the request, but from the perspective of the district, the household's response was incomplete and therefore benefits were terminated. It is also possible that the household did complete the request, but the district did not receive the response or made an error in processing it. These households may have had their benefits terminated without fully understanding why. In two-parent families, it is also possible that the parent who completed the verification request differed from the survey respondent, who was typically the head of household; in these cases, the survey respondent may have not known for certain whether the other parent fully responded to the verification request.

Other common reasons for nonresponse included not having the necessary proof of eligibility (20 percent) and thinking or knowing that they would lose eligibility (17 percent). Somewhat less common reasons included being too busy to respond (12 percent) and missing the deadline (11 percent). A variety of other reasons were cited by households less frequently (each by less than 10 percent of households). Examples included the household thinking the request was too complicated or having privacy concerns. Some households were reluctant to contact their employer for documentation or were concerned about how the district would share their information.

Figure VII.3. Reasons for not responding to the verification request, among verification nonresponders (averages across districts)



Source: Household survey data, SY 2018–2019.

Note: The reasons for nonresponse are not mutually exclusive. Values were weighted to represent all verification nonresponders. This figure includes all households that were still enrolled in the district on March 1, 2019 and that recalled being contacted for verification, among the survey sample of verification nonresponders (649 households). It excludes 4 households in which all students were identified in the district data identified as no longer enrolled as of March 1, 2019. See Appendix Table F.5 for detailed results.

Households with children who are not eating school meals or households that are generally dissatisfied with the school meal programs may be unmotivated to respond to the verification request. However, this does not appear to be the case for most verification nonresponders. As described in Chapter V, relative to no-change households, the children of verification nonresponders ate school meals less frequently and their parents held slightly less positive views of the school meal programs. However, most verification nonresponders still had children who ate school lunch every day or some days. In addition, among households whose children ate school meals, most parents and children were satisfied with the school meal programs. Although 22 percent of verification nonresponders reported that their child typically did not eat school lunch (Chapter V, Table V.1), only 4 percent of households cited dissatisfaction with the school meal programs (including children not eating school meals) as a reason for their nonresponse

(Figure VII.3). This suggests that these households may have had other reasons for not responding to the request, such as those listed in Figure VII.3.

C. Characteristics of verification nonresponders who were reapproved for benefits

As described in Chapter IV, households that have their benefits terminated for not responding to a verification request can be reapproved for benefits at any point after verification, either through reapplication (with documentation of income) or direct certification. Among the survey sample of verification nonresponders, 13 percent were reapproved for benefits by March 1, 2019 (Appendix Table F.6). Many of these households likely could have avoided a temporary gap in benefit receipt if they had responded to the verification request. This section explores these households' characteristics and their experiences with the verification process.

Verification nonresponders who were reapproved for benefits had stronger financial incentives to reapply than those who were not reapproved. Verification nonresponders who were reapproved for benefits were more often initially certified for free meals (74 percent versus 62 percent) and they tended to have more children (an average of 2.2 children versus 1.7 children), which means that the amount of benefits they lost due to verification was greater than for those who were not reapproved (Table VII.2). Households that were reapproved and those not reapproved had similar rates of employment, but those reapproved were slightly more often single-parent households (55 percent versus 51 percent) and more commonly had children in grades 1 or 2 (28 percent versus 16 percent). Single-parent households and households with young children may be constrained in how much they can work and thus have greater financial need for the benefits. Further, the constraints on their time may have made them more susceptible to having simply missed the verification deadline. In addition, households with young children could have been unfamiliar with the verification process and may have not completed the request due to misunderstanding rather than ineligibility. Finally, households that were reapproved were slightly more often SNAP recipients (8 percent versus 3 percent), which means that they could have had the opportunity to be directly certified for free meals after verification.

Verification nonresponders who were eventually reapproved for benefits participated in the school meal programs more frequently and were generally more satisfied with the programs, relative to those who were not reapproved. Households that were reapproved more commonly reported that their child ate school lunch every day, compared to those that were not reapproved (72 percent versus 46 percent). Among those whose children ate school meals, households that were eventually reapproved more often reported being satisfied with the programs, particularly with the school lunch program (85 percent versus 74 percent).

Table VII.2. Characteristics of surveyed verification nonresponders, by whether they were reapproved for benefits (average outcome across districts)

Characteristics	Verification nonresponders that were:	
	Reapproved for benefits	Not reapproved for benefits
Characteristics related to initial certification status (based on district administrative records)		
Initial certification status (percentages)		
Free	74	62
Reduced price	26	38
Characteristics related to eligibility or employment (based on survey reports)[a]		
Household size (means)		
Number of household members	3.9	3.4
Number of children in household	2.2	1.7
Household composition (percentages)		
Single-parent household	55	51
Two-parent household	45	47
Other household composition	0	2
Employment status of household members		
Survey respondent is employed (percentage)	74	75
Number of employed adults in household (mean)	1.1	1.2
Receipt of public assistance (percentages)[b]		
Receiving SNAP	8	3
Receiving TANF	0	0
Receiving FDPIR	0	0
Demographic characteristics (based on survey reports)		
Survey respondent's educational attainment (percentages)		
Less than high school degree	17	20
High school or GED	42	33
Some college[c]	15	30
Bachelor's degree or higher	25	17
Race and ethnicity (percentages)		
Hispanic or Latino	48	51
Black or African American, non-Hispanic	17	15
White, non-Hispanic	20	27
Other or multiple races, non-Hispanic	14	8
English is the primary language spoken at home (percentage)	67	63
At least one child in: (percentages)[d]		
Pre-K to grade 5	63	53
Pre-K to kindergarten	13	13
Grades 1 to 2	28	16
Grades 3 to 5	31	31

Table VII.2 *(continued)*

Characteristics	Verification nonresponders that were:	
	Reapproved for benefits	Not reapproved for benefits
Grades 6 to 8	41	37
Grades 9 to 12	49	48
Characteristics related to school meal program experiences and perceptions (based on survey reports)		
Days per week student usually eats school lunch (reported by parents)		
None	7	24
Some, but not every day	21	31
Every day	72	46
Parents' views on administration of school meal programs (percentages)		
Satisfied with the NSLP overall[e]	85	74
Satisfied with the SBP overall[e]	90	86
Believes the application process to receive F/RP meals is fair	81	75
Parents' reports of students' perceptions of quality/taste of school lunch (percentages)[e]		
Satisfied with amount of food	82	79
Satisfied with quality/taste	75	76
Number of households in sample that were still enrolled in the district on March 1, 2019	**98**	**664**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that did not respond to the verification request. Households reapproved were defined as those that were newly certified for free or reduced price meals between the verification date and March 1, 2019, due to reapplication or direct certification. The table excludes four households that the district data identified as no longer enrolled as of March 1, 2019, and one household whose reapplication status was not recorded in the district administrative data. Subgroups may not sum to 100 percent due to rounding. See Appendix Table F.6 for detailed results.

[a] Eligibility-related information—including household size, composition, employment, income, and participation in programs that confer categorical eligibility—was reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

Most verification nonresponders who were reapproved for benefits had attempted to respond to the verification request but struggled to complete it on time. Close to 90 percent of verification nonresponders who were eventually reapproved for benefits recalled being contacted about the verification request. Among those who recalled the request, 88 percent reported that they had attempted to respond (Table VII.3). Their most common reason for not completing the request was that they thought they had completed it (46 percent). It is possible that districts accommodated a late response to the verification request and recorded the late response in their data system as a reapplication; alternatively, households could have interpreted their reapplication as a response to the verification request. Other common reasons for nonresponse were that they did not have the necessary proof (20 percent); they missed the deadline (13 percent); or they were too busy to respond (10 percent), suggesting that they needed more time to respond to the request. Relative to those not reapproved, reapproved households much more commonly reported that they thought they had responded to the request (46 percent versus 26 percent) and much less commonly said that they thought or knew they would lose eligibility (1 percent versus 19 percent).

Table VII.3. Experience with verification process among verification nonresponders, by whether they were reapproved for school meal benefits (average percentages across districts)

Verification process experience	Verification nonresponders that were:	
	Reapproved for benefits	Not reapproved for benefits
All households		
Household recalled being contacted about verification	87	88
Households that recalled being contacted for verification		
Household attempted to respond to verification request	88	65
Reported reasons for not completing the request included:[a]		
Thought they completed it	46	26
Did not have necessary proof	20	19
Knew/thought child would lose eligibility	1	19
Too busy to respond	10	13
Missed deadline	13	10
Too complicated or overwhelming	3	7
Problem communicating with school	8	6
Not aware of or could not find request	3	4
Family not satisfied with school meals	1	4
Had privacy concerns or did not want to contact employer/boss	0	3
Language or literacy barrier	0	1
Not aware of penalty for not responding	1	0
Other	5	3
Number of households in sample that were still enrolled in the district on March 1, 2019	**98**	**664**
Number of households in sample that were still enrolled in the district on March 1, 2019, and that recalled being contacted for verification	**85**	**564**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all households in the study districts that did not respond to the verification request. Households reapproved were defined as those that were newly certified for free or reduced price meals between the verification date and March 1, 2019, due to reapplication or direct certification. The table excludes four households that the district data identified as no longer enrolled as of March 1, 2019, and one household whose reapplication status was not recorded in the district administrative data. See Appendix Table F.5 for detailed results.

[a] These categories are not mutually exclusive.

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SECTION III: VERIFICATION FOR CAUSE

School districts must verify all questionable applications—a process known as verification for cause. This section, consisting of Chapter VIII, uses data from study district interviews to examine the criteria districts use to select applications for verification for cause, and how districts communicate with households whose applications are selected. Tables related to these analyses can be found in Appendix G.

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VIII. Verification for Cause

In addition to verifying a sample of approved applications, referred to in this chapter as required verification, school districts also must verify all questionable applications—a process known as verification for cause. For example, if there are multiple submissions from the same household, that household's application is considered questionable. District staff are strongly encouraged to contact the household during the certification process to clarify any unclear or questionable information before certifying the application and proceeding with verification for cause.

Using district interview data, this chapter summarizes the prevalence of and processes for verification for cause among the districts in the study sample. Specifically, the chapter discusses the number of districts reporting that they ever conduct verification for cause, along with their reasons for selecting applications to verify and their methods for contacting households.

The study team also used administrative and household survey data from SY 2018–2019 to examine the characteristics and outcomes of households contacted for verification for cause in the study districts and to compare them to those of households contacted for required verification. However, only three study districts conducted verification for cause during the period covered in the study's SY 2018–2019 administrative data. These three districts selected a combined total of 102 applications to verify for cause during this period, and two of these three districts selected only six applications each. Of the 102 households whose applications were selected for verification for cause, only 31 were sampled for the household survey. These small samples cannot support detailed or precisely estimated analysis of the characteristics of households contacted through the verification-for-cause process, or of the outcomes of verification for cause. For this reason, this report does not discuss these results and includes them in the tables in Appendix G alongside a note that they should be interpreted with caution.

Overview of key findings

- Most districts in the study sample did not regularly verify applications for cause, and many did not do it at all. Only one-fifth of study districts verified at least one application for cause in SY 2018–2019.
- The reasons why applications were selected for cause varied, but the most commonly reported reason was multiple submissions from the same household, each reporting different income amounts.

Most districts in the study sample did not verify applications for cause regularly, if at all. Only 4 of the 20 study districts (20 percent) selected at least one application for cause in SY 2018–2019 (Table VIII.1). An additional 8 districts reported having conducted verification for cause at some point, but not in SY 2018–2019. That is, a total of 12 districts reported ever conducting verification for cause; as such, the discussion that follows on the verification for cause processes focuses on the 12 districts that ever conduct verification for cause.

Most districts (10 of 12) reported using informal criteria to select applications for cause, with the other two using formal written criteria (Table VIII.1). Districts using informal criteria are defined as those reporting that they do not use formal (documented) criteria to select applications for cause, but instead use generally understood standards to select applications for cause in certain situations.

Table VIII.1. Number of districts that reported conducting verification for cause, and criteria used for selecting applications

Use of verification for cause	Total	Among districts that reported selecting at least one application for cause in SY 2018–2019	Among districts that reported sometimes selecting applications for cause (none in SY 2018–2019)
All districts that reported ever conducting verification for cause	12	4	8
District reported using formal criteria to select applications	2	1	1
District reported using informal criteria to select applications[a]	10	3	7[b]
District reported that it does not conduct verification for cause	8[c]	n.a.	n.a.
Total number of districts	**20**	**4**	**8**

Source: Interviews with study districts, SY 2018–2019.

[a] Districts using informal criteria are defined as those that reported that they do not use formal (documented) criteria to select applications to verify for cause, but that they would verify applications for cause in certain situations.

