

VI. SUMMARY

Direct certification is an administrative practice with a wide range of potential beneficial effects—reducing administrative burden, promoting access to the program among eligible students, and reducing the proportion of students who are “overcertified,” or ineligible for the level of benefits they are receiving. As a result, a large number of districts have begun using direct certification in the last 10 to 15 years. In this study, we found that direct certification has achieved some of its potential benefits.

One key finding from the study is that direct certification leads to an increase in the proportion of students certified for free meals. Thus, the policy has achieved its aim of promoting access to the program. This finding is robust to alternative models/specifications. Two separate models based on independent data sources showed positive and statistically significant effects of direct certification on the free certification rate, and these estimates were of roughly the same magnitude. The estimates were also consistent with the estimated effect of direct certification on the free certification rate from the previous study of direct certification.

The size of the estimated effect of direct certification on the free certification rate—1.3 to 1.4 percentage points—is not large in percentage terms. Nor would we expect this effect to be large, since direct certification influences only children in households receiving FS/TANF and many of these children would be certified for free meals even in the absence of direct certification. However, the estimated effect is substantial in absolute terms, implying that direct certification induces about 400,000 students to become certified for free meals who would not have done so otherwise.

Of course, increasing the number of certified students is not meaningful unless these students actually eat school meals. Evidence from the study suggests that these students do eat

school meals, as estimates indicate that direct certification leads to an increase in the NSLP participation rate, although the evidence here is not quite as clearcut as it was with respect to certification.

The other key outcome examined in the study was program integrity, with particular attention given to two questions. First, what proportion of districts' certified students are ineligible for the benefits they are receiving as of December of the school year? Second, does the increase in certification induced by the implementation of direct certification lead to a reduction in the rate of ineligibility among all certified students?

We found the estimation of income ineligibility to be a complex and challenging task, largely because many parents do not respond to requests for verification of their children's free/reduced-price meal status. The income eligibility status of their children is then unknown. As a result, we generated lower and upper bound estimates of the proportion of certified students that are income ineligible for the level of benefits they are receiving. In the average district, we estimated the lower bound at 12 percent, when all nonresponders are considered income eligible. The upper bound estimate is 20 percent income ineligible, when nonresponders who did not later reapply and receive benefits are considered income ineligible. Among students overall, we estimated income ineligibility at a lower bound of 12 percent and an upper bound of 33 percent, treating nonresponders as we did in the average district estimates.

Turning to the effects of direct certification on ineligibility, we estimated regression models suggesting that direct certification leads to a decrease in income ineligibility among certified students. However, this estimated effect was substantially influenced by the particulars of the specification being estimated. In addition, no previous studies have provided any evidence as to this relationship. So while our estimates suggest that direct certification leads to an improvement

in program integrity, more research is needed to solidify this finding and to determine the precise magnitude of the effect of direct certification on rates of ineligibility among certified students.

Direct certification has proved to be a popular policy among districts, perhaps because of its effects on program access and integrity described above, or perhaps because it has reduced administrative burden, an outcome not directly examined in this study. For example, Jackson, et al. (1999) found that food service directors in districts using the policy reported believing that direct certification had led to improved program access and lower administrative costs in their district. Overall, more than 60 percent of public school districts serving, two-thirds of students, use direct certification. And although a few districts have dropped direct certification after starting to use it, most districts continue to use the policy once they initially implement it.

Despite its popularity, a large number of districts do not use direct certification, and the proportion of districts using the policy has not grown since 1996. Some of the non-direct certification districts say that they are satisfied with their current procedures for certifying students and do not need direct certification. Others cite resource constraints or problems in the implementation of direct certification, such as problems with various aspects of the process of matching enrolled students with children receiving FS/TANF. Even in districts that use direct certification, many students who could be directly certified are somehow missed by the system. Again, issues with the matching process may lie at the root of this problem.

Given the positive effects of direct certification and its potential for growth, the results of this study suggest that policymakers consider policies aimed at expanding the use of direct certification. As suggested above, direct certification could be spread to additional students within districts already using the policy and/or to additional districts not currently using it. Since this study has focused on estimating the effects of direct certification among districts currently using the policy, the evidence of positive effects most strongly supports expanding direct

certification to additional students within districts already using the policy. This evidence supports expanding direct certification to additional districts only if one believes that the effects of direct certification would be the same in these additional districts as it already is in the districts currently using the policy.

To help districts currently using direct certification expand it to additional students, policymakers might look for ways to address some of the problems districts may have had in implementing the policy. Since many districts cited problems with the matching process, determining “best practices” with respect to matching may help districts to identify and directly certify more students. Similarly, encouraging greater communication between State-level FS/TANF agencies and both the State-level agencies that administer the NSLP and school districts themselves may improve districts’ ability to efficiently implement direct certification. Finally, since some school districts cite resource constraints as their reason for not using direct certification, it is also possible that resource constraints limit districts’ ability to directly certify as many students as possible (and that providing additional resources would help address this problem).

While each of the ideas described above might help to promote direct certification to additional students within districts using the policy, this is an issue for which additional research may be particularly useful with respect to guiding policy. In particular, research is needed to more precisely answer the question of how many students who could be directly certified are either certified by application or not certified at all. And to the extent that this “gap” in direct certification coverage varies by district, what are the characteristics of those districts for which the largest proportion of students who could be directly certified are, in fact, directly certified?

If policymakers wish to expand direct certification to additional districts, one policy option would be to require districts to use the policy. A disadvantage of this approach is that it entails

forcing districts to do something they may not wish to do. Because implementation of the policy in these districts would be mandatory, its effects might be different than the estimated effects (from this study) among districts that implemented direct certification voluntarily.

An alternative approach involves using policies that would make direct certification more attractive for districts not currently using it. The policy options described above—easing the matching process, improving communication between agencies and districts, and providing additional resources to districts implementing direct certification—may convince additional districts to begin using direct certification.