Program Integrity
School Meal Applications and Verification

Ed Harper
Director, Office of Program Integrity
Child Nutrition Programs

Food, Nutrition, and Consumer Services
United States Department of Agriculture
NSLP / SBP Program Error
School Year 2012-2013

- Certification: 58%
- Meal Claiming: 37%
- Aggregation: 5%

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Certification Error
School Year 2012-2013

- Household Reporting: 57%
- Administrative: 32%
- Both / Other: 10%
Certification Error – Sources
School Year 2012-2013

- Household size error, including both household size and income, 44%
- Income amount error, 14%
- Omitted income sources and/or error in number of HH members with income, but correct HH size, 36%
- Other reporting error including incomplete application, 0.3%
- Categorical eligibility, 6%
- Other reporting error including incomplete application, 0.3%
Common Reasons for Household Reporting Error

- informal custody vs foster
- missing grandparents
- missing babies
- net income vs gross
- duplicate names
- EBT vs case num
- ALIMONY
- missing income sources
- don't know case num
- missing frequency
- missing SSN
- gross income
- target income cutoff
- cheating
- language barrier
- missing information
- omit HH members w/o income
- not truthful
- missing younger siblings
- bi weekly
- missing child income
- don't read instructions
Web-Based Application Design
Key Structural Elements

• **Household Size Error** – missing household members
  • Guided household ‘interview’
  • Prompts to limit common errors

• **Income Misreporting** – omitted income sources
  • Descriptive income source categories
  • Require affirmative responses – ‘yes’ or ‘no’
Web-Based Application Design
Additional Features

• **User Experience**
  • Customized to Applicant’s Situation
  • U.S. Web Design Standards – U.S. Digital Service
  • User-Friendly, Interactive Help
  • Easy Navigation
  • Plain Language

• **Behavioral Elements**
  • Confirmation Prompts
  • Sign Up Front
Web-Based Application Design
Crowdsourced Input

CONNECT ON SLACK
Join our E.A.T. School Lunch UX Challenge-only Slack channel. You can use this channel to not only talk in real time with other participants (and maybe find a teammate), and also to ask questions of the competition managers. Just make sure to be respectful — we all have the same goal (building cool stuff)

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### Joe's Income (0)

<table>
<thead>
<tr>
<th>Source</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work</td>
<td></td>
</tr>
<tr>
<td>Military Income</td>
<td></td>
</tr>
<tr>
<td>Public Assistance</td>
<td></td>
</tr>
<tr>
<td>Alimony/Child Support</td>
<td></td>
</tr>
<tr>
<td>Retirement/SSN</td>
<td></td>
</tr>
<tr>
<td>All Other Income</td>
<td></td>
</tr>
</tbody>
</table>

---

**No Source of Income**

---

**Web-Based Application Design Contest Submissions – Income Section**
Web-Based Application Design Contest Submissions – Income Section

Joe’s Income (0)

- Work
- Wages
- Cash Bonuses
- Strike Benefits
- Self-Employment Income
- Gift
- Military Income
- Public Assistance
- Alimony/Child Support
- Retirement/SSN
- All Other Income

No Source of Income
Web-Based Application Design Contest Submissions – Income Section

Tell us about any **income** that the adults in your household earn or receive. *(Why?)*

*“Income” here could be:
- Earnings from work
- Public assistance, alimony, or child support
- Retirement or disability income
- Investment or any other income

Do any of the following adults, including you, listed in this application earn or receive any type of income like the examples above?

* Required Field

<table>
<thead>
<tr>
<th>Joe Smith</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 No 1 Yes</td>
</tr>
</tbody>
</table>

Tell us more about Joe’s income (select all that apply)

TIP: Report total income for each source in whole dollars only (no cents). If they do NOT receive income from any source, enter '0' or leave blank. If you enter '0' or leave the income field blank, you are promising there is no income of that type to report for that adult.

