

# Louisiana Believes

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**Using Data to Feed Children: Improving Accuracy in Identifying Eligible Students with Direct Certification**

# Overview

States face a challenging task when finding students who are eligible for free or reduced-price meals. Files from disparate state agencies must be matched against district and school-level student information for identification and reimbursement.

**Direct Certification** is a process conducted by the States and by Local Educational Agencies (LEAs) to certify eligible children for free meals without the need for household applications. Using sophisticated matching technology to directly certify students means that more children are receiving these critical benefits.

For Louisiana, this is further complicated by legal restrictions, mandated in 2014, that prevent the Louisiana Department of Education (LDOE) from receiving or accessing student personally identifiable information (PII) which is imperative to the matching and certification process.

# Objective

**Participants will learn from Louisiana's implementation of an identity-matching application to improve their direct certification process.**

The presenters will discuss matching technology and best practices, the benefits of a district driven approach, identifying students attending private schools, resolving near matches within the identity matching application, and using files from multiple sources (e.g., Supplemental Nutrition Assistance Program [SNAP], Medicaid, Temporary Assistance for Needy Families [TANF], Migrant, and Foster Care). Next steps will also be discussed.

# Agenda

- Previous Certification Process
- Improvements to Match Rate
- Louisiana Privacy Laws Enacted in 2014
- Implementation of New ID Management System
- Leveraged the New ID System to Sustain Match Rate with PII Restrictions
- Development and Implementation of a new DirectMatch application
- Next Steps

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# Previous Certification Process: Prior to the 2013-14 School Year

- Initial process consisted of the SNAP file containing food-stamp recipients being loaded into the LDOE student information system (SIS) and matched against student demographic records
- Required matching on 3 criteria to be considered a match, and one criteria had to be SSN (e.g. SSN, First Name, DOB or SSN, Last Name, First Name)
- Extract of matches available to LEAs for download
- LEAs then provided a second file containing all students from SNAP file in their geographical area for local matching.
- LDOE not privy to additional local matches
- Resulted in a low reported percentage of direct matches which resulted in designation of corrective action from USDA



	School-Age SNAP Participants (thousands)	NSLP Direct Certifications (thousands)	SNAP Participants in Non-Base Year NSLP Provision 2 or Provision 3 Schools (thousands)	Direct Certification Rates (percentage)
SY 2012-2013	338.1	253.4	0.0	74.9
SY 2011-2012	301.5	257.8	0.0	85.5
SY 2010-2011	284.7	235.9	0.0	82.9
SY 2008-2010	261.8	207.8	0.0	79.4
SY 2008-2009	234.3	202.0	0.0	86.2
SY 2007-2008	233.5	177.5	0.0	76.0

Mathematica Policy Research

# Agenda

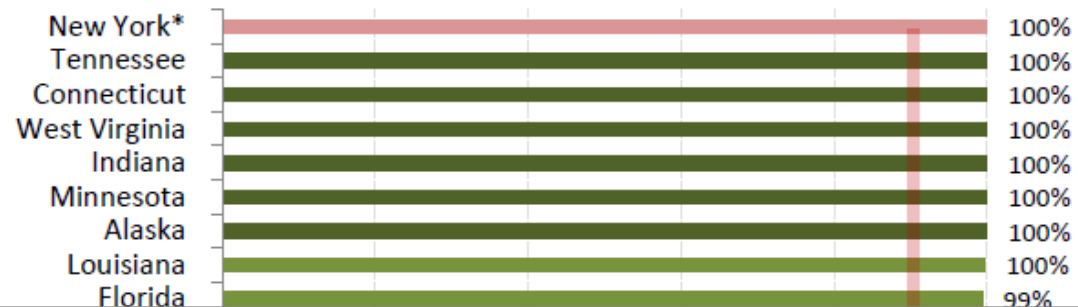
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# Improvements in Match Rate

- In 2013-14, LDOE made changes to the Direct Certification process. In addition to loading the data into SIS for matching, analysts also performed more comprehensive matches and provided those results to LEAs. As a result, the direct match rate improved over 13% from 2012-13.
- In 2014-15, the SIS matching process was discontinued, and analysts added additional passes to the match process (e.g. consonants of first and last name, date of birth, last 4 of SSN). These passes were provide to LEAs as “potential matches”. LDOE monitored throughout the year which “potential matches” were determined by the LEA to be actual matches.
- This process enabled LDOE to match 100% of kids for the 2014-15 school year.
- Because of this growth, Louisiana was featured in a [Mathematica research report](#) to the U.S. Congress.

