Appendix D4: Evaluation of the Independent Review Process: State Director Survey

INTRODUCTION

[PROGRAMMER: SHOW THIS INTRODUCTION EVERY TIME A USER LOGS IN]

The U.S. Department of Agriculture's Food and Nutrition Service (FNS) is interested in understanding more about the Independent Review of Applications (IRA) requirement for school meal programs from the perspective of the States and local education agencies (LEAs). Under IRA, LEAs identified by the State agency must conduct a second, independent review of the eligibility determinations on household applications prior to notifying households of their eligibility status. FNS hired Westat to conduct a study to describe the IRA process and reporting via the FNS-874 form, which captures the activity of the IRA, also called the second review of applications. The study will also explore the effectiveness of the IRA process in reducing administrative errors.

As part of the IRA Study, Westat is conducting a survey of all State-level Child Nutrition agencies. The survey will answer questions like:
- How do States implement the IRA process?
- What is the burden on States to implement the IRA process?
- What opportunities are there to improve the process and minimize burden?

Your answers are important, and will help FNS understand implementation of the IRA requirement for school meal programs. There are no right or wrong answers. If you are unsure of how to answer a question, please give the best answer you can.

The survey link may be shared, and multiple staff in your agency may login to complete the survey. However, the State Child Nutrition Director must approve and submit the completed survey. This survey should take no more than 60 minutes to complete.

Your participation is entirely voluntary. Refusal to participate will not have any impact on your position, your State agency, or child nutrition programs. You may also skip questions that you do not wish to answer.

We will use all data we collect only for the purposes we describe. In the final report we will present the aggregated survey data, and will not link individual States to their responses. However, the raw survey data will be submitted to FNS at the end of the study.

You may login as many times as you wish in order to complete the survey between now and [**DATE**]. Simply click "Save and Continue Later" at the bottom of the screen before logging out to save your work. The survey will close on [**DATE**].

Please answer the questions in the survey based on current policies or procedures.

If you need additional information, please call [study phone number] or email us at [study email].

Thank you.

SECTION A. IDENTIFICATION AND NOTIFICATION OF LOCAL EDUCATIONAL AGENCIES

A1. **How many LEAs were required to conduct a second review of applications in School Year 2016-2017?**

|___| Total Number of LEAs that Conducted a Second Review in School Year 2016-2017

A1a. **How many of those were required to conduct a second review based on <u>Criterion 1</u> of the program regulations?**

Criterion 1 includes all LEAs with <u>10 percent or more</u> of the certification/benefit issuances in error, as determined during an Administrative Review.

|___| Number of LEAs under Criterion 1 in School Year 2016-2017

A1b. **How many LEAs were required to conduct a second review based on <u>Criterion 2</u> of the program regulations?**

Criterion 2 includes LEAs not identified under Criterion 1 that the State agency determines are at risk for certification error.

|___| Number of LEAs under Criterion 2 in School Year 2016-2017.
[Programmer will auto-calculate this number by taking the total number of LEAs that conducted a second review and subtracting the number of LEAs flagged under Criterion 1]

[PROGRAMMER: IF NUMBER IN A1B IS GREATER THAN ZERO, REQUEST UPLOAD OF ALL CRITERIA 2 LEAS IN SY 16/17]
Please upload a <u>Microsoft Excel file</u> that lists all LEAs that were required to conduct a second review in SY 2016-2017 based on Criterion 2. <u>Include only the LEA name and ID number</u>.

