

APPENDIX B

IN-DEPTH, SEMI-STRUCTURED INTERVIEW PROTOCOLS

1. State Child Nutrition Staff

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH STATE CHILD NUTRITION STAFF
NSLP DIRECT CERTIFICATION IMPROVEMENT STUDY

My name is [X], from Mathematica Policy Research.

As you may know, Mathematica is collecting information from state and local child nutrition, education, and SNAP staff regarding direct certification for the National School Lunch Program (NSLP). The study is being conducted for the U.S. Department of Agriculture, Food and Nutrition Service (FNS). The purpose of the study is to provide FNS with a comprehensive picture of the direct certification practices employed by States and districts and to explore the relationship between these practices and overall direct certification performance measures. Under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966, FNS has authority to conduct this study under its responsibility for the development and implementation of national policy for the National School Lunch Program. Participation is voluntary and the information you provide will be kept private to the extent allowed by law.

We really appreciate the time you and your staff took to complete the survey we sent you about direct certification processes in your state, and your participation in today's in-depth interview.

Our final report will describe the range of responses expressed by staff, and may list the names of agencies and school districts who contributed information, but we will not quote you or anyone by name or title.

I expect our conversation will take approximately 60 minutes.

OPTIONAL IF INTERVIEWER CHOOSES TO RECORD: I want to be sure I am keeping track of everything you are saying. May I record our discussion so that I can listen to it later when I write up my notes? No one outside of our research team will have access to the recording.

- IF YES: Thank you. It will be helpful if you speak up, speak clearly, and speak one at a time.
- IF NO: That's no problem. I'll take notes as you talk, but I may sometimes need to ask you to slow down or repeat so that I can get all the information.

First, do you have any questions for me about the project in general or what we will be discussing today?

Public Burden Statement: Public reporting burden for this collection of information is estimated to average 80 minutes per response, including the time for reviewing instructions, and preparing for and participating in the interview. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this project is 0584-0529. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research and Analysis, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-0529).

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH STATE CHILD NUTRITION STAFF

I. INTRODUCTION/OVERVIEW

Direct certification is used in the National School Lunch Program (NSLP) to certify students who receive benefits from the Supplemental Nutrition Assistance Program (SNAP) and sometimes other public assistance programs without requiring their households to complete an NSLP application. We want to talk with you about the methods used for direct certification in your State, the role your agency plays in direct certification, and explore the possibility of future changes in those methods.

1. Please briefly describe the role of your agency in the direct certification process.

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II. CURRENT DIRECT CERTIFICATION PROCESS

[INSTRUCTIONS TO INTERVIEWER: Review information from survey prior to interview and probe any inconsistencies.]

A. DIRECT CERTIFICATION PROCESS

1. How is direct certification currently done in your State/district? Please describe the process.

PROBE: Is direct certification conducted primarily at the state level or at the district level?

[If at the district level, ask:] What guidelines does the state provide districts concerning data matching for NSLP direct certification?

PROBE: Does the state require or recommend the use of specific identifiers and/or matching rules for SFAs to use? What are they?

PROBE: Do you directly certify participants in any public assistance programs other than SNAP? Which ones? (TANF, Medicaid, etc.). Why/Why not?

2. What agencies are involved in the direct certification process? (Child Nutrition, Education, SNAP, TANF, Medicaid, etc.)

Which agency bears primary responsibility for direct certification?

What are the roles of other State agencies and local entities in direct certification? What other agencies does your agency interact with in conducting its role in direct certification?

What types of staff at your agency are involved in the process? What tasks does each type perform?

What agreements do you have with other agencies involved in NSLP direct certification? How do these agreements address data formatting, recipient notification, security and confidentiality, problem resolution, and data retention?

3. Is there much variation at the local level in the way functional responsibilities for direct certification are carried out? If yes, please describe.

Does the direct certification process differ by district characteristics such as size? If so, how? Why?

Does the direct certification process differ for private schools? If so, how? Why?

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4. Does the direct certification process use computer matching? *[If so, ask:]*

Is computer matching done at the state or local level?

[If at local/regional level, ask:]

How widely is computer matching for NSLP direct certification used among the districts in your state?

Does the use of computer matching vary by district characteristics such as size or public/private? If so, how?

5. Were any technology or other infrastructure changes necessary for you to participate in the direct certification process? Please describe.
6. How is information related to direct certification provided and to whom (State agency, school districts, or parents)?

PROBE: How are the data used for direct certification transmitted to the entity that conducts the direct certification / matching?

PROBE: *[District-level matching sites:]* How is the information used for direct certification provided to school districts?

PROBE: *[State-level matching sites:]* How are the lists of directly certified students provided to school districts?

PROBE: Is there a system in place that allows schools or SFAs to look up individual students?

PROBE: Who is responsible for notifying households of direct certification?

PROBE: Are households required to “opt in,” or are they given the option to “opt out” of direct certification?

7. *[For district-level matching sites:]* Who is responsible for compiling data from SNAP [TANF, Medicaid, etc.] and preparing it for district use?

Are districts sent files containing all SNAP [TANF, Medicaid, etc.] cases in the state, or only cases in their area? If the latter, what data elements are used to determine which cases to send to each district?

[If state uses TANF or Medicaid data in direct certification, ask:] Do districts receive separate data files for each program (SNAP, TANF, Medicaid, etc.) or a single file containing all relevant programs? If the latter, does the state child nutrition agency compile the data from different programs, or does the data from the SNAP agency also contain the other programs’ data?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH STATE CHILD NUTRITION STAFF

8. What is the timeline for direct certification activities?

PROBE: When is the first file of SNAP[/TANF/Medicaid/other] data for direct certification provided?

PROBE: How often is SNAP[/TANF/Medicaid/other] data for direct certification provided during the school year?

PROBE: What is the reference point for the first file of enrollment data used for direct certification? Is it based on prior year enrollment lists, or does it include new enrollees and/or transfers?

PROBE: How often are the enrollment data files used for direct certification updated? Do updated enrollment data include all students or only new students/transfers?

PROBE: [*If more than once,*]

[*Ask States:*] Do you know how many SFAs use direct certification data after the first files of the school year?

[*Ask SFAs:*] Do you use direct certification data after the first files of the school year?

PROBE: When are direct certification data available to SFAs?

[*State-level matching sites:*] When are districts given the list of their directly certified students?

PROBE: When are households notified that they have been directly certified?

9. [*If state-level matching state, ask:*] In addition to the matching conducted at the state-level, are individual SFAs allowed or encouraged to perform matches or identify additional students for direct certification at the local level?

If so, why?

How does the district-level direct certification process work? What data files do they use? How often do they conduct the process?

10. Why were the current direct certification methods and procedures chosen?

PROBE: Why does your State conduct direct certification at the [State/district] level?

PROBE: Why does/doesn't your State/district use computer matching for direct certification?

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B. COMPUTER MATCHING PROCESS (INCLUDING INFORMATION SYSTEMS, DATABASES, AND DATA ELEMENTS, FORMATS, VARIABLE DEFINITIONS, DATA-MATCHING ALGORITHMS, AND COMPUTER CODE USED)

[INSTRUCTIONS TO INTERVIEWER: This section will be asked only for sites that use computer matching.]

Now we'd like to talk in more detail about the computer matching methods used for direct certification.

1. Please describe the computer matching process:
2. Which organization conducts the computer match between data from different sources?

Is the matching done by agency staff or a contractor?

3. Which agencies provide data for the match? (education, SNAP, TANF, Medicaid, etc.)

PROBE: Do you use data from any programs other than SNAP? If not, why not?

PROBE: Is a Statewide Student Information System (SSIS) used for NSLP direct certification?

If not, what is the source of the information on students enrolled in schools in the state/district? *[Interviewer: Refer to Field Guide for list of possible data sources.]*

4. What enrollment information is provided for NSLP direct certification? *[Interviewer: Refer to Field Guide for list of possible data elements.]*

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

[For each program providing data (SNAP, TANF, Medicaid, etc.), ask:]

5. What information does the [SNAP/TANF/Medicaid/etc.] agency provide for NSLP direct certification?

[Interviewer: Refer to Field Guide for list of possible data elements.]

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

6. Does the student enrollment file include information from the household's NSLP application?
7. What is the time period covered by the student enrollment and other data used for the match? How often is each data source updated?

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8. How are the data transferred from SNAP [/TANF/Medicaid/etc.] to the child nutrition agency?
9. [*If district-level matching, ask:*] How are the data transferred from the state agency to the SFAs that conduct the matching?
10. How often is each type of data transferred? What is the timeline for the data transfer process?
11. What data use agreements cover the data transfers?
12. What safeguards are in place for data security (such as access requirements, secure file transfer protocols, specific log-ins for internet look-ups, etc.)?
13. What data quality checks are performed on the data received?
14. How often are the data from different sources matched? What is the timeline for the matching? Why is matching done at those times?

PROBE: After the initial data match, are later rounds of matching conducted when updated data is received (from which agencies), when new students enroll in the SFA, or for some other reason?

15. [*If more than once, ask:*] After the initial data match, are later rounds of matching conducted in batches, or are students looked up individually?

Are the later matches conducted by the same staff who conduct the initial match?

Do the processes used for subsequent matches differ from the initial match in any other ways?

How much variation is there in the specific identifiers and matching rules used at the local level? What causes this variation?

[*If computer matching done at the district level, ask:*] Did you consult with other districts in deciding how to set up your data matching system?

16. What specific identifiers and matching rules does your State use for NSLP direct certification data matching?

Do you require exact matches for each of these identifiers, or do you use probabilistic matching for some/all?

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17. Can you provide information on the number of children in the SNAP [TANF, Medicaid, etc.] file and the number matched to the student enrollment data? (If more than one match, refer to the largest match this school year.)

Do you keep files with indicators of which students were matched and which were not?
Is the file continually updated during the school year to indicate matches?

[If district-level matching state, ask:] Do districts inform the state agency of the outcomes of their matching process? Do districts send the state a file indicating whether each case in the SNAP [TANF/Medicaid/etc.] file was successfully matched or not?

18. What do you do about unmatched SNAP [/TANF/Medicaid/etc.] children? Do you have a process for identifying and dealing with “possible” matches?

PROBE: Are there secondary match rules for these cases? What are they?

19. What do you do about duplicate matches?

PROBE: Are there secondary match rules for these cases? What are they?

20. Does your matching process include any specific procedures that respond to FNS’s new policy on Extending Categorical Eligibility to Additional Children in a Household? Please describe.

21. Why were the current identifiers and matching rules chosen?

What are the advantages and disadvantages of the identifiers and matching rules that you use?

Did you consider alternatives to these identifiers and rules? Why did you reject those alternatives?

22. Did your agency incur any startup costs in implementing a computer matching system?

Did SFAs have to implement any technology upgrades to use direct certification?

Who developed the software and data systems used for direct certification?

Did you consult with other states/districts in developing your system? If so, why were these states/districts chosen for consultation?

What are the costs of maintaining the computer matching system now that it has been set up?

GO TO SECTION III

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III. GRANTS

1. Has your State/district applied for any grant funding to support direct certification?

[If no:]

2. Do you have plans to apply for grant funding to support direct certification in the future?
If so, what would you use grant funding for?

[Interviewer: Skip to Section IV]

[If yes:]

3. Was this a direct certification grant from FNS, or some other type of grant?
Was the grant funded under the American Recovery and Reinvestment Act?

4. Was your application approved and funded?

[If no:]

5. What did you propose to use the grant funding for?

[Interviewer: Skip to Section IV]

[If yes:]

6. When was the grant awarded?
7. What was the amount of the grant?
8. What activities were planned under the grant?

PROBE: Expansion of direct certification to include programs like TANF, Medicaid, and SCHIP in addition to SNAP? Investment in technology (to enhance software, develop online query systems, or integrate existing programs' data systems)? To overcome specific challenges? To develop/improve direct verification process?

