05/03/2016

TO: Stephanie Tatham, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Ruth Brown, Information Collection
United States Department of Agriculture
Office of Chief Information Office

FROM: Lynnette Thomas
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Food and Nutrition Service (FNS)

Re: Request Approval to Perform Research Under Approved Generic OMB Clearance No. 0584-0524

The USDA Food and Nutrition Service requests OMB approval for a formative research project under generic clearance number 0584-0524. The proposed research will focus on the communication between school districts and households in the process of verifying household eligibility for free and reduced price school meal benefits under the National School Lunch Program (NSLP) and the School Breakfast Program (SBP).

Local educational agencies (LEAs) are required by statute 42 U.S.C. 1758(b)(3)(D) to verify a small sample of household applications approved for free or reduced price benefits each school year. LEAs select their samples from approved applications on file as of October 1, and notify households by letter that they have been selected for verification review. The letters instruct households to return documentation in support of the type and amount of income that they reported on their applications.

On review of the documentation submitted by households, LEAs either confirm or amend the certification decisions reached at the time the applications were originally processed. Households that fail to return supporting documentation lose their free or reduced-price school meal benefits. A 2004 USDA case study found that many of the households that failed to respond to LEA verification requests were, in fact, income eligible for the benefits that were awarded to them at the time their applications were processed.

The goal of this research is to identify communication protocols that reduce the incidence of household non-response to LEA verification requests. The project proposed here follows up on a project conducted in school year 2015-2016, cleared under the same generic clearance. The previous project varied the content, but not the timing, of LEA verification letters to households.

This second proposed project will test the effectiveness of further changes in the content of

LEA letters, based on results of the 2015-2016 work, as well as changes in the timing of LEA verification. The project will be led by the White House Social and Behavioral Sciences Team in cooperation with FNS.

1. Title of Project

Test Modified Communication Protocols to Reduce Household Non-response in NSLP/SBP Verification Process

2. Control Number

0584-0524, expiration date: 6/30/2016

3. Entities affected by this project

- **Local educational agencies (LEA)**
  The research team will recruit LEAs to participate in a protocol described below. The total study will be made up of a geographically diverse selection of the largest LEAs in terms of number of households contacted for verification. Each of these LEAs will use the revised communication protocol's timing and content for a randomly selected subset of their verification sample households (the intervention group) while retaining their previous process for the remaining households in the verification sample (the control group). The intervention group will be selected by randomization at the household level. Randomization will ensure that selection is fair and that the results of the intervention can be rigorously evaluated. LEAs will use a single protocol that outlines action steps for both the intervention and control households.

  Participating LEAs will record the verification procedures that they followed and the results of the process. Results will be shared with the research team. LEAs will report the following data to the researchers:

  - Dates registered automatically by the LEAs' software indicating:[1]
    - LEA initial contact with verification sample households
    - LEA receipt of household documentation for verification purposes
  - Method of receipt for all contacts, i.e. the number of receipts by email/mail/phone/in-person, etc.
  - Name of any specialized software or vendor used during the verification process
  - A copy of the final verification letter used
  - Final copies of any other printed materials given to verification households
  - Estimated person-hours dedicated to the verification process
  - The ultimate outcome of the verification process (using the same measures

[1] No new record keeping will be requested, but LEAs will be requested to share the dates that are automatically recorded by their software system.

reported on the FNS-742 (OMB No. 0584-0026, Exp. 4/30/2016)) but split into intervention and control household subtotals

- **Household applicants for free and reduced price school meals**
  Household beneficiaries are affected by this project, but no new information will be collected from households as part of this project, nor will any households be contacted by FNS or the research team. The obligation of a household to respond to LEA requests for verification documentation is identical whether their household is part of the intervention group or the control group.

  It is worth noting that the intent of the research protocol is to make the verification procedure more efficient and effective. Therefore, it is possible that the changes implemented will reduce the overall time needed by households and LEAs to process each household's verification by using a more streamlined process and incentivizing more families to respond to the initial contact without need for additional follow-up from the LEA.