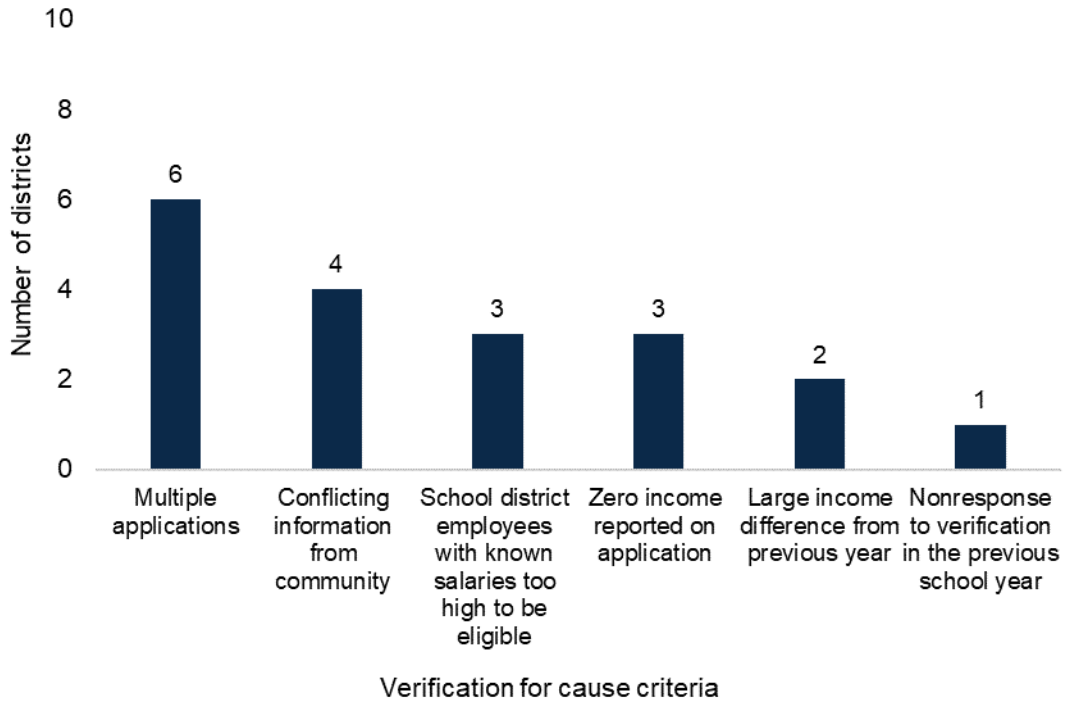
[b] Two districts in this category reported verifying applications for cause only rarely (none in the last 5 years, or one in the last 10 years).

[c] One district has not verified any applications for cause in recent years, but listed circumstances under which it might. Another district reported that it "audits" questionable applications when initially reviewing them, but that it does not conduct verification for cause.

n.a. = not applicable.

There were a number of reasons why certain applications were selected for verification, but half of the 12 districts reported that they conduct verification for cause when households apply multiple times and report different income amounts each time (Figure VIII.1). Four districts reported that they use information from community members, three use public records on salaries to identify households that appear to be ineligible, and three reported that they verify for cause any applications reporting zero income.

Figure VIII.1. Number of districts that reported using specified criteria to select applications for verification for cause, by criterion

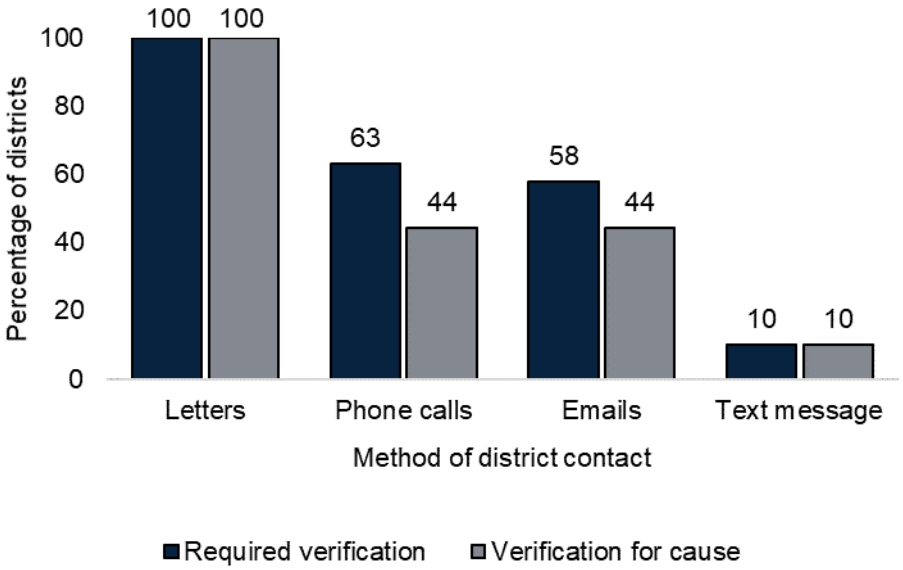


Source: Interviews with study districts, SY 2018–2019.

Note: See Appendix Table G.1 for detailed results.

When verifying an application for cause, all districts contacted households by letter, with some using other methods as well (Figure VIII.2). About 44 percent contacted households by phone, and the same percentage contacted households by email. For required verification, in comparison, the percentage of districts that reported contacting households by phone or email was slightly higher: about 63 percent of districts contacted households by phone, and 58 percent contacted households by email. Contact by text message was uncommon for both verification for cause and required verification. For each type of verification, only 10 percent of districts reported contacting households by text message.

Figure VIII.2. Percentage of districts attempting to contact households in the verification process, by reported contact type

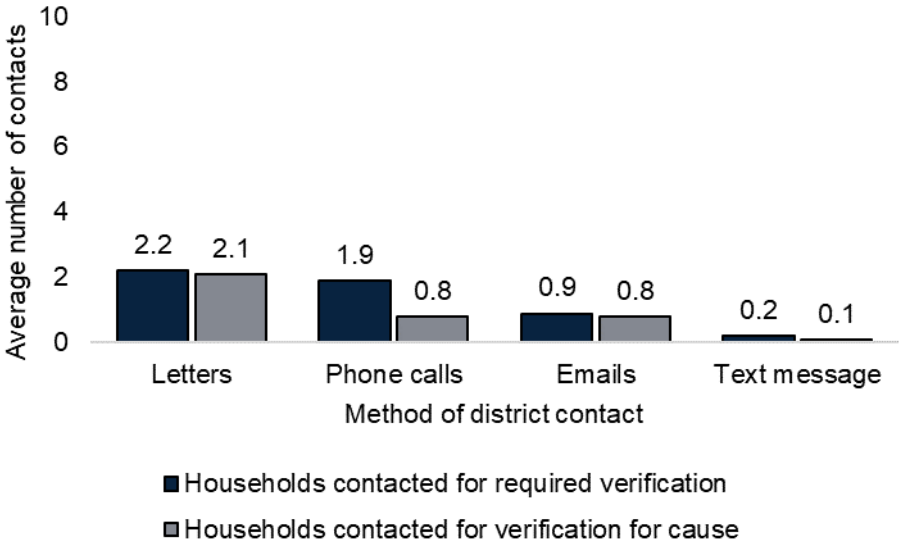


Source: Interviews with study districts, SY 2018–2019.

Note: The percentages in the blue bars representing required verification are based on 20 districts that provided data on whether letters or text message were used to contact households and 19 that provided sufficient data on whether phone calls or emails were used to contact households. The percentage of districts in the gray bars representing verification for cause are based on 10 districts that provided data on whether letters and text messages were used to contact households and 9 districts that provided sufficient data on whether phone calls or emails were used to contact households. See Appendix Table G.2 for detailed results.

Districts contacted households somewhat less often to conduct verification for cause than they did for required verification. Most of this difference is because districts made about one phone call, on average, to households they contacted to verify applications for cause, and they made an average of about two phone calls to households contacted for required verification. (Figure VIII.3). Overall, the number of letters, emails, and text messages sent to households for required verification versus verification for cause was roughly the same across districts.

Figure VIII.3. Average number of times districts attempted to contact households for verification, by reported contact type



Source: Interviews with study districts, SY 2018–2019.

Note: The numbers in the blue bars representing required verification are based on 20 districts that provided data on the number of contacts they made by letter or text message, and 19 that provided sufficient data on the number of contacts they made by phone or email. The number of districts in the gray bars representing verification for cause are based on 10 districts that verify applications for cause and provided data on whether letters and text messages were used to contact households, and 9 districts that provided sufficient data on whether phone calls or emails were used to contact households. See Appendix Table G.3 for detailed results.

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IX. Conclusion

This study examined verification processes and outcomes for a sample of districts selected based on having relatively large numbers of students with certain verification outcomes and on geographic considerations. Although not representative of districts nationwide, findings for these districts provide insight into a sample of households' verification experiences and outcomes.

The report documents verification outcomes for F/RP school meal applications selected for verification in the sample of study districts. The most common verification outcome was termination of benefits due to verification nonresponse: 44 percent of households did not respond to the verification request. For households that responded to the district's verification request, a slight majority (about 60 percent) had changes in certification status due to verification. However, it was also not uncommon for responding households to have no change to their certification status due to verification. The fact that 40 percent of initial certifications were confirmed could reflect favorably on the accuracy of the certification process because most applications selected are error prone, and certification error is expected to be more common in error-prone applications than in a broader set of applications.

The study team examined the verification process for no-change households by conducting an independent assessment of household eligibility for school meal benefits. This analysis compared households' survey-determined eligibility statuses to their certification statuses as determined by the district through verification. This analysis found a match between survey- and district-determined eligibility status for a majority of households (58 percent). The statuses for the remaining 42 percent of households did not match, although only 17 percent of households that the districts determined to be eligible for F/RP meals were determined to be ineligible for F/RP meals based on the survey. Nearly all the difference in survey- and district-determined eligibility statuses was due to differences in survey- and application-reported income: 94 percent of those households whose survey- and district-determined income eligibility did not match had differences in monthly income of at least $100. This finding suggests that it is fairly common for households contacted for verification to report income differently on their applications than in a survey. However, this interpretation has limitations, given the potential for reporting error in the survey data and differences in the reference time period between data sources.

Study findings helped illuminate the types of households that did not respond to verification and why they did not respond. Most verification nonresponders recalled being contacted about verification, reported that they understood the verification request, and reported that they attempted to respond. However, some verification nonresponders reported that it was difficult to provide the information necessary for the verification request and to respond on time. It is possible that putting in the effort to overcome this difficulty is more likely for those with more to lose by having their benefits terminated. Some evidence from the comparison of characteristics of no-change and verification nonresponder households supports this hypothesis. Compared to no-change households, verification nonresponders were somewhat less often certified for free meals, the child less frequently ate school meals, and the household more commonly had income from employment.

Perceived ineligibility for F/RP meal benefits was an important factor for some households that did not respond to the verification request, but a majority of verification nonresponders could have been eligible to continue receiving F/RP meal benefits if they had responded. About 17 percent of verification nonresponders in the household survey sample reported their perceived ineligibility as a reason for their nonresponse, and the study team's independent assessment of school meal benefit eligibility status found that a little more than twice this percentage (37 percent of verification nonresponders) were ineligible for

F/RP meals, which implies that some households that did not respond to the verification request for this reason could have been correct in their perceptions.

Verification for cause was uncommon among study districts. Most districts reported that they do not conduct verification for cause every year. Only one study district selected more than six applications to be verified for cause during the study's analysis period. These patterns suggest that verification for cause is not a regularly used part of the verification process, even for this sample of districts with large verification samples.

As mentioned in the report introduction, this study addressed some of the same research questions as a previous study, the Case Study of National School Lunch Program Verification Outcomes in Large Metropolitan School Districts, which was based on SY 2002–2003 data (Burghardt et al. 2004). Like the current study, the previous study selected districts for the case study, described their verification outcomes, and compared district-determined certification status to survey-determined eligibility status for no-change households and verification nonresponders. Differences in the policy environment and methodology limited the comparability to the previous study. However, despite these differences, it is useful to summarize findings from across the two case studies, as both contribute to the body of research on district verification samples.

Findings from both studies indicate that (1) nonresponse to verification is common in study districts, (2) district-determined eligibility status aligns with survey-determined eligibility status for most no-change households, and (3) most nonresponders were eligible for F/RP meals. Households contacted for verification in the 2004 study had similar response rates to those contacted for the current study: about half responded to the request or were directly verified. In addition, both studies found 83 percent of no-change households to be eligible for free or reduced price meals and 58 percent to be eligible for the exact level of benefits they were certified to receive, based on their survey-reported income.

