

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

Appendix 15

District Frequently Asked Questions



RESPONSES TO FREQUENTLY ASKED QUESTIONS

What is the purpose the study?

The School Meal Application Study will build on the findings from the Case Study of National School Lunch Program Verification Outcomes in Large Metropolitan School Districts (2004) by examining the accuracy of the current verification process and the impact of policy changes since 2004. The project will use a case study methodology to:

- Verify the incomes and categorical eligibility of households that did not respond to verification requests,
- Verify the incomes and categorical eligibility of households with no benefit changes as a result of verification,
- Investigate the process of selecting applications “for cause,” and
- Examine the ultimate results of the verification process.

Under the 2002 Improper Payments Information Act, all federal agencies that administer large programs are required to report these findings to the Office of Management and Budget (OMB).

Who is funding the study?

The United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), is funding the study. Mathematica Policy Research is conducting the study for USDA under contract number AG-3198-B-16-0004, task order number AG-3198-K-16-0063.

Who is Mathematica Policy Research?

Mathematica is one of the nation’s leading research firms. Mathematica has more than 35 years of experience studying child nutrition programs and other human services and health programs. The School Meal Application Study will build on the findings from the Case Study of National School Lunch Program Verification Outcomes in Large Metropolitan School Districts which was conducted by Mathematica in 2004. The company has offices in Princeton, New Jersey; Ann Arbor, Michigan; Cambridge, Massachusetts; Chicago, Illinois; Oakland, California; Tucson, Arizona; and Washington, D.C.

Why was our school district selected for this study?

Your school district was one of 25 school districts selected by FNS and Mathematica. The selected districts encompass all seven FNS regions; are in urban, suburban, and rural areas; include schools of varying sizes and grade levels; and include racially and ethnically diverse student populations. Here are some important points to remember about this study:

- This is an important study for FNS, and your district’s experiences with and opinions about the verification process are extremely valuable to the study.
- The study will help FNS learn about the accuracy of the certification process and investigate how recent policy changes have affected the process.
- The study will help FNS ensure that benefits are provided to those students who need them most.
- This study will help Congress make informed decisions when they make changes to the school breakfast and lunch programs.

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 six 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.

- The study in no way affects meal reimbursements to participating districts, schools, or households—the study is not conducting audits or monitoring visits.
- By participating in this study, you are "the voice" of many districts like yours—you represent hundreds of districts like yours across the country.

What does our school district have to do to participate?

During school year 2017–2018, School Food Authorities (SFAs) will be asked to:

Provide access to the district’s verification sample. SFAs and/or schools will be asked to provide information for each household that was part of the district’s verification sample. Mathematica also needs contact information for the sampled students to ask parents to complete a survey for the study. Mathematica will send you a Verification Data Request Form to guide you through this process.

Complete a phone interview. Each SFA food service director will complete a 20-minute phone interview about the district’s participation in school meals programs. The district interview will take place between March and April 2018.

Are school districts required to participate?

According to Section 305 of the Healthy, Hunger-Free Kids Act of 2010, “States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts.” Because you are a relatively large district with several schools and many students participating in the NSLP and SBP, your experiences and opinions are very important for decision making about the programs.

The study is collecting data from the SFAs about the current verification process for school meal benefits. The study does not involve interviewing students or teachers, and will not affect school curriculum in any way. Our data collection is very similar to your state’s Child Nutrition Agency’s onsite Coordinated Review of the School Food Authority and schools participating in the school meals program.

All information gathered from school districts, schools, and households is for research purposes only and is kept private to the full extent allowed by law. Responses will be grouped with those of other participants, and no individual districts, schools, or students will be identified. **Mathematica is not conducting audits or monitoring visits.** Participation in the study will not affect meal reimbursements to participating districts, schools, or households.

Mathematica is working on behalf of FNS, and various provisions in the National School Lunch Act, the Child Nutrition Act, and the Family Education Rights and Privacy Act, permit Mathematica, acting on behalf of FNS, to access school lunch application information without additional parental consent, and to access other records to confirm compliance.

Did you receive OMB and IRB approval?

The collection of information for the School Meal Application Study was approved by OMB on [DATE]. Upon receiving OMB approval, Mathematica submitted an application for study approval to an Institutional Review Board (IRB) as required by research regulations that apply to federally funded research that qualifies as human subject research. Additional information regarding receipt of IRB approval is available upon request.

What if our district does not have the time or staff to participate in the study?

Your time is very valuable. Therefore, the study has been carefully designed and pretested to collect the required information with minimal burden to you. Most of the data collection requires you to simply provide Mathematica with verification data files or, if necessary, provide trained Mathematica staff with access to records or lists that they can photocopy or abstract the data from your records. An interviewer will also do a quick 20-minute district interview with you or a selected designee about your school district’s “verification for cause” process.

Are the data you collect kept private?

Yes. All information gathered from school districts, schools, and households is for research purposes only and is kept private to the full extent allowed by law. Responses will be grouped with those of other participants, and no individual districts, schools, or students will be identified. Mathematica will inform parents of the study and our confidentiality procedures. **Mathematica is not conducting audits or monitoring visits in this study.**

Participation in the study will not affect meal reimbursements to participating districts and schools, or meal program benefits that participating students or households receive.

What types of data will you collect?

Study data will be obtained from several sources. Data for the household survey will be collected from in-person interviews; data for the district interview will be obtained through telephone interviews; SFAs will provide data about the SY 2017-2018 verification sample via an electronic file or a data collector will abstract necessary data onsite; and, SFAs will provide reapplication and changes to certification data via an electronic file.

SPECIFIC QUESTIONS ABOUT THE DATA COLLECTION

A. HOUSEHOLD SURVEYS

Why does our school district need to give contact information for students?

FNS wants to learn about the accuracy of district verification procedures. As such, Mathematica would like to interview households to assess the quality of information they provide on their applications. To do so, Mathematica needs a copy of your most recent verification sample file. From this file, the study team will select samples of (1) households that did not respond to the verification process and (2) households with no change in benefits after the verification process. To contact these households, Mathematica needs you to provide contact information (name, address, and phone number) for students' parents or guardians on the copy of the verification sample file. Mathematica will use this information to send the household a letter describing the study and asking for an interview. The letter will include a brochure describing the study and answering common questions.

What is the interview about?

The interviewer will ask parents or guardians about their participation in the school breakfast and school lunch programs, household size, and income. The interviewer will also ask parents or guardians why they did not respond to verification requests.

Why are you asking about income?

Income information will help document how accurately school districts determine eligibility for the school meals program. Mathematica will ask parents and guardians for permission to examine income and eligibility records. All information is kept private. The information provided will not affect their child's eligibility to receive school meal benefits or the meal reimbursements your district or school receives.

Are households required to participate?

No, but Mathematica will strongly encourage them to participate. Participation in the survey is entirely voluntary and will not affect their child's eligibility for school meals or any other programs. Parents or guardians may refuse to answer any individual question during the household survey. However, their experiences and opinions are very important for the study and for the program's success, so Mathematica will encourage their full participation. Households will receive a Visa gift card for \$25 when the household survey is completed.

How long will the survey take?

The length of the household survey varies for different households, but it usually takes about 45 minutes, plus up to two additional hours to collect income documentation beforehand.

B. SCHOOL DISTRICT DATA

Why do you need to look at school meal applications?

The study team will only need to look at applications if an electronic version of the district verification file cannot be obtained. This information will allow Mathematica to determine whether applications were processed accurately and whether certifications (free, reduced-price, or denied) are correct. The study team will compare applications with information from the household survey to analyze households' reported income and other eligibility factors, and examine why households failed to respond to verification requests.