

Attachment D – Protocol for Participating LEAs



VERIFICATION IMPROVEMENT PILOT– STUDY PROTOCOL

Dear [LEA Contact Name],

Thank you for agreeing to participate in the Verification Improvement Pilot (VIP), a multi-year project to test low-cost, practical interventions for increasing response to NSLP and SBP verification requests.

The pilot has been designed to place as small a burden as possible on your staff. 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. **[customize for individual LEAs]**

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.

Overview of Protocol

Households that fail to return supporting documentation in response 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: timing changes and changes to letters sent to households.

1 Timing

1.1 Basic Requirements:

Summary of protocol:

1. Divide households into intervention and control groups as you approve applications.

Intervention group:

- a. Send modified verification request letters at the same time you send notification of approved benefits.
- b. Follow up with additional reminders.
- c. Accept household documentation in multiple forms.
- d. Record dates of LEA contacts, household responses, and verification outcomes.

Control group:

- a. Apply LEA’s standard verification procedure.
- b. Record dates of LEA contacts, household responses, and verification outcomes.

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>

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.



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

In order to complete verification, you must draw a sample of approved applications from among all the approved applications on October 1.⁴ Most districts select a three percent (3%) sample from their pool of error prone applications. Districts with low or improved non-response rates may select a smaller error prone sample or a 3 percent random sample. In school year 2015-2016 [district name] selected a [3% random / 3% error prone / 1 ½% error prone + categorically eligible sample]

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*.

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 notification⁶ and the other for verification).

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

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.

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](#))

⁴ The reference here is to the standard method of verification, rather than to one of the two alternate methods.

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](#).

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.



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 Letters

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

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.

⁷ Please see Attachments to this protocol.

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.



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	The research team will work with you to customize the letter template.
2) Separate households into treatment and control groups as you approve applications	Randomly assign households into intervention and control groups as you process and approve applications.	Rolling basis from August – October 1	The research team will work with you to ensure that assignment into intervention and control groups is random. This must take into account LEA procedures that may sort or bundle applications prior to certification processing.
Intervention group			
1) Send verification request with notification of successful application (See Appendix B)	<p>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.</p> <p>The research team will provide assistance on selecting and notifying households for verification on a continuous basis.</p>	Rolling basis from August – October 1	Include a stamped return envelope with the mailing (paid for by FNS).
2) Allow submission of verification materials by <u>email</u> , and emphasize the ability of submission of <u>original</u> documents	<p>Documents sent by households will now be accepted in multiple forms:</p> <ul style="list-style-type: none"> • 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 – November 15 (or December 15 with State-approved extension)	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.

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.



3) Send a postcard or letter reminder (See Appendix C)	Send this follow-up reminder designed by the research team to households at least <u>one week before verification requests are due</u> .	You set this date.	Templates provided by the research team (See Appendix C)
4) Follow-up phone call	Make a follow-up phone call to households two-three days before verification requests are due. If households do not pick up, leave a message. If you cannot leave a message, please try again.	You set this date.	A short call script has been provided by the research team for your convenience (See Appendix D)
5) Record dates of application receipt, household certification, initial verification contact, verification follow-up, and household response; also record method of household response and verification outcomes	Keep track of all dates in the certification and verification processes. Also record the method that households used to send verification documents to you. Finally, record the verification outcomes, as you would on the FNS-742, for the intervention households.	<i>Rolling basis from August – November 15 (or December 15 with State-approved extension)</i>	An optional spreadsheet has been provided by the research team for your convenience (See Appendix E).
Control group			
1) Follow your standard verification notice and follow-up procedures	Follow the same procedures that you would have used in the absence of your participation in this project. That includes using your standard verification letters, accepting household documentation only in the form that you normally accept, and following your standard follow-up process.	The same timeline that you normally follow.	
2) Record dates of application receipt, household certification, initial verification	Keep track of all dates in the certification and verification processes. Also record the method that households used to send verification documents to you. Finally, record the verification outcomes, as you would	<i>Throughout your standard verification processing season</i>	An optional spreadsheet has been provided by the research team for your convenience (See Appendix E).

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.



contact, verification follow-up, and household response; also record method of household response and verification outcomes.	on the FNS-742, for the control households.		
--	---	--	--

An Affirmative Action/Equal Opportunity Employer

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.



Thank you for your participation!

Appendices

Attachment A: "Attachment A - Modified Verification Letter.docx"

Attachment B: "Attachment B – Reminder Letter.docx"

Attachment C: "Attachment C – Intervention-Reminder Call Script.docx"

Attachment D: "Attachment D – Protocol for Participating LEAs.docx" (This document)

Attachment E: "Attachment E - Rolling Assignment Procedure Logic Model.docx"

Attachment F: "Attachment F - Report Template for HH Contact & Responses.xlsx"

An Affirmative Action/Equal Opportunity Employer

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.