Compared to the 2004 case study, the current study found that a slightly smaller percentage of verification nonresponders was eligible for F/RP meals, although F/RP eligibility was common in both studies. In the 2004 study, 69 percent of verification nonresponders were found to be eligible for free or reduced price meals, compared to 63 percent in the current study. The percentage of verification nonresponders who were eligible for at least the level of benefits that they had been certified to receive was 53 percent in the 2004 study and 45 percent in the current study. These households might have retained or increased their school meal benefits had they responded.

Although the findings presented here are informative about the verification process and its outcomes, it is important to keep in mind the limitations of the study. The findings came from a case study of districts that were not randomly selected, so they cannot provide information on verification for districts nationwide. The study's data collection also has inherent limitations. Survey recall error, recording errors in administrative records, and differences in the reference periods of data sources could affect the extent to which certain findings reflect the verification process versus the limitations of the data.

Appropriate interpretation of the findings also requires keeping in mind the broader policy context in which the study took place. Only students approved for F/RP school meal benefits based on applications are subject to verification. Innovations in the school meal benefit certification process have substantially reduced the number of students certified by application, which has increased access to school meals in ways that are less prone to error. Direct certification bases certification for school meal benefits on administrative records from programs that confer categorical eligibility, which enables certification without an application and removes the possibility of reporting error. In addition, the CEP allows all

students in participating schools to receive meals free of charge, while school reimbursements are based on administrative records. As a result of improvements to direct certification and increasingly widespread adoption of the CEP, only 40 percent of public school students receiving F/RP meals nationwide are now certified by application and thus subject to verification. If these trends continue, the number of students receiving F/RP meals that are subject to verification will continue to decrease.

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Appendix A

Household Survey Data Preparation

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This appendix provides additional information on the study team's preparation of the household survey data, including the initial data processing steps, economic unit construction, income construction and imputation, and construction of analysis variables.

A. Initial processing steps

To prepare the household survey data for variable construction and analysis, the study team removed records that were not used in the analysis (see exclusions in Chapter II), added analysis weights (also described in Chapter II), and conducted quality control checks. The team checked for consistency among key interrelated variables, investigated inconsistencies, and recoded values if necessary. For example, the team checked that household members' relationship to the survey respondent plausibly aligned with their ages (for example, that respondents' biological children were not older than the respondent). The team prioritized retaining the information as provided by the survey respondent. However, in cases with inconsistent age and relationship patterns, the team recoded the values as necessary.

B. Economic unit construction

Identifying the economic unit was an important step in determining eligibility for F/RP school meal benefits based on income. Students in households with incomes at or below 130 percent of the FPL are income-eligible for free school meals, while those in households with incomes between 130 percent and 185 percent of the FPL are income-eligible for reduced price meals. The FPL is determined by household size, where the household consists of members of the economic unit. An economic unit is a group of related or unrelated individuals who are not residents of an institution or boarding house but who live together and share housing, significant income, and expenses (7 CFR 245.2).

The study team constructed the economic unit such that it aligned with the definition used for determining eligibility for F/RP school meal benefits. For this analysis, it included the following individuals living in the household in October 2018: (1) the respondent, (2) the respondent's spouse/partner, (3) the target student, (4) all children supported by the respondent or by the spouse/partner, (5) all adults that supported the target student or other children supported by the respondent or the spouse/partner, and (6) all of the respondent's children under 6 years old or in pre-K to grade 12.

C. Income determination and imputation

In the household survey, the study team collected information from the survey respondent about household income received by each household member. The survey collected information separately for child and adult household members. Adult income included income from employment and 24 other sources that districts consider when determining eligibility for school meal benefits, while child income included income from 3 sources: Social Security or disability survivors benefits, income from individuals outside the household (for example, a friend or extended family member regularly gives the child spending money), and other income, including income from a private pension fund, annuity, or trust. The adult income sources were as follows:

- Income for paid work
- Unemployment compensation
- Workers compensation benefits
- Strike benefits

- Social Security or Railroad Retirement
- Pensions, annuities, or survivors benefits
- Military cash benefits
- Veterans benefits
- Government disability benefits from Supplemental Security Income
- Private disability benefits
- Alimony payments
- Child support payments
- Interest and dividends income
- Net rental income
- Profit or loss from nonfarm business, partnership, or professional practice
- Profit or loss from a farm
- Financial aid to college students
- Regular payments or withdrawals from large awards or settlements
- Regular contributions from persons outside the household
- Other income, such as net royalties, trust income, or 401k
- General assistance benefits
- Housing subsidies (excluding Federal)
- Federal Black Lung Program
- Other public benefits, not including TANF or SNAP
- Any other source that was not included above (The study team made decisions on whether to count income from other sources based on the Federal regulations.)

To calculate total household income, the team summed the income for each member of the economic unit across each income source. Although the survey interviewers requested documentation for each income source, it was infrequently provided. When it was provided, it often reflected a time period other than the reference time period of October 2018. Specifically, 36 percent of households provided at least some documentation, and only 10 percent had documentation that covered October 2018. After providing documentation, households were asked to confirm the income amount that they reported for October 2018 and to make any corrections (for each person and source) if needed. Among households that were able to provide any documentation, 99 percent confirmed or corrected their reported income after reviewing their documentation and reported income amount. For these reasons, the team constructed income based on the final confirmed/corrected amounts that a respondent reported (or the original reported amount for the small number of survey respondents that did not confirm or correct their amount) rather than on the documentation that a respondent provided.

For each income source, the survey interviewer asked first whether the household member received the source of income in October 2018. Possible responses were yes, no, don't know, or refused. If the respondent reported that the household member received the income source, the interviewer asked for the amount of income received with possible responses of a dollar value, don't know, or refused. Missing

income data occurred under two scenarios: (1) the respondent did not indicate whether the adult household member received an income source, which was referred to as a missing indication, or (2) the respondent affirmed that he or she received an income source but did not provide an amount, which was referred to as a missing amount.

The study team assessed the extent of missing data before exploring possible imputation approaches or other options for handling households with missing data in the analysis. Most households were not missing any income data. Specifically, about 20 percent of households (231 households) were missing some source of income data (Table A.1). Among those households, most were missing information for some but not all income sources.

Table A.1. Prevalence of missing income data for surveyed households (mean percentages across households)

Characteristics	Number or percentage
Number of households in the survey	1,189
Number of households categorically eligible	63
Number of households not categorically eligible[a]	1,126
Number of households with missing data	231
Household report of income (percentages)[b]	
Missing indication of income receipt	10.4
Reported income receipt but missing income amount	13.8

Source: Household survey data, SY 2018–2019.

Note: Values were weighted to represent all verification nonresponders and no-change households.

[a] Income data were only needed for households that did not appear to be categorically eligible based on the household survey data. The number of households not categorically eligible included seven households for which categorical eligibility could not be determined due to missing data.

[b] For households that were not categorically eligible or for which categorical eligibility could not be determined due to missing data.

Among households with missing income data, it was more common to be missing an income amount than missing an income indication. Roughly half of households with missing income data (49 percent; not shown in Table A.1) were missing an income indication for one or more income source. About 65 percent of households with any missing income data had missing income amounts. In these cases, the household member reported receipt of the income source but did not provide the amount. Missing income amounts predominantly related to income from primary jobs (jobs associated with the most hours), which were a very common income source in the sample. Specifically, about 87 percent of households in the survey had income from a primary job.

The study team considered various imputation approaches for each of the following four types of missing data (for each person in the economic unit):

1. Receipt of earned income from a primary job
2. Receipt of earned income from a nonprimary job or income from another source
3. Amount of earned income from a primary job
4. Amount of earned income from a nonprimary job or income from another source

Based on analyses and in consultation with FNS, the study team selected the following approaches:

- **Receipt of earned income from a primary job.** One approach to dealing with the missing income indication is to assign the most common value from the nonmissing data, particularly if a large majority of nonmissing values have a particular value. Because a large majority of adults in the sample worked (75 percent of all adults with nonmissing employment status), the study team imputed the missing indication for adult income from a primary job to reflect receiving the income source. This assumption affected 1 percent of all households and 4 percent of households with any missing data.
- **Receipt of earned income from a nonprimary job or income from another source.** Based on the infrequency of income sources other than income from primary jobs—about one in five sample members with no missing data reported any of these income sources and the percentage that reported specific income sources was even lower—the study team imputed missing indicators for these income sources to reflect not receiving the income source. This approach resulted in no income from these income sources. This assumption affected 9 percent of all households and 49 percent of households with any missing data.
- **Amount of earned income from a primary job.** For the 114 households that reported receiving income from a primary job but that were missing an income amount for that job, the study team imputed income amounts using a nonparametric imputation method called boosting (Ridgeway 1999).[1,2] This technique is flexible in how it estimates the relationship between the outcome—in this case, income from the primary job—and respondents' characteristics. It uses the median rather than the mean as the estimator, making it more robust to outliers and extreme values than mean-based approaches as well as more appropriate, given that the earnings distribution is typically skewed. The estimated model used a separate set of characteristics for the respondent and for other people in the household, and it was found to have excellent predictive performance.[3] The imputation was conducted separately for the samples of verification nonresponders and no-change households. This imputation affected 10 percent of all households and 49 percent of households with any missing data.
- **Amount of earned income from a nonprimary job or income from another source.** For the 59 households that were missing an income amount from a nonprimary job or income from another source, the study team imputed the amount as the median among households with that particular source of income. This imputation implicitly assumed that the amount of income received by those who received the income but were missing the amount was typical of others who received that source of income. The imputation was conducted separately for the samples of no-change households and verification nonresponders. The imputed income typically did not represent a substantial portion of

[1] Ridgeway, G. "The State of Boosting." *Computing Science and Statistics 31,* 1999, pp. 172–181.
[2] The study team estimated key findings using several alternate imputation approaches for missing income amounts of earnings from a primary job, including using: the median of non-missing positive earnings from a primary job, the 25th percentile of non-missing positive earnings from a primary job, and predicted values based on linear regression. Findings are not substantially sensitive to imputation approach. For the full sample, the survey-based eligibility status differs by imputation method for only about four percent of the sample. Similarly, for no-change households, there is a 3 percentage point range across imputation methods in the percentage whose survey- and district-determined eligibility statuses do not match.
[3] The model for respondents' income from a primary job controlled for study district, education, race, primary language, students' grade levels, age, number of earners in the household, and whether the person was in a household in which at least one adult had missing earnings. The model for other household members controlled for these same respondent characteristics (excluding age) plus the age of the other household members, whether the respondent was employed, and the respondent's total income from a job or jobs (after imputing respondents' income).

total household income. This imputation affected 5 percent of all households and 26 percent of households with any missing data.

D. Analysis variable construction

After calculating total household income, the study team calculated income as a percentage of the appropriate FPL for the household's size. The team then compared this amount to the income-eligibility thresholds for F/RP meals to assess school meal eligibility. Using this eligibility status and the certification status reported by the study districts in their administrative data, the team determined whether the survey-determined eligibility status was consistent with the district-determined status. In addition to income-related analysis variables, the team also assessed categorical eligibility based on reported receipt of SNAP, TANF, FDPIR during SY 2018–2019, or student's foster care status.[4] Due to missing data, categorical eligibility based on the household survey could not be determined for 7 households (5 verification nonresponders and 2 no-change households); for the analysis of survey data, these households were assumed to be not categorically eligible and assessed for eligibility based on income.

The study team also recoded open-ended responses from the survey on topics such as the reasons for not responding to the verification request to the categories included in the analysis tables contained within this report.

[4] The analysis only considered a household to be categorically eligible on the basis of foster care if the target student was a foster child. Categorical eligibility based on foster care does not extend to other children in the household.

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Appendix B

Supplemental Tables Related to Study District Characteristics and Verification Outcomes

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Table B.1. Average administrative characteristics of the study districts versus all public school districts nationwide

Administrative characteristics	Characteristics averaged across districts		Characteristics averaged across students	
	Study districts	Public school districts nationwide	Students in study districts	Students in public school districts nationwide
Number of schools conducting verification (mean)	94	6	130	42
Number of students (mean)	80,200	3,520	116,788	31,714
District enrollment range (percentage)				
0 to 2,499	0.0	71.8	0.0	17.1
2,500 to 9,999	0.0	21.2	0.0	28.8
10,000 to 49,999	40.0	6.3	17.1	35.5
50,000 or more	60.0	0.7	82.9	18.6
School meal benefit status (percentage of all students):				
Attending schools using special provisions not subject to verification[a]	3.3	3.6	3.2	11.3
Directly certified for free meals[b]	26.5	24.6	26.4	22.5
Certified for F/RP meals by application	23.8	17.9	23.4	14.8
Certified for free meals	17.1	11.4	16.8	9.5
Certified for reduced price meals	6.6	6.5	6.6	5.2
Neither certified for F/RP meals nor in schools using special provisions not subject to verification	46.7	54.0	47.3	51.4
Among students receiving F/RP school meal benefits, percentage who were not subject to verification	55.3	60.3	56.3	66.0
Verification sampling method (percentage)				
Standard	90.0	69.7	78.2	78.0
Alternate 1	0.0	25.7	0.0	9.0
Alternate 2	10.0	4.7	21.8	13.1
Number in sample	**20**	**11,037**	**1,604,000**	**38,855,233**

Sources: School Food Authority Verification Collection Report (FNS-742) data, SY 2018–2019.