**Figure 4. Percent of school-age SNAP-participant children directly certified for free school meals, SY 2014-2015**





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# Louisiana R.S. 17:3914 (Act 837 of 2014)

R.S. 17:3914 provides for limitations and prohibitions on the collection and sharing of student personally identifiable information (PII). Some of the requirements include:

- Requires the Department to create a system of unique student identification numbers not based on social security numbers, and students must retain their unique identifier throughout their tenure in Louisiana public schools.
- Requires LEAs to assign unique student identification numbers to all students enrolled in public schools.
- Prohibits anyone from accessing student information that is stored by schools or LEAs except authorized stakeholders.
- Prohibits LEAs from submitting student PII to the LDOE data systems.
- Unlawful disclosure of personally identifiable student information is punishable by a fine of not more than ten thousand dollars or imprisonment for not more than three years, or both.

# Personally Identifiable Information

R.S. 17:3914 defines PII as:

- Information about an individual that can be used on its own or with other information to identify, contact, or locate a single individual, including but not limited to the following:
  - Any information that can be used to distinguish or trace an individual's identity such as full name, social security number, date and place of birth, mother's maiden name, or biometric records.
  - Any other information that is linked or linkable to an individual such as medical, educational, financial, and employment information.
  - Two or more pieces of information that separately or when linked together can be used to reasonably ascertain the identity of the person.

# New Responsibilities

Ensuring the privacy, security, and confidentiality of student information required LDOE and LEAs to work together and assume new responsibilities.

<b>LDOE RESPONSIBILITIES</b>	<ul style="list-style-type: none"><li>• Create unique statewide student identifier system (eScholar)</li><li>• Train LEAs on how to use the eScholar Unique ID System</li><li>• Modify all processes that require PII to comply with the legislation</li><li>• Assist LEAs in resolving data submission and reporting issues as allowed by law</li><li>• Conduct audits as needed, including student enrollment counts</li></ul>
<b>LEA RESPONSIBILITIES</b>	<ul style="list-style-type: none"><li>• Ensure students maintain their unique identifiers known as the Louisiana Secure ID (LASID) throughout their enrollment in Louisiana public schools</li><li>• Conduct initial assignment of LASIDs and maintain them, including deciding whether students should receive a new LASID or transfer an existing LASID</li><li>• Collect and track parental consent</li><li>• Ensure agreements are in place with entities that require the transfer students' PII</li><li>• Ensure no student PII is shared with LDOE unless otherwise allowed by law</li><li>• Make available information about data transferred to external entities upon request</li></ul>