A2. **How many LEAs were required to conduct a second review of applications in School Year 2017-2018?**

|___| <u>Total Number of LEAs</u> that Conducted a Second Review in School Year 2017-2018

A2a. **How many of those were required to conduct a second review based on <u>Criterion 1</u> of the program regulations?**

Criterion 1 includes all LEAs with <u>10 percent or more</u> of the certification/benefit issuances in error, as determined during an Administrative Review.

|___| Number of LEAs under Criterion 1 in School Year 2017-2018

A2b. **How many LEAs were required to conduct a second review of applications based on <u>Criterion 2</u> of the program regulations?**

Criterion 2 includes LEAs not identified under Criterion 1 that the State agency determines are at risk for certification error.

|___| Number of LEAs under Criterion 2 in School Year 2017-2018.
==[Programmer will auto-calculate this number by taking the total number of LEAs that conducted a second review and subtracting the number of LEAs flagged under Criterion 1]==

==[PROGRAMMER: IF NUMBER IN A2B IS GREATER THAN ZERO, REQUEST UPLOAD OF ALL CRITERIA 2 LEAS IN SY 17/18]==
Please upload a <u>Microsoft Excel file</u> that lists all LEAs that were required to conduct a second review in SY 2017-2018 based on Criterion 2. <u>Include only the LEA name and ID number</u>.

Reminder: please answer the remaining questions in the survey based on current policies or procedures.

A3. **Which of the following factors does the State agency use to identify LEAs for a second review of applications under <u>Criterion 2</u> of the program regulations?**

Criterion 2 includes LEAs not identified under Criterion 1 that the State agency determines are at risk for certification error.

SELECT ALL THAT APPLY.

☐ Certification/benefit issuance error between 5 and 10 percent on Administrative Review
☐ LEAs new to the National School Lunch Program (NSLP)
☐ LEAs new to the School Breakfast Program (SBP)
☐ LEAs with recently hired administrative staff
☐ LEAs implementing a new electronic system
☐ Other (PLEASE SPECIFY_____)
☐ State does not use Criterion 2 to identify LEAs

A4. **<u>When</u> does the State agency <u>first</u> notify LEAs that they must conduct a second review of applications?**

SELECT ONLY ONE.

☐ Once a year, all at the same time
     We typically notify the LEAs in [DROPDOWN MENU OF MONTHS]
☐ At different times; it depends when we identify which LEAs have to conduct a second review (e.g., after an administrative review)
☐ Some other time (PLEASE SPECIFY_____)

A5. **<u>How</u> does the State agency notify LEAs that they must conduct a second review of applications?**

SELECT ALL THAT APPLY.

☐ In-person during Administrative Review
☐ In the Administrative Review report shared with the LEA
☐ Telephone call
☐ Email message
☐ Letter mailed to the LEA
☐ Other (PLEASE SPECIFY_____)

SECTION B: TRAINING AND TECHNICAL ASSISTANCE

B1. **To what extent does the State agency provide training to LEAs on the second review of applications requirement?**

SELECT ALL THAT APPLY.

☐ It is briefly touched upon in the annual training we hold for all LEAs
☐ The State conducts a training focused on the second review process for <u>all</u> LEAs
☐ The State conducts a training focused on the second review process for <u>only</u> those LEAs required to complete the second review
☐ We do not train LEAs on the second review of applications requirement

<mark>[IF RESPONDENT MARKS THE 2ND OR 3RD RESPONSE OPTIONS, PROCEED TO B1A, ELSE PROCEED TO B2]</mark>

B1a. **<u>When</u> does the State agency typically hold the LEA training focused on the second review of applications?**

SELECT MONTH: _____(DROPDOWN MENU)_____
☐ It varies from year to year

B1b. **Which of the following <u>topics</u> does the State agency cover in the LEA training focused on the second review of applications?**

SELECT ALL THAT APPLY.

☐ How to approve an application as free, reduced price, or paid
☐ Intent and purpose of the second review of applications provision
☐ Criteria used to identify LEAs to conduct the second review of applications
☐ How to select the second review official
☐ How to train the second review official
☐ How to perform the second review of applications
☐ Documentation and reporting requirements (i.e., FNS-874)
☐ State criteria for discontinuation of second review requirement
☐ Other (PLEASE SPECIFY):_____

B1c. **How does the State agency typically <u>deliver</u> the LEA training focused on the second review of applications?**

SELECT ALL THAT APPLY.