- **Earnings from work**
- **Public assistance, alimony, or child support**
- **Retirement or disability income**
- **Investment or any other income**

<table>
<thead>
<tr>
<th>Total Adult Income</th>
<th>$0</th>
</tr>
</thead>
</table>
Web-Based Application Design
Contest Submissions – Income Section

Tell us about any **income** that the adults in your household earn or receive. (*Why?*)

- Earnings from work
- Public assistance, alimony, or child support
- Retirement or disability income
- Investment or any other income

Do any of the following adults, including you, listed in this application earn or receive any type of income like the examples above?
- Required fields

**JOE SMITH**

- No
- Yes

Tell us more about Joe’s income (select all that apply)

**EARNINGS FROM WORK**

- General assistance (excluding SNAP or TANF) $55
- Any other public assistance $0
- Child support received $0
- Alimony received $100

- How Often? Monthly
- How Often? Every 2 Weeks
- How Often? – Select One–
**Web-Based Application Design Contest Submissions – Income Section**

![Application for Free and Reduced Price School Meals](image)

**Application for Free and Reduced Price School Meals**

**Household Income**

In this section, we’ll go over the income you and the other members of your household who are not infants, children, or students receive.

We’ll ask a lot of questions—this is just to help you remember all of the different possible sources of income that might support your household.

<table>
<thead>
<tr>
<th>Household Member #1: Joe</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Does Joe earn money through work?</strong></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td><strong>Does Joe receive any public assistance benefits?</strong></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td><strong>Does Joe receive alimony payments?</strong></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td><strong>Does Joe receive any child support?</strong></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td><strong>Does Joe receive any pension or retirement money?</strong></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td><strong>Does Joe receive money through any other source?</strong></td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

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Web-Based Application Design Contest Submissions – Income Section

Application for Free and Reduced Price School Meals

Household Income

In this section, we'll go over the income you and the other members of your household who are not infants, children, or students receive.

We'll ask a lot of questions—this is just to help you remember all of the different possible sources of income that might support your household.

Household Member #1: Joe

Does Joe earn money through work?  
Yes ☑  No ☐

Check all that apply:

☐ Work outside the home in a non-military capacity
☐ Self-employed
☐ On strike
☐ In the U.S. military

Does Joe receive any public assistance benefits?  
Yes ☑  No ☐

Does Joe receive alimony payments?  
Yes ☑  No ☐

Does Joe receive any child support?  
Yes ☑  No ☐
Web-Based Application Design
Contest Submissions – Confirmation Prompts

Let’s start with Joe.

Does Joe earn income from work?  
- Yes  
- No

Write Joe’s earnings here (before tax).  
[ ] $535

Does Joe receive public assistance, child support, retirement, pensions, alimony, or any other form of income?  
- Yes  
- No

A prototype for the USDA Hackathon by Taylor Palmer
Web-Based Application Design Contest Submissions – Confirmation Prompts

Let’s start with Joe.

Does Joe earn income from work?  
- Yes  
- No

Write Joe’s earnings here (before tax).  
- $535

How much?  
- How often?

Does Joe receive public assistance, child support, retirement, pensions, alimony, or any other form of income?  
- Yes  
- No

The income information is really important. You said Joe’s income is $13910 per year. If that sounds right, go ahead and continue.

A prototype for the USDA Hackathon by Taylor Palmer
Web-Based Application Design
Contest Submissions – Other Features

Welcome!
Before we begin, please promise that all
information you provide is true and given
voluntarily.

[USDA Non-Discrimination Statement]

In accordance with Federal civil rights laws and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audio tape, American Sign Language, etc.) should contact the Agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing, or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and mail to USDA and provide in the letter all of the information requested.

Ready? Sign below:
The person signing is furnishing true information and to advise that person that the application is being made in connection with the receipt of Federal funds. School officials may verify the information on the application, and Delaware state representatives of the information may subject the applicant to prosecution under State and Federal statutes.

First Name
Last Name
Date

I Accept These Terms
Web-Based Application Design
Contest Submissions – Interactive Help

Let's confirm the number of people (adults & children) living in your household. (why?)

Many families have grandparents, extended family, or even friends that all live in the same household. So we can ensure everyone in your household is accounted for, please confirm the TOTAL number of household members (adults and children, including yourself).

You've reported 2 people, including yourself, living in your household. If you need to change this information, please do so now.

1 CHILD
Mary Smith

1 ADULT
Joe Smith

Update Children
Update Adults
B. All Adult Household Members (including yourself)
List all Household Members not listed in STEP 1 (including yourself) even if they do not receive income. For each Household Member listed, if they do receive income, report total gross income (before taxes) for each source in whole dollars (no cents) only. If they do not receive income from any source, write ‘0’. If you enter ‘0’ or leave any fields blank, you are certifying (promising) that there is no income to report.

