

Community Eligibility Option Evaluation

State Child Nutrition (CN) Director Interview

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Prepared for:
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Office of Research and Analysis

Prepared by:
Abt Associates Inc.

[Note to Reviewers: This version of the interview guide includes the research questions related to each topic. These references will be removed from the version to be administered.](#)

List of respondents: (Note: To be completed by interviewer prior to interview.)

Name	Title	Organization	State	Data Collection Period

INTRODUCTION

My name is (), from Abt Associates.

Thank you for taking part in our telephone interview for the Community Eligibility Option Evaluation. You have been asked to participate in our survey because your State is implementing the new USDA school meals reimbursement program called the Community Eligibility Option [Section 11(a)(1)(F) of the Richard B. Russell National School Lunch Act]. As you may already know from the letter and emails we sent, Abt is evaluating the Community Eligibility Option. The purpose of this interview is to learn more about your decision to participate in this Option, the process of implementation, and the successes and challenges you have encountered. I want to start by thanking you for taking the time to speak with me today. Your perspective and insight on these issues will be extremely valuable to our study.

NOTE TO INTERVIEWER: Below is a brief description of the Community Eligibility Option in case the respondent needs more information.

No data from this interview will be attributed specifically to the individual respondents in evaluation reports or data shared with FNS or the public. However, some information will be presented for individual States. Someone who has knowledge of school meals administration in your State may be able to identify you as the source of information. Responses will in no way affect your State’s receipt of funds from USDA’s school meals program.

This survey will take about 45 minutes. Your input is very important to assure the accuracy of this study. We thank you in advance for your time and cooperation. If you have any questions, feel free to contact Abt Associates at: 855-759-5752 or CommunityEligibility@abtassoc.com.

Brief Description of the Community Eligibility Option: The Community Eligibility Option [Section 11(a)(1)(F) of the Richard B. Russell National School Lunch Act] is a new system of reimbursement for the National School Lunch Program/Breakfast programs. To be eligible to participate in the Community Eligibility Option, an LEA must have at least 40 % of its student body identified through direct certification and/or inclusion on other agency lists (*e.g. migrant, homeless, or foster care youth*). This group of identified students is referred to as the “identified student percentage”. Under the Community Eligibility Option, participating schools will no longer be required to certify the eligibility of every student for free and reduced price meals. Instead, the school or district is reimbursed for meals at 1.6 times the identified student percentage. In turn, schools would offer free breakfast and lunch to all students. The expected benefit of the Community Eligibility Option is an increase in nutritional quality and participation of the school breakfast and lunch programs, while decreasing foodservice costs and administrative burden.

NOTE TO INTERVIEWER: See instructions in each section for which States should respond in each round.

A. BACKGROUND ON RESPONDENT AND CONTEXT

(All States, Rounds 1 and 2)

First, we would like to understand more about your agency and your responsibilities both within the agency and with regard to the Community Eligibility Option.

1. What organization/State agency do you work for?
2. What is your position and what are some of your main responsibilities, particularly related to federal assistance programs at the State- and LEA-level?
 - Probe for responsibilities relating to other federal assistance programs (SNAP, etc.), contact with LEAs, contact with other State agencies, contact with FNS.
3. For how long have you served in your current role at the agency?
4. What are the responsibilities of your agency regarding the Community Eligibility Option? What are your specific responsibilities with respect to the Community Eligibility Option?
 - Probe for responsibilities related to implementation, administration, communication with LEAs/school, communication with FNS, and decision-making power with regard to the Community Eligibility Option.
5. Are decisions to implement new school programs and initiatives generally made at the State or local level? In other words, how much autonomy do LEAs and schools have in making policy decisions, like participating in the CE Option that will impact their communities?
 - Probe for dynamic between State and LEAs (specifically regarding the CE Option)

B. STATE DECISION TO PARTICIPATE IN CEO (RQ1)

*(Questions without asterisk will only be asked in Round 1 in Year 1 and Year 2 States, and in Round 2 in Year 3 States. For questions with * ask for Year 1 States in Round 1 and Round 2, and for Year 2, Round 2)*

I would now like to ask you several questions related to your State's decision to participate in and challenges of implementing the Community Eligibility Option that your State both anticipated and encountered.