Are grant funds being used for a pilot? If so, when will full implementation take place?

9. Which activities have been implemented?
10. How has your implementation of grant activities deviated from your original plans? Why did you alter your plans?
11. Who has been involved in activities under the grant? Describe their roles.
12. What challenges have you encountered in implementing grant activities? How have you addressed these challenges?

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13. Do you feel like the grant has accomplished its goals?

What results have you seen from the grant activities? Do these results meet your expectations?

How do you track the success of the grant activities?

[If no results yet, ask:] When do you expect to see results?

14. Will the State/district continue these activities after the grant funding ends?

GO TO SECTION IV

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH STATE CHILD NUTRITION STAFF

IV. CHANGES TO DIRECT CERTIFICATION

A. RECENT CHANGES IN DIRECT CERTIFICATION PROCEDURES

1. When (in what school year) did your State/district begin directly certifying students for the NSLP?
2. How long have you used your current methods for direct certification?
3. Please describe any changes in the direct certification process since you first began directly certifying students for the NSLP (besides any discussed in Section III).

[Probe for any changes indicated in survey.]

PROBE: Has direct certification always been conducted at the [State/district] level in your State?

PROBE: Have the roles played by each agency changed at all? How?

PROBE: Have the data sources or specific data elements or algorithms used for matching changed? How?

PROBE: Has the frequency with which matches are conducted changed? How?

4. When were these changes made?
5. Why were these changes made?

PROBE: Have you made any changes to your direct certification procedures or guidance for SFAs in response to FNS's new policy on Extending Categorical Eligibility to Additional Children in a Household that became effective in SY2009-2010?

PROBE: Most states have experienced large increases in the SNAP caseload recently. Have such changes affected your direct certification procedures at the State or local level?

6. Do you consider these changes to be an improvement or not?
7. What are the major advantages and disadvantages of the different procedures you've used? What are the trade-offs?

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B. CHANGES TO DIRECT CERTIFICATION PROCEDURES PLANNED FOR THE FUTURE

1. Are you planning or considering any changes in your NSLP direct certification procedures in the future? If so, please describe

PROBE: [*If district-level matching used*] Have you considered conducting the matching at the state level?

PROBE: If a Statewide Student Information System (SSIS) is not currently used for NSLP direct certification: does your State plan to develop a SSIS or use an existing SSIS for this purpose? What changed to make this possible?

PROBE: [*If TANF/Medicaid are not used to directly certify students*] Have you considered directly certifying students based on programs other than SNAP, such as TANF or Medicaid? Why/ why not?

PROBE: Do you plan any changes to the specific data elements or algorithms used for matching? If so, how?

PROBE: Do you plan any changes to frequency of matching during the school year?

PROBE: Are you planning to make any changes to direct certification as a result of FNS's policy to extend categorical eligibility to all children in a household?

PROBE: Most states have experienced large increases in the SNAP caseload recently. Are you planning any changes in direct certification procedures in response to such changes?

2. What are the reasons for the planned changes?
3. What is the expected timeline of these changes?
4. Is there anything you would like to change about your State's direct certification process?

Why haven't those changes been made? What obstacles stand in the way of such changes?

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C. CAPACITY TO CHANGE DIRECT CERTIFICATION PROCEDURES

1. Would it be possible to expand the current direct certification process to use information from other means-tested programs, such as TANF, Medicaid or SCHIP, child care assistance, or energy assistance? How feasible is this option?

If so: What data would be required? What steps would be necessary? What, in your view, would be the greatest challenges?

If not: Why not?

PROBE: Do the eligibility criteria differ between NSLP and other programs?

PROBE: Are the necessary data not available?

PROBE: Would confidentiality concerns prevent sharing the data between programs?

2. [*For sites where a Statewide Student Information System (SSIS) is **not** used for direct certification:*] Why is the SSIS not currently used for NSLP direct certification?

[*For sites where TANF/Medicaid data systems are **not** used for direct certification:*]

Next, we'd like to talk about data sharing between schools and programs like TANF and Medicaid.

3. Do any school districts exchange data with TANF, Medicaid/SCHIP, or other means-tested programs?

[*If so:*]

What is the purpose of these data exchanges? (For example, do you/SFAs provide data on NSLP certifications for referrals to the Medicaid or SCHIP program?)

How does the process work?

PROBE: What are the sources of the data (district or statewide student information systems, or SFA food service information systems (POS etc.)?)

How are the data exchanged?

PROBE: Who conducts the match (the school district or the program)?

What data elements are used for matching?

PROBE: Does the process vary by SFA?

PROBE: Does the process use computer matching for all school districts? If not, what are the barriers to wider use of computer matching?

PROBE: If manual methods are used (e.g., sharing copies of application forms), what would make an electronic process feasible for some or all SFAs in your State?

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PROBE: What are the main challenges in the matching process as it currently operates? (technology, staffing, cost, school district cooperation, privacy or other legal restrictions?)

4. [*If no data sharing with TANF/Medicaid, ask:*] Have State or local agencies in your State considered this option? What do you see as the pros and cons of such data sharing? What would make it feasible for some or all SFAs in your State?

GO TO SECTION V

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH STATE CHILD NUTRITION STAFF

V. SUCCESSES, CHALLENGES, AND LESSONS LEARNED

A. STATES' ASSESSMENT OF EFFICIENCY/EFFECTIVENESS

1. How well does direct certification work in your State?

PROBE: How effectively does the current system identify children receiving SNAP [TANF/Medicaid/etc.]?

[If computer matching used, ask:] What do you think about the accuracy of computer matching?

2. Does the effectiveness of direct certification vary by any district characteristics, such as size or public vs. private schools?
3. How often do families receiving SNAP [TANF/Medicaid/etc.] submit NSLP applications? Why does the direct certification process miss these families?
4. How do you measure the effectiveness of your direct certification process?

[If district-level matching, ask:] Do you assess effectiveness at the district level?

Are any written reports available on direct certification outcomes within the state? If so, could we have a copy?

B. DIRECT CERTIFICATION SUCCESSES

1. What are the greatest successes you've had in implementing direct certification?
2. Which aspects of the process do you think work best?
3. What have been the results of any changes you've made in the process?
4. Have some types of districts had greater success than others in implementing direct certification? What types of districts have been most successful?
5. Are there any unique state or local factors in your State that contribute to the success you've had in implementing direct certification?

C. BARRIERS TO DIRECT CERTIFICATION

1. What are the main challenges or barriers you've encountered in implementing direct certification in the NSLP in your State?

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2. Which aspects of the direct certification process do you think are most challenging?
3. [*If computer matching is used, ask:*] What barriers have you faced in the computer matching process?

PROBE: Have you encountered barriers related to technology, data issues, SFA buy-in, cost, accuracy, or parent response? Please describe.

Have any legal issues or consent requirements limited the ability to use computer matching for direct certification in your State/district?

4. [*If computer matching is not used, ask:*] What are the barriers to use of computer matching?
5. [*If computer matching is used for some, but not all, SFAs in the State, ask:*] What are the barriers to wider use of computer matching among SFAs in your State?
6. What kinds of problems do school districts encounter in receiving and using direct certification data?

What assistance does the state provide?

How do these problems or other factors affect whether school districts use the information from computer matching?

7. Have you encountered any barriers or challenges to implementing the policy to extend categorical eligibility to all children in a household?
8. Do key barriers to direct certification vary by district characteristics such as size or public/private? If so, how?
9. How have you attempted to address the challenges you've encountered? Have the challenges been resolved?
10. In hindsight, do you think anything could have been done to avoid or mitigate these challenges?
11. Are there any unique state or local factors that contribute to the challenges you've encountered in implementing direct certification?

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D. POTENTIAL LESSONS LEARNED FROM IMPLEMENTING DIRECT CERTIFICATION

1. What advice would you give to another state that was struggling with implementing direct certification effectively?
2. *[If the state/district has experience with more than one method—either because of a change, or district-level differences within the state, or if the direct certification process uses both the letter method and computer matching—ask:]* What are the challenges and advantages of each direct certification approach you've used?
3. Are there particular procedures/methods you think are critical for efficient direct certification?

PROBE: Many States are now using centralized data matching for direct certification, while others use decentralized methods. What is your opinion about the best way to match SNAP data with student enrollment data?

PROBE: What are the best strategies for directly certifying children who are enrolled in SNAP but not matched with student enrollment data?

PROBE: What is the right frequency for data matching?

PROBE: What are some of the best ways to provide direct certification to private schools?

PROBE: What are the most successful ways of implementing FNS's policy of Extending Categorical Eligibility to Additional Children in a Household?

PROBE: Are there any aspects of direct certification that we have not yet talked about that could be considered a best practice?

4. Are there direct certification methods or procedures you would advise other States/districts to avoid? Which ones?
5. Is there anything else states should keep in mind when considering changes to their direct certification processes?
6. What do you think USDA can do to improve direct certification?

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VI. CONCLUDING QUESTIONS

1. Is there anything we haven't covered that you'd like us to know about how NSLP direct certification is implemented in your State/district?
2. If I have any additional questions later, as I write up my notes from our conversation, may I call you to follow up?

Thank you for your time.

END OF INTERVIEW

2. State Education Staff

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

NSLP DIRECT CERTIFICATION IMPROVEMENT STUDY

My name is [X], from Mathematica Policy Research.

As you may know, Mathematica is collecting information from state and local child nutrition, education, and SNAP staff regarding direct certification for the National School Lunch Program (NSLP). The study is being conducted for the U.S. Department of Agriculture, Food and Nutrition Service (FNS). The purpose of the study is to provide FNS with a comprehensive picture of the direct certification practices employed by States and districts and to explore the relationship between these practices and overall direct certification performance measures. Under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966, FNS has authority to conduct this study under its responsibility for the development and implementation of national policy for the National School Lunch Program. Participation is voluntary and the information you provide will be kept private to the extent allowed by law.

We really appreciate your participation in today's in-depth interview about direct certification processes.

Our final report will describe the range of responses expressed by staff, and may list the names of agencies and school districts who contributed information, but we will not quote you or anyone by name or title.

I expect our conversation will take approximately 60 minutes.

OPTIONAL IF INTERVIEWER CHOOSES TO RECORD: I want to be sure I am keeping track of everything you are saying. May I record our discussion so that I can listen to it later when I write up my notes? No one outside of our research team will have access to the recording.

- IF YES: Thank you. It will be helpful if you speak up, speak clearly, and speak one at a time.
- IF NO: That's no problem. I'll take notes as you talk, but I may sometimes need to ask you to slow down or repeat so that I can get all the information.

First, do you have any questions for me about the project in general or what we will be discussing today?

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PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

I. INTRODUCTION/OVERVIEW

Direct certification is used in the National School Lunch Program (NSLP) to certify students who receive benefits from the Supplemental Nutrition Assistance Program (SNAP) and sometimes other public assistance programs without requiring their households to complete an NSLP application. We want to talk with you about the methods used for direct certification in your State, the role your agency plays in direct certification, and explore the possibility of future changes in those methods.

1. Is your agency involved with NSLP direct certification?
2. Please briefly describe the role of your agency in the direct certification process.

GO TO SECTION II

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

II. CURRENT DIRECT CERTIFICATION PROCESS

[INSTRUCTIONS TO INTERVIEWER: Review information from survey prior to interview and probe any inconsistencies.]

A. DIRECT CERTIFICATION PROCESS

1. How is direct certification currently done in your State? Please describe the process.
2. What agencies are involved in the direct certification process? (Child Nutrition, Education, SNAP, TANF, Medicaid, etc.)