- [ ] Group training in person
- [ ] Group online training (e.g., Skype or GoToMeeting)
- [ ] One-on-one training in person
- [ ] One-on-one training over the telephone
- [ ] Online training module(s)
- [ ] Other (PLEASE SPECIFY):

B1d. **Does the State agency require that the <u>second review official(s)</u> from LEAs attend or complete <u>State-provided</u> training on the second review of applications?**

- [ ] Yes, all second review officials must attend/complete
- [ ] Only some second review officials must attend/complete
  Explain:_____
- [ ] No, it is not required to complete State-provided training

B2. **What topics do LEAs have the most questions about with regard to the second review of applications requirement?**

SELECT THE TOP 3 MOST COMMON AREAS OF INQUIRY BY LEAs.

- [ ] How to approve an application as free, reduced price, or paid
- [ ] How to select the second review official
- [ ] How to train the second review official
- [ ] How to perform the second review of applications
- [ ] How to document the second review of applications
- [ ] Reporting (i.e., FNS-874)
- [ ] How to be removed from the IRA requirement
- [ ] Other (PLEASE SPECIFY):_____
- [ ] We do not typically receive questions on the second review requirement

SECTION C: MONITORING THE SECOND REVIEW PROCESS

C1. **How does the State agency monitor the <u>accuracy</u> of the second review of applications conducted by identified LEAs?**

SELECT ALL THAT APPLY.
- [ ] Review applications and second review process during each LEA's Administrative Review
- [ ] Review applications and second review process during technical assistance visits to LEAs
- [ ] Review the FNS-874 data from each LEA and follow up on questionable data entries
- [ ] Review LEA policies and procedures for second review of applications
- [ ] Other (PLEASE SPECIFY):_____
- [ ] None of the above

C2. **How does the State agency validate that the second review has been completed each year?**

☐ The State confirms it was completed during an administrative review
☐ Other (PLEASE SPECIFY): _____
☐ Not applicable, we do not validate the completion of the second review

C3. **Is there any follow up with an LEA if it reports making no changes to the initial eligibility determinations?**

☐ Yes
☐ No ➜ GO TO QUESTION C4

C3a. Briefly describe how the State follows up with LEAs that report making no changes:

_____   _____
_____

C4. **How does the State agency handle a situation in which an LEA does <u>not</u> conduct a required second review of applications?**

SELECT ALL THAT APPLY.

☐ Require the LEA to conduct a second review in future school years
☐ Go onsite to the LEA to examine their certification process
☐ Review during the next Administrative Review
☐ Require a corrective action plan
☐ Withold claims for reimbursement until the IRA is completed
☐ No policies in this area
☐ Have not encountered this situation
☐ Other (PLEASE SPECIFY):_____

C5. **What documentation does the State agency use to determine that an LEA improved certification accuracy and may discontinue the second review in the following school year?**

Per Federal regulations, to discontinue the second review, data must demonstrate that no more than 5 percent of the applications reviewed by the LEA required a change in eligibility determination.

SELECT ALL THAT APPLY.

☐ Data submitted by the LEA for the FNS-874
☐ Data obtained by the State agency during Administrative Review at the LEA
☐ Other (PLEASE SPECIFY)_____

SECTION D: REPORTING

The questions in this section ask about annual reporting on the LEAs' second review of applications. State agencies annually report the results to FNS on the FNS-874, *Local Educational Agency Second Review of Applications*. The report is due from the State agency to FNS by March 15.

D1. **By what date does the State agency require LEAs to submit data for the FNS-874?**

|___|___| / |___|___| MONTH/DAY

D2. **How do LEAs submit data for the FNS-874?**

SELECT ALL THAT APPLY.

☐ LEAs enter data elements directly into the online State reporting system
☐ LEAs upload a spreadsheet or Word document (or similar) to the online State reporting system
☐ LEAs email a spreadsheet or Word document (or similar) data file to the State agency
☐ LEAs scan handwritten documents and email them to the State agency
☐ LEAs scan handwritten documents and upload them to the online State reporting system
☐ LEAs send a hard copy spreadsheet or Word document (or similar) data file in the mail
☐ Other (PLEASE SPECIFY):_____

D3. **Does the State data system that houses LEA-level data for the FNS-874 have built-in edit checks to ensure the data submitted by LEAs are complete and accurate?**
An edit check is a means of checking data entered for validity (i.e., prevent erroneous data from being entered in a cell, flag missing data elements).

