Supporting Statement for OMB Clearance for the Study of Non-Response to the School Meals Application Verification Process

Appendix 11

District Interview



United States Department of Agriculture

oplication Study Interview

OMB No.: 0584-xxxx

Expiration Date: xx/xx/xxxx

Phone #: _____

Did the SFA select any applications for verification for cause during Fall 2017?

1 🗌 Yes

• 🗌 No

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-XXXX**. The time required to complete this information collection is estimated to average 20 minutes per 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.

During this interview, we will talk about your verification process and reasons for selecting applications for cause. Even if your SFA did not verify any applications for cause this year, we would still like to ask you questions about your verification for cause process.

PROBE: SFAs have an obligation to verify all questionable applications. This is known as "verification for cause." Such verification efforts cannot delay the approval of applications. If an application is complete and indicates that the child is eligible for free or reduced-price meals, the application must be approved at face value. Only after determining eligibility can the school begin the "verification for cause" process.

Section A: Selecting Applications for Verification

Before we discuss your district's "verification for cause" process, we will talk about your district's process for selecting applications for verification.

1a. How long does your SFA continue to contact households before they are marked as a non-response household?

|____ NUMBER OF DAYS

- 1b. Before households are marked as non-responsive, can you please tell me:
 - 1. The number of letters that your SFA will send per household?
 - 2. The number of emails that your SFA will send per household?
 - 3. The number of follow-up phone calls that your SFA will make per household? |___|
 - 4. The number of text messages that your SFA will make per household |____|
- 1c. When contacting households, does your district attempt to use the household's preferred language to communicate?
 - 1 🗌 Yes
 - ² D To the extent possible
 - 🗌 No
 - d 🗌 Don't know
- 1d. Does your SFA use the "We Must Check Your Application" letter template drafted by FNS?
 - 1 🗌 Yes
 - 0 🗌 NO
 - d 🗌 Don't know
- **1e.** IF THE DISTRICT SENDS A LETTER/EMAIL/TEXT MESSAGE: **Can you provide us with the letter**, email, and/or text message that your district sends to households?

IF NO: Ok, no problem.

IF YES: Great, can you please send this letter, email, and/or text message to me after we have completed the interview?

Section B: Selecting Applications for Cause

IF SFA SELECTED APPLICATIONS "FOR CAUSE": Now, we will talk about how your SFA selects applications "for cause".

IF SFA DID NOT SELECT ANY APPLICATIONS "FOR CAUSE" DURING SY 2017-2018: **Our records show** that you may not have selected applications for verification "for cause" during Fall 2017, but we would still like to speak with you about your SFA's general process when you select applications "for cause."

1f. When does your SFA select applications for "verification for cause"?

How often does your SFA select applications for "verification for cause"?					
	ENTIONED, PROBE: Does your SFA select applications on a rolling basis or just a school year?				
	r SFA have formal written criteria, or a related policy, that you use to identify ons for "verification for cause"?				
1 🗌 Y	es				
0 🗆 N	\rightarrow GO TO Q4				
What form	nal criteria does your SFA use to identify applications for "verification for cause"				
PROBE:	Here we just want to talk about any set standards that your SFA uses to identify questionable applications. We are interested in your written standards.				

3a. Is there any written documentation that you can share that outlines these criteria?

IF "NO" SAY: Ok, no problem.

IF "YES" SAY: Great! Can you please send this to us after we complete the interview?

4. IF "NO" IN QUESTION 2: What method(s) do you use to identify applications to verify for a cause?

OR

IF "YES" IN QUESTION 2: Are there any other (informal) reasons why your SFA may identify an application for "verification for cause"?

PROBE: Informal reasons may include any reasons generally understood as standards that may or may not be documented in writing.

INTERVIEWER: ADDRESS THE FOLLOWING QUESTIONS IF NOT COVERED IN RESPONDENT'S ANSWERS ABOVE:			CONE ROW	INTERVIEWER: IF RESPONDENT
		YES NO RESPONDENT VOLUNTEERS WHY DO NOT USE A CRIT THEN CODE THE ANS HERE. IF THE RESPON NOT VOLUNTEERED LEAVE BLANK: Why		VOLUNTEERS WHY THEY DO NOT USE A CRITERIA THEN CODE THE ANSWER HERE. IF THE RESPONSE IS NOT VOLUNTEERED THEN LEAVE BLANK: Why does your SFA not use this
a.	Does your SFA automatically "verify for cause" all non- responders from the previous school year?	1	o 🗆	
b.	Does your SFA flag all error-prone applications and verify them for cause?			
	PROBE: Error-prone refers to those applications with an income listed within \$100/month (\$1,200/year) above or below the eligibility limit for free meals or \$100/month (\$1,200/year) below the eligibility limit for reduced-price meals.	1	о 🗆	
C.	Does your SFA verify all applications that repeatedly list total income as \$0 on the application each year?	1	o 🗌	
d.	Does your SFA use available salary information to identify questionable applications for school district employees?	1	o 🗆	
e.	Does your SFA verify for cause when there are multiple application submissions with different information?	1	o 🗌	

5. Once you have selected a household to be verified for cause, what steps does your SFA take to verify this application?