1. Why did your State initially choose to apply to implement the Community Eligibility Option?
 - Probe for reasons (cost savings, reduced paperwork, food offerings, political pressure, decreased stigma for students receiving FRP meals, meal quality)
2. Who was involved in the decision to apply for the Community Eligibility Option?
 - Probe for roles of senior managers in CN Agency, other State officials, School Boards, LEAs
3. When you applied, what did you anticipate as the biggest benefit(s) to implementing the Community Eligibility Option?
 - Probe for benefits for the State and for the LEA/school
4. When you applied, what did you anticipate as the biggest challenge(s) to implementing the Community Eligibility Option?
 - Probe for challenges for the State and for the LEA/school
5. *Now that the Community Eligibility Option has been implemented, what have you encountered as the biggest challenge(s) to implementation of the Community Eligibility Option for *the State*?
 - *Probe for objections/challenges raised by stakeholders, challenges not anticipated originally, challenges anticipated but that weren't issues, communication with LEAs and schools, verification process.
6. *Now that the Community Eligibility Option has been implemented, what have you encountered as the biggest challenges to implementation of the Community Eligibility Option by *LEAs and/or schools*? To what extent were these challenges initially anticipated?
 - *Probe for any new challenges that emerged not originally anticipated, or challenges initially anticipated that were not an issue for implementation.
7. *Now that the Community Eligibility Option has been implemented, what have you encountered as the biggest benefits to implementing the Community Eligibility Option?
 - *How are these different from the anticipated benefits? Probe for benefits at the State and LEA/school level.
8. *What resources already existed in your State that facilitated adoption and/or implementation of the Community Eligibility Option?

- *Probe for resources (pre-existing partnerships, Provision 2/3, stakeholder buy-in, Direct Certification/pre-established processes)
9. *What resources were unavailable to you that would have facilitated implementation?
- *Probe for resources (pre-existing partnerships, verification and certification methods...)
10. *How likely is it that you will continue with the Community Eligibility Option next year?
- a. *If it is likely, will the benefits of the Community Eligibility Option change in subsequent years?
 - b. *If it is unlikely, what factors make it unlikely?

C. COMMUNICATION WITH LEAS AND SCHOOLS (RQ2, RQ4)

(Year 1 and Year 2 States: Ask only in Round 1. Year 3 States: Ask in Round 2.)

The questions in this next section seek to understand your State's methods of communicating with LEAs and schools, as well as the success of and changes to the communication process.

1. What strategies did your agency employ to inform LEAs and schools within your State about the availability of the Community Eligibility Option?
 - Probe for methods of informing LEAs: Aggressively promoting the Community Eligibility Option, Providing basic information but leave decision to LEAs, etc.
2. What forms of communication did you use to notify LEAs of the Community Eligibility Option?
 - Probe for methods of delivery (notices, emails, meetings, phone calls, press releases, media events, webinars)
3. Who was responsible for developing the messages included in these forms of communication?
 - Probe for people at the State agency, LEA, schools
4. Are there notification and public reporting requirements that you had to meet? What are some barriers to meeting these requirements?
 - Probe for barriers (lack of resources, lack of staff, unclear requirements, etc.)
5. What were some of the questions being asked by LEAs and schools about the Community Eligibility Option? Were there questions that you were unable to answer? Did your agency go to FNS for more information or for help with these issues?
 - Probe for possible questions from the LEAs and schools (How can we qualify for other programs without FRP applications? What is the reimbursement rate? What is the reimbursement process? Etc.)
6. Were LEAs timely and efficient in responding to your agency with the necessary information to participate in the Community Eligibility Option?

