

## Evaluation of the Independent Review of Applications in USDA Child Nutrition Programs (Summary)

### Background

The Richard B. Russell National School Lunch Act requires a second, independent review of applications (IRA) for certain local education agencies (LEAs). Under the IRA provision, LEAs that demonstrate high levels of, or a high risk for, administrative error associated with certification, verification, and other school meal program administrative processes are required to conduct a second review of the eligibility determinations.

The Evaluation of the Independent Review Process study examined the processes, procedures, and effectiveness of the requirement. The requirement, which was first implemented in School Year (SY) 2014-15, is intended to reduce administrative certification error in LEA processing of household applications.

The regulations provide two criteria for State agencies to annually identify LEAs that must conduct the IRA:

- Criterion 1: All LEAs with 10 percent or more of certification/benefit issuances in error, as determined by the State agency during an Administrative Review; and
- Criterion 2: LEAs that the State agency considers with its own discretion to be at risk for certification error but were not selected under Criterion 1.

### Methods

The research objectives of the study were:

1. describe IRA processes and policies at the State and LEA levels;
2. review eligibility classifications on a sample of household applications; and
3. assess the effectiveness of IRA and recommend best practices.

The study was conducted through:

- a survey of all State agencies;
- in-depth interviews with a purposively selected sample of 30 LEAs;
- review of household applications for two nonconsecutive school years (SY 2016-17 and SY 2018-19); and
- analyses of FNS-874 (“Local Educational Agency Second Review of Applications”) data.

Collected data were assessed to:

### Key Findings

- A certification/benefit issuance error rate of 10 percent or more (Criterion 1) was the primary method used to trigger the IRA requirement for the LEA.
- When State agency discretion was used to identify LEAs for IRA (Criterion 2), the primary risk indicator used was certification/benefit issuance error between 5 and 10 percent on Administrative Review.
- IRA rarely found incorrect eligibility classification determination by the LEA (less than 5 percent of applications).
- State agency respondents perceived that LEAs of all sizes find it challenging to complete IRA within the 10-day timeframe.
- LEAs reported that the biggest challenges to IRA are receiving incomplete/ineligible applications and lack of staff availability.

- examine the implementation of the IRA requirement;
- identify IRA challenges and opportunities for improvement;
- assess types of application errors; and
- evaluate the impact of IRA.

### Findings: Process and Policies

**Across the LEAs that conducted IRA in the two school years examined, Criterion 1 was the primary method that triggered the IRA requirement.** In SY 2016-17, 62 percent of all LEAs required to conduct IRA were identified using Criterion 1, and 38 percent were identified using Criterion 2. The split was similar in SY 2018-19, when 55 percent of all LEAs required to conduct IRA were identified for IRA using Criterion 1, and 45 percent were identified using Criterion 2.

**The primary Criterion 2 factor, used by 31 States, was certification/benefit issuance error between 5 and 10**

**percent on Administrative Review.** Eleven States reported they do not use Criterion 2 to select LEAs, and the remaining States adopted one or more of the recommendations in FNS guidance for Criterion 2.

**Twenty-eight States review the IRA process during Administrative Review, and 11 States review it during technical assistance visits.** Most States (36) review the IRA data submitted by LEAs and look for peculiarities.

**Findings: Application Review**

**LEAs in the study seldom made incorrect eligibility classification determinations.** When comparing the independent assessment of eligibility to the final determinations made by these LEAs, there were relatively few incorrect classifications observed in either school year. In SY 2016-17 and SY 2018-19, 4.4 percent and 3.9 percent of applications, respectively, were incorrectly classified [See Figures 1 and 2].

**Incomplete applications were between 50 and 60 percent of the incorrect classifications.** Between 60 and 70 percent of incomplete applications that were missing a social security number and/or signature were incorrectly classified. Had these applications included all required data elements, the percentage of incorrect classifications in the study sample would have dropped to around 2 percent for each school year.

**Findings: Challenges and Recommendations**

**LEAs identified several challenges associated with the IRA process.** LEAs reported that the two biggest challenges with the IRA are: (1) receiving incomplete and/or illegible applications from households; and (2) lack of staff availability (and clearance) to review applications.

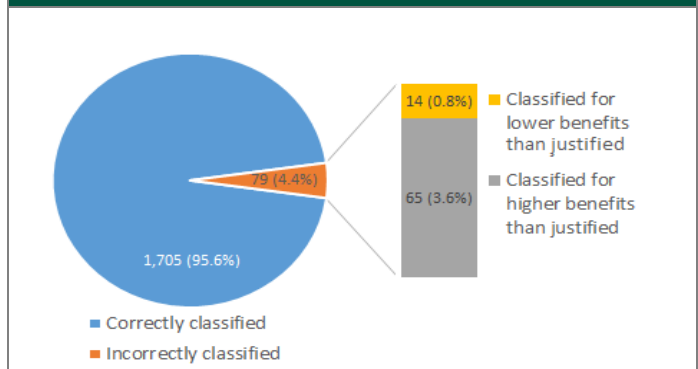
**State agency respondents perceived that all sizes of LEAs struggle to complete IRA within the 10-day timeframe.** States also commented that their small and very small LEAs struggle the most with identifying and training staff to review applications, and inadequate technology. The large and very large LEAs struggle the most with the volume of applications they need to review for IRA.

**When asked what could minimize the State-level burden of IRA, nine States suggested the IRA requirement be eliminated altogether.** Other suggestions, each mentioned by five or fewer States, included:

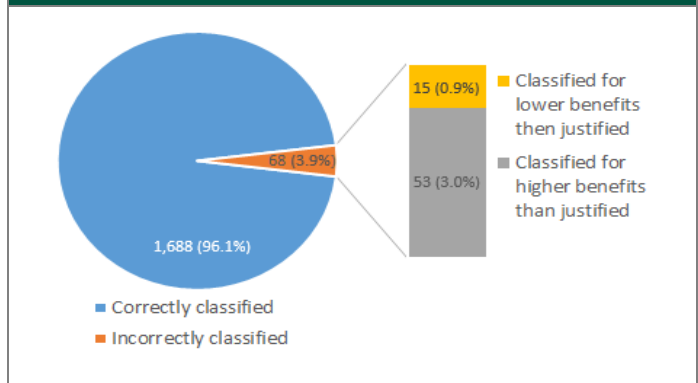
- providing additional training resources to States so that they can improve LEAs’ understanding of the initial application review process;
- allowing States to resolve issues with LEAs during an Administrative Review instead of through IRA;
- setting a higher threshold of errors for Criterion 1;
- removing the requirement for States to establish a Criterion 2 to trigger IRA; and
- changing the timing of the IRA away from the start of the school year.

**LEAs requested more training on reviewing applications and conducting the IRA.** Some LEAs experience difficulties navigating relevant trainings and others would prefer more hands-on training. LEAs also want more information from their States about the IRA process, such as the purpose of the requirement, how States select LEAs, and the deadline to complete the IRA.

**Figure 1: Number of incorrect classifications among study applications, SY 2016-17**



**Figure 2: Number of incorrect classifications among study applications, SY 2018-19**



**For More Information:**

Rothstein, M., Giesen, L., Manglitz, C., and Robins, C. (2021). Evaluation of the Independent Review Process. Prepared by Westat, Contract No. AG-3198-B-15-0010. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Jinee Burdug and Hunjin Lee. Available online at: [www.fns.usda.gov/research-and-analysis](http://www.fns.usda.gov/research-and-analysis).