<table>
<thead>
<tr>
<th>Name of Adult Household Members (First and Last)</th>
<th>Earnings from Work</th>
<th>How often?</th>
<th>Public Assistance/Child Support/Alimony</th>
<th>How often?</th>
<th>Pensions/Retirement/All Other Income</th>
<th>How often?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Weekly</td>
<td>Bi-Weekly</td>
<td>2x Monthly</td>
<td>Monthly</td>
<td>Weekly</td>
<td>Bi-Weekly</td>
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Web-Based Application Design
Typical Online Application – Income Section

List each household member and their total gross income (Do not include children listed from the previous step).
Gross income: all income before taxes and deductions. Whole Dollar Amounts only
*Required Fields

1. *First Name
   Joe

2. *Last Name
   Smith

Earnings from work
$ 100.00

How Often?
Weekly

Public Assistance/Child Support/Alimony

$ 0.00

How Often?
—Select—

Pensions/Retirement/All Other Income

$ 0.00

How Often?
—Select—

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Web-Based Application Design
Income ‘Interview’ Outline

Does Mary have earnings from work including salary, wages, tips, commissions, cash bonuses or net income from self-employment?
- Yes
- No

Does Mary have income from unemployment benefits, worker's compensation, strike benefits, or Social Security Disability Insurance (SSDI)?
- Yes
- No

Does Mary have income from public assistance including Supplemental Security Income (SSI), or cash assistance or housing subsidies from state or local government?
- Yes
- No

Does Mary have retirement income from Social Security (including Black Lung Benefits and Railroad Retirement) or private pensions?
- Yes
- No

Does Mary have other sources of income including regular cash payments from outside the household, rental income, earned interest, investment income and annuities, or any other source of income available to pay for children's school meals?
- Yes
- No
Web-Based Application Design
Income ‘Interview’ Outline

Does Mary have earnings from work including salary, wages, tips,
commissions, cash bonuses or net income from self-employment?

- Yes
- No

Does Mary have income from unemployment benefits, worker’s
compensation, strike benefits, or Social Security Disability Insurance
(SSDI)?

- Yes
- No

Does Mary have income from public assistance including
Supplemental Security Income (SSI), or cash assistance or housing
subsidies from state or local government?

- Yes
- No

Does Mary have retirement income from Social Security (including
Black Lung Benefits and Railroad Retirement) or private pensions?

- Yes
- No

Does Mary have other sources of income including regular cash
payments from outside the household, rental income, earned
interest, investment income, and annuity, or any other source of
income available to pay for children’s school meals?

- Yes
- No
Web-Based Application Design

Income ‘Interview’ Outline

Does Mary have retirement income from Social Security (including Black Lung Benefits and Railroad Retirement) or private pensions?

- Yes
- No

Note: Remember, to report gross income, which is all money earned before deductions, such as income taxes, employee’s social security taxes, and insurance premiums.

Social Security (including Black Lung Benefits and Railroad Retirement)

- Yes
- No

Private pension

- Yes
- No

Back  Continue
Web-Based Application Design
Income ‘Interview’ Outline

[Image of a web-based application interface with options and input fields]

Does Mary have retirement income from Social Security (including Black Lung Benefits and Railroad Retirement) or private pensions?
- Yes
- No

Note: Remember, to report gross income, which is all money earned before deductions, such as income taxes, employee's social security taxes, and insurance premiums.

Social Security (including Black Lung Benefits and Railroad Retirement)
- Yes
- No

Private pension
- Yes
- No

$ Amount

Frequency...
Web-Based Application Design
Additional Features – Mobile First

Does Mary have retirement income from Social Security (including Black Lung Benefits and Railroad Retirement) or private pensions?

- Yes
- No

Note: Remember, to report gross income, which is all money earned before deductions, such as income taxes, employee's social security taxes, and insurance premiums.

Social Security (including Black Lung Benefits and Railroad Retirement)

- Yes
- No

Private pension

- Yes
- No

-$ 600

Monthly

Back  Continue
Verification Project
Social and Behavioral Science Research

Our Goal

To make the verification process easier for you
To improve the verification process so that eligible households do not lose their benefits

40% of households across the country do not respond

Thank you for joining us in this important effort.
Verification Project
Social and Behavioral Science Research

Research Supporting the Modified Letter

What is social and behavioral science?