- a. Did your agency develop the format for this information to be received? If so, what is the format?
7. What strategies do you think were most effective in communicating with LEAs and schools about the Community Eligibility Option? Are there any other communication strategies you would suggest other States employ?

D. INITIAL REACTION FROM LEAS AND SCHOOLS (RQ1)

(Year 1 and Year 2 States: Ask only in Round 1. Year 3 States: Ask in Round 2.)

This next section will ask you to describe the initial reactions your agency received from LEAs and schools regarding your State's decision to participate in the Community Eligibility Option.

1. What was the general reaction from LEAs and schools to the Community Eligibility Option?
 - Probe for positive/negative reaction, concerns raised. Probe for both eligible and non-eligible LEAs/schools
2. What were some general concerns, at the State and local level, about participation in the Community Eligibility Option? To what extent did these concerns keep some LEAs and schools from participating in the Community Eligibility Option?
 - Probe for concerns (ISP cut-off, removal of household application, etc.)
3. How many LEAs participate in the CE Option in your State? Have you noticed that certain types of LEAs are more or less likely to participate? What is the reaction of non-participating LEAs to those that choose to participate?
 - Probe for explanations about eligible non-participating LEAs, non-participating schools within participating LEAs, patterns to LEAs that took up the Option, perceptions on some LEAs offering free meals while others don't.

E. ELIGIBILITY DATA FOR CE OPTION (RQ3)

(Year 1 and Year 2 States: Ask only in Round 1. Year 3 States: Ask in Round 2.)

As you know, eligibility for the Community Eligibility Option is based on the Identified Student Percentage (ISP) for LEAs and schools. This next set of questions will focus on the processes and methods your agency uses to gather eligibility data on LEAs and schools.

1. What process has your State agency implemented to identify eligible LEAs and schools for the Community Eligibility Option?
 - Probe specifically for the following information (ISP, enrollment data, Verification Summary Report, direct certification)
 - a. What other uses are there for this information, at the State and LEA level?
 - Probe for other uses (qualifying for other programs: test fee waivers, transportation fee waivers, funding for tutoring and afterschool programs, health programs, state education funding)
2. How does your State verify that the percentage of identified students reported by LEAs is accurate?
 - Probe for Coordinated Review Effort (CRE), cross-checking with databases, etc.
 - a. Have any of the LEAs participating in the Community Eligibility Option received a Coordinated Review Effort (CRE) since they elected the CEO? If so, what problems, if any, were encountered?
 - b. Has your state encountered any problems associated with the process of verifying the accuracy of the ISP reported by the LEAs?
 - c. What information is used in this process?
 - Probe: VSR, other documentation, review direct certification data, etc.
 - d. Has this process changed since the implementation of the Community Eligibility Option?
 - e. If there is no established verification process in place, what are the main reasons?
3. At the State level, who is primarily responsible for determining or verifying LEA and school eligibility for the Community Eligibility Option?
4. As you may know, the percentage of students directly certified is the main means of determining which LEAs and schools are eligible for the Community Eligibility Option. Direct Certification involves significant communication between the SNAP Program (Supplemental Nutrition Assistance Program) and the NSLP (National School Lunch Program). Do you have experience with the direct certification process?
 - a. If not, who is responsible for overseeing this process?

- b. If so, how would you rate the communication between the State agencies that are administering SNAP and NSLP? Could you describe the process of coordination between the two entities?
 - c. How has the communication between SNAP and NSLP affected the implementation of the Community Eligibility Option in your State?
 - Probe: Positively, negatively, no influence
5. Has the implementation of the Community Eligibility Option resulted in any changes to your data-tracking procedures?
- a. If so, how have they changed?

F. IMPLEMENTATION PROCESSES (RQ1, RQ5, RQ6)

*(Questions without asterisk will be asked in Round 1 in Year 1 and Year 2 States, and in Round 2 in Year 3 States. For questions with * ask for Year 1 in Round 1 and Round 2, and for Year 2, Round 2)*

This next section will ask about how your State and its LEAs have implemented aspects of the Community Eligibility Option, particularly relative to the meal reimbursement system.