Which agency bears primary responsibility for direct certification?

What are the roles of other State agencies and local entities in direct certification? What other agencies does your agency interact with in conducting its role in direct certification?

Why did your agency take on the role(s) it plays?

What types of staff at your agency are involved in the process? What tasks does each type perform?

What agreements do you have with other agencies involved in NSLP direct certification? How do these agreements address data formatting, recipient notification, security and confidentiality, problem resolution, and data retention?

3. How is information related to direct certification provided and to whom (State agencies, school districts, or parents)?

PROBE: How are the data used for direct certification transmitted to the entity that conducts the direct certification/matching? [*district-level matching sites:*] How is the information used for direct certification provided to school districts?

PROBE: Who is responsible for notifying households of direct certification? Are households required to “opt in,” or are they given the option to “opt out” of direct certification?

4. What is the timeline for direct certification activities?

PROBE: When is the first file of SNAP/[TANF/Medicaid/other] data for direct certification provided?

PROBE: What is the reference point for the first file of enrollment data used for direct certification? Is it based on prior year enrollment lists, or does it include new enrollees and/or transfers?

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PROBE: How often are the enrollment data files used for direct certification updated? Do updated enrollment data include all students or only new students/transfers?

PROBE: When are households notified that they have been directly certified?

5. Why were the current direct certification methods and procedures chosen?

B. COMPUTER MATCHING PROCESS (INCLUDING INFORMATION SYSTEMS, DATABASES, AND DATA ELEMENTS, FORMATS, VARIABLE DEFINITIONS, DATA-MATCHING ALGORITHMS, AND COMPUTER CODE USED)

[INSTRUCTIONS TO INTERVIEWER: This section will be asked only for sites that use computer matching.]

Now we'd like to talk in more detail about the computer matching methods used for direct certification.

1. Which agencies provide data for the match? (education, SNAP, TANF, Medicaid, etc.)

PROBE: Do you use data from any programs other than SNAP? If not, why not?

PROBE: Is a Statewide Student Information System (SSIS) used for NSLP direct certification? If not, what is the source of the information on students enrolled in schools in the State/district? *[Interviewer: refer to Field Guide for list of possible data sources.]*

4. What enrollment information is provided for NSLP direct certification? *[Interviewer: refer to Field Guide for list of possible data elements.]* Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?
5. Does the student enrollment file include information from the household's NSLP application?
6. What is the time period covered by the student enrollment data used for the match? How often is the data source updated?
7. *[If district-level matching, ask:]* How are the data transferred from the state agency to the SFAs that conduct the matching?
8. How often is each type of data transferred? What is the timeline for the data transfer process?
9. What data use agreements cover the data transfers?
10. What safeguards are in place for data security (such as access requirements, secure file transfer protocols, specific log-ins for internet look-ups, etc)?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

11. Did your agency have input on how the matching process works?

PROBE: Did you have input regarding the choice of identifiers, matching rules, file format, and/or who has access to your agency's data?

12. [*Interviewer Instruction: only ask if the agency is involved in a lead role, including conducting a data match.*] Why were the current identifiers and matching rules chosen?

13. Did your agency incur any startup costs in implementing a computer matching system?

GO TO SECTION IV

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

IV. CHANGES TO DIRECT CERTIFICATION

A. RECENT CHANGES IN DIRECT CERTIFICATION PROCEDURES

1. Please describe any changes in the direct certification process since you first began directly certifying students for the NSLP.

[Probe for any changes indicated in survey.]

PROBE: Have the roles played by each agency changed at all? How?

2. When were these changes made?
3. Why were these changes made?
4. Do you consider these changes to be an improvement or not?
5. What are the major advantages and disadvantages of the different procedures you've used? What are the trade-offs?

B. CHANGES TO DIRECT CERTIFICATION PROCEDURES PLANNED FOR THE FUTURE

1. Are you planning or considering any changes in your NSLP direct certification procedures in the future? If so, please describe.

PROBE: [If a Statewide Student Information System (SSIS) is not currently used for NSLP direct certification:] Does your State plan to develop a SSIS or use an existing SSIS for this purpose? What changed to make this possible?

2. What are the reasons for the planned changes?
3. What is the expected timeline of these changes?

C. CAPACITY TO CHANGE DIRECT CERTIFICATION PROCEDURES

*[Interviewer instruction: details on data sources currently used for direct certification are discussed in earlier sections. In this section, we ask for information on data sources that are **not** currently used for direct certification, to explore the possibility of their use in the future.]*

1. *[For sites where a Statewide Student Information System (SSIS) is **not** used for direct certification:]* Next, we'd like to ask about your student enrollment data systems. Does the SEA collect individual student data? Are these data maintained in a Statewide Student Information System (SSIS)?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

[If so, ask:]

How often are these data collected from districts?

What are the functions of the SSIS? Are there legal or regulatory restrictions on the information that can be maintained in the SSIS?

What data elements are collected?

PROBE: Does the SSIS contain date of birth and Social Security Number of students? What information does the system contain for parents or guardians?

PROBE: Does the SSIS collect information on the free/reduced-price NSLP status of individual students? If not, why not? Does the SSIS include any information from the household's NSLP application?

PROBE: Does the SSIS include all LEAs in the state? If not, why not? Are there certain types of districts that are typically included/excluded? Does the SSIS include private schools? What would have to happen to reach statewide implementation?

PROBE: Do school districts have direct access to the SSIS? Do they access the system to view student information, update student information, or both?

PROBE: What is the process for updating information in the SSIS? How often is it updated?

PROBE: Why is the SSIS not currently used for NSLP direct certification?

2. What identifying and demographic data are the hardest to keep accurate in your databases, and why?

PROBE: Is there a problem with duplicate records? If so, how large is the problem and what causes it?

PROBE: Is there a problem with timeliness of data, either overall or with certain types of districts or data? If so, how large is the problem and what causes it?

3. *[For sites where TANF/Medicaid data systems are **not** used for direct certification:]* Next, we'd like to talk about data sharing between schools and programs like TANF and Medicaid. Do your school districts exchange data with TANF, Medicaid/SCHIP, or other means-tested programs?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

[If so, ask:]

What is the purpose of these data exchanges? (For example, is the SFA involved with computer matching for Medicaid administrative claiming (MAC)? Do you provide data on NSLP certifications for referrals to the Medicaid or SCHIP program? Does Medicaid participate in a data matching program of individual records to determine Medicaid reimbursements to school districts?)

How does the process work?

PROBE: What are the sources of the data (district or statewide student information systems, or SFA food service information systems (POS etc.)?)

PROBE: How are the data exchanged?

PROBE: Who conducts the match (the school districts or the program)?

PROBE: What data elements are used for matching?

PROBE: Does the process use computer matching in any school districts? If not, what are the barriers to computer matching?

PROBE: If manual methods are used (e.g., sharing copies of application forms), what would make an electronic process feasible for your SFAs?

PROBE: What are the main challenges in the matching process as it currently operates? (technology, staffing, cost, school district cooperation, privacy or other legal restrictions?)

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

V. SUCCESSES, CHALLENGES, AND LESSONS LEARNED

A. STATES' ASSESSMENT OF EFFICIENCY/EFFECTIVENESS

1. How well does direct certification work in your State?
PROBE: How effectively does the current system identify children receiving SNAP [TANF/Medicaid/etc.]?

[If computer matching used, ask:] What do you think about the accuracy of computer matching?

2. How do you measure the effectiveness of your direct certification process?

B. DIRECT CERTIFICATION SUCCESSES

1. What are the greatest successes you've had in implementing direct certification?
2. Which aspects of the process do you think work best?
3. What have been the results of any changes you've made in the process?
4. Are there any unique state or local factors in your State that contribute to the success you've had in implementing direct certification?

C. BARRIERS TO DIRECT CERTIFICATION

1. What are the main challenges or barriers you've encountered in implementing direct certification in the NSLP in your State?
2. Which aspects of the direct certification process do you think are most challenging?
3. *[If computer matching is used, ask:]* What barriers have you faced in the computer matching process?

PROBE: Have you encountered barriers related to technology, data issues, SFA buy-in, cost, accuracy, or parent response? Please describe.

PROBE: Have any legal issues or consent requirements limited the ability to use computer matching for direct certification in your State?

4. *[If computer matching is not used, ask:]* What are the barriers to use of computer matching?
5. What kinds of problems do school districts encounter in receiving and using direct certification data?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

What assistance does the State provide?

How do these problems or other factors affect whether school districts use the information from computer matching?

6. How have you attempted to address the challenges you've encountered? Have the challenges been resolved?
7. In hindsight, do you think anything could have been done to avoid or mitigate these challenges?
8. Are there any unique state or local factors that contribute to the challenges you've encountered in implementing direct certification?

D. POTENTIAL LESSONS LEARNED FROM IMPLEMENTING DIRECT CERTIFICATION

1. What advice would you give to another State that was struggling with implementing direct certification effectively?
2. *[If the State has experience with more than one method—either because of a change, or district-level differences within the State, or if the direct certification process uses both the letter method and computer matching—ask:]* What are the challenges and advantages of each direct certification approach you've used?
3. Are there particular procedures/methods you think are critical for efficient direct certification?

PROBE: Many States are now using centralized data matching for direct certification, while others use decentralized methods. What is your opinion about the best way to match SNAP data with student enrollment data?

PROBE: What are the best strategies for directly certifying children who are enrolled in SNAP but not matched with student enrollment data?

PROBE: What is the right frequency for data matching?

PROBE: What are some of the best ways to provide direct certification to private schools?

PROBE: What are the most successful ways of implementing FNS's policy of Extending Categorical Eligibility to Additional Children in a Household?

PROBE: Are there any aspects of direct certification that we have not yet talked about that could be considered a best practice?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

4. Are there direct certification methods or procedures you would advise other States to avoid? Which ones?
5. Is there anything else states should keep in mind when considering changes to their direct certification processes?
6. What do you think USDA can do to improve direct certification?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH EDUCATION AGENCY STAFF

VI. CONCLUDING QUESTIONS

1. Is there anything we haven't covered that you'd like us to know about how NSLP direct certification is implemented in your State?
2. If I have any additional questions later, as I write up my notes from our conversation, may I call you to follow up?

Thank you for your time.

3. State SNAP Staff

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

NSLP DIRECT CERTIFICATION IMPROVEMENT STUDY

My name is [X], from Mathematica Policy Research.

As you may know, Mathematica is collecting information from state and local child nutrition, education, and SNAP staff regarding direct certification for the National School Lunch Program (NSLP). The study is being conducted for the U.S. Department of Agriculture, Food and Nutrition Service (FNS). The purpose of the study is to provide FNS with a comprehensive picture of the direct certification practices employed by States and districts and to explore the relationship between these practices and overall direct certification performance measures. Under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966, FNS has authority to conduct this study under its responsibility for the development and implementation of national policy for the National School Lunch Program. Participation is voluntary and the information you provide will be kept private to the extent allowed by law.

We really appreciate your participation in today's in-depth interview about direct certification processes.

Our final report will describe the range of responses expressed by staff, and may list the names of agencies and school districts who contributed information, but we will not quote you or anyone by name or title.

I expect our conversation will take approximately 60 minutes.

OPTIONAL IF INTERVIEWER CHOOSES TO RECORD: I want to be sure I am keeping track of everything you are saying. May I record our discussion so that I can listen to it later when I write up my notes? No one outside of our research team will have access to the recording.

- IF YES: Thank you. It will be helpful if you speak up, speak clearly, and speak one at a time.
- IF NO: That's no problem. I'll take notes as you talk, but I may sometimes need to ask you to slow down or repeat so that I can get all the information.

First, do you have any questions for me about the project in general or what we will be discussing today?

