



Exploring an Online School Meal Application for Oklahoma

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Introduction

The National School Lunch Program and School Breakfast Program serve as the nation's second largest nutrition assistance program, serving nearly 35 million meals per day at a free or-reduced price rate in 2019¹. Over 60%, or 420,000, of Oklahoma students were eligible for free or reduced-price meals in 2019², making the free and reduced-price meal benefit a vital tool in improving nutritional statuses and addressing childhood food insecurity. Yet the burden of certifying eligible students for free or reduced-price rates is placed solely upon individual school districts with little centralization of resources to process the thousands of applications that Oklahoma schools receive every year.

Districts and states across the U.S. are increasingly looking to electronic meal benefit applications to streamline the application process for households, reduce both processing and applicant error rates, and better manage their processing systems, particularly in the face of a pandemic that is forcing many in-person interactions to be moved online. With over 500 school districts processing meal benefit applications for hundreds of thousands of students annually, **Oklahoma is in the position to consider larger-scale solutions on a state level to better manage the free and reduced-price meal application process for the benefit of districts and households alike.**

In this report, we will be assessing feasibility and making recommendations for a statewide process for online free and reduced-price meal applications in Oklahoma. Factors to be considered in assessing options for Oklahoma include costs, benefits, state-specific needs, software available on the market, and potential barriers online applications might bring to households.

¹ School Nutrition Association, School Meal Trends & Statistics
<https://schoolnutrition.org/aboutschoolmeals/schoolmealtrendsstats/#:~:text=Participation%2C%20Meals%20Served%20and%20Program%20Cost,-National%20School%20Lunch&text=Pre%2Dpandemic%2C%20nearly%20100%2C000%20schools,7.7%20million%20of%20price>

² Table 204.10., Number and percentage of public school students eligible for free or reduced-price lunch, by state, https://nces.ed.gov/programs/digest/d19/tables/dt19_204.10.asp

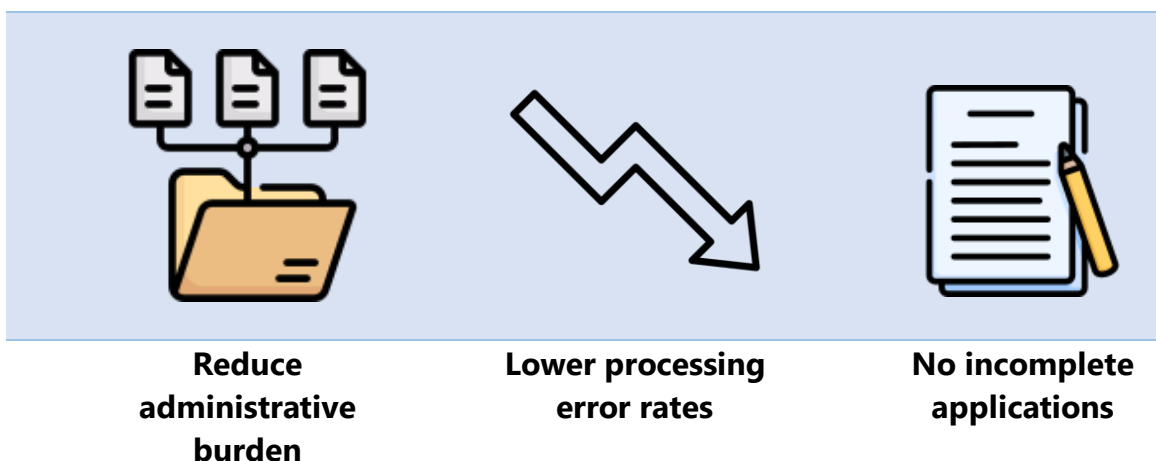
Benefits of an Online Meal Application

Online applications for free and reduced-price meals offer an array of benefits for both school districts and households, as compared to paper applications³.

School districts can accept and process online applications throughout the school year and lower administrative burden and staffing costs typically associated with paper application processing. Online applications can also be offered in more languages than the district currently offers on paper applications, as is seen in the software vendors some Oklahoma school districts currently contract with.

Because school districts typically accept and process the majority of school meal applications in the fall semester and require considerable manpower to process them, some larger school districts hire additional support staff to process the thousands of paper applications.