☐ Yes
☐ No
☐ Not applicable. Explain:_____

D3a. Briefly describe the types of built-in edit checks in the system that houses the FNS-874 data:_____

D4. **Does the State agency typically need to request corrections to the data submitted by LEAs for the FNS-874?**

SELECT ONE RESPONSE. YOUR BEST ESTIMATE IS ACCEPTABLE.

☐ Yes, for more than 75% of the LEAs (almost all or all)
☐ Yes, for 25-75% of LEAs (some)
☐ Yes, for less than 25% of LEAs (a few)
☐ Never ➜ GO TO QUESTION D6

D5. **What are the most common data corrections that the State agency requests from LEAs for data submitted for the FNS-874?**

SELECT ALL THAT APPLY.

- [ ] Supply missing data
- [ ] The total number of <u>reviewed</u> applications does not equal the sum of the subtotals
- [ ] The total number of <u>changed</u> applications does not equal the sum of the subtotals
- [ ] The number of schools in the LEA does not match other records at the State agency
- [ ] The number of enrolled students reported does not match other records at the State agency
- [ ] Other (PLEASE SPECIFY):_____

D6. <mark>[PROGRAMMER: SKIP IF ANSWERED "We do not train LEAs on the second review of applications requirement" IN RESPONSE TO B1]</mark> **Briefly describe how, if at all, the State agency uses the <u>data results</u> of the second review of applications reported by LEAs to develop training or technical assistance (TA) for LEAs?**

If the State agency does not use the IRA data results to develop training or TA, simply check the box below.

_____

_____

_____

- [ ] We do not use the data results to inform or further develop training for LEAs

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SECTION E: STATE POLICIES AND PROCEDURES

E1. **Does the State agency have <u>written</u> policies or procedures pertaining to the second review of applications?**

SELECT ALL THAT APPLY.

- [ ] Yes, for State-level staff ➔ <mark>[IF THIS IS THE <u>ONLY</u> RESPONSE OPTION SELECTED, GO TO QUESTION E4; OTHERWISE GO TO QUESTION E2]</mark>
- [ ] Yes, for LEA staff
- [ ] No <mark>➔ GO TO SECTION F</mark>

E2. **Which of the following topics do the written policies and/or procedures <u>for LEAs</u> address?**

SELECT ALL THAT APPLY.

☐ Factors used to identify LEAs under Criterion 2
☐ Training requirements for LEAs that are subject to second review
☐ Second review documentation requirements
☐ Qualifications for second review official
☐ FNS-874 reporting requirements and procedures
☐ Discontinuing the second review requirement
☐ Other (PLEASE SPECIFY):_____

E3. **How does the State agency disseminate these written policies and/or procedures to LEAs?**

SELECT ALL THAT APPLY.

☐ Through the State agency's public website
☐ Through a secure State portal that LEAs can access
☐ At the annual State training for LEAs
☐ Via email
☐ Other (PLEASE SPECIFY):_____

[PROGRAMMER: IF E1 RESPONSE IS "LEA ONLY," GO TO SECTION F]

E4. **Which of the following topics do the written policies and/or procedures for <u>State-level staff</u> address?**

SELECT ALL THAT APPLY.

☐ Factors used to identify LEAs under Criterion 2
☐ Requirements for LEAs that are subject to second review (e.g., training, documentation, etc.)
☐ Reviewing the data submitted by LEAs
☐ Monitoring the second review process at the LEAs
☐ Following up with LEAs regarding the IRA process or data
☐ FNS-874 reporting requirements and procedures
☐ Discontinuing the second review requirement
☐ Other (PLEASE SPECIFY):_____

[PROGRAMMER: REQUEST UPLOAD OF POLICIES AND PROCEDURES]

SECTION F: CHALLENGES

F1. **Please indicate the extent to which each of the following factors is <u>time consuming for the State agency</u>.**
[PROGRAMMER: ALLOW RESPONDENTS TO CHECK ONLY ONE BOX PER ROW.]

