USDA Food and Nutrition Service
U.S. DEPARTMENT OF AGRICULTURE

Research Summary July 2021

Study of Nonresponse to the School Meals Application Verification Process (Summary)

Background

Students receiving free or reduced price (F/RP) meal benefits through the U.S. Department of Agriculture, Food and Nutrition Service's National School Lunch Program (NSLP) and School Breakfast Program (SBP) are certified either by application or direct certification. To detect and deter errors in the certification process, school districts must verify (1) a small sample of approved applications and (2) all questionable applications (called "verification for cause"). Districts may verify the eligibility of selected applications using administrative records from public assistance programs ("direct verification"), or districts may request documentation of household size and income. Benefits are terminated for households that do not respond to the verification request with documentation, but all households with terminated benefits can reapply at any time with documentation of income.

The U.S. Department of Agriculture's Food and Nutrition Service (FNS) conducted the Study of Nonresponse to the School Meals Application Verification Process to examine (1) the accuracy of the current verification process, (2) district practices when verifying applications for cause, and (3) the ultimate results of the verification process, including the reasons why households do not respond to verification requests and how many households reapply.

Key Findings

- On average, approximately 44 percent of households in the districts' verification samples had their benefits terminated because they did not respond to the verification request.
- Most responders (71 percent) to the verification request maintained some level of F/RP benefits.
- The majority (63 percent) of verification nonresponders were determined to be eligible for F/RP meals based on the household survey.
- Most households (83 percent) with no change in certification status after district verification were found eligible for F/RP benefits based on the household survey, but often not at the level of benefits they were verified by the district to receive.

Methods

This in-depth case study used data from a non-random sample of 20 large school districts in 8 metropolitan areas. Data were collected from November 2018–May 2019. Each district provided administrative data on verification outcomes from school year (SY) 2018-2019 and participated in interviews about verification procedures. The study team also used district-level data from the School Food Authority Verification Collection Report (FNS-742) and other extant data sources to examine district characteristics and certification and verification totals.

To independently assess eligibility for F/RP meals and to understand the experiences of households, the study team conducted a survey, either in-person or by phone, with two sets of households selected for verification: (1) households that responded to the verification request but had no change in certification status ("no-change households"; n=425) and (2) households that did not respond to the verification request ("verification nonresponders"; n=778).

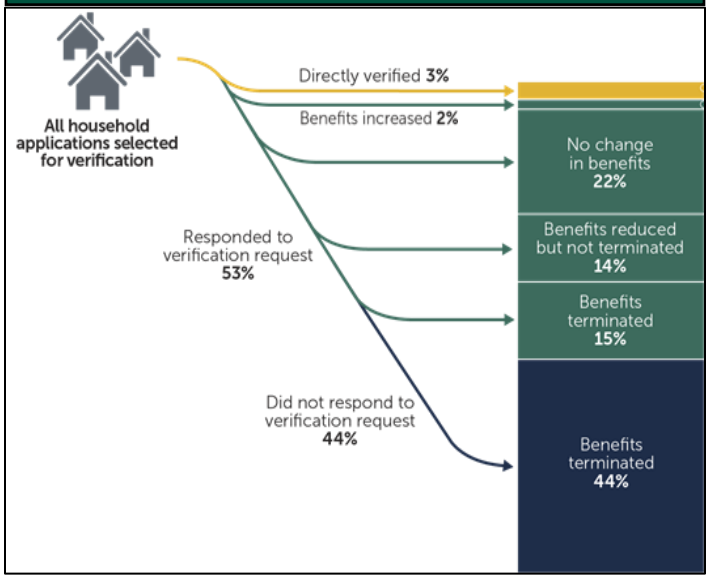
The study purposefully enrolled geographically clustered districts with large verification samples and those with large numbers of households that did not repond to the verification request. Because the sample was not randomly selected, findings are not representative of districts other than those in the study. The study districts are all in urban areas and, on average, much larger than districts nationwide. Survey recall error, recording errors, and differences in the reference periods of data sources could affect the extent to which findings accurately reflect the verification process. Additionally, because verification efforts largely target error-prone applications, the incidence of ineligibility among the verification samples is likely much higher than would be found among all households approved for F/RP meals.

Findings

On average, approximately 44 percent of households in the district verification samples had their benefits terminated because they did not respond to the

verification request. On average, across the study districts, the SY 2018-19 verification process resulted in direct verification for 3 percent of households, a response to the verification request for 53 percent of households, and a nonresponse for the remaining 44 percent (Figure 1).

Figure 1: Summary of average household verification outcomes across study districts based on district administrative data.



Among the 53 percent of households that responded to the verification request, most (71 percent) maintained some level of F/RP benefits. On average, approximately 41 percent of households that responded to the verification request saw no change in their school meal benefits as a result of verification. Three percent of responding households had their benefits increased from reduced price to free meals, and 28 percent had their benefits reduced from free to reduced price meals. Only 29 percent had their F/RP meal benefits terminated.

The majority (63 percent) of verification nonresponders were determined to be eligible for F/RP meals based on the household survey. Though some households were ineligible for the level of benefits they were initially certified to receive, based on the household survey, 45 percent of verification nonresponders would have been eligible to either maintain or increase their level of benefits had they responded to the verification request, and 18 percent would have had their benefits reduced from free to reduced price meals, on average. The other nonresponders (approximately 37 percent) were ineligible for F/RP meals, with 6 percent having survey-determined income amounts between 186 to 200 percent of the FPL—just above the eligibility threshold for reduced price meals.

Most verification nonresponders reported having been contacted about verification, understanding the verification request, and attempting to respond. While nonresponders' reasons for not responding to the request varied, the most common reason, cited by 28 percent of households, was that they thought they had completed the request.

Most households (83 percent) with no change in certification status after district verification were found eligible for F/RP meal benefits based on the household survey, but often not at the level of benefits they were verified by the district to receive (Figure 2). The household survey sought to examine the accuracy of the verification process by independently assessing no-change households' eligibility for F/RP meals. On average, district-determined certification status differed from eligibility status based on the household survey for 42 percent of no-change households. Nearly all (98 percent) of these cases were explained by differences in income eligibility, which occurred when the income amount or household size reported on the school meal application differed from that reported on the household survey. Differences in categorical eligibility and possible certification errors or data entry errors in the district data explain the remaining 2 percent of differences. These findings indicate that districts are largely making correct certification and verification decisions based on the information provided to them, but households may need additional guidance to ensure they are reporting all applicable information to the district.

Figure 2: Survey-determined eligibility among no-change households (averages across districts).

For More Information:

Leftin, J., Baxter, C., Niland, K., et al. (2021). Study of Nonresponse to the School Meals Application Verification Process. Prepared by Mathematica, Contract No. AG-3198-B-16-0004/AG-3198-K-16-0063, Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Holly Figueroa. Available online at: www.fns.usda.gov/research-and-analysis.

USDA is an equal opportunity provider, employer, and lender.