How districts benefit:




For households, online applications greatly simplify the application process and lower barriers to access. While paper applications must be picked up from schools or printed out at home, online applications allow households to apply at any time, from any device, and don't require the use of a printer or need to drop off an application in person. Households also can learn of their approval status faster with some online applications offered through different software vendors. This can both allow students to receive

³ School Nutrition Association, Free and Reduced-Price Meal Application and Income Verification Practices in School Nutrition Programs in the United States
https://schoolnutrition.org/uploadedFiles/5_News_and_Publications/4_The_Journal_of_Child_Nutrition_and_Management/Spring_2017/Free-and-Reduced-Price-Meal-Application-Spring2017.pdf

meals faster and notify households that are miscategorized to reach out to their district and fix application issues faster than notice through mail.

How households benefit:



Apply from any device, any time

Applications can be offered in more languages

Learn of approval status faster

Images: flaticon.com

Most importantly, online applications **seek to minimize application errors that account for up to 30% of free and reduced-price meal applications being miscategorized or rejected.** The U.S. Department of Agriculture (USDA) has identified the greatest sources of errors in free and reduced-price applications as applicants' omission of household members and income types and application certification errors that miscategorize applicants or deny them benefits altogether. Online applications seek to eliminate these errors by generally following a guided virtual income interview developed by the USDA, which prevents applicants from submitting incomplete applications and provides information on what applicants need to provide.

An online application for free and reduced-price meals offers the additional benefit of serving as an online application for Oklahoma's Pandemic-EBT program, for which households can currently qualify if they qualify for free or reduced-price school meals.

Overview of Options for Oklahoma

Creating a statewide online application for free and reduced-price meals requires 1) **developing and writing code** for an interactive and dynamic (can fit multiple devices) household application, and 2) **building a database and data security system** that can process, store, and transfer data from applicants to districts.

Two main paths to developing a statewide application for free and reduced-price meals have been identified, based on USDA guidance and statewide application efforts seen in other states. The first path involves Oklahoma developing and managing its own online application by adapting the USDA's open-source prototype application to its needs. The second path involves contracting with an existing software vendor to offer a third-party-built online application to participating school districts. In this section, we will assess each option.

Option 1. Independently-created form

If Oklahoma were to independently develop an online school meal benefit application, the main focus of the work needed would be adapting the USDA's prototype interactive free and reduced-price meals application and building out a secure database that districts can access.

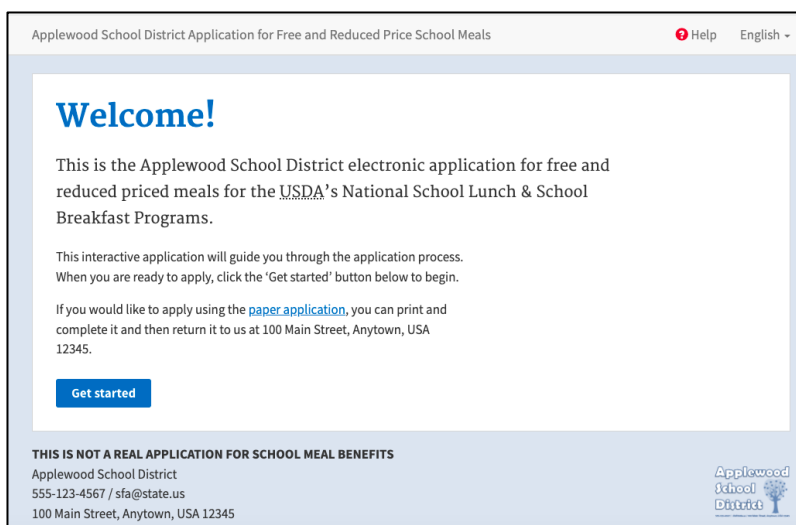


Figure 1. USDA Prototype Application Interface

To promote the use of online school meal applications, the USDA has developed an open-source prototype online meal application⁴ and actively encourages vendors and

⁴ USDA, Guide to USDA's Web-Based Prototype Application <https://fns-prod.azureedge.net/sites/default/files/cn/webbasedprototype-guide.pdf>

application administrators to adopt code and design features from the prototype. This prototype specifically sets out to address common sources of error in both applying for and processing. Through extensive surveying and research on how school districts are currently using applications and where errors come up while applying and processing applications, USDA has identified some key features that online applications should incorporate to address large sources of error.

In order to address applicants' greatest source of error—omission of household member (e.g. college students temporarily away from home) and types of income—a virtual income "interview" has been developed that guides applicants through declaring income type and sources and prevents submission of incomplete applications. Additional explanations are provided on types of income (gross vs. net), how to report discrete income, and how to provide case number(s) of benefits that applicants currently receive⁵.

Easy-to-read instructions that are provided in multiple languages have been highlighted as necessary for applicant success, and additional features like "things you'll need" lists have been shown to increase comfort with online applications and lower application error rates.