# New Sharing Requirements

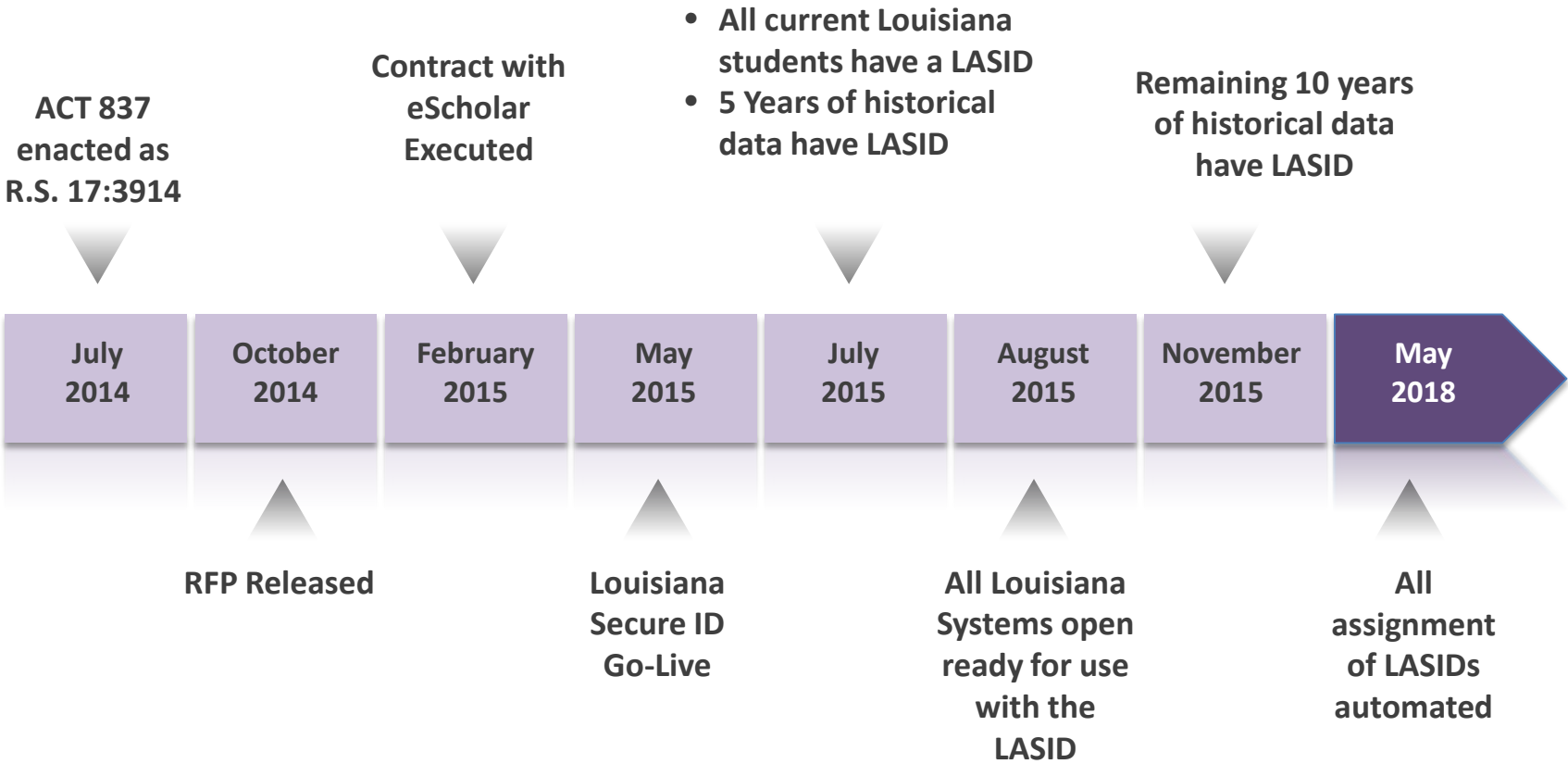
LEAs are responsible for ensuring they share data in ways that are consistent with the law. In practical terms, this means that LEAs must abide by the following scenarios when sharing student information:

<b>LEA to LDOE Vendors</b>	<ul style="list-style-type: none"><li>• With agreements: Full PII with LASID</li><li>• Without agreements: Initials with LASID</li></ul>
<b>LEA to LDOE</b>	<ul style="list-style-type: none"><li>• Initials with LASID</li></ul>
<b>LDOE PII Exceptions</b>	<ul style="list-style-type: none"><li>• Superintendent authorization via local school board policy</li><li>• Parent authorization or student of majority authorization</li><li>• Audit functions</li></ul>

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# Implementation of R.S. 17:3914





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# Data Submissions Changes

- Prior to the 2015-2016 school year, LEAs submitted students' full PII (names, full dates of birth, social security numbers, etc.) to LDOE systems and resolved data submission errors using LDOE reports that included students' PII.
- Now LEAs are still required to submit student-level information to LDOE data systems and resolve errors; however, the submissions and reports can no longer contain students' PII.
- Instead student PII is submitted to the eScholar Unique ID System, assigned an unique identifier known as the Louisiana Secure ID (LASID), and stored.
- LEAs then report data to LDOE using the LASID and other non-PII data (LEA, School, Local ID, student initials, etc.) which are validated against the data stored in eScholar. This required major changes to most LDOE data systems.
- Additionally, when LEAs communicate with LDOE, only non-PII information can be provided to LDOE staff unless otherwise allowed by law (e.g. parental consent).