<p>Public Burden Statement: Public reporting burden for this collection of information is estimated to average 80 minutes per response, including the time for reviewing instructions, and preparing for and participating in the interview. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this project is 0584-0529. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research and Analysis, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-0529).</p>
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PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

I. INTRODUCTION/OVERVIEW

Direct certification is used in the National School Lunch Program (NSLP) to certify students who receive benefits from the Supplemental Nutrition Assistance Program (SNAP) and sometimes other public assistance programs without requiring their households to complete an NSLP application. We want to talk with you about the methods used for direct certification in your State, the role your agency plays in direct certification, and explore the possibility of future changes in those methods.

1. Is your agency involved with NSLP direct certification?
2. Please briefly describe the role of your agency in the direct certification process.

GO TO SECTION II

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

II. CURRENT DIRECT CERTIFICATION PROCESS

[INSTRUCTIONS TO INTERVIEWER: Review information from survey prior to interview and probe any inconsistencies.]

A. DIRECT CERTIFICATION PROCESS

1. How is direct certification currently done in your State/district? Please describe the process.
2. What agencies are involved in the direct certification process? (Child Nutrition, Education, SNAP, TANF, Medicaid, etc.)

Which agency bears primary responsibility for direct certification?

What are the roles of other State agencies and local entities in direct certification? What other agencies does your agency interact with in conducting its role in direct certification?

Why did your agency take on the role(s) it plays?

What types of staff at your agency are involved in the process? What tasks does each type perform?

What agreements do you have with other agencies involved in NSLP direct certification? How do these agreements address data formatting, recipient notification, security and confidentiality, problem resolution, and data retention?

3. How is information related to direct certification provided and to whom (State agency, school districts, or parents)?

PROBE: How are the data used for direct certification transmitted to the entity that conducts the direct certification / matching?

PROBE: [*District-level matching sites*] How is the information used for direct certification provided to school districts?

4. What is the timeline for direct certification activities?

PROBE: When is the first file of SNAP data for direct certification provided?

PROBE: How often is SNAP data for direct certification provided during the school year?

5. Why were the current direct certification methods and procedures chosen?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

B. COMPUTER MATCHING PROCESS (INCLUDING INFORMATION SYSTEMS, DATABASES, AND DATA ELEMENTS, FORMATS, VARIABLE DEFINITIONS, DATA-MATCHING ALGORITHMS, AND COMPUTER CODE USED)

[INSTRUCTIONS TO INTERVIEWER: This section will be asked only for sites that use computer matching.]

Now we'd like to talk in more detail about the computer matching methods used for direct certification.

1. Which agencies provide data for the match? (education, SNAP, TANF, Medicaid, etc.)

PROBE: Does your state use data from any programs other than SNAP? If not, why not?

2. What information does the SNAP agency provide for NSLP direct certification?

[Interviewer: refer to Field Guide for list of possible data elements.]

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

3. What is the time period covered by the student enrollment and other data used for the match? How often is each data source updated?

4. How are the data transferred from SNAP to the child nutrition agency?

5. *[If district-level matching, ask:]* How are the data transferred from the state agency to the SFAs that conduct the matching?

6. How often is each type of data transferred? What is the timeline for the data transfer process?

7. What data use agreements cover the data transfers?

8. What safeguards are in place for data security (such as access requirements, secure file transfer protocols, specific log-ins for internet look-ups, etc.)?

9. Did your agency have input on how the matching process works?

PROBE: Did you have input regarding the choice of identifiers, matching rules, file format, and/or who has access to your agency's data?

10. *[Interviewer Instruction: Only ask if the agency is involved in a lead role, including conducting a data match.]* Why were the current identifiers and matching rules chosen?

11. Did your agency incur any startup costs in implementing a computer matching system?

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PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

GO TO SECTION IV

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

IV. CHANGES TO DIRECT CERTIFICATION

A. RECENT CHANGES IN DIRECT CERTIFICATION PROCEDURES

1. Please describe any changes in the direct certification process since you first began directly certifying students for the NSLP.

[Probe for any changes indicated in survey.]

PROBE: Have the roles played by each agency changed at all? How?

2. When were these changes made?
3. Why were these changes made?

PROBE: Most states have experienced large increases in the SNAP caseload recently. Have such changes affected your direct certification procedures at the State or local level?

4. Do you consider these changes to be an improvement or not?
5. What are the major advantages and disadvantages of the different procedures you've used? What are the trade-offs?

B. CHANGES TO DIRECT CERTIFICATION PROCEDURES PLANNED FOR THE FUTURE

1. Are you planning or considering any changes in your NSLP direct certification procedures in the future? If so, please describe

PROBE: Most states have experienced large increases in the SNAP caseload recently. Are you planning any changes in direct certification procedures in response to such changes?

2. What are the reasons for the planned changes?
3. What is the expected timeline of these changes?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

C. CAPACITY TO CHANGE DIRECT CERTIFICATION PROCEDURES

[For sites where TANF/Medicaid data systems are *not* used for direct certification:] Next, we'd like to talk about your data systems and about integration and data sharing between SNAP, TANF, and Medicaid.

1. What is the organizational relationship of the State SNAP, Medicaid, and TANF agencies? Is there a joint application process for Medicaid and SNAP?
2. Is the eligibility management system for programs like SNAP, TANF, and Medicaid integrated in your State?
3. Are other agencies integrated with this system? Which agencies?
4. Does your State maintain a client registry or client index of social service clients? If so:
Which agency maintains this information system?
What other agencies are included?
How frequently does your agency send information to this system?
What types of information does your agency send to this system?
5. What identifying and demographic data are the hardest to keep accurate in your databases, and why?
PROBE: Is there a problem with duplicate records? If so, how large is the problem and what causes it?
PROBE: Is there a problem with timeliness of data, either overall or with certain types of districts or data? If so, how large is the problem and what causes it?

GO TO SECTION V

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

V. SUCCESSES, CHALLENGES, AND LESSONS LEARNED

A. STATES' ASSESSMENT OF EFFICIENCY/EFFECTIVENESS

1. How well does direct certification work in your State?

PROBE: How effectively does the current system identify children receiving SNAP?

[If computer matching used, ask:] What do you think about the accuracy of computer matching?

B. DIRECT CERTIFICATION SUCCESSES

1. What are the greatest successes you've had in implementing direct certification?
2. Which aspects of the process do you think work best?
3. What have been the results of any changes you've made in the process?
4. Are there any unique state or local factors in your State that contribute to the success you've had in implementing direct certification?

C. BARRIERS TO DIRECT CERTIFICATION

1. What are the main challenges or barriers you've encountered in implementing direct certification in the NSLP in your State?
2. Which aspects of the direct certification process do you think are most challenging?
3. *[If computer matching is used, ask:]* What barriers have you faced in the computer matching process?

PROBE: Have you encountered barriers related to technology, data issues, SFA buy-in, cost, accuracy, or parent response? Please describe.

PROBE: Have any legal issues or consent requirements limited the ability to use computer matching for direct certification in your State/district?

4. *[If computer matching is not used, ask:]* What are the barriers to use of computer matching?
5. How have you attempted to address the challenges you've encountered? Have the challenges been resolved?
6. In hindsight, do you think anything could have been done to avoid or mitigate these challenges?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

7. Are there any unique state or local factors that contribute to the challenges you've encountered in implementing direct certification?

D. POTENTIAL LESSONS LEARNED FROM IMPLEMENTING DIRECT CERTIFICATION

1. What advice would you give to another state that was struggling with implementing direct certification effectively?
2. *[If the state has experience with more than one method—either because of a change, or district-level differences within the state, or if the direct certification process uses both the letter method and computer matching—ask:]* What are the challenges and advantages of each direct certification approach you've used?
3. Are there particular procedures/methods you think are critical for efficient direct certification?

PROBE: Many States are now using centralized data matching for direct certification, while others use decentralized methods. What is your opinion about the best way to match SNAP data with student enrollment data?

PROBE: What are the best strategies for directly certifying children who are enrolled in SNAP but not matched with student enrollment data?

PROBE: What is the right frequency for data matching?

PROBE: What are some of the best ways to provide direct certification to private schools?

PROBE: What are the most successful ways of implementing FNS's policy of Extending Categorical Eligibility to Additional Children in a Household?

PROBE: Are there any aspects of direct certification that we have not yet talked about that could be considered a best practice?

4. Are there direct certification methods or procedures you would advise other States/districts to avoid? Which ones?
5. Is there anything else states should keep in mind when considering changes to their direct certification processes?
6. What do you think USDA can do to improve direct certification?

GO TO SECTION VI

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH SNAP STAFF

VI. CONCLUDING QUESTIONS

1. Is there anything we haven't covered that you'd like us to know about how NSLP direct certification is implemented in your State/district?
2. If I have any additional questions later, as I write up my notes from our conversation, may I call you to follow up?

Thank you for your time.

END OF INTERVIEW

4. State Medicaid/TANF/Other Staff

**PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TANF/MEDICAID/OTHER
AGENCY STAFF**

NSLP DIRECT CERTIFICATION IMPROVEMENT STUDY

My name is [X], from Mathematica Policy Research.

As you may know, Mathematica is collecting information from state and local child nutrition, education, and SNAP staff regarding direct certification for the National School Lunch Program (NSLP). The study is being conducted for the U.S. Department of Agriculture, Food and Nutrition Service (FNS). The purpose of the study is to provide FNS with a comprehensive picture of the direct certification practices employed by States and districts and to explore the relationship between these practices and overall direct certification performance measures. Under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966, FNS has authority to conduct this study under its responsibility for the development and implementation of national policy for the National School Lunch Program. Participation is voluntary and the information you provide will be kept private to the extent allowed by law.

We really appreciate your participation in today's in-depth interview about direct certification and related processes.

Our final report will describe the range of responses expressed by staff, and may list the names of agencies and school districts who contributed information, but we will not quote you or anyone by name or title.

I expect our conversation will take approximately 60 minutes.

OPTIONAL IF INTERVIEWER CHOOSES TO RECORD: I want to be sure I am keeping track of everything you are saying. May I record our discussion so that I can listen to it later when I write up my notes? No one outside of our research team will have access to the recording.

- IF YES: Thank you. It will be helpful if you speak up, speak clearly, and speak one at a time.
- IF NO: That's no problem. I'll take notes as you talk, but I may sometimes need to ask you to slow down or repeat so that I can get all the information.

First, do you have any questions for me about the project in general or what we will be discussing today?

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**PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TANF/MEDICAID/OTHER
AGENCY STAFF**

I. INTRODUCTION/OVERVIEW

Direct certification is used in the National School Lunch Program (NSLP) to certify students who receive benefits from the Supplemental Nutrition Assistance Program (SNAP) and sometimes other public assistance programs without requiring their households to complete an NSLP application. We want to talk with you about the methods used for direct certification in your State, the role your agency plays in direct certification, and explore the possibility of future changes in those methods.

1. Is your agency involved with NSLP direct certification?

[If not:]

Has your agency considered becoming involved in direct certification? Are you familiar with the NSLP direct certification process?

[Skip to Section IV.3]

2. *[Interviewer Instruction: only ask if the agency is currently involved in direct certification.]*
Please briefly describe the role of your agency in the direct certification process.

GO TO SECTION II

**PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TANF/MEDICAID/OTHER
AGENCY STAFF**

II. CURRENT DIRECT CERTIFICATION PROCESS

A. DIRECT CERTIFICATION PROCESS

[INSTRUCTIONS TO INTERVIEWER: Review information from survey prior to interview and probe any inconsistencies.]

[Interviewer Instruction: Only ask if the agency is currently involved in direct certification.]

1. How is direct certification currently done in your State? Please describe the process.

Do you directly certify participants in any public assistance programs other than SNAP? Which ones? (TANF, Medicaid, etc.)