Notes: Public school districts nationwide include only districts that conduct verification. FNS-742 data were modified to mask district identity; findings from unmasked data were qualitatively similar. Student-level characteristics for the study districts include students from all households in the 20 study districts, including those households selected for the household survey and those not selected. Results averaged across students weight districts by enrollment size. Subgroups may not sum to 100 percent due to rounding.

[a] This includes students in schools operating under the Community Eligibility Provision (CEP) and Provisions 2 and 3 in a non-base year.

[b] This does not include students directly certified for reduced price meals based on Medicaid information; these students are not identified from the FNS-742 data.

F/RP = free and reduced price

Table B.2. Average local characteristics of the study districts versus all public school districts nationwide

Local characteristics	Characteristics averaged across districts		Characteristics averaged across students	
	Study districts	Public school districts nationwide	Students in study districts	Students in public school districts nationwide
Urbanicity (percentage)				
Urban	100.0	60.6	100.0	87.2
Suburban	0.0	31.2	0.0	11.7
Rural	0.0	8.2	0.0	1.2
FNS region (percentage)[a]				
Mid-Atlantic	15.0	10.8	28.1	12.1
Midwest	10.0	25.8	2.6	16.1
Mountain Plains	15.0	15.1	10.2	7.4
Northeast	0.0	12.0	0.0	7.1
Southeast	15.0	6.9	24.6	19.7
Southwest	35.0	16.4	28.1	18.8
Western	10.0	12.9	6.5	18.8
Percentage of school-age children in poverty	15.2	16.7	14.3	15.9
Median household income in district	$69,850	$58,901	$75,108	$64,903
Number in sample	**20**	**11,037**	**1,604,000**	**38,855,233**

Sources: School Food Authority Verification Collection Report (FNS-742) data, SY 2018–2019; 2018 Census Small Area Income and Poverty Estimates (SAIPE) data; and U.S. Department of Agriculture Economic Research Service 2013 Rural-Urban Continuum Codes.

Notes: Public school districts nationwide include only districts that conduct verification. FNS-742 data were modified to mask district identity; findings from unmasked data were qualitatively similar. Student-level characteristics for the study districts include students from all households in the 20 study districts, including those households selected for the household survey and those not selected. Results averaged across students weight districts by enrollment size. Subgroups may not sum to 100 percent due to rounding.

[a] Region is defined based on the FNS regions as of October 2019. Region breakouts by State can be accessed at https://www.fns.usda.gov/fns-regional-offices.

Table B.3. Summary of household verification outcomes for the study districts versus all public school districts nationwide

	Characteristics averaged across districts		Characteristics averaged across students	
	Study districts	Public school districts nationwide	Students in study districts	Students in public school districts nationwide
Selection for verification				
Percentage of all applications selected for verification[a]	2.8	5.3	2.6	3.2
Total number of students in households contacted for verification[b]	340	14	6,795	154,618
Verification outcomes (percentage of students in households contacted for verification)[b]				
Directly verified	6.6	5.6	4.9	4.5
Responded, no change in benefits	16.9	42.9	16.6	28.8
Maintained free status	11.4	26.5	10.9	17.3
Maintained reduced price status	5.5	16.4	5.7	11.5
Responded, benefits increased	1.6	2.2	1.3	2.0
Responded, benefits reduced but not terminated	13.4	10.9	13.3	12.8
Responded, benefits terminated	13.5	14.6	13.8	16.5
Free to paid	6.2	5.8	5.8	6.4
Reduced price to paid	7.1	8.9	7.7	10.2
Did not respond, benefits terminated	48.4	23.9	50.3	35.5
Free to paid	31.6	13.3	33.3	19.9
Reduced price to paid	16.8	10.6	16.9	15.7
Number in sample[b]	**20**	**11,037**	**1,604,000**	**38,855,233**

Sources: School Food Authority Verification Collection Report (FNS-742) data, SY 2018–2019.

Notes: Public school districts nationwide include only districts that conduct verification. Student-level characteristics for the study districts include students from all households in the 20 study districts, including those households selected for the household survey and those not selected. FNS-742 data were modified to mask district identity; findings from unmasked data were qualitatively similar. Results averaged across students weight districts by enrollment size. Subgroup percentages may not sum to totals due to rounding.

[a] The totals presented here reflect the sum from the FNS-742 data of applications with verification results, excluding those selected for cause. For a small percentage of districts (2.3 percent), this number differs from the district report from the FNS-742 data of the total number of applications selected for verification.

[b] Includes applications selected for cause.

Table B.4. Summary of household verification outcomes among responders to the verification request for the study districts versus all public school districts nationwide

	Characteristics averaged across districts		Characteristics averaged across students	
Verification outcome	Study districts	Public school districts nationwide	Students in study districts	Students in public school districts nationwide
No change in benefits	38.9	59.1	38.1	46.9
Benefits increased	3.1	3.2	2.7	3.4
Benefits reduced but not terminated	29.9	16.4	29.9	22.2
Benefits terminated	28.2	21.3	29.2	27.4
Number in sample	**20**	**10,045**	**3,092**	**89,457**

Sources: School Food Authority Verification Collection Report (FNS-742) data, SY 2018–2019.

Notes: Public school districts nationwide include only districts that conduct verification. FNS-742 data were modified to mask district identity; findings from unmasked data were qualitatively similar. Subgroup percentages may not sum to totals due to rounding. Student-level characteristics for the study districts include students from all households in the 20 study districts, including those households selected for the household survey and those not selected. Results averaged across students weight districts by enrollment size. These numbers include applications selected for cause.

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Appendix C

Supplemental Tables Related to Detailed Account of Verification Outcomes in Study Districts

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Table C.1. Summary of household verification outcomes (mean percentages across districts)

Verification outcome	Percentage of all households in verification sample
All households	**100.0**
Responded, no change in benefits	21.5
Responded, benefits increased	1.7
Responded, benefits reduced but not terminated	13.8
Responded, benefits terminated	15.4
Did not respond, benefits terminated	44.2
Directly verified	3.4
Households initially certified based on income[a]	**99.5**
Responded, no change in benefits	21.3
Responded, benefits increased	1.7
Responded, benefits reduced but not terminated	13.8
Responded, benefits terminated	15.4
Did not respond, benefits terminated	44.2
Directly verified	3.2
Households initially certified based on categorical eligibility	**0.5**
Responded, no change in benefits	0.2
Responded, benefits increased	n.a.
Responded, benefits reduced but not terminated	0.0
Responded, benefits terminated	0.0
Did not respond, benefits terminated	0.0
Directly verified	0.2
Number of households in verification sample	**4,749**
Number of districts in verification sample	**20**

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. Subgroups may not sum to totals due to rounding.

[a] Includes two households that had a missing initial certification basis in the district administrative data.

n.a. = not applicable.

Table C.2. Summary of household verification outcomes, by district enrollment (mean percentages across districts)

Verification outcome	Percentage of all households in districts with fewer than 50,000 enrolled students	Percentage of all households in districts with 50,000 or more enrolled students
All households	**100.0**	**100.0**
Responded, no change in benefits	23.3	20.3
Responded, benefits increased	2.2	1.3
Responded, benefits reduced but not terminated	16.5	12.1
Responded, benefits terminated	19.2	12.9
Did not respond, benefits terminated	34.8	50.4
Directly verified	4.0	2.9
Households initially certified based on income[a]	**99.7**	**99.4**
Responded, no change in benefits	23.0	20.1
Responded, benefits increased	2.2	1.3
Responded, benefits reduced but not terminated	16.5	12.1
Responded, benefits terminated	19.2	12.9
Did not respond, benefits terminated	34.8	50.4
Directly verified	4.0	2.6
Households initially certified based on categorical eligibility	**0.3**	**0.6**
Responded, no change in benefits	0.3	0.2
Responded, benefits increased	n.a.	n.a.
Responded, benefits reduced but not terminated	0.0	0.0
Responded, benefits terminated	0.0	0.0
Did not respond, benefits terminated	0.0	0.0
Directly verified	0.0	0.3
Number of households in verification sample	**1,160**	**3,589**
Number of districts in verification sample	**8**	**12**

Source: Administrative data from the study districts and School Food Authority Verification Collection Report (FNS-742) data, SY 2018–2019.

Note: This table includes the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. Subgroups may not sum to totals due to rounding.

[a] Includes two households that had a missing initial certification basis in the district administrative data.

n.a. = not applicable.

Table C.3. Summary of household verification outcomes, by free or reduced price meal certification rate (mean percentages across districts)

Verification outcome	Percentage of all households in districts where less than 50 percent of students were certified for free or reduced price meals	Percentage of all households in districts where at least 50 percent of students were certified for free or reduced price meals
All households	**100.0**	**100.0**
Responded, no change in benefits	21.5	21.5
Responded, benefits increased	1.4	1.8
Responded, benefits reduced but not terminated	14.4	13.4
Responded, benefits terminated	15.3	15.5
Did not respond, benefits terminated	41.5	46.0
Directly verified	5.8	1.8
Households initially certified based on income[a]	**99.9**	**99.3**
Responded, no change in benefits	21.4	21.2
Responded, benefits increased	1.4	1.8
Responded, benefits reduced but not terminated	14.4	13.4
Responded, benefits terminated	15.3	15.4
Did not respond, benefits terminated	41.5	45.9
Directly verified	5.8	1.4
Households initially certified based on categorical eligibility	**0.1**	**0.7**
Responded, no change in benefits	0.1	0.3
Responded, benefits increased	n.a.	n.a.
Responded, benefits reduced but not terminated	0.0	0.0
Responded, benefits terminated	0.0	0.0
Did not respond, benefits terminated	0.0	0.0
Directly verified	0.0	0.3
Number of households in verification sample	**1,494**	**3,255**
Number of districts in verification sample	**8**	**12**

Source: Administrative data from the study districts and School Food Authority Verification Collection Report (FNS-742) data, SY 2018–2019.

Note: Students certified for free or reduced price meals include students in the FNS-742 data reported as free or reduced price eligible as of the last operating day of October through an application or direct certification, and students attending schools using special provisions, including the CEP and Provisions 2 and 3 in a non-base year, that are not subject to verification. This table includes the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. Subgroups may not sum to totals due to rounding.

[a] Includes two households that had a missing initial certification basis in the district administrative data.

n.a. = not applicable.

Table C.4. Summary of changes to household certification status from post-verification to March 1, 2019 (mean percentages across districts)

Change in household certification status from post-verification to March	Percentage of all households in verification sample
All households	
No change from post-verification status	93.9
Change from post-verification status	6.0
Paid to free meals	2.9
Paid to reduced price meals	2.8
Reduced price to free meals	0.3
Unknown (March 1 certification status not recorded)	0.1
Households that reapplied	
Reapplied	6.1
No change from post-verification status	1.3
Change from post-verification status	4.7
Paid to free meals	1.9
Paid to reduced price meals	2.6
Reduced price to free meals	0.1
Unknown (March 1 certification status not recorded)	0.1
Households directly certified after verification	
Directly certified after verification	1.7
No change from post-verification status	0.4
Change from post-verification status	1.3
Paid to free meals	1.0
Paid to reduced price meals	0.1
Reduced price to free meals	0.2
Number of households in verification sample that were still enrolled in the district on March 1, 2019	**4,706**
Number of districts in verification sample	**20**

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes all households with students who were still enrolled in the district on March 1, 2019, among the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. It excludes 43 households in which all students were no longer enrolled on March 1, 2019. Subgroups may not sum to totals due to rounding.

