



United States Department of Agriculture

October 26, 2016

Food and
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Becky Domokos-Bays, PhD, RD, SNS
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 School Nutrition Association
 120 Waterfront Street, Suite #300
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Re: Response to FNS-2016-18983

Dear Dr. Domokos-Bays and Ms. Montague,

Thank you for your response to the Federal Register Notice for the third study on Access, Participation, Eligibility, and Certification (APEC III). The Food and Nutrition Service (FNS) is committed to increasing integrity in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) while also maintaining access to these important programs for students and families. As an important step in this process, APEC III will provide FNS with key information on the annual error rates and erroneous payments for the NSLP/SBP in school year (SY) 2017-2018. In addition, APEC III will identify School Food Authority (SFA), school, and student/household characteristics that may be related to error rates, and identify strategies and actionable guidance for reducing errors.

We appreciate your recommendations for how to improve the accuracy and decrease the burden of data collection in APEC III, building off lessons learned in previous iterations of this research. In this vein, school district notification and data verification is occurring in the fall of 2016, well in advance of the SY 2017-2018 data collection. This was done deliberately in order to reduce the burden imposed on school nutrition professionals as they prepare for data collection during the following school year. In addition, the process by which districts can submit data is streamlined in APEC III. For example, the contractor, Westat, obtained administrative data on schools from the National Center for Education Statistics' Common Core of Data. School districts were asked to provide updates and/or corrections to their district's information directly in a web-based portal. A reference guide was also provided to facilitate this process.

FNS is also mindful of the burden created by asking districts for information that they may have recently reported to their State agency as part of the Administrative Review (AR) process. Although some of the information requested in APEC III may be redundant with some information collected during the AR, the cyclical nature of the AR process (i.e., every 3 or 4 years) means that the data generated from it may not be the most current data available for the sampled districts and schools. Also, using administrative data from previous years would not allow APEC III to meet study objectives nor allow for an independent data collection specific to SY 2017-2018. To the extent that districts

have migrated to electronic data capture and reporting systems, the administrative data requests for APEC III should not be overly burdensome.

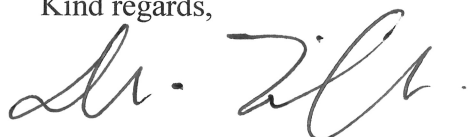
FNS understands the importance of an accurate assessment of erroneous payments as a result of meal claiming errors. Given the complexities of the meal pattern requirements, data collectors who conduct the onsite meal observations will not be tasked with making determinations about the meal eligibility for reimbursement. Specifically, their role will be solely to observe and record. Senior researchers with the required technical knowledge will make these determinations based on the observation data. Due diligence will be made to ensure that the research team considers the important nuances of meal pattern requirements and meal pattern flexibilities permitted by States.

The impact that the Community Eligibility Provision (CEP) has had on the technical approach for measuring certification error in AEPC III cannot be understated. Westat has sought information from State and SFA directors on their process for selecting CEP so that administrative data requests for CEP schools and districts are more targeted. Also, APEC III will request that districts provide the documentation for the identified student percentage (ISP) after the start of SY 2017-2018. This will minimize the burden of completing data requests while conducting their ISP calculations for the current school year.

Finally, FNS recognizes the import and impact of NSLP and SBP as well as the complexity involved in accurately assessing errors in program operations and reimbursements. As SNA recommends, APEC III will attempt to identify and understand the relevant variables and how they may provide context for study findings. There are several enhancements from APEC II designed to further strengthen the measurement of erroneous payments and provide additional insight into the sources of those errors. Some of these enhancements include: increased sampling of SFAs, schools, households, and student records; new procedures to further strengthen the quality of income data obtained from households; and qualitative interviews with SFA directors (or other key staff), cafeteria managers, and parents. This qualitative data will supplement quantitative data to help provide context and better identify potential policy options for reducing errors.

FNS appreciates your comments and investment in the well-being of America's children, as we work together to create healthier school environments for them.

Kind regards,

A handwritten signature in black ink, appearing to read 'Dr. Williams', with a stylized flourish at the end.

Devin Wallace-Williams, PhD, COR
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