

National School Lunch Program Verification

Increasing access while maintaining program integrity

Agency Objective. Increase household response to requests by Local Education Agencies (LEAs) to provide materials supporting applications for benefits delivered under the National School Lunch Program (NSLP).

Background. NSLP is a federally assisted meal program operating in over 100,000 public and non-profit private schools and residential child care institutions. It provided nutritionally balanced, low-cost or free lunches to more than 30 million children each school day.²² USDA's Food and Nutrition Service (FNS) administers the NSLP at the Federal level, while state and local authorities deliver the program to children in schools. As part of the NSLP program, LEAs are required to confirm the eligibility of some household recipients for free and reduced-price meals.²³ Prior studies have demonstrated that some of the households selected for verification do not respond to requests to provide proof of eligibility not because they lack these materials, but because of misunderstanding or confusing procedures.²⁴

Methods. In order to make the request for verification clearer and easier to understand, the research team designed a new request letter that used simpler language, pictures meant to cue an association with the NSLP, a new visual summary of materials that the household was required to submit, and a personalized message from the LEA. In addition, the letter emphasized that

materials could be submitted in multiple formats, including by smart phone (households could take pictures of required documents and email them to the LEA using their smart phone). Finally, rather than conduct the verification procedure in October—two months or more from the beginning of school when benefits begin to be delivered for most families—FNS considered conducting verification on a rolling basis, requesting verification materials from households as the household's application is approved for benefits. Ultimately it was impossible to implement each of the planned changes at once, since the verification procedure is independently carried about by each of the nearly 20,000 LEAs across the country. Revised letters were used in 74 LEAs across the country, balanced by 82 LEAs that were randomly paired with the pilot LEAs but were not asked to revise their letters. Some, but not all, of treatment LEAs were able to implement smartphone submission. None of the treatment LEAs were able to implement changes in the timing of their verification procedures during year one of the pilot.²⁵ We report here on what we term a “feasibility pilot” meant both to generate preliminary data on the impact of revised letters, as well as to learn about procedural variation across LEAs.

Results. Using a difference-in-difference estimator, we estimate that the new letters increased response by 2.1 percent ($p = 0.66$, 95% CI [-7.10, 11.28]), though this is imprecisely estimated.

Conclusions. Initial work in this area suggests that improving the design and clarity of communications to beneficiaries may be helpful in increasing response to verification requests, but also suggest that more substantial changes to the verification procedure will be necessary to

²² <http://www.fns.usda.gov/sites/default/files/NSLPFactSheet.pdf>

²³ LEAs are required by statute 42 U.S.C. 1758(b)(3)(D) to verify a sample of household applications approved for free or reduced price benefits each school year. See, for example, the 2015 Edition of the Eligibility Manual for School Meals, which was operative during the period discussed here: <http://www.fns.usda.gov/2015-edition-eligibility-manual-school-meals>

²⁴ 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. See Report No. CN-04-AV3 at: <http://www.fns.usda.gov/sites/default/files/NSLPcasestudy.pdf>

²⁵ The pilot described here continues in school year 2016/2017, during which several LEAs are implementing the full suite of changes described, including changes in the timing of verification.

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increase response rates appreciably. LEAs involved in the first-year pilot suggested that use of smartphone and email submission was helpful, and reported that beneficiaries took advantage of the method. A test of the full suite of modifications, including changes in the timing of verification activity, is currently underway.