Table C.5. Changes to household certification status from post-verification to March 1, 2019, by initial certification status and verification outcome (mean outcome across districts)

Verification outcome, by initial certification status	Mean number of households whose status changed post-verification	Change in certification status from post-verification to March 1, 2019 (percentage of households)		
		Paid to free	Paid to reduced price	Reduced price to free
All households	**13.8**	**53.1**	**37.5**	**9.3**
Households initially certified for free meals	**10.8**	**60.5**	**33.9**	**5.6**
Responded to verification request	1.1	40.9	20.5	38.6
Responded, benefits reduced but not terminated	0.4	n.a.	n.a.	100.0
Responded, benefits terminated	0.8	67.6	32.4	n.a.
Did not respond, benefits terminated	9.6	59.6	40.4	n.a.
Directly verified	0.1	0.0	0.0	100.0
Households initially certified for reduced price meals	**3.0**	**35.1**	**49.6**	**15.3**
Responded to verification request	0.5	19.4	33.3	47.2
Responded, no change in benefits	0.2	n.a.	n.a.	100.0
Responded, benefits terminated	0.3	50.0	50.0	n.a.
Did not respond, benefits terminated	2.5	43.3	56.7	n.a.
Directly verified	0.1	n.a.	n.a.	100.0
Number of households in verification sample whose status changed from post-verification to March 1, 2019	**277**			
Number of districts	**20**			

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes all households whose status changed from post-verification to March 1, 2019, among the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. Subgroups may not sum to totals, and percentages in rows may not sum to 100 due to rounding.

n.a. = not applicable.

Table C.6. Post-verification withdrawal rates, as of March 1, 2019, by initial certification status and verification outcome (mean outcome across districts)

Verification outcome, by initial certification status	Mean number of households in verification sample	Percentage of households in verification sample that were no longer enrolled
All households	**237.4**	**0.9**
Responded to verification request	118.8	0.6
Responded, no change in benefits	48.1	0.6
Responded, benefits increased	3.5	0.0
Responded, benefits reduced but not terminated	31.6	0.6
Responded, benefits terminated	35.5	0.7
Did not respond, benefits terminated	112.2	1.3
Directly verified	6.5	0.9
Households initially certified for free meals	**166.1**	**1.0**
Responded to verification request	84.0	0.7
Responded, no change in benefits	35.1	0.7
Responded, benefits reduced but not terminated	31.6	0.6
Responded, benefits terminated	17.4	0.6
Did not respond, benefits terminated	77.3	1.4
Directly verified	4.7	1.0
Households initially certified for reduced price meals	**71.4**	**0.9**
Responded to verification request	34.8	0.6
Responded, no change in benefits	13.0	0.3
Responded, benefits increased	3.5	0.0
Responded, benefits terminated	18.2	0.9
Did not respond, benefits terminated	34.9	1.3
Directly verified	1.8	0.0
Number of households in verification sample	**4,749**	
Number of districts	**20**	

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. Subgroups may not sum to totals due to rounding.

Table C.7. Post-verification reapplication and direct certification rates, as of March 1, 2019, by initial certification status and verification outcome, restricted to households where at least one student was still enrolled in the district on March 1, 2019 (mean outcome across districts)

Verification outcome, by initial certification status	Mean number of households in verification sample	Percentage of households in verification sample that:[a]		
		Reapplied	Became directly certified	Were enrolled; did not reapply or become directly certified
All households	**235.3**	**6.1**	**1.7**	**92.2**
Responded to verification request	117.8	1.6	1.4	97.0
Responded, no change in benefits	47.8	0.4	1.2	98.4
Responded, benefits increased	3.5	n.a.	2.0	98.0
Responded, benefits reduced but not terminated	31.4	1.4	1.6	97.1
Responded, benefits terminated	35.2	3.7	0.9	95.4
Did not respond, benefits terminated	111.0	11.1	2.0	86.9
Directly verified	6.4	0.7	0.3	99.0
Households initially certified for free meals	**164.4**	**6.6**	**1.7**	**91.7**
Responded to verification request	83.3	1.5	1.4	97.0
Responded, no change in benefits	34.8	n.a.	0.9	99.1
Responded, benefits reduced but not terminated	31.4	1.4	1.6	97.1
Responded, benefits terminated	17.1	4.2	1.4	94.4
Did not respond, benefits terminated	76.5	13.0	1.8	85.1
Directly verified	4.7	1.2	0.0	98.8
Households initially certified for reduced price meals	**70.9**	**4.8**	**1.7**	**93.5**
Responded to verification request	34.5	2.2	1.3	96.5
Responded, no change in benefits	12.9	1.4	1.6	97.0
Responded, benefits increased	3.5	n.a.	2.0	98.0
Responded, benefits terminated	18.1	3.9	0.5	95.5
Did not respond, benefits terminated	34.6	8.3	1.9	89.8
Directly verified	1.8	0.0	1.4	98.6
Number of households in verification sample	**4,706**			
Number of districts	**20**			

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. It excludes 43 households in which all students were no longer enrolled on March 1, 2019. Subgroups may not sum to totals, and percentages in rows may not sum to 100 due to rounding.

[a] These groups are mutually exclusive; we categorize households to a single status as of March 1, 2019 using the following order: (1) were no longer enrolled, (2) became directly certified, and (3) reapplied.

n.a. = not applicable.

Table C.8. Reapplication rates, by basis of initial certification (mean outcome across districts)

Verification outcome, by initial certification status	Households initially certified based on income[a]	
	Mean number of households that reapplied	Reapplication rate
All households	**14.3**	**6.1**
Households initially certified for free meals	**10.7**	**6.6**
Responded to verification request	1.1	1.5
Responded, benefits reduced but not terminated	0.3	1.4
Responded, benefits terminated	0.8	4.2
Did not respond, benefits terminated	9.4	13.0
Directly verified	0.1	1.2
Households initially certified for reduced price meals	**3.6**	**4.8**
Responded to verification request	0.6	2.2
Responded, no change in benefits	0.1	1.4
Responded, benefits terminated	0.4	3.9
Did not respond, benefits terminated	3.1	8.3
Directly verified	0.0	0.0
Number of households in verification sample that reapplied	**286**	
Number of districts	**20**	

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. It excludes 43 households in which all students were no longer enrolled on March 1, 2019. Subgroups may not sum to totals due to rounding.

[a] No households initially certified based on categorical eligibility in the district administrative data reapplied.

n.a. = not applicable.

Table C.9. Reapplication outcomes, by certification status before and after verification (mean outcome across districts)

Verification outcome, by initial certification status	Mean number of households that reapplied	Reapplication result (percentage of households)			
		Newly eligible and certified for free meals	Newly eligible and certified for reduced price meals	Already certified for reduced price meals, changed to free	Household reapplication denied
All households	**14.8**	**38.1**	**39.5**	**3.7**	**18.7**
Households initially certified for free meals	**11.1**	**45.3**	**38.6**	**1.1**	**15.0**
Responded to verification request	1.2	36.1	23.9	5.6	34.4
Responded, benefits reduced but not terminated	0.4	n.a.	n.a.	25.0	75.0
Responded, benefits terminated	0.8	41.7	32.4	n.a.	25.9
Did not respond, benefits terminated	9.8	43.4	44.0	n.a.	12.6
Directly verified	0.1	n.a.	n.a.	50.0	50.0
Households initially certified for reduced price meals	**3.7**	**22.4**	**41.6**	**6.3**	**29.7**
Responded to verification request	0.6	28.6	7.1	14.3	50.0
Responded, no change in benefits	0.2	n.a.	n.a.	33.3	66.7
Responded, benefits terminated	0.4	33.3	11.1	n.a.	55.6
Did not respond, benefits terminated	3.1	16.9	55.7	n.a.	27.4
Directly verified	0.0	n.a.	n.a.	n.a.	n.a.
Number of households in verification sample that reapplied	**281**				
Number of districts	**19**				

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes all households that reapplied among the full verification samples for the study districts, including those households selected for the household survey and those not selected, excluding five households that reapplied but whose reapplication status is unknown. One of the 20 districts did not report any reapplications. Subgroups may not sum to totals, and percentages in rows may not sum to 100 due to rounding.

n.a. = not applicable.

Table C.10. Direct certifications after verification, by type of direct certification, and certification status before and after verification (mean outcome across districts)

Verification outcome, by initial certification status	Mean number of households that were directly certified after verification	Percentage of households directly certified after verification on the basis of:					Total direct certification rate[a]
		SNAP	TANF	Medicaid	Other	Unknown	
Households initially certified for free meals	**2.7**	**63.3**	**0.0**	**21.3**	**3.8**	**11.5**	**1.7**
Responded to verification request	1.1	59.3	0.0	40.7	0.0	0.0	1.4
Responded, no change in benefits	0.6	83.3	0.0	16.7	0.0	0.0	0.9
Responded, benefits reduced but not terminated	0.4	42.9	0.0	57.1	0.0	0.0	1.6
Responded, benefits terminated	0.1	66.7	0.0	33.3	0.0	0.0	1.4
Did not respond, benefits terminated	1.6	62.3	0.0	19.5	4.5	13.6	1.8
Directly verified	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Households initially certified for reduced price meals	**1.1**	**59.2**	**0.0**	**30.8**	**0.0**	**10.0**	**1.7**
Responded to verification request	0.4	53.3	0.0	46.7	0.0	0.0	1.3
Responded, no change in benefits	0.2	50.0	0.0	50.0	0.0	0.0	1.6
Responded, benefits increased	0.1	100.0	0.0	0.0	0.0	0.0	2.0
Responded, benefits terminated	0.1	50.0	0.0	50.0	0.0	0.0	0.5
Did not respond, benefits terminated	0.6	54.2	0.0	33.3	0.0	12.5	1.9
Directly verified	0.1	0.0	0.0	100.0	0.0	0.0	1.4
Households initially certified based on income	**3.8**	**55.2**	**0.0**	**30.5**	**3.6**	**10.7**	**1.7**
Households initially certified based on categorical eligibility	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**
Number of households in the verification sample that were directly certified after verification	**75**						
Number of districts	**20**						

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the full verification samples for the 20 districts, including those households selected for the household survey and those not selected. Subgroups may not sum to totals and percentages in rows (excluding the total direct certification rate) may not sum to 100 due to rounding.

[a] Total direct certification rate is defined as the percentage of households in the verification sample that were directly certified after verification.

SNAP = Supplemental Nutrition Assistance Program; TANF = Temporary Assistance for Needy Families.

Appendix D

Supplemental Tables Related to Characteristics of the Household Survey Samples

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Table D.1. Characteristics of surveyed no-change households, by certification status (mean outcome across districts)

Characteristics	All no-change households	Households whose verification confirmed initial certification status for:	
		Free meals	Reduced price meals
Characteristics related to initial certification status (based on district administrative records)			
Initial certification status (percentages)			
Free	71.3	100.0	0.0
Reduced price	28.7	0.0	100.0
Characteristics related to eligibility or employment (based on survey reports)[a]			
Household size (mean)			
Number of household members	3.6	3.6	3.8
Number of children in household	1.9	1.9	2.0
Household composition (percentages)			
Single-parent household	50.1	53.2	42.1
Two-parent household	46.2	41.4	57.3
Other household composition	3.6	5.4	0.6
Employment status of household members			
Survey respondent is employed (percentage)	65.6	65.2	61.1
Number of employed adults in household (mean)	1.1	1.1	1.0
Receipt of public assistance (percentages)[b]			
Receiving SNAP	5.8	7.8	0.3
Receiving TANF	0.2	0.4	0.0
Receiving FDPIR	0.1	0.2	0.0
Demographic characteristics (based on survey reports)			
Survey respondent's educational attainment (percentages)			
Less than high school degree	19.3	21.7	11.5
High school or GED	38.4	39.4	39.6
Some college[c]	23.5	22.7	21.7
Bachelor's degree or higher	18.9	16.2	27.2
Race and ethnicity (percentages)			
Hispanic or Latino	53.3	56.6	46.8
Black or African American, non-Hispanic	16.0	15.1	15.9
White, non-Hispanic	18.5	15.1	25.6
Other or multiple races, non-Hispanic	12.3	13.2	11.7
English is the primary language spoken at home (percentage)	54.1	49.8	64.5

Characteristics	All no-change households	Households whose verification confirmed initial certification status for:	
		Free meals	Reduced price meals
At least one child in: (percentages)[d]			
Pre-K to grade 5	62.2	60.9	61.5
Pre-K to kindergarten	15.6	14.0	23.0
Grades 1 to 2	23.6	22.7	22.3
Grades 3 to 5	36.0	35.9	37.1
Grades 6 to 8	37.5	35.7	38.9
Grades 9 to 12	41.8	42.6	45.3
Characteristics related to school meal program experiences and perceptions (based on survey reports)			
Days per week student usually eats school lunch (reported by parents)			
None	5.6	3.8	13.5
Some, but not every day	23.9	17.5	35.9
Every day	70.5	78.7	50.6
Parents' views on administration of school meal programs (percentages)			
Satisfied with the NSLP overall[e]	87.9	90.2	82.5
Satisfied with the SBP overall[e]	93.6	95.2	86.4
Believes the application process to receive F/RP meals is fair	94.3	93.5	95.4
Parents' reports of students' perceptions of quality/taste of school lunch (percentages)[e]			
Satisfied with amount of food	83.9	84.1	83.9
Satisfied with quality/taste	82.9	82.0	85.1
Number of no-change households	**422**	**308**	**114**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households in the study districts. Percentages may not sum to totals due to rounding.