1. One of the intentions of the Community Eligibility Option is to reduce the administrative burden of processing applications and paperwork. Do the LEAs and schools still collect FRP applications to use the information to qualify for funding through other sources or do they use other sources, such as Household Income Forms, for this information? If so, what are the reasons?
 - Probe for other uses (test fee waivers, transportation fee waivers, health programs, funds for tutoring and afterschool programs)
 - a. Is this a one-time data collection effort? If no, how often will this data be collected? How will it be stored?
 - b. What type of response rates are the LEAs achieving in collecting this data?
2. How does the State conduct [or plan to conduct] the process of meal reimbursement for LEAs and schools participating in the Community Eligibility Option?
 - a. How has the payment system changed [or will it change] with the adoption of the Community Eligibility Option?
3. *Have there been any barriers to successfully implementing a meal reimbursement process to accommodate the Community Eligibility Option?
 - *Probe for barriers (funding, staff time, resources, electronic systems issues)
4. *Has it been an issue that some LEAs participate in the Community Eligibility Option and others do not? Has it been an issue that some schools within an LEA participate in the Community Eligibility Option and others do not?
 - a. * If so, what are the main issues?

5. What proportion of the LEAs and schools that now participate in the Community Eligibility Option in your State previously participated in Provision 2 and 3?
 - a. *How has the implementation of the Community Eligibility Option in these LEAs and schools differed from those that didn't previously participate in Provision 2 and 3?
 - *Probe for ways in which it differed (positive change, negative change, etc.)

G. FOOD SERVICE MANAGEMENT COMPANY CONTRACTS

*(Questions without asterisk will be asked in Round 1 in Year 1 and Year 2 States, and in Round 2 in Year 3 States. For questions with * ask for Year 1 in Round 1 and Round 2, and for Year 2, Round 2)*

This next section will ask about Food Service Management Company (FSMC) contracts and whether the Community Eligibility Option has affected that process.

1. Are there issues associated with LEAs using FSMCs?
 - Probe for other uses (test fee waivers, transportation fee waivers, health programs, funds for tutoring and afterschool programs)
 - a. Is this a one-time data collection effort? If no, how often will this data be collected? How will it be stored?
 - b. What type of response rates are the LEAs achieving in collecting this data?
2. Are there material changes in the contract that need to be renegotiated? If so, how was this process?
 - Probe for easy/difficult, lengthy or short
3. Do LEAs have to rebid contracts in order to participate? If so, how was this process? Who was mainly responsible?
4. Are the FSMCs different for LEAs electing CEO? If they are different, how so?

H. RESULTS AND IMPRESSIONS (RQ1)

*(Questions with * ask for Year 1 in Round 1 and Round 2, and for Year 2, in Round 2)*

Now I would like to ask a few questions about your State's impressions of the Community Eligibility Option after participating for a year, as well as any feedback you have received from LEAs and schools.

1. *After participating in the Community Eligibility Option for a year, what are your conclusions about the Option?
 - a. *Did you have positive results at the State level? Negative?
 - b. *What has the feedback been from participating LEAs and schools? Positive or negative?
2. *At the State level, what changes would you make to improve the implementation of the Community Eligibility Option?

I. PROGRAM IMPROVEMENT

(Ask in Round 2 interview, Year 1 States only)

This section will ask about your State's impressions about the Community Eligibility Option after participating for two years. It will also inquire about any changes your State has made to the implementation process, and whether additional LEAs and schools have taken up the Community Eligibility Option.

1. Now that you have participated in the Community Eligibility Option for 2 years, what are your conclusions about the program?
 - a. Have your impressions about the Community Eligibility Option changed in the past year?
 - b. Have your expectations of the Community Eligibility Option been met?
2. What changes did your State agency make in implementing the Community Eligibility Option during your second year of participation?
 - Probe for changes (Management structure, eligibility process, payment systems, etc.)
3. What changes did the LEAs and schools make in implementing the Community Eligibility Option during your State's second year of participation?
4. What have been the challenges for your agency in implementing the Community Eligibility Option this past year?
 - a. How are these challenges different from those faced during your first year of participation?
 - Probe: Same, different, less, more
5. What program improvements has the State made to the implementation of the Community Eligibility Option within the past year? How was it determined that these improvements should be made (i.e., State felt the need, requested by LEAs/schools, etc.)?