# Implications for Direct Certification

- The State can no longer add IDs to the SNAP file or act as a liaison between the DCFS and the school districts
- The LEAs need to find eligible students and report back for reimbursement on their own
- LEAs must own the process

# SNAP Reimagined

- With Louisiana coming off the 2014-15 school year with an amazing win for direct certification, not losing those gains under the new constraints was a top priority.
- Before the law went into effect, LDOE performed extensive tests using the eScholar matching engine capabilities to find the threshold that most closely matched pre-law direct certification results.
- During the 2015-16 school year, eScholar processed SNAP files through their matching engine at the determined threshold and provided those results to LEAs.
- eScholar additionally provided a file containing only the LEA Code (SponsorCd), School/Site Code (SiteCd), and Uniq-ID (LouisianaSecureId) fields to LDOE for use in their direct certification processes.
- Non-public schools provided enrollments to LDOE for manual matching to the SNAP file.
- While successful, the process was time consuming and didn't allow for the type of real-time matches that LEAs need.

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# New Automated SNAP = DirectMatch Application Beginning 2017-18

- eScholar and LDOE designed a new, fully automated process in which match decisions are made by the LEA.
- eScholar loads the SNAP file into the application, and LEAs at any time can match their enrollments to the file with the push of a button.
- New SNAP files are loaded at monthly intervals throughout the school year.
- In addition to matching the entire LEA enrollment, students can also be searched one at a time through online screens.
- Non-public students in Louisiana are not assigned unique IDs nor stored in eScholar; however, non-public schools are able to upload their students' information to the DirectMatch Application for matching against the SNAP file.
- All match decisions are stored in the DirectMatch Application, and non-PII versions of the data are available for LDOE for use in reporting and auditing.