[a] Eligibility-related information—including household size, composition, employment, income, and participation in programs that confer categorical eligibility—was reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported that their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

Table D.2. Characteristics of verification nonresponders (mean outcome across districts)

Characteristics	All households that did not respond to the verification request
Characteristics related to initial certification status (based on district administrative records)	
Initial certification status (percentages)	
Free	64.1
Reduced price	35.9
Characteristics related to eligibility or employment (based on survey reports)[a]	
Household size (means)	
Number of household members	3.5
Number of children in household	1.8
Household composition (percentages)	
Single-parent household	51.6
Two-parent household	46.4
Other household composition	2.0
Employment status of household members	
Survey respondent is employed (percentage)	74.6
Number of employed adults in household (mean)	1.2
Receipt of public assistance (percentages)[b]	
Receiving SNAP	3.0
Receiving TANF	0.0
Receiving FDPIR	0.0
Demographic characteristics (based on survey reports)	
Survey respondent's educational attainment (percentages)	
Less than high school degree	20.2
High school or GED	34.0
Some college[c]	28.5
Bachelor's degree or higher	17.4
Race and ethnicity (percentages)	
Hispanic or Latino	50.7
Black or African American, non-Hispanic	15.5
White, non-Hispanic	25.7
Other or multiple races, non-Hispanic	8.2
English is the primary language spoken at home (percentage)	62.7
At least one child in: (percentages)[d]	
Pre-K to grade 5	53.9
Pre-K to kindergarten	12.2
Grades 1 to 2	18.3
Grades 3 to 5	31.3
Grades 6 to 8	37.7
Grades 9 to 12	48.1

Characteristics	All households that did not respond to the verification request
Characteristics related to school meal program experiences and perceptions (based on survey reports)	
Days per week student usually eats school lunch (reported by parents)	
None	21.8
Some, but not every day	29.7
Every day	48.5
Parents' views on administration of school meal programs (percentages)	
Satisfied with the NSLP overall[e]	75.5
Satisfied with the SBP overall[e]	86.5
Believes the application process to receive F/RP meals is fair	76.6
Parents' reports of students' perceptions of quality/taste of school lunch (percentages)[e]	
Satisfied with amount of food	79.4
Satisfied with quality/taste	76.1
Number of households	**767**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all verification nonresponders. Percentages may not sum to totals due to rounding.

[a] Eligibility-related information—including household size, composition, employment, income, and participation in programs that confer categorical eligibility—was reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported that their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

Appendix E

Supplemental Tables Related to Independent Assessment of Eligibility for Households that had No Change in Certification Status Due to the Certification Process

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Table E.1. Survey-determined eligibility status of no-change households (mean percentages across districts)

Survey-determined eligibility	All no-change households	District-determined certification status[a]	
		Free[b]	Reduced price
Eligible for free meals	**50.0**	**60.0**	**25.9**
Based on categorical eligibility	6.2	8.3	0.3
Based on income	43.8	51.8	25.6
Eligible for reduced price meals	**32.7**	**27.7**	**43.9**
Ineligible for free or reduced price meals	**17.3**	**12.2**	**30.2**
Income 186 to 200 percent of FPL	3.6	2.3	8.2
Income 201 to 225 percent of FPL	4.6	2.2	11.2
Income 226 to 250 percent of FPL	2.7	1.9	2.7
Income greater than 250 percent of FPL	6.3	5.9	8.1
Eligible for the level of benefits they were certified to receive	**57.6**	**60.0**	**43.9**
Eligible for free meals, certified for reduced price meals	**6.0**	**0.0**	**25.9**
Eligible for reduced price meals, certified for free meals	**19.1**	**27.7**	**0.0**
Number of no-change households	**422**	**308**	**114**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. Subgroups may not sum to totals due to rounding.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

[b] Includes households certified for free meals based on income and categorical eligibility. In the survey sample of no-change households, only 6 households were certified for free meals based on categorical eligibility; all were found eligible for free meals based on the household survey.

FPL = Federal poverty level.

Table E.2. Survey-determined eligibility status and detailed Federal poverty level (FPL) breakdowns of no-change households (mean percentages across districts)

		District-determined certification status[a]			
Survey-determined eligibility	All no-change households	Free	Free, based on categorical eligibility	Free, based on income	Reduced price
Eligible for free meals	**50.0**	**60.0**	**100.0**	**59.7**	**25.9**
Based on categorical eligibility	6.2	8.3	88.9	7.4	0.3
Based on income	43.8	51.8	11.1	52.3	25.6
Income at or below 100 percent of FPL	21.8	24.9	11.1	25.1	12.7
Income 101 to 115 percent of FPL	9.2	11.8	0.0	11.9	6.6
Income 116 to 130 percent of FPL	12.8	15.1	0.0	15.3	6.3
Eligible for reduced price meals	**32.7**	**27.7**	**0.0**	**27.9**	**43.9**
Income 131 to 145 percent of FPL	11.8	14.1	0.0	14.2	6.6
Income 146 to 165 percent of FPL	8.9	8.1	0.0	8.1	8.9
Income 166 to 185 percent of FPL	12.1	5.6	0.0	5.6	28.4
Ineligible for school meal benefits	**17.3**	**12.2**	**0.0**	**12.4**	**30.2**
Income 186 to 200 percent of FPL	3.6	2.3	0.0	2.3	8.2
Income 201 to 225 percent FPL	4.6	2.2	0.0	2.2	11.2
Income 226 to 250 percent FPL	2.7	1.9	0.0	2.0	2.7
Income greater than 250 percent of FPL	6.3	5.9	0.0	5.9	8.1
Number of no-change households	**422**	**308**	**6**	**302**	**114**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. Subgroups may not sum to totals due to rounding.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

FPL = Federal poverty level.

Table E.3. Reasons for differences in survey-determined eligibility status and district-determined certification status for no-change households (mean percentages across districts)

Survey-determined eligibility	Total	District-determined certification status[a]		
		Free	Free, based on income	Reduced price
Survey-determined eligibility is the same as certification status	**57.6**	**60.0**	**59.7**	**43.9**
Categorical eligibility status is the same[b]	0.9	1.0	0.0	n.a.
Income eligibility status is the same[c]	54.5	56.1	56.8	42.9
Household size and total income amount is the same[d]	8.3	6.0	6.2	12.4
Categorical eligibility status and income status are different[e]	2.2	2.9	2.9	1.1
Survey-determined eligibility is not the same as certification status	**42.4**	**40.0**	**40.3**	**56.1**
Difference in categorical eligibility determination	0.2	0.0	0.0	0.3
Difference in income eligibility determination; no difference in categorical eligibility determination[d]	41.6	38.8	39.1	55.8
Difference in household size but not total income amount	1.1	0.1	0.1	2.2
Difference in total income amount but not household size	21.2	20.0	20.2	30.9
Differences in both total income amount and household size	17.9	17.0	17.2	22.3
Survey-determined eligibility differs from certification status, but no difference in total income amount or household size	1.4	1.6	1.7	0.5
Number of no-change households in survey	**422**	**308**	**302**	**114**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. Subgroups may not sum to totals due to rounding. Two households had a certification status that differed from what was implied by their household income and household size in the district administrative data but had a survey-determined eligibility status that aligned with the certification status implied by the district-recorded household income and size. These cases may reflect either certification errors or else data entry errors in the certification status or income eligibility information in the district data.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

[b] Refers to households initially certified for school meals based on categorical eligibility that were found categorically eligible for school meals based on the information in the household survey.

[c] Excludes households where categorical eligibility status is the same.

[d] Income amounts were counted as different if the difference in monthly income exceeded $100.

[e] Reflects households certified based on income that were found eligible based on categorical eligibility (but not income), based on the household survey, and households certified based on income with an income amount and household size recorded in the district data that implied a different certification status. The latter cases may reflect certification errors or data entry errors in the district data, in either the certification status or the income eligibility information.

n.a. = not applicable.

Table E.4. Reasons for differences between survey-determined eligibilty status and district-determined certification status for no-change households (mean percentages across districts)

Survey-determined eligibility is not the same as certification status	Total	District-determined certification status[a]	
		Free	Reduced price
Difference in categorical eligibility determination	0.3	0.0	0.4
Difference in income eligibility determination; no difference in categorical eligibility determination	98.4	97.9	99.6
Number of no-change households with a survey status that is different than the district-determined certification status	**171**	**113**	**58**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. The table includes households with differences between their survey-determined eligibility status and district-determined certification status. Two households had a certification status that differed from what was implied by their household income and household size in the district administrative data but had a survey-determined eligibility status that aligned with the certification status implied by the district-recorded household income and size. These cases may reflect either certification errors or else data entry errors in the certification status or income eligibility information in the district data.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

Table E.5. Reasons for differences in income eligibility determinations for no-change households with a survey-determined eligibility status that differs from the district-determined certification status (mean percentages across districts)

Reasons for differences in income eligibility determinations[b]	Total	District-determined certification status[a]	
		Free	Reduced price
Difference in household size but not total income amount	2.4	0.4	4.6
Difference in total income amount but not household size	51.4	50.1	49.6
Differences in both total income amount and household size	42.9	44.5	40.7
No difference in total income amount or household size	3.4	5.0	5.0
Number of no-change households with a difference in income eligibility determination only	**168**	**111**	**57**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. The table includes households with a difference between their survey-determined eligibility status and district-determined certification status that have a difference in their income eligibility determination but no difference in their categorical eligibility determination. Subgroups may not sum to totals due to rounding.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

[b] Income amounts are counted as different if the difference in monthly income exceeds $100.

Table E.6. How survey-determined eligibility status differs from district-determined certification status for no-change households (mean percentages across districts)

Whether household survey eligibility status indicates a higher or lower level of benefits than certification status determined by district	All households with a survey eligibility status that is different than the district-determined certification status
Higher level of benefits based on household survey than based on verification[a]	15.6
Lower level of benefits based on household survey than based on verification	84.4
Reduced price, relative to free	43.1
Paid, relative to free	21.6
Paid, relative to reduced price	19.7
Number of no-change households in the survey	**171**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. The table includes households with differences between their survey-determined eligibility status and district-determined certification status. Subgroups may not sum to totals due to rounding.

[a] All households in this group were found eligible for free meals based on the household survey, but the district certified them for reduced price meals.

Table E.7. Reasons for differences in survey-determined eligibility status and district-determined certification status for no-change households, by whether household survey eligibility status indicates a higher or lower level of benefits (mean percentages across districts)

Reason why survey-determined eligibility status differs from district-determined certification status[a]	Higher level of benefits based on household survey than verification[b]	Lower level of benefits based on household survey than certification			
		Total	Reduced price, relative to free	Paid, relative to free	Paid, relative to reduced price
Difference in categorical eligibility determination	**1.7**	**0.0**	**0.0**	**0.0**	**n.a.**
Difference in income eligibility determination; no difference in categorical eligibility determination[c]	**98.3**	**98.6**	**96.5**	**100.0**	**100.0**
Difference in household size but not total income amount	0.0	2.4	0.4	0.0	7.0
Difference in total income amount but not household size	65.0	47.9	59.7	32.8	45.3
Differences in both total income amount and household size	33.3	44.2	30.5	67.2	41.4
No difference in total income amount or household size	0.0	4.1	5.8	0.0	6.3
Number of no-change households	**24**	**147**	**78**	**35**	**34**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. Subgroups may not sum to totals due to rounding. Two households had a certification status that differed from what was implied by their household income and household size in the district administrative data but had a survey-determined eligibility status that aligned with the certification status implied by the district-recorded household income and size. These cases may reflect either certification errors or else data entry errors in the certification status or income eligibility information in the district data.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

[b] All households in this group were found eligible for free meals based on the household survey, but the district certified them for reduced price meals.

[c] Income amounts were counted as different if the difference in monthly income exceeded $100.

n.a. = not applicable.

Table E.8. Reasons for differences in survey-determined eligibilty status and district-determined certification status for no-change households, by whether household survey eligibility status indicates a higher or lower level of benefits (mean percentages across districts)

Reason why Survey-determined eligibility is not the same as the district-determined certification status[a]	Eligibility status based on the household survey is:		
	Different from certification status	Higher level of benefits than certification status	Lower level of benefits than certification status
Difference in income eligibility determination; no difference in categorical eligibility determination[b]	**98.4**	**98.3**	**98.6**
Survey income is higher, household size is same	39.2	0.0	47.3
Survey income is lower, household size is same	11.4	65.0	0.6[c]
Survey income is higher, household size is larger	16.1	0.0	18.3
Survey income is higher, household size is smaller	15.4	0.0	17.9
Survey income is lower, household size is larger	1.2	10.0	0.0
Survey income is lower, household size is smaller	9.6	23.3	7.9
Other (household income and/or household size is the same)	3.4	0.0	4.1
Difference in categorical eligibility or no difference in income or categorical eligibility determination	**1.6**	**1.7**	**1.4**
Number of no-change households with a household survey status that is different than the district-determined certification status	**171**	**24**	**147**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. Subgroups may not sum to totals due to rounding.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

[b] Income amounts were counted as different if the difference in monthly income exceeded $100.