4. Research Objectives and Design

Objectives:

This project will test the effectiveness of limited changes in the content and timing of letters sent by LEAs to households requesting documentation to support the households' applications for free or reduced price school meal benefits. The project will also test the effectiveness of changes in LEAs' follow-up communication protocol with households. In both cases effectiveness will be measured by:

- The rate at which households respond to LEA communication with the requested documentation
- The time it takes households to respond to the LEAs' initial and follow-up requests[2]

The ultimate goal of the project is to identify communication protocols that reduce the household non-response rate. Households that fail to respond to the LEA request for documentation lose their free or reduced price benefits. In the school year 2014-2015 verification process, 35.8 percent of households contacted by their LEAs failed to respond. Among the nine largest LEAs, the rate of non-response was even worse at 52.2%. This is more than four times higher than the percent of households that lose the benefits by responding to the verification process and exceeding the income threshold. Research conducted by USDA in 2004 suggests that many of these households may be income-eligible for free or reduced-price

[2] This will be based on the date registered automatically by the software system for when a particular household was sent the verification request and when they were marked as verified after submission of documents. LEAs will not need to employ any new record keeping system, but will be requested to export and share the dates registered by their software system. Ideally this data will be exported at household level for matching and analysis.

meals.[3]

The project will take place in the summer and fall of 2016, during the application and verification process for school year 2016-2017.

Sample selection:

The research team will sample at least three LEAs but no more than nine with the largest number of households selected for verification as reported in the most current available FNS-742 dataset.[4] The LEAs will be included in the sample if they reported a response rate below 80% in SY 2015-2016 with a verification sample of at least 500 applications. Within each of the LEAs, revised communication materials and protocols will be randomly assigned to one half of the households selected for verification (intervention group) while the other half of the households will continue to receive the same communications as normally would be used by the LEAs (control group).

Because the project is focused on the NSLP/SBP verification process, the research team will draw their samples from the subset of LEAs that will process traditional applications in school year 2016-2017. The following LEAs will be dropped from the FNS-742 universe before selecting the intervention and control group samples:

- LEAs that operate district-wide under the Community Eligibility Provision as of school year 2015-2016
- LEAs that are expected to see significant decreases in household applications due to increase in CEP participation in school year 2016-2017
- LEAs that operate under NSLP/SBP Provision 2 or Provision 3 and will be a non-base year in school year 2016-2017

On selection of LEAs for participation in the project, FNS will contact the appropriate FNS Regional Offices and State Agencies by letter to inform them of the purpose of the project and the nature of the data collection. FNS and the research team will then contact the State agencies, working with them to secure the participation of the selected LEAs. After securing the participation of LEAs, the research team will work with the LEAs and their vendors providing verification sampling software to integrate the proposed changes to the

[3] The 2004 *USDA Case Study of National School Lunch Program Verification Outcomes in Large Metropolitan School Districts* found that just over half of households that failed to respond to verification requests in 21 large metropolitan LEAs in the fall of 2002 were eligible for at least the level of benefits they were initially certified to receive. Although the LEAs examined in the case study are not representative of all LEAs, and the makeup of the households that are subject to verification review today is much different than was the case in 2002, the structure of the verification process has not changed much over the years. For this reason, these findings continue to raise concern that the verification process is a barrier to program access for some households.

[4] The FNS-742 is an LEA-level form submitted annually by State agencies that administer the school meal programs. It is one of the few forms with LEA level statistics, making it ideal for use in selecting LEA-level samples for FNS research projects.

communication timing and content.

The research team will provide a written protocol to all LEAs and will hold an individual phone calls with any LEA that requires assistance in implementing research protocol.

5. Number of participants / respondents

Proposed Sites for Pilot	Number of respondents	Number of intervention households	Number of control households
Participating LEAs	9[5]	2800	2800
Notes	*Only the LEAs will be reporting the pilot evaluation data to the research team while the households will be reporting the same information that would be required regardless of the pilot project and therefore are not respondents. The total number of households may change in accordance with verification sample size requirements in the Senate's 2016 Child Nutrition Reauthorization bill.*		

LEAs selected for participation will implement the following steps as part of the research protocol for intervention households:

1. Use of a verification communication material designed by the research team that incorporates insights from the behavioral sciences literature. The verification letter may be customized by the LEA with input from the research team and FNS
2. Send verification letters to households on a continuous basis (as certification decisions are made) along with letters notifying households of their certification for program benefits. The research team will provide assistance on selecting and notifying households for verification on a continuous basis
3. Follow a standard protocol for reminding households to return verification documentation. This will include one or more contacts via letter, email, and phone designed by the research team and sent to households at intervals specified by the research team. The protocol may also include text messages and phone calls to households
4. Acceptance of household documentation in multiple forms:
    a. Photocopies delivered by mail (the current standard)
    b. Original documents delivered by mail with expectation that the LEA will return original documents to the household
    c. Emailed pictures of documents
5. Provide documentation to the research team that records when each step in the research protocol was implemented
6. Provide data to the research team on when notification letters were sent (regarding initial acceptance), when verification requests were sent, and when responses were received

[5] Depending upon our success in recruitment of LEAs for participation, the research team may be able to reduce the number of participating LEAs to as few as three (3)

from households[6]

6. Time Needed per Response

Respondent Type	Type of Response	Time	
		Minutes	Hours[7]
Local Education Agencies	Recruitment and follow-up discussions with research team in conference call and/or individually	90	1.5
	Customization of verification letter	120	2
	Review of instructions and implementation of research protocol	60	1
	1. Implement continuous sampling/selection process (weekly)	15	0.25
	2. Marginal time per letter prepared	1	0.017
	Reminders to households (50%)	5	0.083
	Processing documentation other than paper copies (50%)	3	0.05
	Document household response & date	2	0.033
	Provide copy of verification letter to FNS	10	0.167
	Prepare final report on household level outcomes	30	0.5
Software Vendors	Determine best method for automating study protocol through software	120	2
LEA: Decline participation	Communication about recruitment	30	0.5
States Agencies	Communication regarding the project and recruitment	60	1

[6] As noted earlier, this will only be requested if the data can be automatically generated by the LEAs software system. The LEA will not be requested to manual track dates of interaction with each household beyond their normal procedures.

[7] Hours shown rounded to nearest thousandth

7. Total Respondent Burden

(a) Affected Public	(b) Type of Response	(c) Attachment	(d) Number of Respondents	(e) Responses per Respondent	(f) Number of Responses (d × e)	(g) Hours per Response [8]	(h) Total burden Hours[9] (f × g)
LEA: Intervention	Recruitment and follow-up discussions with research team in conference call and/or individually	Attachment H	9	1	9	1.5	13.5
	Customization of verification letter	Attachment A	9	1	9	2	18
	Review of instructions and implementation of intervention protocol	Attachment D (provides instructions)	9	1	9	1	9
	1. Implement continuous sampling/selection process (weekly)[10]	Attachment E[11]	9	12	108	0.25	27

[8] Table shows rounded hours. Unrounded hours used in calculation for Total burden hours (h)
[9] Hours are rounded up to the a tenth of an hour. Unrounded hours are used for calculation of total burden hours.
[10] Based on conversations with software vendors, the time burden upon LEAs may be more or less depending on how much of the process can be automated and installed without additional time. The time may be less if one software provider services all included LEAs and can easily install the automated process.
[11] This diagram provides a high level overview of the selection of applications into the "rolling verification" and "October 1" verification subsamples. Because LEAs will rely on their software to select these subsamples, this diagram is mainly background reference for the LEAs. FNS and the SBST will use the same diagram in more technical conversations with software vendors to discuss possible coding changes necessary to support the rolling verification process.

(a) Affected Public	(b) Type of Response	(c) Attachment	(d) Number of Respondents	(e) Responses per Respondent	(f) Number of Responses (d × e)	(g) Hours per Response [8]	(h) Total burden Hours [9] (f × g)
	2. Marginal time per letter prepared	Attachment A	9	311.1[12]	2800	0.017	46.7
	Reminders to households (50%)[13]	Attachment B & C	9	155.6[14]	1400	0.083	116.7
	Processing documentation other than paper copies (50%)[15]	Attachment D (provides instructions)	9	155.6[16]	1400	0.05	70
	Document household response & date[17]	Attachment F	9	622.2[18]	5600	0.033	186.7
	Provide copy of verification letter to FNS	Attachment D (provides instructions)	9	1	9	0.167	1.5

[12] Average responses from intervention households. Rounded for display, unrounded used in calculations.
[13] Intervention households only.
[14] Half of average responses from intervention households. Rounded for display, unrounded used in calculations.
[15] Intervention households only.
[16] Half of average responses from intervention households. Rounded for display, unrounded used in calculations.
[17] This provides a maximum burden. Much of this documentation will be automated by the software in use and as a result the burden will likely be lower through the use of technological automation.
[18] Average responses from both intervention and control households. Rounded for display, unrounded used in calculations.