The USDA application is notably mobile-friendly and dynamic, meaning that it can be filled on different devices, which increases access for households that don't have access to a computer or printer.

Technical guidance on how to adapt the prototype application has been provided by the USDA, and Oklahoma has the chance to independently create its own version of the online meal application with the help of technical staff and buy-in from school districts. If Oklahoma were to create and host its own application, additional IT staff that can adapt prototype app code and developer(s) that are skilled in data security and database set-up must be hired to adapt the USDA prototype. Infrastructure to receive and send application data to districts must be established, and school districts must be trained in using the online application.

Option 2. Third-Party Software

Numerous third-party software companies offer online meal benefit applications with a variety of features and range of similarity closest to USDA prototype language. The four vendors identified in Table 1 below are currently being used in at least one Oklahoma

⁵ U.S. Department of Agriculture, Web-Based Interactive Prototype Household Application for Free and Reduced Price School Meals <https://www.fns.usda.gov/apps/school-meals/web-based-prototype/docs/index.html#>

school district, with MySchoolApps hosting the highest number of districts (18)⁶. If Oklahoma were to choose to contract with an application software vendor, the state could negotiate a contract with a vendor for a potentially lower annual software license rate than districts currently pay. Ideas on cost-sharing structures are discussed later in Key Consideration.

	School Lunch App by Nutri-Link	LunchApplication by LINQ	MySchoolApps	SchoolCafe	Independently-Created Form
States using the application for a large number of districts	ME, ID, TX	CA, MN, NY, NC, OH	AL, CA, CO, FL, GA, NJ, NY, TX, VA	PA, AK, FL, GA, TX	OR, PA
Indicates that Social Security Number is required to apply	No	No	Yes	Unknown	OR: No PA: Yes
Are OK districts using this*?	Yes- 10 districts	Yes- 2 districts	Yes- 18 districts	Yes- 1 district	No

Table 1. Features of free and reduced-price meal application software vendors as well as current USDA prototype software

*See Appendix A for OK districts currently using these software vendors.

⁶ See Appendix A for lists of Oklahoma school districts currently using third-party vendors for school meal benefit applications.

Current State of Online Meal Applications in the U.S.

The following states are the only currently known states offering a statewide online free and reduced-price meal application at the time of publication. These states reflect the two development paths (independently-created form or third-party application software) identified in this report and could serve as a valuable resource as Oklahoma explores a statewide online application.

Oregon

Oregon serves as a prime example of a state undertaking the responsibility of developing its own statewide free and reduced-price meal application⁷. As of 2021, the Oregon Department of Education hosts the “Oregon Confidential Household Application for Free and Reduced Price Meals” on its website, where households can apply for benefits and will be notified by their respective school districts of eligibility status.

Idaho

Idaho⁸ has partnered with Nutri-Link Technologies, Inc. to offer its districts an online meal benefit application for school districts participating in the federal Child Nutrition Programs. The Idaho Child Nutrition Programs has negotiated a contract with Nutri-Link and is using grant funding to pay for set-up costs, training, and technical support through June 30, 2022 to implement the Idaho School Meal Online Application statewide. After June 30, 2022, districts can opt to keep using the Online Application through Nutri-Link by assuming the financial responsibility of the annual software license fee, which is a flat fee per district of \$1,150.

Maine

The state of Maine has also partnered with Nutri-Link Technologies, Inc. to provide an online meal benefit application for any interested school district participating in the federal Child Nutrition Programs at no cost to the district⁹. The Maine Department of Education (DOE) pays an annual statewide licensure fee to Nutri-Link. The SchoolLunchApp application is being used in Maine and is similar to the software being used in Idaho. Data input on the form will be directly transferred to the school district

⁷ Oregon Department of Education, Confidential Household Application for Free and Reduced-Price Lunch <https://www.ode.state.or.us/apps/frlapp>

⁸ Idaho State Department of Education, FAQ: Idaho School Meal Online Application <https://www.sde.idaho.gov/events/grant-opportunities/cnp/sch-mp/Idaho-School-Meal-Online-Application-FAQ.pdf>

⁹ H.P. 707: An Act To Provide Equity in Access to Applications for the National School Lunch Program and School Breakfast Program <http://www.mainelegislature.org/legis/bills/getPDF.asp?paper=HP0707&item=1&snum=130>

and the website link to the form must be hosted on the Maine DOE website, as per legislation passed in March 2021.