[c] Reflects one household that, in the district administrative data, had a certification status that differed from the certification status that was implied by the household's income and household size. The survey-determined eligibility status was lower than the certification status recorded in the district data but higher than the certification status that was implied by the district-recorded household income and household size. This case may reflect data entry errors in the district data, in either the certification status or income eligibility information.

Table E.9. Characteristics of surveyed no-change households, by whether the survey-determined eligibility status and district-determined certification status differed (mean outcome across districts)

Characteristics	All no-change households	Eligibility status based on the household survey is:	
		Same as certification status	Different from certification status
Characteristics related to initial certification status (based on district administrative records)			
Initial certification status (percentages)			
Free	71.3	74.7	64.7
Reduced price	28.7	25.3	35.3
Characteristics related to eligibility or employment (based on survey reports)[a]			
Household size (means)			
Number of household members	3.6	3.7	3.6
Number of children in household	1.9	1.9	1.9
Household composition (percentages)			
Single-parent household	50.1	47.7	52.3
Two-parent household	46.2	48.8	43.8
Other household composition	3.6	3.5	3.9
Employment status of household members			
Survey respondent is employed (percentage)	65.6	59.5	74.8
Number of employed adults in household (mean)	1.1	1.0	1.2
Receipt of public assistance (percentages)[b]			
Receiving SNAP	5.8	9.4	0.3
Receiving TANF	0.2	0.3	0.0
Receiving FDPIR	0.1	0.2	0.0
Demographic characteristics (based on survey reports)			
Survey respondent's educational attainment (percentages)			
Less than high school degree	19.3	18.1	21.0
High school or GED	38.4	42.0	33.7
Some college[c]	23.5	22.9	23.0
Bachelor's degree or higher	18.9	17.0	22.3
Race and ethnicity (percentages)			
Hispanic or Latino	53.3	58.4	46.0
Black or African American, non-Hispanic	16.0	15.0	17.9
White, non-Hispanic	18.5	15.2	20.2
Other or multiple races, non-Hispanic	12.3	11.4	15.9
English is the primary language spoken at home (percentage)	54.1	53.1	53.3
At least one child in: (percentages)[d]			
Pre-K to kindergarten	15.6	15.5	18.7
Grades 1 to 2	23.6	25.4	22.9

Characteristics	All no-change households	Eligibility status based on the household survey is:	
		Same as certification status	Different from certification status
Grades 3 to 5	36.0	36.1	35.6
Grades 6 to 8	37.5	36.9	35.9
Grades 9 to 12	41.8	38.7	43.6
Characteristics related to school meal program experiences and perceptions (based on survey reports)			
Days per week student usually eats school lunch (reported by parents)			
None	5.6	6.3	4.9
Some, but not every day	23.9	23.4	26.8
Every day	70.5	70.3	68.3
Parents' views on administration of school meal programs (percentages)			
Satisfied with the NSLP overall[e]	87.9	85.1	88.8
Satisfied with the SBP overall[e]	93.6	94.1	93.4
Believes the application process to receive F/RP meals is fair	94.3	94.7	93.8
Parents' reports of students' perceptions of quality/taste of school lunch (percentages)[e]			
Satisfied with amount of food	83.9	83.6	85.1
Satisfied with quality/taste	82.9	83.7	81.0
Number of no-change households	**422**	**251**	**171**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households. Percentages may not sum to totals due to rounding.

[a] Eligibility-related information—including household size, composition, employment, income, and participation in programs that confer categorical eligibility—was reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported that their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

Table E.10. District verification procedures for no-change households, by whether the survey-determined eligibility status and district-determined certification status differed (mean percentages across households)

Characteristics	All no-change households	Eligibility status based on the household survey is:	
		Same as certification status[a]	Different from certification status
District contacts household by:[b]			
Letter	100.0	100.0	100.0
Phone[c]	65.5	63.3	68.7
Email[c]	62.9	61.8	64.6
Text message	9.2	8.4	10.3
District attempts to use household's preferred language to communicate	90.1	90.5	89.4
District attempts to verify applications when verification response is received after the deadline[c]	100.0	100.0	100.0
District conducts verification for cause	51.7	51.9	51.3
District selected an application for verification for cause in SY 2018–2019	16.9	17.2	16.5
Number of no-change households	**422**	**251**	**171**

Source: Household survey data, study district administrative data, and interviews with the study districts, SY 2018–2019.

Note: Values were weighted to represent all no-change households.

[a] For no-change households, a household's initial certification status and certification status after verification are the same.

[b] These categories are not mutually exclusive.

[c] This row excludes households in one district that did not provide sufficient information about this construct.

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Appendix F

Supplemental Tables Related to Examination of Households that Did Not Respond to the Verification Request

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Table F.1. Eligibility status of verification nonresponders based on the survey (mean percentages across districts)

Survey-determined eligibility	All verification nonresponders	Initial district-determined certification status	
		Free	Reduced price
Eligible for free meals	**34.2**	**42.0**	**19.7**
Based on categorical eligibility	3.0	3.9	0.5
Based on income	31.2	38.0	19.2
Eligible for reduced price meals	**28.8**	**28.0**	**31.4**
Ineligible for free or reduced price meals	**37.0**	**30.1**	**48.9**
Income 186 to 200 percent of FPL	6.4	4.6	9.5
Income 201 to 225 percent of FPL	8.8	7.8	10.2
Income 226 to 250 percent of FPL	7.7	8.4	8.0
Income greater than 250 percent of FPL	14.1	9.2	21.3
Eligible for at least the level of benefits they were initially certified to receive	**45.3**	**42.0**	**51.1**
Number of verification nonresponders	**767**	**530**	**237**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all verification nonresponders. Subgroups may not sum to totals due to rounding.

FPL = Federal poverty level.

Table F.2. Experience with verification process for all households, verification nonresponders, and no-change households (mean percentages across districts)

Verification process experience	All households	Verification nonresponders	No-change households
All households			
Household recalled being contacted about verification	90.3	88.2	95.5
Household moved since first day of school	8.3	7.9	7.4
Phone usage[a]			
Currently owns an active cell phone	98.4	98.7	97.6
Has a landline	16.5	16.1	17.6
Households that recalled being contacted for verification			
Contact method[a]			
Letter	93.2	92.0	95.9
Phone	42.8	45.5	41.3
Email	42.6	41.0	46.3
Text message	10.0	9.7	8.8
Multiple methods	56.0	54.6	59.3
Unable to recall method	1.4	1.4	1.1
Household found the instructions in the letter and form accompanying the request to be clear or somewhat clear	91.1	89.3	94.8
Household reported that responding to the request on time was, or would have been, easy or somewhat easy	77.5	72.7	86.2
Household reported that providing the requested eligibility information was, or would have been, easy or somewhat easy	74.2	67.9	84.7
Number in sample	**1,189**	**767**	**422**
Number of households in sample that recalled being contacted for verification	**1,047**	**653**	**394**

Source: Household survey data, SY 2018–2019.

Note: Values were weighted to represent all verification nonresponders and no-change households.

[a] These rows are not mutually exclusive.

Table F.3. Percentage of households certified accurately among households with selected verification outcomes (mean percentages across districts)

Initial certification status	Number of households across districts	Percentage of households initially certified based on income that, based on information from the household survey, are eligible for:				
		Free meals	Reduced price meals	Paid meals	Exactly the level of benefits they were initially certified to receive	At least the level of benefits they were initially certified to receive
Verification nonresponders that were initially certified for:						
Free meals	529	42.2	28.0	29.7	42.2	42.2
Reduced price meals	237	19.7	31.4	48.9	31.4	51.1
Free or reduced price meals	766	34.2	28.9	36.9	38.7	45.4
No-change households that were initially certified for:						
Free meals	302	59.7	27.9	12.4	59.7	59.7
Reduced price meals	114	25.9	43.9	30.2	43.9	69.8
Free or reduced price meals	416	49.6	32.9	17.4	57.3	63.4

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all verification nonresponders and no-change households. This table excluded seven households in the sample that were initially certified for free meals based on categorical eligibility, as identified by the district data. Subgroups may not sum to totals due to rounding.

Table F.4. Experience with verification process for no-change households (mean percentages across districts)

Verification process experience	No-change households
Reported reasons for completing the request include:[a]	
Household did not want to lose eligibility	83.0
District requested/required a response	13.1
Student enjoys the school meals	5.2
Parent wanted to confirm the student's eligibility status	3.1
Request was easy	1.0
Doesn't remember completing the request	1.1
Other	2.6
Time required to complete the verification request	
Less than 30 minutes	59.9
30 minutes to one hour	24.6
More than one hour but less than four hours	10.8
Four hours or more	4.7
Number of no-change households in survey	**422**

Source: Household survey data, SY 2018–2019.

Note: Values were weighted to represent all no-change households.

[a] These categories are not mutually exclusive and were based on open-ended responses to the survey.

Table F.5. Experience with verification process among verification nonresponders, by whether they were reapproved for school meal benefits (mean percentages across districts)

Verification process experience	All verification nonresponders	Verification nonresponders who were:	
		Reapproved for benefits	Not reapproved for benefits
All households			
Household recalled being contacted about verification	88.2	86.6	88.2
Households that recalled being contacted for verification			
Contact method			
Letter	92.0	92.4	91.7
Phone	45.7	37.6	45.4
Email	40.9	50.4	39.3
Text message	9.7	11.8	8.5
Multiple methods	54.7	56.2	53.7
Unable to recall method	1.4	1.5	1.6
Household attempted to respond to verification request	68.2	88.3	64.5
Household found the instructions in the letter and form accompanying the request to be clear or somewhat clear	89.2	91.5	89.3
Household reported that responding to the request on time would have been easy or somewhat easy	72.7	75.7	71.6
Household reported that providing the requested eligibility information would have been easy or somewhat easy	67.7	82.4	65.3
Reported reasons for not completing the request included:[a]			
Thought they completed it	27.6	46.2	25.6
Did not have necessary proof	19.8	19.9	19.1
Knew/thought child would lose eligibility	16.8	1.0	18.6
Too busy to respond	12.2	9.5	13.2
Missed deadline	11.2	13.4	10.1
Too complicated or overwhelming	6.6	3.1	7.3
Problem communicating with school	6.4	8.3	5.8
Not aware of or could not find request	4.1	2.7	4.1
Family not satisfied with school meals	3.7	0.5	4.1
Had privacy concerns or did not want to contact employer/boss	2.5	0.0	2.9
Language or literacy barrier	1.2	0.0	1.3
Not aware of penalty for not responding	0.4	0.9	0.3
Other	3.6	4.8	3.4
Number of households in sample that were still enrolled in the district on March 1, 2019	**763**	**98**	**664**
Number of households in sample that were still enrolled in the district on March 1, 2019, and that recalled being contacted for verification	**649**	**85**	**564**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all verification nonresponders. Households reapproved were defined as those that were newly certified for free or reduced price meals between the verification date and March 1, 2019, due to reapplication or direct certification. The table excluded four households that the district data

identified as no longer enrolled as of March 1, 2019. One household was excluded from the last two columns because the household's reapplication status was not recorded in the district administrative data.

[a] These categories are not mutually exclusive and were based on open-ended responses to the survey.