	Very time consuming	Moderately time consuming	Not time consuming	Not Applicable	Not sure
Identifying LEAs to conduct a second review	☐	☐	☐		☐
Determining Criterion 2 selection factors	☐	☐	☐	☐	☐
Training LEAs to conduct a second review	☐	☐	☐	☐	☐
Providing technical assistance to LEAs on the second review process	☐	☐	☐	☐	☐
Ensuring the IRA process is carried out correctly	☐	☐	☐	☐	☐
Reviewing FNS-874 data from LEAs	☐	☐	☐	☐	☐
Following up with LEAs to correct FNS-874 data	☐	☐	☐	☐	☐
Submitting the FNS-874 report to FNS	☐	☐	☐		☐
Calculating LEA errors in order to determine whether they may discontinue the second review	☐	☐	☐	☐	☐
Other (PLEASE SPECIFY): _____	☐	☐			
Other (PLEASE SPECIFY): _____	☐	☐			

F2. Below is a list of potential challenges that the State agency may face in implementing the second review of applications requirement. Please indicate the extent to which each of the following factors is <u>a challenge for the State agency</u>.

DO NOT consider the time required to complete each task.

[PROGRAMMER: ALLOW RESPONDENTS TO CHECK ONLY ONE BOX PER ROW.]

	Very challenging	Somewhat challenging	Not challenging	Not Applicable	Not sure
Staff availability at State agency for the IRA process *(e.g., training LEAs on IRA process, reviewing IRA data, etc.)*	☐	☐	☐		☐
Identifying LEAs to conduct a second review	☐	☐	☐		☐
Determining Criterion 2 selection factors	☐	☐	☐	☐	☐
Training LEAs to conduct a second review	☐	☐	☐	☐	☐
Providing technical assistance to LEAs on the second review process	☐	☐	☐	☐	☐
Ensuring the IRA process is carried out correctly	☐	☐	☐	☐	☐
Reviewing FNS-874 data from LEAs	☐	☐	☐	☐	☐
Correcting FNS-874 data from LEAs	☐	☐	☐	☐	☐
Submitting the FNS-874 report to FNS	☐	☐	☐		☐
Calculating LEA errors in order to determine whether they may discontinue the second review	☐	☐	☐	☐	☐
Other (PLEASE SPECIFY): _____	☐	☐			
Other (PLEASE SPECIFY): _____	☐	☐			

The tables that follow ask about potential challenges that <u>LEAs</u> may face in implementing the second review of applications requirement. Based on your observations, indicate the extent to which of the following factors is <u>a challenge for LEAs of different sizes</u>.
<mark>[PROGRAMMER: RESPONDENT MAY ONLY SELECT ONE RESPONSE IN EACH ROW]</mark>

F3. Identifying staff who are <u>qualified</u> to conduct the first and second reviews of applications.

LEA Size	Very Challenging	Somewhat Challenging	Not Challenging	Not Applicable	Not Sure
Very Small *(<500 students)*	☐	☐	☐	☐	☐
Small *(500-999 students)*	☐	☐	☐	☐	☐
Medium *(1,000-4,999 students)*	☐	☐	☐	☐	☐
Large *(5,000-9,999 students)*	☐	☐	☐	☐	☐
Very Large *(10,000+ students)*	☐	☐	☐	☐	☐

F4. Identifying staff who are <u>available</u> to conduct the first and second reviews of applications.