(a) Affected Public	(b) Type of Response	(c) Attachment	(d) Number of Respondents	(e) Responses per Respondent	(f) Number of Responses (d × e)	(g) Hours per Response [8]	(h) Total burden Hours [9] (f × g)
	Prepare final report on household level outcomes	Attachment D (provides instructions)	9	1	9	0.5	4.5
Software Vendors	Determine best method for automating study protocol through software	Attachment E (rolling verification logic model)[19]	9	1	9	2	18
LEA: Decline participation	Communication about recruitment	Attachment H	4[20]	1	9	0.5	2
State Agencies	Communication regarding the project and recruitment	Attachment G	6[21]	1	6	1	6
State & Local Government Sub-total			**19**		**11378**		**502**
Business Sub-total			**9**		**9**		**18**

[19] FNS and the SBST will use the Attachment E diagram in conversations with the vendors that design and maintain the verification software used by the project's participating LEAs. The purpose of those conversations is to discuss how the software can support rolling verification and whether any coding changes will be necessary.

[20] Maximum number of LEAs estimated to decline participation.

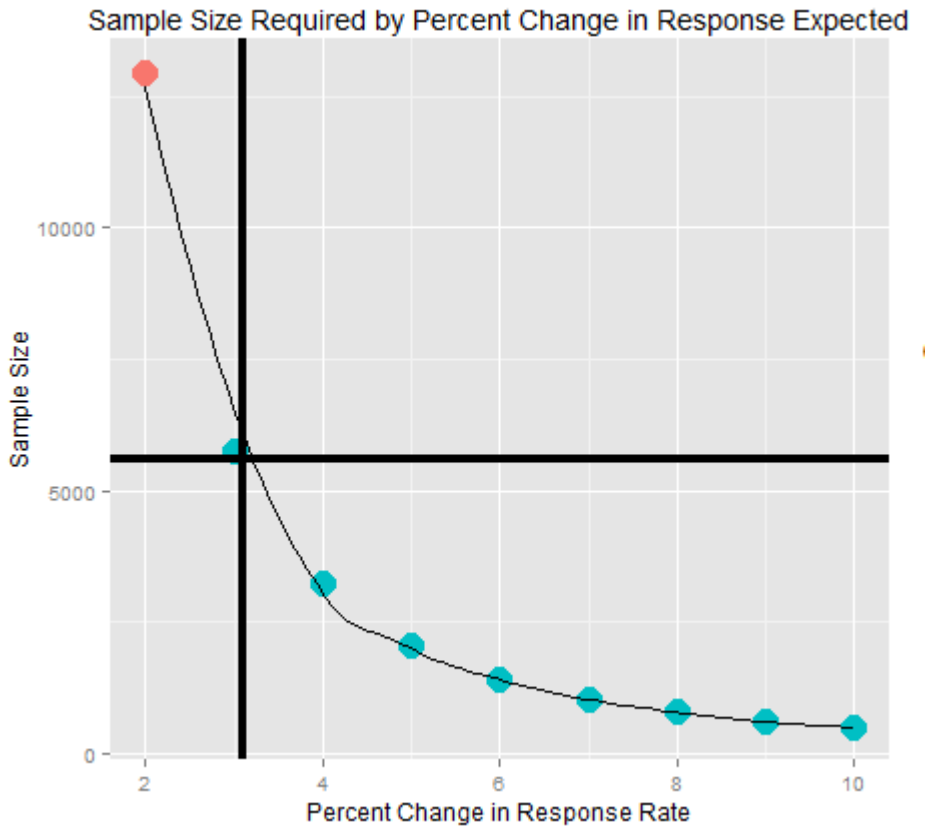
[21] Maximum number of State Agencies contacted: assumes one LEA will decline and thus another state will need to be contacted.