Pennsylvania

Pennsylvania offers a free and reduced-price meals application through its online statewide benefits COMPASS portal¹⁰ and applicant data is sent directly to the school districts. However, little is currently known about when the school meal benefits application was added to the COMPASS application portal, what its effects have been on free and reduced-price meal applications, and how school districts feel about the COMPASS application. Pennsylvania school districts still utilize third-party vendors for applications, with SchoolCafe hosting over 30 districts' online applications as of 2022.

Notable Considerations for a Statewide Application

Some key considerations in creating an online meal application for Oklahoma school districts include cost of development and use, potential for creating barriers to access through prohibitive application language, and concern for data security.

Cost

Creating and utilizing an electronic application for free and reduced-price meals from which Oklahoma's hundreds of school districts can benefit requires considerable cost. Adapting USDA prototype code and building and maintaining a secure database and data-transferring process requires dedicated developers and IT staff. A strong advantage to Oklahoma creating a universal online meal benefit application is that a reasonable cost for dedicated IT staff or contracting with a nutrition software company can be negotiated. By negotiating with Nutri-Link Technologies for a statewide contract for their SchoolLunchApp and Nutri-Cloud software, Idaho Child Nutrition Programs has secured a two-year initial contract to set up and provide the meal benefit application to any interested school district, after which school districts can continue to use the SchoolLunchApp application for an annual software license fee of \$1,150 per district, no matter the size of the district. Maine has also negotiated with Nutri-Link Technologies to provide their SchoolLunchApp software for all interested school districts. As of 2022, Maine will be paying upfront and indefinitely for any district to use SchoolLunchApp software for meal benefit applications.

¹⁰ Pennsylvania Health and Human Services, COMPASS
<https://www.compass.state.pa.us/compass.web/Public/CMPHome>

A potential cost-sharing opportunity could be constructed with Oklahoma State Department of Education similar to Idaho, where the state of Oklahoma foots the set-up and training bill for an initial period, after which school districts can opt to continue using the software for a negotiated annual license fee.

Data Sharing

Data-sharing agreements between online meal applications or contracted software companies are an important part of determining how to build an online free and reduced-price meals application for Oklahoma. Should Oklahoma choose to build its own application and host it independently, IT staff and developers skilled in data security are a must and will help ensure that applicant data will be sent directly to school districts. Should a third-party company be selected to create and/or operate Oklahoma's online meal application, data security needs must be vetted thoroughly. Nutri-Link's partnership with the state of Idaho is set up so that Idaho state agency staff never see applicant data; the data is sent directly to participating school districts. Similarly, Pennsylvania's free and reduced-price meal application built into their COMPASS all-in-one benefits application sends applicant/household data directly to school districts, and the Pennsylvania Department of Education does not view this data.

Accessibility

One of the main features that online applications can offer over paper applications is increased accessibility to applying for benefits. As is outlined and encouraged by USDA technical guidance, an online application for Oklahoma should prioritize accessibility features for its household applicants. Notable features like offering multiple languages for application instructions, adjusting reading level to meet state averages, and making the web application interface dynamic to fit mobile phones will ensure that applicants of all backgrounds are able to apply for benefits for their children. An additional accessibility feature that is interpreted differently by application developers is language requiring adult applicants of each household to provide a Social Security Number.

Although school meal programs are not allowed to consider applicants' citizenship status when determining eligibility, further examination of legislative language and technical guidance outlining eligibility requirements has revealed vague directions around requiring Social Security Numbers (SSN) from the adult applying for their household. Districts or states who use online applications, either independently-created or third-party built, have understood this vague language to mean that applicants are required to have an SSN to apply, as seen in the screenshot (Figure 2) below.

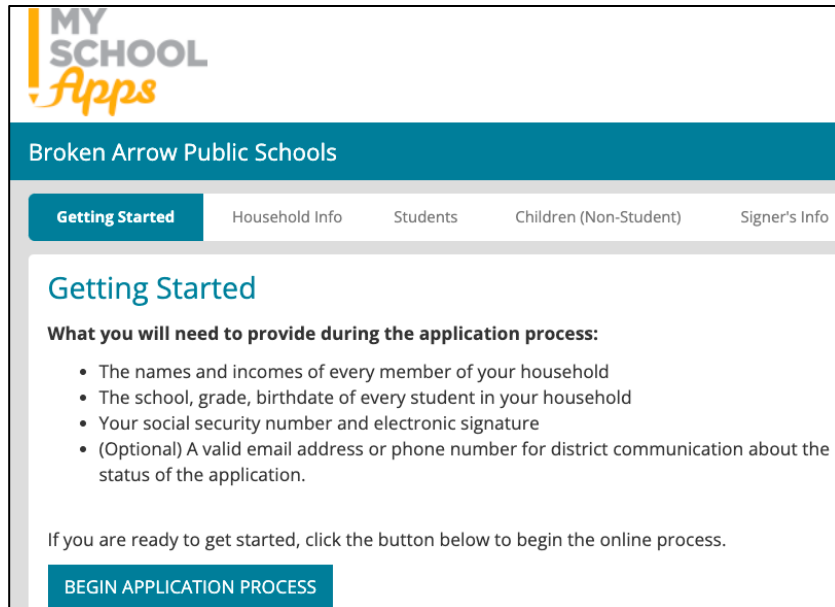


Figure 2. MySchoolApps landing page for Broken Arrows Public School district.