Why/why not?

2. What agencies are involved in the direct certification process? (Child Nutrition, Education, SNAP, TANF, Medicaid, etc.)

Which agency bears primary responsibility for direct certification?

What are the roles of other State agencies and local entities in direct certification? What other agencies does your agency interact with in conducting its role in direct certification?

Why did your agency take on the role(s) it plays?

What types of staff at your agency are involved in the process? What tasks does each type perform?

What agreements do you have with other agencies involved in NSLP direct certification?

How do these agreements address data formatting, recipient notification, security and confidentiality, problem resolution, and data retention?

3. How is information related to direct certification provided and to whom (State agency, school districts, or parents)?

PROBE: How are the data used for direct certification transmitted to the entity that conducts the direct certification / matching?

PROBE: *[District-level matching sites]* How is the information used for direct certification provided to school districts?

4. What is the timeline for direct certification activities?

**PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TANF/MEDICAID/OTHER
AGENCY STAFF**

PROBE: When is the first file of TANF/Medicaid/other data for direct certification provided?

PROBE: How often is TANF/Medicaid/other data for direct certification provided during the school year?

5. Why were the current direct certification methods and procedures chosen?

B. COMPUTER MATCHING PROCESS (INCLUDING INFORMATION SYSTEMS, DATABASES, AND DATA ELEMENTS, FORMATS, VARIABLE DEFINITIONS, DATA-MATCHING ALGORITHMS, AND COMPUTER CODE USED)

[INSTRUCTIONS TO INTERVIEWER: This section will be asked only for sites that use computer matching, and only if the agency is currently involved in direct certification.]

Now we'd like to talk in more detail about the computer matching methods used for direct certification.

1. Which agencies provide data for the match? (education, SNAP, TANF, Medicaid, etc.)

PROBE: Does your state use data from any programs other than SNAP? If not, why not?

[For each program providing data (TANF, Medicaid, etc.), ask:]

2. What information does the TANF/Medicaid/etc. agency provide for NSLP direct certification?

[Interviewer: refer to Field Guide for list of possible data elements.]

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

3. What is the time period covered by the student enrollment and other data used for the match? How often is each data source updated?
4. How are the data transferred from TANF/Medicaid/etc. to the child nutrition agency?
5. *[If district-level matching, ask:]* How are the data transferred from the state agency to the SFAs that conduct the matching?
6. How often is each type of data transferred? What is the timeline for the data transfer process?
7. What data use agreements cover the data transfers?
8. What safeguards are in place for data security (such as access requirements, secure file transfer protocols, specific log-ins for internet look-ups, etc.)?

**PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TANF/MEDICAID/OTHER
AGENCY STAFF**

9. Did your agency have input on how the matching process works?

PROBE: Did you have input regarding the choice of identifiers, matching rules, file format, and/or who has access to your agency's data?

10. Why were the current identifiers and matching rules chosen?

11. Did your agency incur any startup costs in implementing a computer matching system?

GO TO SECTION IV

**PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TANF/MEDICAID/OTHER
AGENCY STAFF**

IV. CHANGES TO DIRECT CERTIFICATION

A. RECENT CHANGES IN DIRECT CERTIFICATION PROCEDURES

[Interviewer Instruction: Only ask if the agency is currently involved in direct certification.]

1. Please describe any changes in the direct certification process since you first began directly certifying students for the NSLP.

[Probe for any changes indicated in survey.]

PROBE: Have the roles played by your agency changed at all? How?

2. When were these changes made?
3. Why were these changes made?
4. Do you consider these changes to be an improvement or not?
5. What are the major advantages and disadvantages of the different procedures you've used? What are the trade-offs?

B. CHANGES TO DIRECT CERTIFICATION PROCEDURES PLANNED FOR THE FUTURE

[Interviewer Instruction: Only ask if the agency is currently involved in direct certification.]

1. Are you planning or considering any changes in your NSLP direct certification procedures in the future? If so, please describe

PROBE: [If TANF/Medicaid are not used to directly certify students]: Have you considered directly certifying students based on programs such as TANF or Medicaid? Why/why not?

2. What are the reasons for the planned changes?
3. What is the expected timeline of these changes?

C. CAPACITY TO CHANGE DIRECT CERTIFICATION PROCEDURES

1. Would it be possible to expand the current direct certification process to use information from other means-tested programs, such as TANF, Medicaid, or SCHIP, child care assistance, or energy assistance? How feasible is this option?

If so:

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What data would be required? What steps would be necessary? What, in your view, would be the greatest challenges?

If not: Why not?

PROBE: Do the eligibility criteria differ between NSLP and other programs? Are the necessary data not available? Would confidentiality concerns prevent sharing the data between programs?

[For sites where TANF/Medicaid data systems are **not** used for direct certification:] Next, we'd like to talk about your data systems and about integration and data sharing between SNAP, TANF, and Medicaid.

2. What is the organizational relationship of the State SNAP, Medicaid, and TANF agencies? Is there a joint application process for Medicaid and SNAP?
3. Is the eligibility management system for programs like SNAP, TANF, and Medicaid integrated in your State?
4. Are other agencies integrated with this system? Which agencies?
5. Does your State maintain a client registry or client index of social service clients?
6. What identifying and demographic data are the hardest to keep accurate in your databases, and why?

PROBE: Is there a problem with duplicate records? If so, how large is the problem and what causes it?

PROBE: Is there a problem with timeliness of data, either overall or with certain types of districts or data? If so, how large is the problem and what causes it?

7. [If data systems SNAP, TANF, and Medicaid **not** integrated, ask:] Does Medicaid share eligibility and/or income information with other means-tested programs for purposes of identifying Medicaid enrollees who may be eligible for other programs or establishing or verifying eligibility for applicants to other programs? If so:

Which means-tested programs receive eligibility or income information from the Medicaid agency?

How often is the information furnished?

Which data elements are shared?

How are the data matched?

What agreements govern this information sharing?

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8. Does the Medicaid application contain informed consent or disclosure of data sharing activities? Do federal or State regulations prohibit Medicaid from sharing data with other means-tested programs?

[For sites where TANF/Medicaid data systems are *not* used for direct certification:]

Next, we'd like to talk about data sharing between schools and programs like TANF and Medicaid.

9. Do any school districts exchange data with TANF, Medicaid/SCHIP, or other means-tested programs?

[If so:]

What is the purpose of these data exchanges? (For example, is the SEA or SFAs involved with computer matching for Medicaid administrative claiming (MAC)? Do SFAs provide data on NSLP certifications for referrals to the Medicaid or SCHIP program? Does Medicaid participate in a data matching program of individual records to determine Medicaid reimbursements to school districts?)

How does the process work?

PROBE: What are the sources of the data (district or statewide student information systems, or SFA food service information systems (POS etc.)? How are the data exchanged?

PROBE: Who conducts the match (the school district or the program)? What data elements are used for matching?

PROBE: Does the process vary by SFA?

PROBE: Does the process use computer matching for all school districts? If not, what are the barriers to wider use of computer matching?

PROBE: If manual methods are used (e.g., sharing copies of application forms), what would make an electronic process feasible for some or all SFAs in your State?

PROBE: What are the main challenges in the matching process as it currently operates? (technology, staffing, cost, school district cooperation, privacy or other legal restrictions?)

10. [If no data sharing with TANF/Medicaid, ask:] Have State or local agencies in your State considered this option? What do you see as the pros and cons of such data sharing? What would make it feasible for some or all SFAs in your State?

GO TO SECTION V

**PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TANF/MEDICAID/OTHER
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V. SUCCESSES, CHALLENGES, AND LESSONS LEARNED

[Interviewer Instruction: Only ask if the agency is currently involved in direct certification.]

A. STATES' ASSESSMENT OF EFFICIENCY/EFFECTIVENESS

1. How well does direct certification work in your State?

PROBE: How effectively does the current system identify children receiving TANF/Medicaid/etc.?

[If computer matching used, ask:] What do you think about the accuracy of computer matching?

B. DIRECT CERTIFICATION SUCCESSES

1. What are the greatest successes you've had in implementing direct certification?
2. Which aspects of the process do you think work best?
3. What have been the results of any changes you've made in the process?
4. Are there any unique state or local factors in your State that contribute to the success you've had in implementing direct certification?

C. BARRIERS TO DIRECT CERTIFICATION

[Interviewer Instruction: Only ask if the agency is currently involved in direct certification.]

1. What are the main challenges or barriers you've encountered in implementing direct certification in the NSLP in your State?
2. Which aspects of the direct certification process do you think are most challenging?
3. *[If computer matching is used, ask:]* What barriers have you faced in the computer matching process?

PROBE: Have you encountered barriers related to technology, data issues, SFA buy-in, cost, accuracy, or parent response? Please describe.

Have any legal issues or consent requirements limited the ability to use computer matching for direct certification in your State/district?

4. *[If computer matching is not used, ask:]* What are the barriers to use of computer matching?

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5. How have you attempted to address the challenges you've encountered? Have the challenges been resolved?
6. In hindsight, do you think anything could have been done to avoid or mitigate these challenges?
7. Are there any unique state or local factors that contribute to the challenges you've encountered in implementing direct certification?

*[For those **not** involved in direct certification, ask:]*

8. What barriers stand in the way of your agency being involved in direct certification?

**D. POTENTIAL LESSONS LEARNED FROM IMPLEMENTING DIRECT
CERTIFICATION**

[Interviewer Instruction: Only ask if the agency is currently involved in direct certification.]

1. What advice would you give to another state that was struggling with implementing direct certification effectively?
2. *[If the state has experience with more than one method—either because of a change, or district-level differences within the state, or if the direct certification process uses both the letter method and computer matching—ask:]* What are the challenges and advantages of each direct certification approach you've used?
3. Are there particular procedures/methods you think are critical for efficient direct certification?

PROBE: Many States are now using centralized data matching for direct certification, while others use decentralized methods. What is your opinion about the best way to match TANF/Medicaid/other data with student enrollment data?

PROBE: What are the best strategies for directly certifying children who are enrolled in TANF/Medicaid/other but not matched with student enrollment data?

PROBE: What is the right frequency for data matching?

PROBE: What are some of the best ways to provide direct certification to private schools?

PROBE: What are the most successful ways of implementing FNS's policy of Extending Categorical Eligibility to Additional Children in a Household?

PROBE: Are there any aspects of direct certification that we have not yet talked about that could be considered a best practice?

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4. Are there direct certification methods or procedures you would advise other States/districts to avoid? Which ones?
5. Is there anything else states should keep in mind when considering changes to their direct certification processes?
6. What do you think USDA can do to improve direct certification?

GO TO SECTION VI

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VI. CONCLUDING QUESTIONS

1. [*Interviewer Instruction: Only ask if the agency is currently involved in direct certification.*]
Is there anything we haven't covered that you'd like us to know about how NSLP direct certification is implemented in your State/district?
2. If I have any additional questions later, as I write up my notes from our conversation, may I call you to follow up?

Thank you for your time.

END OF INTERVIEW

5. LEA/SFA Staff

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

NSLP DIRECT CERTIFICATION IMPROVEMENT STUDY

My name is [X], from Mathematica Policy Research.

As you may know, Mathematica is collecting information from state and local child nutrition, education, and SNAP staff regarding direct certification for the National School Lunch Program (NSLP). The study is being conducted for the U.S. Department of Agriculture, Food and Nutrition Service (FNS). The purpose of the study is to provide FNS with a comprehensive picture of the direct certification practices employed by States and districts and to explore the relationship between these practices and overall direct certification performance measures. Under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966, FNS has authority to conduct this study under its responsibility for the development and implementation of national policy for the National School Lunch Program. Participation is voluntary and the information you provide will be kept private to the extent allowed by law.