Study of why people behave the way they do. Often used to inform policy and program design. In this case, to positively impact verification response, we revised the letter and submission process to make it more user friendly and hassle-free.

State clear action steps
Make it as easy as possible
Use a friendly tone

Lessons learned from this pilot on what works will inform next year’s recommendations
Verification Project

FNS Prototype Letter to Households

WE MUST CHECK YOUR APPLICATION

[Form text]

UNEMPLOYMENT, DISABILITY, OR WORKER’S COMP. Notice of eligibility from State employment security office, check stub, or letter from the Worker’s Compensation’s office.

WELFARE PAYMENTS: Benefit letter from the [State] TANF office.

CHILD SUPPORT OR ALIMONY: Court decree, agreement, or copy of checks received.

OTHER INCOME (SUCH AS RENTAL INCOME): Information that shows the amount of income received, how often it is received, and the dates received.

NO INCOME: A brief note explaining how you provide food, clothing, and housing for your household, and what you expect as income.

MILITARY HOUSING PRIVATIZATION INITIATIVE: Letter or rental contract showing that your housing is part of the Military Privatized Housing Initiative.

TIMEFRAME OF ACCEPTABLE INCOME DOCUMENTATION: Please submit proof of one month’s income; you could use the month prior to application, the month you applied, or any month after that.

If you have questions or need help, please call [name] at [phone number]. The call is free. (Tell free or reverse charge explained). You may also e-mail us at [e-mail address].

Sincerely,

[Signature]

The Richard B. Russell National School Lunch Act requires the information requested in order to verify your children’s eligibility for free or reduced-price meals. If you do not provide the information or provide incomplete information, your children may no longer receive free or reduced-price meals. Pursuant to Section 7 of the Privacy Act, disclosure of your Social Security number is not required. We do not need and are not requesting any Social Security numbers that may appear on documents you submit.

Non-Discrimination Statement: This explains what to do if you believe you have been treated unfairly.

In accordance with Federal civil rights laws and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for participating or not participating in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication (e.g. Braille, large print, audiotape, American Sign Language, etc.) should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.
Verification Project
Modified LEA Letter to Households

Fake School District, 100 Main Street
Household ID #

Confirm Your Eligibility for Free/Reduced Price Meals

Dear [Parent],

Your application was approved a little while ago and [Bob, Jill, and Sara] should already be receiving free/reduced price meals.

However, there is one last step you need to take – please send us documents to confirm your eligibility. Each year we select different meal applications to confirm eligibility. This year, your household was selected.

You must send us the information we request on the next page immediately, or [Bob], [Jill], and [Sara] will stop receiving free/reduced price meals.

We understand that your situation may have changed since you applied, or you may not remember exactly what you put on your application. That’s fine. We explain what you need to send on the next page.

For questions or help, please contact Alvin Collins at the toll free number (xxx)-xxx-xxxx or via email.

Sincerely,
[Signature]

[Name]
[Principal/Administrative]
Fake School District Public Schools

This district is an equal opportunity provider.

How to Show Eligibility for Free/Reduced Price Meals

Please provide the following information immediately. All documents can be dated from the month before application, or any month since. Include this page with your documents.

Were you or someone in your household receiving benefits from [SNAP], [TANF], or [FPFR] at the time of application, or any time since?

IF YES, please send us your [SNAP], [TANF], or [FPFR] Certification Notice that shows dates of certification. OR, you can send the “Statement of SNAP/TANF/FPFR Benefits” page included in this packet instead. Do not send your EBT card.

If you send us one of these documents, you are DONE. You do NOT need to send anything else.

IF NO, please read the following options and follow the instructions if they apply to you:

1. The child is homeless, migrant, or runaway. Contact [school], [homeless liaison], or [migrant coordinator] or (xxx)-xxx-xxx or e-mail for help.

2. The child is a foster child: Send documentation that verifies the child is in the legal responsibility of the agency or court. OR, provide the name and contact information for a person at the agency or court who can verify the child’s foster status.