For this reason, it is imperative that any application Oklahoma chooses to develop or utilize must use appropriate language that clarifies that an SSN is not required to apply, and that the application will allow one to indicate whether or not the applicant has an SSN. Should this concern not be adequately addressed, applicants without SSNs could be mistakenly rejected from benefits. Oregon’s confidential online household application has omitted language around Social Security Numbers as a requirement, which is possibly a benefit of their control in developing an independent form.

Paths forward

Two paths for creating a statewide electronic free and reduced-price meal application in Oklahoma have been identified: 1) independently developing and managing an electronic application by adapting the USDA prototype application, or 2) contracting with a third-party software vendor such as LINQ or Nutri-Link Technologies to create an Oklahoma-specific application into which school districts can opt. Here, we will explore each path and clarify the advantages and disadvantages.

Option 1: Independently-created and managed form

Given that the USDA has provided the public a working electronic application prototype that was intentionally developed to address common sources of error, Oklahoma is in a great position to adapt this prototype to meet its needs. The prototype requires developers and dedicated IT staff to modify the prototype’s

source code and build out a secure database and data security system that can send applicant data directly to school districts. By directly tailoring the prototype to serve Oklahoma's school districts, Oklahoma is in a position to have a larger amount of control over application language, which is of note when considering language "requiring" Social Security Numbers (SSNs) from applicants.

Option 2: Third-party form

However, such an undertaking on a statewide scale is still an immense effort, and Oklahoma could draw on other states' successes using third-party meal application software companies (i.e., Maine and Idaho's contract with Nutri-Link Technologies) and benefit from the ease of working with a third-party company. By working with a company who has already developed their own application by drawing on the USDA prototype language and code, Oklahoma could potentially save time, administrative burden, and money. By contracting with one company to develop a universal online application for Oklahoma, districts can benefit from lower annual software license costs, vetted application instructions, and more uniform processing methods that can reduce application and certification error rates. At least 31 Oklahoma school districts are currently using online applications offered by the four companies identified earlier in this report; when districts must each explore, select, and negotiate with a company for an online meal benefit application, knowledge on how to best choose an application and negotiate an affordable license fee can be unnecessarily siloed. Potential drawbacks of contracting with third-party companies include potential fear of security breaches that could expose household data to third parties.

Conclusion

Oklahoma has the opportunity to increase access to one of the largest food security programs in the state with an online free and reduced-price meals application. A statewide online application offers Oklahoma households interactive, mobile-friendly, and easy-to-read forms and gives districts complete applications with lower processing error rates. As many administrative processes have been made virtual in the face of the pandemic, it is crucial that Oklahoma learn from the successes of its districts and other states currently using online applications and prioritize the need for administrative ease for both districts and households.

Appendix A. Oklahoma school districts identified as using listed software vendors for online meal benefit applications

School Lunch App by Nutri-Link	LunchApplication by LINQ	MySchoolApps	SchoolCafe
<ul style="list-style-type: none"> • Bartlesville Public Schools • Bixby Public Schools • Durant ISD • El Reno PS • Jenks Public Schools • Moore Public Schools • Mustang Public Schools • Skiatook Schools • Sperry Public Schools • Union Public Schools 	<ul style="list-style-type: none"> • Kipp Tulsa Charter • Vinita Public Schools 	<ul style="list-style-type: none"> • Arapaho-Butler Public Schools • Bethany Public Schools • Broken Arrow Public Schools • Claremore Public Schools • Comanche Public Schools • Coweta Public Schools • Elk City Public Schools • McAlester ISD • Miami Public Schools • Owasso Public Schools • Piedmont Public Schools • Ponca City Public Schools • Pryor Public Schools • Putnam City Schools • Sand Springs Pic Schools • Sapulpa Public Schools • Tulsa Public Schools District 1 • Weatherford Public Schools • Yukon Public Schools 	<ul style="list-style-type: none"> • Stillwater Public Schools