We really appreciate your participation in today's in-depth interview about the direct certification processes used in your district.

Our final report will describe the range of responses expressed by staff, and may list the names of agencies and school districts who contributed information, but we will not quote you or anyone by name or title.

I expect our conversation will take approximately 60 minutes.

OPTIONAL IF INTERVIEWER CHOOSES TO RECORD: I want to be sure I am keeping track of everything you are saying. May I record our discussion so that I can listen to it later when I write up my notes? No one outside of our research team will have access to the recording.

- IF YES: Thank you. It will be helpful if you speak up, speak clearly, and speak one at a time.
- IF NO: That's no problem. I'll take notes as you talk, but I may sometimes need to ask you to slow down or repeat so that I can get all the information.

First, do you have any questions for me about the project in general or what we will be discussing today?

<p>Public Burden Statement: Public reporting burden for this collection of information is estimated to average 80 minutes per response, including the time for reviewing instructions, and preparing for and participating in the interview. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this project is 0584-0529. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research and Analysis, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-0529).</p>
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PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

I. INTRODUCTION/OVERVIEW

Direct certification is used in the National School Lunch Program (NSLP) to certify students who receive benefits from the Supplemental Nutrition Assistance Program (SNAP) and sometimes other public assistance programs without requiring their households to complete an NSLP application. We want to talk with you about the methods used for direct certification in your district, the role your agency plays in direct certification, and explore the possibility of future changes in those methods.

1. Please briefly describe the role of your staff in the direct certification process.

GO TO SECTION II

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II. CURRENT DIRECT CERTIFICATION PROCESS

[INSTRUCTIONS TO INTERVIEWER: Review information from survey prior to interview and probe any inconsistencies.]

A. DIRECT CERTIFICATION PROCESS

1. How is direct certification currently done in your district? Please describe the process.

PROBE: Is direct certification conducted primarily at the state level or at the district level?

[If at the district level, ask:] What guidelines does the state provide districts concerning data matching for NSLP direct certification?

PROBE: Does the state require or recommend the use of specific identifiers and/or matching rules for SFAs to use? What are they?

Do you directly certify participants in any public assistance programs other than SNAP? Which ones? (TANF, Medicaid, etc.). Why/Why not?

2. What agencies are involved in the direct certification process? (Child Nutrition, Education, SNAP, TANF, Medicaid, etc.)

Which agency bears primary responsibility for direct certification?

What are the roles of other State agencies and local entities in direct certification? What other agencies does your agency interact with in conducting its role in direct certification?

What types of staff at your agency are involved in the process? What tasks does each type perform?

What agreements do you have with other agencies involved in NSLP direct certification?

How do these agreements address data formatting, recipient notification, security and confidentiality, problem resolution, and data retention?

3. Does the direct certification process use computer matching? *[If so, ask:]*

Is computer matching done at the state or local level?

4. Were any technology or other infrastructure changes necessary for you to participate in the direct certification process? Please describe.

5. How is information related to direct certification provided and to whom (State agency, school districts, or parents)?

PROBE: How are the data used for direct certification transmitted to the entity that conducts the direct certification / matching?

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PROBE: [*District-level matching sites:*] How is the information used for direct certification provided to school districts?

PROBE: [*State-level matching sites:*] How are the lists of directly certified students provided to school districts?

PROBE: Is there a system in place that allows schools or SFAs to look up individual students?

PROBE: Who is responsible for notifying households of direct certification? Are households required to “opt in,” or are they given the option to “opt out” of direct certification?

6. [*For district-level matching sites:*] Who is responsible for compiling data from SNAP [TANF, Medicaid, etc.] and preparing it for district use?

PROBE: Are districts sent files containing all SNAP [TANF, Medicaid, etc.] cases in the state, or only cases in their area? If the latter, what data elements are used to determine which cases to send to each district?

PROBE: [*If state uses TANF or Medicaid data in direct certification, ask:*] Do districts receive separate data files for each program (SNAP, TANF, Medicaid, etc.) or a single file containing all relevant programs? If the latter, does the state child nutrition agency compile the data from different programs, or does the data from the SNAP agency also contain the other programs’ data?

7. What is the timeline for direct certification activities?

[*Interviewer Instruction: Only ask next four probes if the district is involved in a lead role, including conducting a data match:*]

PROBE: When is the first file of SNAP[TANF/Medicaid/other] data for direct certification provided?

PROBE: How often is SNAP[TANF/Medicaid/other] data for direct certification provided during the school year?

PROBE: What is the reference point for the first file of enrollment data used for direct certification? Is it based on prior year enrollment lists, or does it include new enrollees and/or transfers?

PROBE: How often are the enrollment data files used for direct certification updated? Do updated enrollment data include all students or only new students/transfers?

[*If more than once, ask:*] Do you use direct certification data after the first files of the school year?

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PROBE: When are direct certification data available to SFAs?

PROBE: [*State-level matching sites:*] When are districts given the list of their directly certified students?

PROBE: When are households notified that they have been directly certified?

8. [*If state-level matching site, ask:*] In addition to the matching conducted at the state-level, are individual SFAs allowed or encouraged to perform matches or identify additional students for direct certification at the local level?

If so, why?

How does the district-level direct certification process work? What data files do you use?
How often do you conduct the process?

9. [*Interviewer Instruction: Only ask if the district is involved in a lead role, including conducting a data match*] Why were the current direct certification methods and procedures chosen?

PROBE: Why does/doesn't your State/district use computer matching for direct certification?

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B. COMPUTER MATCHING PROCESS (INCLUDING INFORMATION SYSTEMS, DATABASES, AND DATA ELEMENTS, FORMATS, VARIABLE DEFINITIONS, DATA-MATCHING ALGORITHMS, AND COMPUTER CODE USED)

[INSTRUCTIONS TO INTERVIEWER: This section will be asked only for sites that use computer matching.]

Now we'd like to talk in more detail about the computer matching methods used for direct certification.

[Interviewer Instruction: Ask Questions 1-4 only if the district is involved in a lead role, including conducting a data match:]

1. Which organization conducts the computer match between data from different sources? Is the matching done by agency staff or a contractor?
2. Which agencies provide data for the match? (education, SNAP, TANF, Medicaid, etc.)

PROBE: Do you use data from any programs other than SNAP? If not, why not?

PROBE: *[Interviewer Instruction: Ask of all]* Is a Statewide Student Information System (SSIS) used for NSLP direct certification? If not, what is the source of the information on students enrolled in schools in the state/district? *[Interviewer: Refer to Field Guide for list of possible data sources.]*

3. What enrollment information is provided for NSLP direct certification? *[Interviewer: Refer to Field Guide for list of possible data elements.]*

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

4. *[For each program providing data (SNAP, TANF, Medicaid, etc.), ask:]*
What information does the [SNAP/TANF/Medicaid/etc.] agency provide for NSLP direct certification? *[Interviewer: Refer to Field Guide for list of possible data elements.]*

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

5. Does the student enrollment file include information from the household's NSLP application?
6. *[Interviewer Instruction: Only ask if the district is involved in a lead role, including conducting a data match:]* What is the time period covered by the student enrollment and other data used for the match? How often is each data source updated?

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7. *[If district-level matching, ask:]* How are the data transferred from the state agency to the SFAs that conduct the matching?

[Interviewer Instruction: Ask Questions 8-18 only if the district is involved in a lead role, including conducting a data match:]

8. How often is each type of data transferred? What is the timeline for the data transfer process?
9. What data use agreements cover the data transfers?
10. What safeguards are in place for data security (such as access requirements, secure file transfer protocols, specific log-ins for internet look-ups..etc)?
11. What data quality checks are performed on the data received?
12. How often are the data from different sources matched? What is the timeline for the matching? Why is matching done at those times?

PROBE: After the initial data match, are later rounds of matching conducted when updated data is received (from which agencies?), when new students enroll in the SFA, or for some other reason?

13. *[If more than once, ask:]* After the initial data match, are later rounds of matching conducted in batches, or are students looked up individually?

Are the later matches conducted by the same staff who conduct the initial match?

Do the processes used for subsequent matches differ from the initial match in any other ways?

[If computer matching done at the district level, ask:] Did you consult with other districts in deciding how to set up your data matching system?

14. What specific identifiers and matching rules does your district use for NSLP direct certification data matching?

Do you require exact matches for each of these identifiers, or do you use probabilistic matching for some/all?

15. Can you provide information on the number of children in the SNAP [TANF, Medicaid, etc.] file and the number matched to the student enrollment data? (If more than one match, refer to the largest match this school year.)

Do you keep files with indicators of which students were matched and which were not? Is the file continually updated during the school year to indicate matches?

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[If district-level matching state, ask:] Do districts inform the state agency of the outcomes of their matching process? Do districts send the state a file indicating whether each case in the SNAP [/TANF/Medicaid/etc.] file was successfully matched or not?

16. What do you do about unmatched SNAP [/TANF/Medicaid/etc.] children? Do you have a process for identifying and dealing with “possible” matches?

PROBE: Are there secondary match rules for these cases? What are they?

17. What do you do about duplicate matches?

PROBE: Are there secondary match rules for these cases? What are they?

18. Does your matching process include any specific procedures that respond to FNS’s new policy on Extending Categorical Eligibility to Additional Children in a Household? Please describe.

19. Did your district have input on how the matching process works?

PROBE: did you have input regarding the choice of identifiers, matching rules, file format, and/or who has access to your district’s data?

[Interviewer Instruction: Ask Questions 20 and 21 only if the district is involved in a lead role, including conducting a data match:]

20. Why were the current identifiers and matching rules chosen?

What are the advantages and disadvantages of the identifiers and matching rules that you use? Did you consider alternatives to these identifiers and rules? Why did you reject those alternatives?

21. Did your district incur any startup costs in implementing a computer matching system?

Did you have to implement any technology upgrades to use direct certification?

Who developed the software and data systems used for direct certification?

Did you consult with other states/districts in developing your system? If so, why were these states/districts chosen for consultation?

What are the costs of maintaining the computer matching system now that it has been set up?

GO TO SECTION III

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

III. GRANTS

A. USES OF DIRECT CERTIFICATION AND ARRA PROGRAMS

1. Has your district applied for any grant funding to support direct certification?

[If no:]

2. Do you have plans to apply for grant funding to support direct certification in the future?

If so, what would you use grant funding for?

[Interviewer: Skip to Section IV]

[If yes:]

3. Was this a direct certification grant from FNS, or some other type of grant?

Was the grant funded under the American Recovery and Reinvestment Act?

4. Was your application approved and funded?

[If no:]

5. What did you propose to use the grant funding for?

[Interviewer: Skip to Section IV]

[If yes:]

6. When was the grant awarded?

7. What was the amount of the grant?

8. What activities were planned under the grant?

PROBE: Expansion of direct certification to include programs like TANF, Medicaid, and SCHIP in addition to SNAP? Investment in technology (to enhance software, develop online query systems, or integrate existing programs' data systems)? To overcome specific challenges? To develop/improve direct verification process?

Are grant funds being used for a pilot? If so, when will full implementation take place?

9. Which activities have been implemented?

10. How has your implementation of grant activities deviated from your original plans? Why did you alter your plans?

11. Who has been involved in activities under the grant? Describe their roles.

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

12. What challenges have you encountered in implementing grant activities? How have you addressed these challenges?

13. Do you feel like the grant has accomplished its goals?

What results have you seen from the grant activities? Do these results you're your expectations?

How do you track the success of the grant activities? [*If no results yet, ask:*] When do you expect to see results?