LEA Size	Very Challenging	Somewhat Challenging	Not Challenging	Not Applicable	Not Sure
Very Small *(<500 students)*	☐	☐	☐	☐	☐
Small *(500-999 students)*	☐	☐	☐	☐	☐
Medium *(1,000-4,999 students)*	☐	☐	☐	☐	☐
Large *(5,000-9,999 students)*	☐	☐	☐	☐	☐
Very Large *(10,000+ students)*	☐	☐	☐	☐	☐

F5. Training staff to perform the second review.

LEA Size	Very Challenging	Somewhat Challenging	Not Challenging	Not Applicable	Not Sure
Very Small *(<500 students)*	☐	☐	☐	☐	☐
Small *(500-999 students)*	☐	☐	☐	☐	☐
Medium *(1,000-4,999 students)*	☐	☐	☐	☐	☐
Large *(5,000-9,999 students)*	☐	☐	☐	☐	☐
Very Large *(10,000+ students)*	☐	☐	☐	☐	☐

F6. The volume of applications that staff need to review.

LEA Size	Very Challenging	Somewhat Challenging	Not Challenging	Not Applicable	Not Sure
Very Small *(<500 students)*	☐	☐	☐	☐	☐
Small *(500-999 students)*	☐	☐	☐	☐	☐
Medium *(1,000-4,999 students)*	☐	☐	☐	☐	☐
Large *(5,000-9,999 students)*	☐	☐	☐	☐	☐
Very Large *(10,000+ students)*	☐	☐	☐	☐	☐

F7. Completing the second review within the 10-day timeframe.

LEA Size	Very Challenging	Somewhat Challenging	Not Challenging	Not Applicable	Not Sure
Very Small *(<500 students)*	☐	☐	☐	☐	☐
Small *(500-999 students)*	☐	☐	☐	☐	☐
Medium *(1,000-4,999 students)*	☐	☐	☐	☐	☐
Large *(5,000-9,999 students)*	☐	☐	☐	☐	☐
Very Large *(10,000+ students)*	☐	☐	☐	☐	☐

F8. Inadequate technology hinders the second review of applications.

LEA Size	Very Challenging	Somewhat Challenging	Not Challenging	Not Applicable	Not Sure
Very Small *(<500 students)*	☐	☐	☐	☐	☐
Small *(500-999 students)*	☐	☐	☐	☐	☐
Medium *(1,000-4,999 students)*	☐	☐	☐	☐	☐
Large *(5,000-9,999 students)*	☐	☐	☐	☐	☐
Very Large *(10,000+ students)*	☐	☐	☐	☐	☐

F9. Reporting the results of the second review process (FNS-874 form).

LEA Size	Very Challenging	Somewhat Challenging	Not Challenging	Not Applicable	Not Sure
Very Small *(<500 students)*	☐	☐	☐	☐	☐
Small *(500-999 students)*	☐	☐	☐	☐	☐
Medium *(1,000-4,999 students)*	☐	☐	☐	☐	☐
Large *(5,000-9,999 students)*	☐	☐	☐	☐	☐
Very Large *(10,000+ students)*	☐	☐	☐	☐	☐

F10. Based on your observations, briefly describe any additional challenges that LEAs face in completing the second review of applications.

_____

_____

SECTION G: FINAL REFLECTIONS

G1. **Overall, do you think that the second review process helps to reduce certification error? Why or why not?**

_____

_____

_____

_____

_____

G2. **Briefly describe any changes that could <u>minimize the burden on the State</u> of the second review process.**

_____

_____

_____

_____

_____

G3. **Briefly describe how the second review process could be improved.**

_____

_____

_____

_____

_____

G4. **Please note anything else you would like to tell us about the second review of applications.**

_____

_____

_____

_____

_____

_____

G5. **Please list the names and titles of those who helped to complete this survey.**

_____

SECTION H: SUBMIT SURVEY (State Child Nutrition Director only)

☐ I, [State CN Director Name], have reviewed the information in this survey and confirm that it is an accurate accounting of the second review of applications process in my State.

Thank you for participating in this USDA study.
FNS anticipates the study results will be published on the FNS website in Spring 2019, located here:
https://www.fns.usda.gov/ops/child-nutrition-programs.