IF NOT MENTIONED, PROBE: What are the main activities in each of these steps?

- 6. How many staff were involved with the "verification for cause" process in SY 2017-2018? Please include all staff who are involved in the process, including secretarial and clerical staff needed to produce materials and send out requests.
 - 1 🗌 1 to 3
 - 2 🗌 4 to 6
 - 3 🗌 7 to 9
 - 4 🗌 10 or more
- 7. How does your SFA ensure that the person <u>who approved the applications during the</u> <u>certification process</u> does not also conduct the <u>confirmation of the applications</u> selected for verification?

8. What steps does your SFA take to ensure employees are not approving their own household's applications or verifying their own applications?

Section C: Direct Verification

Let's talk about direct verification of applications that have been selected for cause.

9.	Does your SFA conduct direct verification as part of "verification for cause?"
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- 1 🗌 Yes
 - ₀ □ No → GO TO Q10

9a. How does your SFA conduct direct verification as a part of "verification for cause?"

IF NOT MENTIONED, PROBE: How often does your SFA conduct direct verification as part of verification for cause?

9b. Does the direct verification process that your SFA conducts as part of verification for cause differ from the <u>regular</u> direct verification process used for other applications not being verified for cause? If so, how?

10. Why doesn't your SFA conduct direct verification as part of "verification for cause?"

Section D: Notifying Households

Now let's talk about your SFA's procedures for notifying households about their applications being <u>verified for cause</u>.

IF RESPONDENT INDICATES THAT THEIR PROCESS FOR NOTIFYING HOUSEHOLDS ABOUT THEIR APPLICATIONS BEING VERIFIED FOR CAUSE IS THE SAME AS THEIR NOTIFICATION PROCESS FOR VERIFICATION THEN CHECK THE BOX, FILL IN THE APPROPRIATE ANSWERS FROM SECTION A, AND SKIP TO QUESTION 11d.

SAME PROCESS AS VERIFICATION

11a. How long does your SFA continue to contact households before they are marked as a non-response household?

|____ NUMBER OF DAYS

- 11b. Before households are marked as non-responsive, can you please tell me:
 - 1. The number of letters that your SFA will send per household?
 - 2. The number of emails that your SFA will send per household?
 - 3. The number of follow-up phone calls that your SFA will make per household?
 - 4. The number of text messages that your SFA will make per household
- 11c. When contacting households, does your district attempt to use the household's preferred language to communicate?
 - 1 🗌 Yes
 - $_2$ \Box To the extent possible
 - 🗌 No
 - d Don't know
- 11d. IF THE PROCESS IS THE SAME AS THE VERIFICATION FOR CAUSE PROCESS: Does your SFA use the same letter that is used for verification to notify households that their application has been selected to be verified for cause?
 - 1 🗌 Yes
 - 0 🗌 NO

IF A LETTER IS NOT SENT DURING VERIFICATION: Does your SFA use the "We Must Check Your Application" letter template drafted by FNS?

- 1 🗌 Yes
- 0 🗌 NO

11e. IF THE DISTRICT SENDS A LETTER/EMAIL/TEXT MESSAGE: **Can you provide us with the letter**, email, and/or text message that your district sends to households?

IF NO: Ok, no problem.

IF YES: Great, can you please send this letter, email, and/or text message to me after we have completed the interview?

12. After selecting an application for "verification for cause", how long does it take your SFA to initially notify a household that its application has been selected for verification?

PROBE: How many days, weeks, months?

Section E: Assessing Household Information

Let's talk about how your SFA assesses household information.

13. Does your SFA have any special procedures for siblings or children living at the same address in your "verification for cause" process? If so, what are they?

14. What steps are taken when a household does not respond to the "verification for cause" request?

15. What steps are taken when a household submits incomplete or incorrect documentation/ information during the "verification for cause" process?

16. What do you do if a household submits another application after its child(ren)'s certification status has been terminated due to non-response in the same school year?

Section F: Finalizing the "Verification for Cause" Process

In this last section, we will talk about how your SFA finalizes the "verification for cause" process.

17. After the household's information has been reviewed, how does your SFA communicate the results of the review to the household?

IF NOT MENTIONED, PROBE: Does your SFA send a "Your Application Has Been Reviewed" letter and/or email? If so, how soon after the household's information has been reviewed do you send a letter and/or email? What does the letter and/or email include?

18. How does your SFA report the results of the "verification for cause" process to your state agency? PROBE: How does your SFA use the data collected during the verification period to report to your state agency? What does your SFA report to your state agency? 19. What data from the "verification for cause" process are you required to report to your state agency?

20. What information from the "verification for cause" process do you retain? Where/how do you store this information?

Thank you for your time. Let me give you my contact information so you can send me the letters/emails/text messages and/or formal documentation of processes used to identify applications for "verification for cause".