14. Will the district continue these activities after the grant funding ends?

GO TO SECTION IV

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

IV. CHANGES TO DIRECT CERTIFICATION

A. RECENT CHANGES IN DIRECT CERTIFICATION PROCEDURES

1. When (in what school year) did your district begin directly certifying students for the NSLP?
2. How long have you used your current methods for direct certification?
3. Please describe any changes in the direct certification process since you first began directly certifying students for the NSLP (besides any discussed in Section III).

[Probe for any changes indicated in survey.]

PROBE: Has direct certification always been conducted at the [State/district] level in your State?

PROBE: Have the roles played by each agency changed at all? How?

PROBE: Have the data sources or specific data elements or algorithms used for matching changed? How?

PROBE: Has the frequency with which matches are conducted changed? How?

4. When were these changes made?
5. Why were these changes made?

PROBE: Have you made any changes to your direct certification procedures or guidance for SFAs in response to FNS's new policy on Extending Categorical Eligibility to Additional Children in a Household that became effective in SY2009-2010?

PROBE: Most states have experienced large increases in the SNAP caseload recently. Have such changes affected your direct certification procedures at the State or local level?

6. Do you consider these changes to be an improvement or not?
7. What are the major advantages and disadvantages of the different procedures you've used? What are the trade-offs?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

B. CHANGES TO DIRECT CERTIFICATION PROCEDURES PLANNED FOR THE FUTURE

1. Are you planning or considering any changes in your NSLP direct certification procedures in the future? If so, please describe.

PROBE: [*Interviewer Instruction: Only ask if the district is involved in a lead role, including conducting a data match.*] Do you plan any changes to the specific data elements or algorithms used for matching? If so, how?

PROBE: Do you plan any changes to frequency of matching during the school year?

PROBE: Are you planning to make any changes to direct certification as a result of FNS's policy to extend categorical eligibility to all children in a household?

PROBE: Most states have experienced large increases in the SNAP caseload recently. Are you planning any changes in direct certification procedures in response to such changes?

2. What are the reasons for the planned changes?
3. What is the expected timeline of these changes?

C. CAPACITY TO CHANGE DIRECT CERTIFICATION PROCEDURES

1. [*If computer matching **not** used for direct certification.*] We'd like to ask about other ways in which technology is used in the NSLP application and verification processes.

Are computers used to determine eligibility status in the NSLP application process? How much data is entered from applications for this procedure?

Can households submit NSLP applications via the Internet? Does your SFA use the Internet to communicate with the State Child Nutrition agency?

Is computerized sampling used to select samples for verification?

How is categorical eligibility verified?

PROBE: Are SNAP or TANF administrative records used for this process? Who does this? What SFA records are used?

[*Interviewer instruction: Details on data sources currently used for direct certification are discussed in earlier sections. In this section, we ask for information on data sources that are **not** currently used for direct certification, to explore the possibility of their use in the future.*]

[*For sites where a Statewide Student Information System (SSIS) is **not** used for direct certification.*] Next, we'd like to ask about your student enrollment data systems.

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

2. Does the SEA collect individual student data? Are these data maintained in a Statewide Student Information System (SSIS)?

[If so, ask:]

How often are these data collected from districts?

Why is the SSIS not currently used for NSLP direct certification?

*[For sites where TANF/Medicaid data systems are **not** used for direct certification:]* Next, we'd like to talk about data sharing between schools and programs like TANF and Medicaid.

3. Does your school district exchange data with TANF, Medicaid/SCHIP, or other means-tested programs?

[If so, ask:]

What is the purpose of these data exchanges? (For example, is the SFA involved with computer matching for Medicaid administrative claiming (MAC)? Do you provide data on NSLP certifications for referrals to the Medicaid or SCHIP program? Does Medicaid participate in a data matching program of individual records to determine Medicaid reimbursements to school districts?)

How does the process work?

PROBE: What are the sources of the data (district or statewide student information systems, or SFA food service information systems (POS etc.)?)

PROBE: How are the data exchanged?

PROBE: Who conducts the match (the school district or the program)?

PROBE: What data elements are used for matching?

PROBE: Does the process use computer matching in your school district? If not, what are the barriers to computer matching?

PROBE: If manual methods are used (e.g., sharing copies of application forms), what would make an electronic process feasible for your SFA?

PROBE: What are the main challenges in the matching process as it currently operates? (technology, staffing, cost, school district cooperation, privacy or other legal restrictions?)

4. *[If no data sharing with TANF/Medicaid, ask:]* Have you considered this option? What do you see as the pros and cons of such data sharing? What would make it feasible for your SFA?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

V. SUCCESSES, CHALLENGES, AND LESSONS LEARNED

A. STATES' ASSESSMENT OF EFFICIENCY/EFFECTIVENESS

1. How well does direct certification work in your district?

PROBE: How effectively does the current system identify children receiving SNAP [/TANF/Medicaid/etc.]?

[If computer matching used, ask:] What do you think about the accuracy of computer matching?

2. How often do families receiving SNAP [/TANF/Medicaid/etc.] submit NSLP applications? Why does the direct certification process miss these families?
3. How do you measure the effectiveness of your direct certification process?

B. DIRECT CERTIFICATION SUCCESSES

1. What are the greatest successes you've had in implementing direct certification?
2. Which aspects of the process do you think work best?
3. What have been the results of any changes you've made in the process?
4. Have you identified any cost savings from using direct certification instead of processing NSLP applications?
5. Are there any unique local factors in your district that contribute to the success you've had in implementing direct certification?

C. BARRIERS TO DIRECT CERTIFICATION

1. What are the main challenges or barriers you've encountered in implementing direct certification in the NSLP in your State/district?
2. Which aspects of the direct certification process do you think are most challenging?

[If computer matching is used, ask:] What barriers have you faced in the computer matching process?

PROBE: Have you encountered barriers related to technology, data issues, SFA buy-in, cost, accuracy, or parent response? Please describe.

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

PROBE: Have any legal issues or consent requirements limited the ability to use computer matching for direct certification in your State/district?

3. *[If computer matching is not used, ask:]* What are the barriers to use of computer matching?
4. What kinds of problems do school districts encounter in receiving and using direct certification data?

What assistance does the State provide?

How do these problems or other factors affect whether school districts use the information from computer matching?

5. Have you encountered any barriers or challenges to implementing the policy to extend categorical eligibility to all children in a household?
6. How have you attempted to address the challenges you've encountered? Have the challenges been resolved?
7. In hindsight, do you think anything could have been done to avoid or mitigate these challenges?
8. Are there any unique local factors that contribute to the challenges you've encountered in implementing direct certification?

D. POTENTIAL LESSONS LEARNED FROM IMPLEMENTING DIRECT CERTIFICATION

1. What advice would you give to another district that was struggling with implementing direct certification effectively?
2. *[If the district has experience with more than one method—either because of a change, or if the direct certification process uses both the letter method and computer matching—ask:]* What are the challenges and advantages of each direct certification approach you've used?
3. Are there particular procedures/methods you think are critical for efficient direct certification?

PROBE: Many States are now using centralized data matching for direct certification, while others use decentralized methods. What is your opinion about the best way to match SNAP data with student enrollment data?

PROBE: What are the best strategies for directly certifying children who are enrolled in SNAP but not matched with student enrollment data?

PROBE: What is the right frequency for data matching?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH LEA/SFA STAFF

PROBE: What are some of the best ways to provide direct certification to private schools?

PROBE: What are the most successful ways of implementing FNS's policy of Extending Categorical Eligibility to Additional Children in a Household?

PROBE: Are there any aspects of direct certification that we have not yet talked about that could be considered a best practice?

4. Are there direct certification methods or procedures you would advise other districts to avoid? Which ones?
5. Is there anything else states should keep in mind when considering changes to their direct certification processes?
6. What do you think USDA can do to improve direct certification?

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VI. CONCLUDING QUESTIONS

1. Is there anything we haven't covered that you'd like us to know about how NSLP direct certification is implemented in your district?
2. If I have any additional questions later, as I write up my notes from our conversation, may I call you to follow up?

Thank you for your time.

6. State and Local Technical (IS) Staff

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

NSLP DIRECT CERTIFICATION IMPROVEMENT STUDY

My name is [X], from Mathematica Policy Research.

As you may know, Mathematica is collecting information from state and local child nutrition, education, and SNAP staff regarding direct certification for the National School Lunch Program (NSLP). The study is being conducted for the U.S. Department of Agriculture, Food and Nutrition Service (FNS). The purpose of the study is to provide FNS with a comprehensive picture of the direct certification practices employed by States and districts and to explore the relationship between these practices and overall direct certification performance measures. Under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966, FNS has authority to conduct this study under its responsibility for the development and implementation of national policy for the National School Lunch Program. Participation is voluntary and the information you provide will be kept private to the extent allowed by law.

We really appreciate your participation in today's in-depth interview about direct certification processes.

Our final report will describe the range of responses expressed by staff, and may list the names of agencies and school districts who contributed information, but we will not quote you or anyone by name or title.

I expect our conversation will take approximately 60 minutes.

OPTIONAL IF INTERVIEWER CHOOSES TO RECORD: I want to be sure I am keeping track of everything you are saying. May I record our discussion so that I can listen to it later when I write up my notes? No one outside of our research team will have access to the recording.

- IF YES: Thank you. It will be helpful if you speak up, speak clearly, and speak one at a time.
- IF NO: That's no problem. I'll take notes as you talk, but I may sometimes need to ask you to slow down or repeat so that I can get all the information.

First, do you have any questions for me about the project in general or what we will be discussing today?

Public Burden Statement: Public reporting burden for this collection of information is estimated to average 80 minutes per response, including the time for reviewing instructions, and preparing for and participating in the interview. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this project is 0584-0529. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research and Analysis, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-0529).

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

I. INTRODUCTION/OVERVIEW

Direct certification is used in the National School Lunch Program (NSLP) to certify students who receive benefits from the Supplemental Nutrition Assistance Program (SNAP) and sometimes other public assistance programs without requiring their households to complete an NSLP application. We want to talk with you about the methods used for direct certification in your state/district, the role your agency plays in direct certification, and explore the possibility of future changes in those methods.

1. Please briefly describe the role of your staff in the direct certification process.

GO TO SECTION II

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

II. CURRENT DIRECT CERTIFICATION PROCESS

[INSTRUCTIONS TO INTERVIEWER: Review information from survey prior to interview and probe any inconsistencies.]

A. DIRECT CERTIFICATION PROCESS

1. How is direct certification currently done in your State/district? Please describe the process.

PROBE: Is direct certification conducted primarily at the state level or at the district level?

[If at the district level, ask:] What guidelines does the state provide districts concerning data matching for NSLP direct certification?

PROBE: Does the state require or recommend the use of specific identifiers and/or matching rules for SFAs to use? What are they?

Do you directly certify participants in any public assistance programs other than SNAP? Which ones? (TANF, Medicaid, etc.). Why/Why not?

2. What agencies are involved in the direct certification process? (Child Nutrition, Education, SNAP, TANF, Medicaid, etc.)

Which agency bears primary responsibility for direct certification?

What are the roles of other State agencies and local entities in direct certification? What other agencies does your agency interact with in conducting its role in direct certification?

What types of staff at your agency are involved in the process? What tasks does each type perform?

What agreements do you have with other agencies involved in NSLP direct certification?

How do these agreements address data formatting, recipient notification, security and confidentiality, problem resolution, and data retention?

3. Is there much variation at the local level in the way functional responsibilities for direct certification are carried out? If yes, please describe.

4. Does the direct certification process use computer matching? *[If so, ask:]*

Is computer matching done at the state or local level?

5. Were any technology or other infrastructure changes necessary for you to participate in the direct certification process? Please describe.

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

6. How is information related to direct certification provided and to whom (State agency, school districts, or parents)?

PROBE: How are the data used for direct certification transmitted to the entity that conducts the direct certification / matching?

PROBE: [*District-level matching sites*] How is the information used for direct certification provided to school districts?