# eScholar DirectMatch

## DEMO



# Demo Student Data



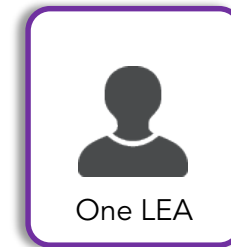
FERPA Police

State



or

Local



# Matching Datasets

## eScholar DirectMatch



SNAP

# eScholar DirectMatch



SNAP

Medicaid

# eScholar DirectMatch



eScholar

# eScholar DirectMatch

SNAP

Medicaid

TANF



eScholar

# eScholar DirectMatch



eScholar

SNAP

Medicaid

TANF

Migrant



# eScholar DirectMatch

SNAP

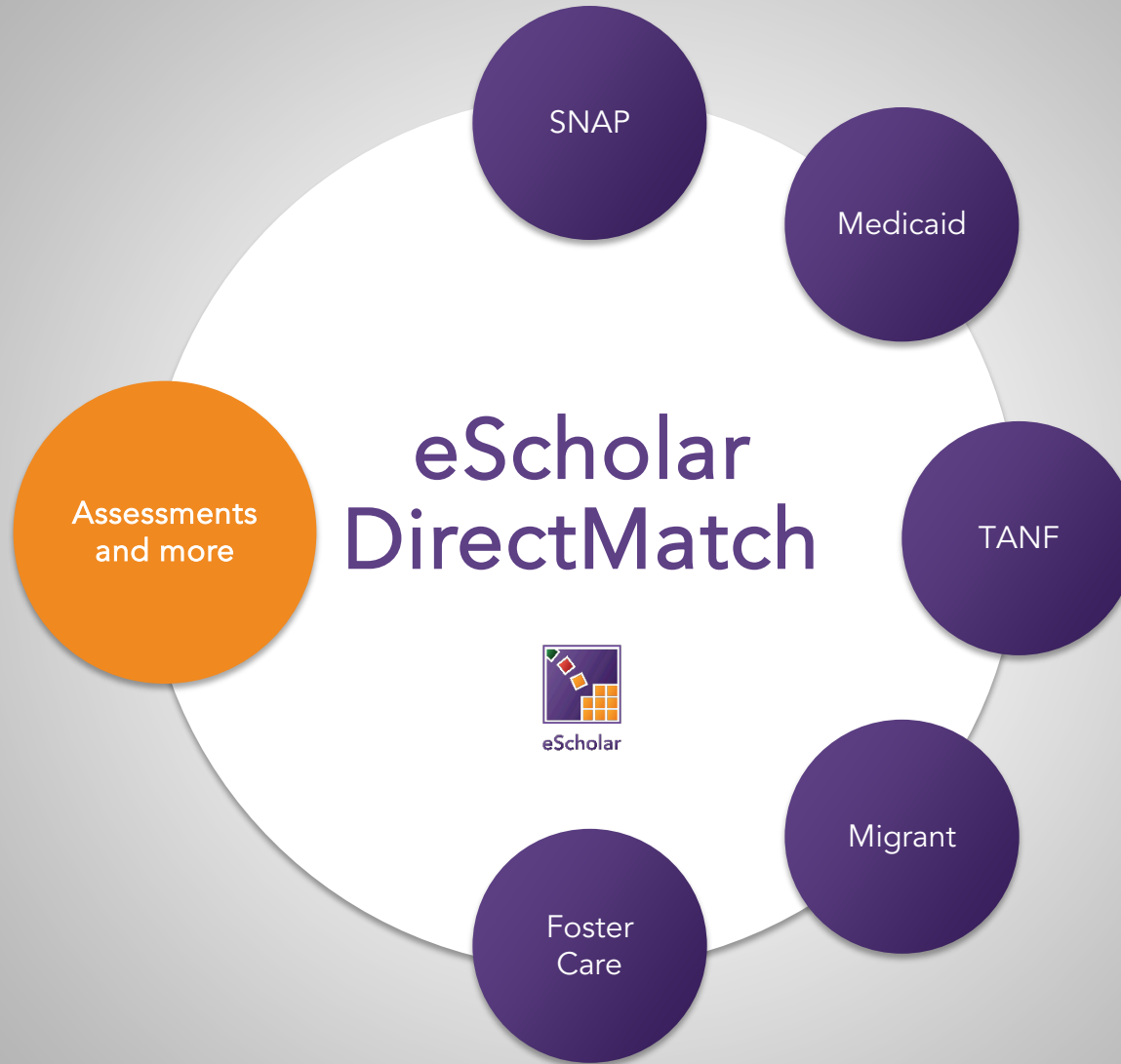
Medicaid

TANF

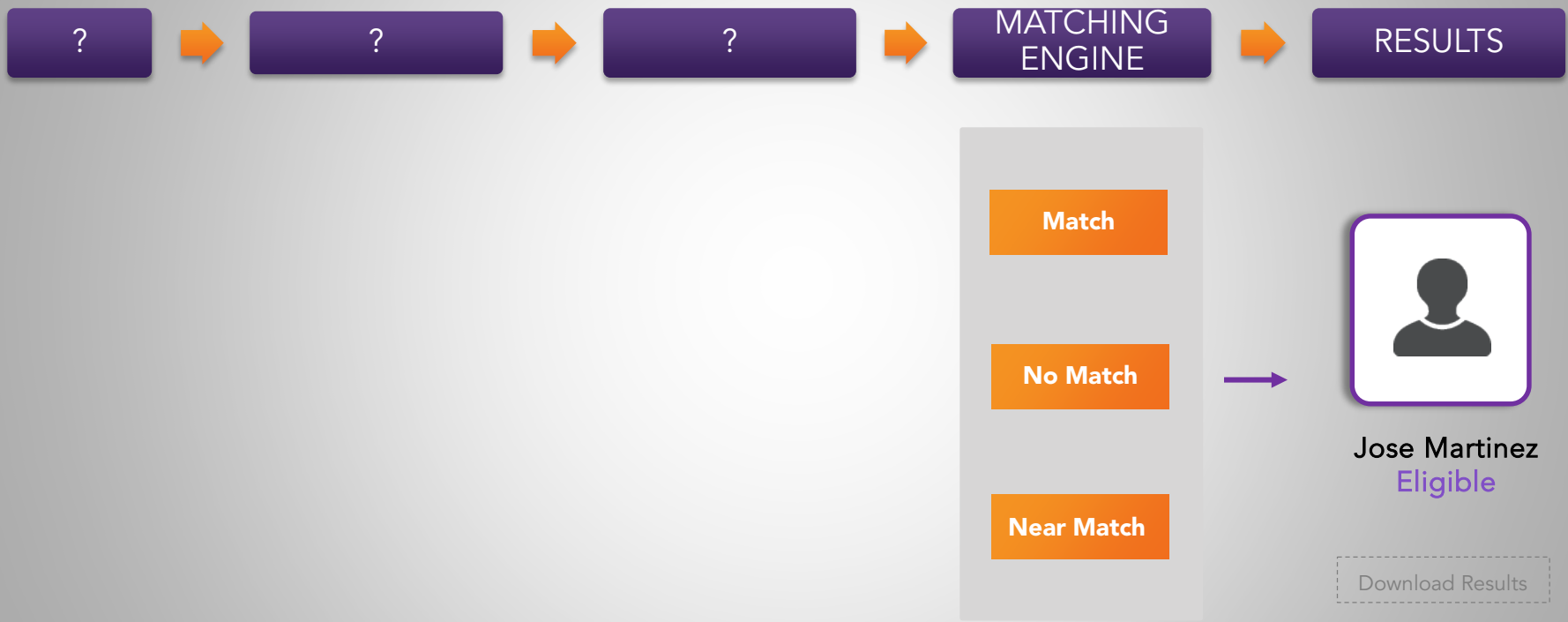
Migrant