(a) Affected Public	(b) Type of Response	(c) Attachment	(d) Number of Respondents	(e) Responses per Respondent	(f) Number of Responses (d × e)	(g) Hours per Response [8]	(h) Total burden Hours [9] (f × g)
TOTAL			**28**		**11387**		**520**

Methodology / Research Design

Statistical testing:

The minimum of three proposed LEAs would comprise an estimated sample of 5600 households receiving verification applications.[22] This sample size will enable the project to detect a 3.1% change in the response rate with a Type I error rate of 5% and a Type II error rate of 10%.[23] This means that the study will have a 90% chance of detecting a positive outcome of a response rate of 57.8% for intervention households compared to 54.7% among the control group households.



Intervention details: changes to letter

An alternative verification letter will be provided to all participating LEAs for intervention use.

[22] Note that while the respondent time incorporates only the intervention households (2800) the full sample size calculation includes the control group households.

[23] This sample size calculation does not control for stratification. The calculation was based on the baseline levels of response rates in the sample from the 2014-2015 school year. The expected change is informed by preliminary data the 2015-2016 pilot results.

The letter template will be customized by the research team with LEA input. That template will then be adapted by the LEA to each LEA's context.

Intervention details: changes to timing
Currently, LEAs determine the verification sample in one of three ways:

1. Verification process 1: Standard
2. Verification process 2: Alternate 1
3. Verification process 3: Alternate 2

Typically, LEAs using the Standard verification process wait until at least 1 October to begin verification. They determine the total number of applications and multiply by 0.03 to obtain the total number of applications to verify. They also determine the total number of error-prone applications (applications with incomes within $100 of the limit). They then select the verification sample as the lesser of:

- (Total applications)*0.03, selected from error prone applications.
- 3,000 error prone applications.

To use the 3% sample method continuously (rather than on or after 1 October), LEAs would simply determine whether or not an individual application required verification *at the time of eligibility determination.* There are a number of ways to do this. One way to do this would be to establish a random order ahead of time, such that, for example, the first approved application that is considered error prone is asked for verification, the second is not, the third is not, and so on. This way, as soon as individuals are determined to be eligible, LEAs know whether the household income must be verified. This would allow for a much shorter lag between application and verification.

The research team will help LEAs to determine an exact procedure for conducting the continuous sampling. For example, notifications and verification samples could be bundled and sent out on a weekly basis.

Since LEAs are required to notify households of an eligibility determination—i.e. notify them of a successful application—LEAs will include a request for verification at this time for selected households. Collapsing the verification step and the notification step will reduce the total communications burden on the LEAs and decrease the likelihood of household non-response.

Intervention details: Reminders
The research protocol includes extra reminders to households selected for verification. Currently, LEAs must make one follow up attempt to contact households that do not respond. LEAs will communicate with intervention households that do not respond to the initial verification request through reminder letters, emails, phone calls, and/or texts. Letters and emails are the most

straightforward technology to use, and thus these are the modes of communication that we expect all of the LEAs to be capable of utilizing. The research team will design the reminder template to have a similar look and feel to the redesigned letter and will also create a communication protocol around phone call reminders.

8. Federal Costs

FNS will offer to pay the costs of:

1. Stamped return envelopes included with the initial verification letters sent by LEAs to intervention households
2. The cost of letters and/or postcards plus postage for up to two reminder mailings by LEAs to intervention households

A high end estimate of this cost assumes that all intervention group households are sent postage-paid return envelopes with their initial verification letters and are all contacted by mail two additional times during the course of the intervention.

Total Federal Cost: $5,000

9. Confidentiality

Household level information

LEAs will collect no additional information from households through this project. All household level information collected by LEAs as part of the certification and verification processes will remain with the LEAs. LEAs will report only summary statistics on verification outcomes to FNS and the research team.

10. List of Attachments

- Attachment A: “Attachment A - Modified Verification Letter.docx”
- Attachment B: “Attachment B – Reminder Letter.docx”
- Attachment C: “Attachment C – Intervention-Reminder Call Script.docx”
- Attachment D: “Attachment D – Protocol for Participating LEAs.docx”
- Attachment E: “Attachment E - Rolling Assignment Procedure Logic Model.docx”
- Attachment F: “Attachment F - Report Template for HH Contact & Responses.xlsx”
- Attachment G: “Attachment G – State Recruitment Letter.docx”
- Attachment H: “Attachment H – LEA Recruitment Letter.docx”