PROBE: [*State-level matching sites*] How are the lists of directly certified students provided to school districts?

PROBE: Is there a system in place that allows schools or SFAs to look up individual students?

7. What is the timeline for direct certification activities?

PROBE: When is the first file of SNAP[/TANF/Medicaid/other] data for direct certification provided?

PROBE: How often is SNAP[/TANF/Medicaid/other] data for direct certification provided during the school year?

PROBE: What is the reference point for the first file of enrollment data used for direct certification? Is it based on prior year enrollment lists, or does it include new enrollees and/or transfers?

PROBE: How often are the enrollment data files used for direct certification updated? Do updated enrollment data include all students or only new students/transfers?

8. [*If state-level matching site, ask:*] In addition to the matching conducted at the state-level, are individual SFAs allowed or encouraged to perform matches or identify additional students for direct certification at the local level?

How does the district-level direct certification process work? What data files do they use? How often do they conduct the process?

9. Why were the current direct certification methods and procedures chosen?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

B. COMPUTER MATCHING PROCESS (INCLUDING INFORMATION SYSTEMS, DATABASES, AND DATA ELEMENTS, FORMATS, VARIABLE DEFINITIONS, DATA-MATCHING ALGORITHMS, AND COMPUTER CODE USED)

[INSTRUCTIONS TO INTERVIEWER: This section will be asked only for sites that use computer matching.]

Now we'd like to talk in more detail about the computer matching methods used for direct certification.

1. Please describe the computer matching process.
2. Which organization conducts the computer match between data from different sources? Is the matching done by agency staff or a contractor?
3. Which agencies provide data for the match? (education, SNAP, TANF, Medicaid, etc.)

PROBE: Do you use data from any programs other than SNAP? If not, why not?

PROBE: Is a Statewide Student Information System (SSIS) used for NSLP direct certification? If not, what is the source of the information on students enrolled in schools in the state/district? *[Interviewer: Refer to Field Guide for list of possible data sources.]*

4. What enrollment information is provided for NSLP direct certification? *[Interviewer: Refer to Field Guide for list of possible data elements.]*

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

[For each program providing data (SNAP, TANF, Medicaid, etc.), ask:]

5. What information does the [SNAP/TANF/Medicaid/etc.] agency provide for NSLP direct certification? *[Interviewer: Refer to Field Guide for list of possible data elements.]*

Is there a data dictionary that lists the file specifications, data elements, their definitions, formats, etc? Could we have a copy of that?

6. Does the student enrollment file include information from the household's NSLP application?
7. What is the time period covered by the student enrollment and other data used for the match? How often is each data source updated?
8. How are the data transferred from SNAP [TANF/Medicaid/etc.] to the child nutrition agency?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

9. *[If district-level matching, ask:]* How are the data transferred from the state agency to the SFAs that conduct the matching?
10. How often is each type of data transferred? What is the timeline for the data transfer process?
11. What data use agreements cover the data transfers?
12. What safeguards are in place for data security (such as access requirements, secure file transfer protocols, specific log-ins for internet look-ups..etc)?
13. What data quality checks are performed on the data received?
14. How often are the data from different sources matched? What is the timeline for the matching? Why is matching done at those times?

PROBE: After the initial data match, are later rounds of matching conducted when updated data is received (from which agencies?), when new students enroll in the SFA, or for some other reason?

[If more than once, ask:]

15. After the initial data match, are later rounds of matching conducted in batches, or are students looked up individually?

Are the later matches conducted by the same staff who conduct the initial match?

Do the processes used for subsequent matches differ from the initial match in any other ways?

How much variation is there in the specific identifiers and matching rules used at the local level? What causes this variation?

16. What specific identifiers and matching rules does your State/district use for NSLP direct certification data matching?

Do you require exact matches for each of these identifiers, or do you use probabilistic matching for some/all?

17. Can you provide information on the number of children in the SNAP [TANF, Medicaid, etc.] file and the number matched to the student enrollment data? (If more than one match, refer to the largest match this school year.)

Do you keep files with indicators of which students were matched and which were not? Is the file continually updated during the school year to indicate matches?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

[If district-level matching state, ask:] Do districts inform the state agency of the outcomes of their matching process? Do districts send the state a file indicating whether each case in the SNAP [/TANF/Medicaid/etc.] file was successfully matched or not?

18. What do you do about unmatched SNAP [/TANF/Medicaid/etc.] children? Do you have a process for identifying and dealing with “possible” matches?

PROBE: Are there secondary match rules for these cases? What are they?

19. What do you do about duplicate matches?

PROBE: Are there secondary match rules for these cases? What are they?

20. Does your matching process include any specific procedures that respond to FNS’s new policy on Extending Categorical Eligibility to Additional Children in a Household? Please describe.

21. Why were the current identifiers and matching rules chosen?

What are the advantages and disadvantages of the identifiers and matching rules that you use? Did you consider alternatives to these identifiers and rules? Why did you reject those alternatives?

22. Did your agency incur any startup costs in implementing a computer matching system?

Did SFAs have to implement any technology upgrades to use direct certification?

Who developed the software and data systems used for direct certification?

Did you consult with other states/districts in developing your system? If so, why were these states/districts chosen for consultation?

What are the costs of maintaining the computer matching system now that it has been set up?

GO TO SECTION IV

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

IV. CHANGES TO DIRECT CERTIFICATION

A. RECENT CHANGES IN DIRECT CERTIFICATION PROCEDURES

1. Please describe any changes in the direct certification process since you first began directly certifying students for the NSLP (besides any discussed in Section III).
[Probe for any changes indicated in survey.]

PROBE: Have the data sources or specific data elements or algorithms used for matching changed? How?

PROBE: Has the frequency with which matches are conducted changed? How?

2. When were these changes made?
3. Why were these changes made?

PROBE: Have you made any changes to your direct certification procedures or guidance for SFAs in response to FNS's new policy on Extending Categorical Eligibility to Additional Children in a Household that became effective in SY2009-2010?

4. Do you consider these changes to be an improvement or not?
5. What are the major advantages and disadvantages of the different procedures you've used? What are the trade-offs?

B. CHANGES TO DIRECT CERTIFICATION PROCEDURES PLANNED FOR THE FUTURE

1. Are you planning or considering any changes in your NSLP direct certification procedures in the future? If so, please describe.

PROBE: Do you plan any changes to the specific data elements or algorithms used for matching? If so, how?

PROBE: Do you plan any changes to frequency of matching during the school year?

2. What are the reasons for the planned changes?
3. What is the expected timeline of these changes?

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C. CAPACITY TO CHANGE DIRECT CERTIFICATION PROCEDURES

1. *[If respondent is at the district level and computer matching **not** used for direct certification:]* We'd like to ask about other ways in which technology is used in the NSLP application and verification processes.

Are computers used to determine eligibility status in the NSLP application process? How much data is entered from applications for this procedure?

Can households submit NSLP applications via the Internet? Does your SFA use the Internet to communicate with the State Child Nutrition agency?

Is computerized sampling used to select samples for verification?

How is categorical eligibility verified?

PROBE: Are SNAP or TANF administrative records used for this process? Who does this? What SFA records are used?

*[Interviewer instruction: details on data sources currently used for direct certification are discussed in earlier sections. In this section, we ask for information on data sources that are **not** currently used for direct certification, to explore the possibility of their use in the future.]*

*[For sites where respondent is at the district level and TANF/Medicaid data systems are **not** used for direct certification:]* Next, we'd like to talk about data sharing between schools and programs like TANF and Medicaid.

2. Does your school district exchange data with TANF, Medicaid/SCHIP, or other means-tested programs?

[If so, ask:]

What is the purpose of these data exchanges? (For example, is the SFA involved with computer matching for Medicaid administrative claiming (MAC)? Do you provide data on NSLP certifications for referrals to the Medicaid or SCHIP program? Does Medicaid participate in a data matching program of individual records to determine Medicaid reimbursements to school districts?)

How does the process work?

PROBE: What are the sources of the data (district or statewide student information systems, or SFA food service information systems (POS etc.)?)

PROBE: How are the data exchanged?

PROBE: Who conducts the match (the school district or the program)?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

PROBE: What data elements are used for matching?

PROBE: Does the process use computer matching in your school district? If not, what are the barriers to computer matching?

PROBE: If manual methods are used (e.g., sharing copies of application forms), what would make an electronic process feasible for your SFA?

PROBE: What are the main challenges in the matching process as it currently operates? (technology, staffing, cost, school district cooperation, privacy or other legal restrictions?)

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V. SUCCESSES, CHALLENGES, AND LESSONS LEARNED

A. STATES' ASSESSMENT OF EFFICIENCY/EFFECTIVENESS

1. How well does direct certification work in your State/district?

PROBE: How effectively does the current system identify children receiving SNAP [TANF/Medicaid/etc.]?

[If computer matching used, ask:] What do you think about the accuracy of computer matching?

2. How do you measure the effectiveness of your direct certification process?

[If district-level matching, ask:] Do you assess effectiveness at the district level?

B. DIRECT CERTIFICATION SUCCESSES

1. What are the greatest successes you've had in implementing direct certification?
2. Which aspects of the process do you think work best?
3. What have been the results of any changes you've made in the process?
4. Are there any unique state or local factors in your State/district that contribute to the success you've had in implementing direct certification?

C. BARRIERS TO DIRECT CERTIFICATION

1. What are the main challenges or barriers you've encountered in implementing direct certification in the NSLP in your State/district?
2. Which aspects of the direct certification process do you think are most challenging?

[If computer matching is used, ask:] What barriers have you faced in the computer matching process?

PROBE: Have you encountered barriers related to technology, data issues, SFA buy-in, cost, accuracy, or parent response? Please describe.

PROBE: Have any legal issues or consent requirements limited the ability to use computer matching for direct certification in your State/district?

3. *[If computer matching is not used, ask:]* What are the barriers to use of computer matching?

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4. *[If computer matching is used for some, but not all, SFAs in the State, ask:]* What are the barriers to wider use of computer matching among SFAs in your State?
5. What kinds of problems do school districts encounter in receiving and using direct certification data?
What assistance does the State provide?
How do these problems or other factors affect whether school districts use the information from computer matching?
6. How have you attempted to address the challenges you've encountered? Have the challenges been resolved?
7. In hindsight, do you think anything could have been done to avoid or mitigate these challenges?
8. Are there any unique state or local factors that contribute to the challenges you've encountered in implementing direct certification?

D. POTENTIAL LESSONS LEARNED FROM IMPLEMENTING DIRECT CERTIFICATION

1. What advice would you give to another state/district that was struggling with implementing direct certification effectively?
2. *[If the state/district has experience with more than one method—either because of a change, or district-level differences within the state, or if the direct certification process uses both the letter method and computer matching—ask:]* What are the challenges and advantages of each direct certification approach you've used?
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PROBE: What is the right frequency for data matching?

PROBE: What are some of the best ways to provide direct certification to private schools?

PROBE: What are the most successful ways of implementing FNS's policy of Extending Categorical Eligibility to Additional Children in a Household?

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PROBE: Are there any aspects of direct certification that we have not yet talked about that could be considered a best practice?

4. Are there direct certification methods or procedures you would advise other States/districts to avoid? Which ones?
5. Is there anything else states should keep in mind when considering changes to their direct certification processes?
6. What do you think USDA can do to improve direct certification?

PROTOCOL FOR SEMI-STRUCTURED INTERVIEWS WITH TECHNICAL STAFF

VI. CONCLUDING QUESTIONS

1. Is there anything we haven't covered that you'd like us to know about how NSLP direct certification is implemented in your State/district?
2. If I have any additional questions later, as I write up my notes from our conversation, may I call you to follow up?

Thank you for your time.