Foster  
Care

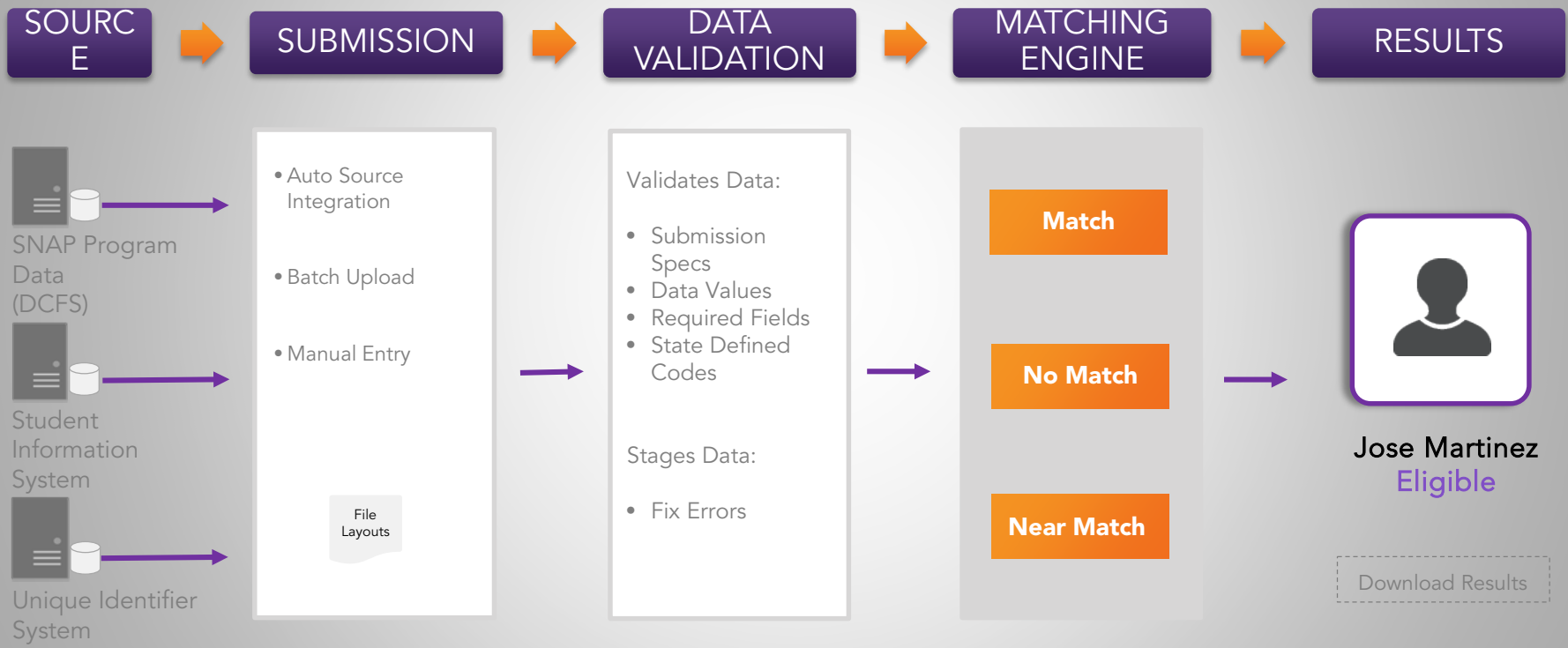




# Matching Process



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# Next Steps

eScholar and LDOE will continue to build out and enhance DirectMatch

- Develop centralized federal reporting of direct certification
- Expand DirectMatch to other file types: Medicaid, Temporary Assistance for Needy Families [TANF], Migrant, and Foster Care
- Solve issues such as truncated names in files

# Questions?

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