Attachment D - Protocol for Treatment LEAs

VERIFICATION IMPROVEMENT PILOT– STUDY PROTOCOL

1. Introduction

Thank you for agreeing to participate in the Verification Improvement Pilot (VIP), which will test low-cost, low-burden interventions for increasing response to NSLP and SBP verification requests.

The pilot has been designed to place minimal burden on your staff; depending on your current procedure for conducting NSLP and SBP verification, the process explained below may not be very different from your current operations. However, we know that participating in a study of any kind can be demanding, so the research team will provide close support and technical assistance.

Please contact Ed Harper (Edward.Harper@fns.usda.gov) or Nathaniel Higgins (Nathaniel.Higgins@gsa.gov) with any questions at any time.

Federal funds will cover the cost of additional paper and postage required for the intervention.

2. Overview of Protocol

Households that fail to return supporting documentation to verification requests lose their free or reduced-price benefits. A 2004 USDA study found that 50% of non-responder households were, in fact, income eligible for the benefits that were awarded to them at the time their applications were processed.[1]

This pilot will test some basic changes – changes that have worked well in other contexts – to the verification process. There are two types of changes: <u>timing</u> changes and changes to <u>letters</u> sent to households.

2.1 Timing

2.1.1 Basic Requirements:

All LEAs are required to perform *verification* each fall.[2] The verification process must be completed by November 15 of the school year.[3]

> Summary of protocol:
>
> 1. Send requests for verification at the same time you send notification of approved benefits.
>
> 2. Send modified letters.
>
> 3. Follow up with additional reminders.

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[1] Mathematica (commissioned by USDA FNS). 2004. Case Study of National School Lunch Program Verification Outcomes in Large Metropolitan School Districts. http://www.fns.usda.gov/sites/default/files/NSLPcasestudy.pdf
[2] See Part 9 of the Eligibility Manual for School Meals.
[3] A request for a written extension to December 15 can be submitted to the state agency (see p. 83 of the Eligibility Manual for School Meals)

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In order to complete verification, you must draw a random sample of approved applications from among all the approved applications on October 1.[4] If there are 1,000 approved applications on October 1, you must verify 30 applications (3% of the total). These applications should come first from among the group of error-prone applications.

If there are less than 30 error-prone applications, then each of the error-prone applications must be verified and, in addition, some applications from among the not-error-prone applications must be randomly selected so that a total of 30 applications are verified.

There are several ways to accomplish this verification. As part of the protocol for the pilot, you will verify approved error-prone applications *on a rolling basis*.

2.1.2 Rolling Verification

The modified process will result in selecting households for verification and notifying them on a rolling basis simultaneous with the notification of benefit approval. This collapses the verification step with the notification step, which we hope will reduce the total communications burden.

As you approve an error-prone application for benefits, you will immediately determine whether or not the application must be verified using the provided Excel workbook.[5] If the application must be verified, you will send a letter to the household that (1) notifies them of the approval of their application and (2) requests verification materials. We have provided a template for this letter that you can modify. This one letter replaces two separate letters (one for notification[6] and the other for verification).

You should send a letter home via mail, but are additionally encouraged to hand deliver a letter to the household by providing it to a household member, and to email the letter if you have a contact email address.

If you determine that an application does not need to be verified, please do what you would normally do to notify the household of the approval of their application.

2.2 Letters

> Questions? Call or email our research team.
>
> Ed Harper
> Edward.Harper@fns.usda.gov
> 571 206 7236
>
> Nathaniel Higgins
> Nathaniel.Higgins@gsa.gov
> 202 302 9146

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[4] The reference here is to the standard method of verification, rather

[5] "Rolling assignment procedure worksheet"

[6] All LEAs are required to process applications within 10 operating days of receiving an application for free or reduced-price meals. Households with children who are approved for free or reduced-price meal benefits may be notified in writing or verbally. See p. 28 of the Eligibility Manual for School Meals.

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According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0524. The time required to complete this information collection is estimated to average about 45 minutes (0.75 hours) in one-time activity, and 3 minutes (0.05 hours) per variable response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The research team has designed new letter templates for you to use during the verification process, as mentioned above. The major change is that two letters have been replaced by one: when individuals are selected for verification, you will send them a single letter than notifies them of their application's approval and of the need for the household to return verification items.

The letter template to use is here [link].

Additionally, the research team has designed templates for extra reminder letters to households selected for verification. The research team has designed a modified reminder letter template (linked [here]) and a template for reminder phone calls (linked [here]).[7]

2.3 Other changes

Households may currently satisfy verification requirements by sending in copies of documents, or original documents. As part of the pilot, households will additionally be allowed to submit documents electronically by email. Since many households do not have easy access to scanners, households will be allowed to submit *pictures* of documents by email in addition to scans of documents.

These changes are emphasized in the modified verification letter template provided.

Households will not be contacted by FNS or the research team. Their obligation to respond to your requests for verification documentation is no different from before.

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[7] Please see Attachments XXX to this protocol.

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Verification process: What to do

Step	Description	Date	Comment
1) Customize the modified letter template (See Appendix A)	Customize the attached verification letter designed by the research team that incorporates insights from the behavioral sciences literature to generate high response.	*July*	Please contact the research team if you would like assistance customizing the letter template.
2) Send verification request with notification of successful application (See Appendix B)	Send verification letters to sampled households on a continuous basis (as approval decisions are made) in the same mailing as the notification of successful application. • Some LEAs may already send verification letters to households on a continuous basis as applications are processed, which is permitted under current regulations; for these LEAs, the intervention protocol may require very little change in current procedure. • For all other LEAs, the research team will provide assistance on selecting and notifying households for verification on a continuous basis.	*Rolling basis from August – October 1*	Include a stamped return envelope with the mailing (paid for by FNS).
3) Allow submission of verification materials by email, and emphasize the ability of submission of original documents	Documents sent by households will now be accepted in multiple forms: • Photocopies delivered by mail (the current standard) • Original documents delivered by mail with expectation that the LEA will return these to the household • Emailed pictures of documents	*Rolling basis from August – October 1*	Email submissions of documents, including scans or digital pictures of documents, especially pictures taken with a mobile phone, will be acceptable for the purposes of verification.
4) Send a postcard or letter reminder (See Appendix C)	Send this follow-up reminder designed by the research team to households one week before verification requests are due.	You set this date.	Templates provided by the research team (See Appendix C)
5) Follow-up phone call	Make a follow-up phone call to households two-three days	You set	A short call script has been

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	before verification requests are due. If households do not pick up, leave a message. If you cannot leave a message, please try again.	this date.	provided by the research team for your convenience (See Appendix D)

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Verification process: What to report

Please fill out the attached report (Appendix D) by October 31 to tell us about your verification practices.

1. Date of application review for all NSLP households
2. Date of application approval for all NSLP households
3. Date of initial and follow-up contacts with households, including reminder letter / postcard, and telephone contact with households
4. Date that verification documentation is provided by the households to you, and
5. Ultimate outcome of the verification process (using the same measures reported on the FNS-742)

Thank you for your participation!

Appendices

A. Modified verification letter
B. Rolling sampling procedure workbook
C. Reminder letter
D. Follow-up call script

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