- Probe for areas of improvement (frequency of direct certification, verification, reimbursement systems, management structure, communication with LEAs and schools)
6. Have additional LEAs and schools taken up the Community Eligibility Option this past year?
 - a. What do you think are the reasons behind their decisions to take up the Community Eligibility Option in the second year?
 - Probe for reasons (saw the success of other LEAs, changes in the implementation process at the State level, more knowledge of the Community Eligibility Option, etc.)
 - b. To what extent has the increase in LEAs/schools affected State-level processes?
 7. Have any LEAs and schools suspended participation in the Community Eligibility Option this year?
 - a. What do you think are the reasons behind their decisions to suspend participation in the Community Eligibility Option in the second year?
 - Probe for reasons: Implementation difficulties, payment system issues, etc.
 8. After implementing the Community Eligibility Option for 2 years, what suggestions would you make to improve the way States and LEAs are able to implement the Community Eligibility Option?

J. DIRECT CERTIFICATION PROCESS

(Ask in Round 1, for Year 1 and Year 2 States; in Round 2 for Year 3 States)

Now that we have completed our discussion about the Community Eligibility Option, I have a few questions about the direct certification process in your State.

1. Does your State conduct computer matching for direct certification at the State level? If so:
 - a. What programs are included?
 - Probe for SNAP, TANF, FDPIR, Medicaid
 - b. How often is matching done?
 - c. Do all LEAs receive computer matching results? If not, please explain why some do not.
 - d. How are the results provided to LEAs?
 - Probe for in what form(s) and ways to access data
 - e. What information about matched students is included in the report or file with the results?
2. Does your State provide lists of children participating in assistance programs to LEAs so that they can match the lists to their student records? If so:
 - a. What programs are included?
 - Probe for SNAP, TANF, FDPIR, Medicaid

- b. How often are lists provided?
 - c. Do all LEAs receive computer matching results? If not, please explain why some do not.
 - d. How are the lists provided to LEAs?
 - Probe for in what form(s) and ways to access data
 - e. What information about students is included in the lists?
3. Does the SNAP agency in your State send letters to families with school-aged children that can be used in lieu of applications for free/reduced-price meals? If so:
 - a. When are the letters sent?
 - b. What information is included in the letters?
 4. Does your State provide any additional tools or methods for direct certification? This might include a system to look up the status of individual children or a list of SNAP children who are not matched to student records at the State level (Extended Direct Certification Match). If so, please describe.
 5. What records of direct certification are LEAs required to maintain?
 - a. In what form (hard copy, electronic media, on a computer network)?

K. COMMUNICATION WITH DEPARTMENT OF EDUCATION

(Year 1 and Year 2 States: Ask only in Round 1. Year 3 States: Ask in Round 2.)

The questions in this next section seek to understand your State's methods of communicating with other Department of Education staff, as well as the success of and changes to the communication process.

1. How frequent is your contact with Department of Education staff?
 - Probe for regular forms of communication, or ad-hoc conversations
2. What forms of communication do you typically use when interacting with Department of Education staff?
 - Probe for methods of communication (emails, meetings, phone calls)
3. To what extent has this been an effective process for communicating? What, if any, are areas of improvement?
4. To what extent are communications timely? For example, are issues discussed when they are anticipated or when they actually occur?

Closing

Is there anything else you think is important for us to know about the Community Eligibility Option in your State that we did not ask about?

Thank you so much for your time and helpful feedback. This information will be extremely valuable to our team as we continue to look at the implementation of the Community Eligibility Option in participating States.

Do you have any questions for me before we conclude the interview?