



Food and
Nutrition
Service

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SUBJECT: Reducing School Meal Certification Error through Improved Online Application Design

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

A growing number of local educational agencies (LEAs) offer an online option to families applying for free or reduced price meals. LEAs understand that online applications, offered alongside traditional paper versions, have the potential to reach more families and extend program access to more eligible children. Online applications are also well-suited to improve certification accuracy. The purpose of this memo is to encourage LEAs and their software vendors to rethink online application design. By combining insights from the LEA perspective with lessons from the technology and design communities, LEAs and their software vendors can build applications that advance both user accessibility and program integrity.

USDA's most current research finds that more than one in five applicants for school meal benefits are certified incorrectly. The same research finds that applicant error, in the form of omitted income sources and household members, is the largest driver of improper certification. These errors lead to over-certification and the mistaken denial of benefits to eligible families.

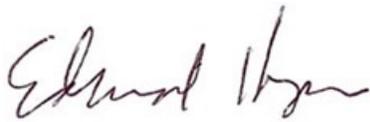
USDA strongly encourages LEAs and their software vendors to take full advantage of the interactive online environment when developing or updating their online applications. In particular, LEAs should consider designs that guide applicants step by step through the collection of household member names and their incomes, applying the same "interview" approach that underpins most tax preparation software. Developers of that software recognize that a longer series of simple questions can be easier to navigate correctly than a smaller number of complex questions that rely on the applicant's mastery of a separate set of instructions.

One of the important messages that USDA hopes to communicate with this memo is that online applications need not, and in fact should not, mimic the look and feel of USDA's paper prototype, or paper-based applications generally. USDA released a web-based prototype application in 2016 to illustrate a number of research-backed integrity features. Despite its departure from traditional application design, it is fully compliant with program regulations and USDA guidance. (A demo and the open source code for the application can be found on the FNS website at <https://www.fns.usda.gov/school-meals/web-based-prototype-application>.) USDA views release

of the prototype as the first step in a process of continued improvement of web-based application design – a process that LEAs and their software vendors can improve upon from here.

Ensuring accuracy in the certification of children for free and reduced price school meal benefits is a top priority of USDA, and is a shared responsibility of this agency and our State and local partners. To that end, USDA strongly encourages the adoption of integrity features like those included in the web-based prototype application. Attached to this memo is a set of questions and answers about integrity-focused online application design.

State agencies are reminded to distribute this memorandum to Program operators. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate FNS Regional Office.

A handwritten signature in dark ink, appearing to read "Edward Harper". The signature is written in a cursive, flowing style.

Edward Harper
Director
Office of Program Integrity
Child Nutrition Program

Questions and Answers About Online Application Design

1. Why release a memo on online application design now?

A number of LEAs and software vendors have contacted USDA to ask whether school meal applications can be modified to include more detailed questions under current USDA policy. This memo clarifies that taking advantage of a web-based platform to improve the quality of information collected (e.g., by asking more in-depth income interview questions and individual income questions for children) is appropriate and allowed under current USDA policy.

2. Why is USDA putting so much emphasis on integrity features in online applications for school meals?

USDA published the second *Access, Participation, Eligibility and Certification Study* (APEC II) study in May 2015. As stated earlier, that study showed that one in five applicants was incorrectly certified or was denied benefits due to applicant mistakes and administrative processing error. The most significant applicant errors were missing household members and omitted income sources. USDA is targeting those mistakes by rethinking how an application collects that information from applicants. As a first step, USDA turned its attention to the interactive nature of the online platform and its potential as a tool to guide applicants through the most complicated parts of the application. Current online applications simply reproduce the characteristics of a paper application and do not take advantage of the capabilities provided by a web-based platform. USDA is encouraging LEAs and software vendors to think beyond the paper application and design applications that help parents fill out their school meal application more accurately.

3. What are some examples of integrity features for online applications?

Here are three examples of integrity features that research suggests may reduce household reporting error.

- **Guided income and household interview.** Taking a cue from tax preparation software, applications should prompt users with a straightforward series of questions about household composition and income. FNS understands that the eligibility rules for the school meal programs might not be intuitively understood by many applicants. As such, questions should be fully descriptive, and as mentioned above, all critical information should be immediately available through on-screen instructions and accessible help.
- **Integrated instructions and accessible help.** Failure to read instructions is a well-known human behavior, and consolidating a given set of instructions in a separate location (e.g. on a separate webpage) makes it even less likely that the intended audience will acknowledge them. In online applications, instructions can be integrated directly into the questions, placing additional information right at users' fingertips. So rather than asking, "Do you have any income from reportable sources?" (and requiring people look up them up), the income sources can be listed in the question itself. When critical information cannot be integrated, it should still be available on the screen and written in plain language. As an added benefit, these help

features might even cut down on the number of phone calls LEAs receive from households during application season.

- **Up-front attestation.** Research by social scientists finds that requiring users to sign up front, attesting to the accuracy of the information they will provide in the application, reduces self-reporting errors.

These and other integrity features (including summary pages, pop-up help, progress bars, features to improve readability and comprehension, and more) are described and illustrated in the context of USDA's web-based prototype application in the accompanying Guide on the FNS website.

4. Families in my school district are familiar and comfortable with our online application's three-question income section. A guided income interview would make our application longer and more complicated. Why should we switch?

The space limitations of the paper format drive many of the design choices in paper applications used around the country. Providing a small number of boxes to enter all income sources is one of those space-saving design choices. By necessity, that design puts the burden on the applicant to consult the instructions, and to review and sum up the applicable sources from among more than 20 income types that are reportable under program rules. It is important to remember that the responsibility to report completely and accurately is the same, whether the applicant uses a paper form or a web-based form with more detailed income questions.