Table F.6. Characteristics of surveyed verification nonresponders, by whether they were reapproved for benefits (mean outcome across districts)

Characteristics	All verification nonresponders	Verification nonresponders who were:	
		Reapproved for benefits	Not reapproved for benefits
Households that were reapproved for benefits before March 1, 2018 (percentages)	13.2	100.0	0.0
Characteristics related to initial certification status (based on district administrative records)			
Initial certification status (percentages)			
Free	63.8	74.2	62.0
Reduced price	36.2	25.8	38.0
Characteristics related to eligibility or employment (based on survey reports)[a]			
Household size (means)			
Number of household members	3.5	3.9	3.4
Number of children in household	1.8	2.2	1.7
Household composition (percentages)			
Single-parent household	51.8	55.4	51.1
Two-parent household	46.2	44.6	46.7
Other household composition	2.0	0.0	2.2
Employment status of household members			
Survey respondent is employed (percentage)	74.8	73.7	74.9
Number of employed adults in household (mean)	1.2	1.1	1.2
Receipt of public assistance (percentages)[b]			
Receiving SNAP	3.1	7.7	2.5
Receiving TANF	0.0	0.0	0.0
Receiving FDPIR	0.0	0.0	0.0
Demographic characteristics (based on survey reports)			
Survey respondent's educational attainment (percentages)			
Less than high school degree	20.0	17.0	19.7
High school or GED	34.1	42.3	33.1
Some college[c]	28.5	15.3	29.9
Bachelor's degree or higher	17.4	25.4	17.3
Race and ethnicity (percentages)			
Hispanic or Latino	50.5	48.4	50.9
Black or African American, non-Hispanic	15.5	17.1	14.7
White, non-Hispanic	25.7	20.3	26.5
Other or multiple races, non-Hispanic	8.2	14.3	7.8
English is the primary language spoken at home (percentage)	62.7	67.0	63.0

Characteristics	All verification nonresponders	Verification nonresponders who were:	
		Reapproved for benefits	Not reapproved for benefits
At least one child in: (percentages)[d]			
Pre-K to grade 5	54.1	63.4	52.8
Pre-K to kindergarten	12.1	13.5	12.6
Grades 1 to 2	18.4	27.6	16.5
Grades 3 to 5	31.3	31.5	31.3
Grades 6 to 8	37.7	41.2	36.9
Grades 9 to 12	48.0	48.7	48.0
Characteristics related to school meal program experiences and perceptions (based on survey reports)			
Days per week student usually eats school lunch (reported by parents)			
None	21.7	7.5	23.5
Some, but not every day	29.6	21.0	31.0
Every day	48.6	71.6	45.5
Parents' views on administration of school meal programs (percentages)			
Satisfied with the NSLP overall[e]	75.4	84.9	73.6
Satisfied with the SBP overall[e]	86.3	89.9	85.7
Believes the application process to receive F/RP meals is fair	76.5	80.6	75.2
Parents' reports of students' perceptions of quality/taste of school lunch (percentages)[e]			
Satisfied with amount of food	79.3	82.5	78.6
Satisfied with quality/taste	76.0	75.0	75.8
Number of households in sample that were still enrolled in the district on March 1, 2019	**763**	**98**	**664**

Source: Household survey data and study district administrative data, SY 2018–2019.

Note: Values were weighted to represent all verification nonresponders. Households reapproved were defined as those that were newly certified for free or reduced price meals between the verification date and March 1, 2019, due to reapplication or direct certification. The table excluded four households that the district data identified as no longer enrolled as of March 1, 2019. One household was excluded from the last two columns because the household's reapplication status was not recorded in the district administrative data. Subgroups may not sum to 100 percent due to rounding.

[a] Eligibility-related information—including household size, composition, employment, income, and participation in programs that confer categorical eligibility—was reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

Appendix G

Supplemental Tables Related to Verification for Cause

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Table G.1. Number of districts that reported using specified criteria to select applications for verification for cause, by criterion

District reported selecting applications for verification for cause based on:	Total	Among districts that reported selecting at least one application for cause in SY 2018–2019	Among districts that reported sometimes selecting applications for cause (none in SY 2018–2019)
Multiple applications/change in income[a]	6	2	4
School district employees who have known salaries too high to be likely eligible for free or reduced price school meals[b]	3	1	2
Conflicting information provided by community members	4	2	2
Zero income reported on application for school meal benefits	3	1	2
Large income difference from previous year	2	1	1
Nonresponse to verification in the previous SY	1	1	0
Number of districts that reported ever conducting verification for cause	**12**	**4**	**8**

Source: Interviews with study districts, SY 2018–2019.

Notes: Specified criteria listed in this table include both formal and informal criteria. A single district can report multiple criteria.

[a] The total in this row does not include two districts that reported they have never selected applications for cause, but would select them based on this criterion.

[b] The total in this row does not include one district that reported it had never selected applications for cause, but would select them based on this criterion.

Table G.2. Percentage of districts attempting to contact households in the verification process, by reported contact type

	Contact type				
	At least one contact type	Letters	Emails[a]	Phone calls[b]	Text message
Households contacted for required verification					
Percentage of districts with at least one contact attempt for method	100.0	100.0	57.9	63.2	10.0
Number of districts in sample	**20**	**20**	**19**	**19**	**20**
Households contacted for verification for cause					
Percentage of districts with at least one contact attempt for method	100.0	100.0	44.4	44.4	10.0
Number of districts ever conducting verification for cause in sample[c]	**10**	**10**	**9**	**9**	**10**

Source: Interviews with study districts, SY 2018–2019.

[a] One district that reported selecting households for required verification and for cause did not provide sufficient information on the number of emails it sent.

[b] One district that reported selecting households for required verification and for cause did not provide sufficient information on the number of phone calls it made.

[c] The total sample for this row includes the 12 districts that reported they do verify households for cause. Two districts that very rarely verify households for cause did not provide the number of contact attempts.

Table G.3. Number of times districts attempt to contact households in the verification process, by reported contact type

	Number of letters	Number of emails[a]	Number of phone calls[b]	Number of text messages
Households contacted for required verification				
Mean	2.2	0.9	1.9	0.2
Range	1–3	0–3	0–15	0–2
Median	2.0	1.0	1.0	0.0
Number of districts in sample	**20**	**19**	**19**	**20**
Households contacted for verification for cause				
Mean	2.1	0.8	0.8	0.1
Range	1–3	0–3	0–3	0–1
Median	2.0	0	1.0	0.0
Number of districts ever conducting verification for cause in sample[c]	**10**	**9**	**9**	**10**

Source: Interviews with study districts, SY 2018–2019.

[a] One district that reported selecting applications for required verification and for cause did not provide sufficient information on the number of emails it sent.

[b] One district that reported selecting applications for required verification and for cause did not provide sufficient information on the number of phone calls it made.

[c] The numbers presented in this section of the table include the 12 districts that reported they do verify applications for cause. Two districts that very rarely verify applications for cause did not provide the number of contact attempts.

Table G.4. Characteristics of survey sample, by whether application was selected for verification for cause (mean outcome across districts)

Note: Due to small sample sizes, we recommend caution when interpreting the results in this table.

Characteristics	All applications selected for verification for cause	All applications selected for required verification
Characteristics related to initial certification status (based on district administrative records)		
Initial certification status (percentages)		
Free	58.8	71.4
Reduced price	41.2	28.6
Characteristics related to eligibility or employment (based on survey reports)[a]		
Household size (mean)		
Number of household members	3.7	3.4
Number of children in household	1.8	1.7
Household composition (percentages)		
Single-parent household	47.6	54.6
Two-parent household	52.4	42.8
Other household composition	0.0	2.6
Employment status of household members		
Survey respondent is employed (percentage)	72.4	65.1
Number of employed adults in household (mean)	1.2	1.1
Receipt of public assistance (percentages)[b]		
Receiving SNAP	3.8	9.1
Receiving TANF	0.0	0.0
Receiving FDPIR	0.0	0.0
Demographic characteristics (based on survey reports)		
Survey respondent's educational attainment (percentages)		
Less than high school degree	23.4	23.7
High school or GED	43.8	26.6
Some college[c]	24.7	25.0
Bachelor's degree or higher	8.1	24.7
Race and ethnicity (percentages)		
Hispanic or Latino	21.8	48.7
Black or African American, non-Hispanic	42.1	13.8
White, non-Hispanic	13.7	20.2
Other or multiple races, non-Hispanic	22.4	17.2
English is the primary language spoken at home (percentage)	55.1	60.9
At least one child in: (percentages)[d]		
Pre-K to kindergarten	4.4	9.7

Characteristics	All applications selected for verification for cause	All applications selected for required verification
Grades 1 to 2	6.1	24.6
Grades 3 to 5	38.1	30.5
Grades 6 to 8	32.0	49.2
Grades 9 to 12	90.1	40.0
Characteristics related to school meal program experiences and perceptions (based on survey reports)		
Days per week student usually eats school lunch (reported by parents)		
None	4.0	31.8
Some, but not every day	5.8	25.6
Every day	90.1	42.6
Parents' views on administration of school meal programs (percentages)		
Satisfied with the NSLP overall[e]	78.1	74.4
Satisfied with the SBP overall[e]	66.7	91.1
Believes the application process to receive F/RP meals is fair	74.8	88.3
Parents' report of students' perceptions of quality/taste of school lunch (percentages)[e]		
Satisfied with amount of food	46.6	91.9
Satisfied with quality/taste	95.4	85.8
Number of households in sample	**31**	**121**
Number of districts in sample	**3**	**3**

Source: Household survey data and administrative data from the study districts, SY 2018–2019.

Note: This table includes households in 3 districts where any applications were selected for cause. Values were weighted to represent all verification nonresponders and no-change households. Subgroups may not sum to 100 percent due to rounding.

[a] Eligibility-related information—including household size, composition, employment, income, and participation in programs that confer categorical eligibility—is reported as of October 2018.

[b] Includes households that reported receiving public assistance at any point during the SY.

[c] Includes respondents who started college but did not attain a degree, those with a technical or vocational degree or diploma, and those with an associate's degree.

[d] These categories are not mutually exclusive.

[e] Among households that reported that their child usually eats school lunch/breakfast every day or some days, but not every day.

FDPIR = Food Distribution Program on Indian Reservations; F/RP = free and reduced price; GED = General Education Development; NSLP = National School Lunch Program; SBP = School Breakfast Program; SNAP = Supplemental Nutrition Assistance Program; and TANF = Temporary Assistance for Needy Families.

Table G.5. Summary of household verification outcomes, by whether application was selected for verification for cause (mean percentage across districts)

Note: Due to small sample sizes, we recommend caution when interpreting the results in this table.

Verification outcome	Percentage of all applications selected for verification for cause	Percentage of all applications selected for required verification
All households	**100.0**	**100.0**
Responded, no change in benefits	20.7	19.0
Responded, benefits increased	5.9	1.3
Responded, benefits reduced but not terminated	11.1	16.4
Responded, benefits terminated	15.2	20.5
Did not respond, benefits terminated	47.0	42.4
Directly verified	0.0	0.4
Households initially certified based on income	**99.6**	**99.8**
Responded, no change in benefits	20.4	18.8
Responded, benefits increased	5.9	1.3
Responded, benefits reduced but not terminated	11.1	16.4
Responded, benefits terminated	15.2	20.5
Did not respond, benefits terminated	47.0	42.4
Directly verified	0.0	0.4
Households initially certified based on categorical eligibility	**0.4**	**0.2**
Responded, no change in benefits	0.4	0.2
Responded, benefits increased	n.a.	n.a.
Responded, benefits reduced but not terminated	0.0	0.0
Responded, benefits terminated	0.0	0.0
Did not respond, benefits terminated	0.0	0.0
Directly verified	0.0	0.0
Number of households in sample	**102**	**376**
Number of districts in sample	**3**	**3**

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the full verification samples for the three study districts that verified applications for cause in the SY 2018–2019 administrative data provided to the study. Subgroups may not sum to totals due to rounding.

n.a. = not applicable.

Table G.6. Summary of changes to household certification status from post-verification to March 1, 2019, by whether application was selected for verification for cause (mean percentage across districts)

Note: Due to small sample sizes, we recommend caution when interpreting the results in this table.

Change in household certification status from post-verification to March 1, 2019	Percentage of all applications selected for verification for cause	Percentage of all applications selected for required verification
All households		
No change from post-verification status	75.9	94.3
Change from post-verification status	7.4	5.3
Paid to free meals	1.1	2.7
Paid to reduced price meals	5.9	2.7
Reduced price to free meals	0.4	0.0
Unknown (reapplication status not recorded)	16.7	0.4
Households that reapplied		
Reapplied	30.0	5.5
No change from post-verification status	5.9	1.9
Change from post-verification status	7.4	3.2
Paid to free meals	1.1	1.3
Paid to reduced price meals	5.9	1.9
Reduced price to free meals	0.4	0.0
Unknown (reapplication status not recorded)	16.7	0.4
Households directly certified after verification		
Directly certified after verification	0.0	2.3
No change from post-verification status	0.0	0.2
Change from post-verification status	0.0	2.1
Paid to free meals	0.0	1.3
Paid to reduced price meals	0.0	0.8
Reduced price to free meals	0.0	0.0
Number of households in sample that were still enrolled in the district on March 1, 2019	**101**	**375**
Number of districts in sample	**3**	**3**

Source: Administrative data from the study districts, SY 2018–2019.

Note: This table includes the full verification samples for the three study districts that verified applications for cause in the SY 2018–2019 administrative data provided to the study, including those households selected for the household survey and those that were not selected. It excludes 2 households in which all students were identified in the district data identified as no longer enrolled as of March 1, 2019. In addition, one household from one district is excluded from the table because its application's selected-for-cause status is missing. Subgroups may not sum to totals due to rounding.

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