3. The child is not covered by 1 or 2: Return this page along with documentation of your household’s sources of income for either the month before application, or any month since. Acceptable documents below. The document(s) must show:
   • Name of person who received the income
   • Date received
   • Amount received
   • How often it was received

Acceptable Documents for Showing Household Income

• Jobs: Paycheck stub or pay envelope. If the stub or envelope does not list how often you are paid, you can send the “Statement of Earnings” page, completed by your employer. If you work for yourself, please include business of accounting papers, such as ledger books or 1040-Schedule C.

• Social Security, Pension, or Retirement: Social Security retirement or other statement of benefits received, or pension award notice. OR, you can send the “Statement of Social Security and/or Supplemental Security Income” page, completed by employer.

• Unemployment, Disability, or Worker’s Compensation: Notice of eligibility from State employment security office, check stub, letter from the worker’s Compensation office.

• Child Support or Alimony: Court decree, agreement, or copies of courts received.

• All Other Income: Information that shows the amount of the income, name of the person who received the income, the date it was received, and how often it was received.

No Income: A brief note explaining how you provide for your children’s expenses, and where you expect an income.

Military Housing Privatization Initiative: Letter or rental contract showing that your housing is part of the Military Privatized Housing Initiative.

Send this information via ONL of the following methods:

Take pictures of the requested documents with your phone/camera and email them to [email]. Include a picture of this page.

Mail documents along with this page to 13300 Old Marlboro Pike, Upper Marlboro, MD 20772 using the envelope provided. If possible, send copies.

Come in person to the office located at 13300 Old Marlboro Pike, Upper Marlboro, MD 20772 to drop off the documents. Bring this page with you.

The final deadline is Nov 15, 2016.

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Verification Project
Social and Behavioral Science Research

Dear [Susan],

Your application was approved a little while ago, and [Bob, Jill and Sara] should already be receiving free/reduced price meals.

However, there is one last step you need to take – please send us documents to confirm your eligibility. Each year we select different meal applications to confirm eligibility. This year, your household was selected.

You must send us the information we request on the next page immediately, or [Bob], [Jill], and [Sara] will stop receiving free/reduced price meals.

We understand that your situation may have changed since you applied, or you may not remember exactly what you put on your application. That’s fine. We explain what you need to send on the next page.
Verification Project
Social and Behavioral Science Research

State clear action steps

Were you or someone in your household receiving benefits from [SNAP], [TANF] or [FDPIR] at the time of application, or any time since?

IF YES, please send us your [SNAP], [TANF] or [FDPIR] Certification Notice that shows dates of certification. OR, you can send the "Statement of SNAP/TANF/FDPIR Benefits" page included in this packet instead. Do not send your EBT card.

If you send us one of the above documents, you are DONE. You do NOT need to send anything else.

IF NO, please read the following options and follow the instructions if they apply to you:

1. The child is homeless, migrant or runaway: Contact [school, homeless liaison, or migrant coordinator at (xxx)-xxx-xxxx or e-mail] for help.

2. The child is a foster child: Send documentation that verifies the child is the legal responsibility of the agency or court. OR, provide the name and contact information for a person at the agency or court who can verify the child's foster status.

3. The child is not covered by 1 or 2: Return this page along with documentation of your household's sources of income for either the month before application, or any month since. Acceptable documents below. The document(s) must show:
   - Name of person who received the income
   - Date received
   - Amount received
   - How often it was received
Verification Project
Social and Behavioral Science Research

Make it as easy as possible

Send this information via **ONE** of the following methods:

- **Take pictures of the requested documents with your phone/camera and email them to [e-mail]. Include a picture of this page.** OR
- **Mail documents along with this page to [ADDRESS] using the envelope provided. If possible, send copies.** OR
- **Come in person to the office located at [ADDRESS] to drop off the documents. Bring this page with you.**
Verification Project – Next Steps Timing

July, 2016

August, 2016

September, 2016

October, 2016

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Verification Project – Next Steps Timing

July, 2016

August, 2016

September, 2016

October, 2016
Verification Project – Next Steps Timing

![Calendar showing monthly steps for July, August, September, and October 2016. The steps are marked with arrows indicating the progression of the project.]
USDA is Here to Help!

- Visit our “Help Desk” to speak with subject matter experts
- Come see us in the Exhibit Hall ➔ USDA Lane Booths #2047-2053
- Become a Team Nutrition School ➔ www.fns.usda.gov/tn/join-team
- Visit us online

facebook.com/USDA  @USDANutrition  @TeamNutrition  fns.usda.gov