



FOOD AND NUTRITION SERVICES

VERIFICATION

Presented by
Ellen Rees
School Nutrition Program Manager

Verification

- Verification is confirmation of eligibility for free and reduced price meals under the National School Lunch Program and School Breakfast Program.
- Verification must include either confirmation of income eligibility or confirmation that the child is included in a certified Food Stamp household or Temporary Assistance unit.



Verification

- Not required for:
 - **Directly Certified** students
 - Students certified as homeless, runaway, migrant, Head Start, Early Head Start, and Foster Children on list provided by Missouri Dept. of Social Services
 - **RCCIs** without day students
 - LEAs operating district-wide **CEP**
 - LEAs operating district-wide **Provision 3 not in the base year**
 - LEAs operating district-wide **Provision 2 for both lunch and breakfast not in the base year**
 - Schools operating non-pricing programs claiming only the paid rate for reimbursement
 - Schools participating in only Special Milk Program

Even if not required to perform verification, RCCIs, CEP & Provision Schools are still required to complete the Verification Report.

Verification Dates



Date	Action	Comment
October 1 st	Count approved free & reduced price applications subject to verification*	This is your sample pool which is used to determine sample size.
Last operating day in October	Count the approved free & reduced price students on applications subject to verification*	This number is needed to complete the verification report, but is not used during the verification process
November 15 th	Verification Process must be completed	Any extension must be approved by DESE FNS
December 15 th	Verification Report Due in Web Applications System	Must not be completed earlier than the Last operating day in October.

** The number of applications subject to verification on the last day of October could be different than on October 1st if a student was directly certified between these dates. If this is the case, please include in the comments when submitting the Verification Report.*



Establishing the Sample Pool

- Count the approved free and reduced applications as of October 1st
 - The pool is based on the number of applications, not the number of students
- Do count:
 - Approved Free and Reduced applications based on income
 - Approved Free applications based on SNAP/TANF Case number on the application
 - Foster child application without supporting document
 - “Mixed Households” which include children who are eligible based on income and others based on Other Source Categorical Eligibility (Foster, Homeless, Migrant, etc.)



Establishing the Sample Pool

- Do **NOT** count:
 - Applications with students who have been Directly Certified
 - Students certified as homeless, runaway, migrant, Head Start, Early Head Start, and Foster Children on list provided by Missouri Dept. of Social Services
 - Denied Applications
 - Denied based on income
 - Denied because incomplete



Establishing the Sample Size

- Sample Size – The number of applications that must be verified
- There are 3 available sample sizes
 - Standard Sample Size
 - Error-prone
 - Alternate One (*most LEAs qualify for and use*)
 - Random
 - Alternate Two
 - Focused



Sampling Method Summary

Standard Sampling

Used by new LEAs and those with $\geq 20\%$ Non-response Rate

- Verify 3% of applications
- Select from error-prone applications

Alternate One (Random Sampling)

Can be used by LEAs with $< 20\%$ Non-response Rate

- Verify 3% of applications
- Select applications randomly

Alternate Two (Focused Sampling)

Can be used by LEAs with $< 20\%$ Non-response Rate

- Verify 1% of applications, selected from error-prone applications
- PLUS 0.5% of case number applications

ERROR PRONE means applications within \$100 per month of the applicable Income Eligibility Guideline



Establishing the Sample Size

- Standard Sample Size
 - Required for LEAs that had a non-response rate of 20% or more from the prior year
 - A list is published by DESE FNS each year
 - 3% of approved applications (rounded up), selected from error prone applications;
 - **OR** 3,000 error prone applications
 - If there are not enough error-prone applications, additional applications must be randomly selected



Establishing the Sample Size

- Alternate One
 - LEA must have a non-response rate of less than 20% the prior year
 - Verify 3% of approved applications (rounded up), selected at random;
 - **OR** 3,000 applications, selected at random
 - Most LEAS are qualified for and use Alternate One



Establishing the Sample Size

- Alternate Two
 - Either of the following:
 - 1% of approved applications (rounded up), selected from error prone applications; or
 - 1,000 error prone applications
 - Include applications with income and case numbers
 - **PLUS** the lesser of the following:
 - 500 approved applications with Case Numbers in lieu of income
 - 0.5% of approved applications with Case Numbers in lieu of income



Establishing the Sample Size

Additional Verification practices....

- All fractions or decimals are rounded upward to the nearest whole number. At least one application must always be verified
- Verification for cause is not included in the sample size – it is done in addition to the required sample size
 - Verification report: VC-1
- LEAs must not verify more or less than the sample size and must not verify 100% of applications (*unless there is only 1 application*)



Example Calculations

Example District

836	Income Applications • 23 of them are error-prone
30	Case Number Applications
2	Foster Applications
868	Total Applications

Standard Sample Size Calculations

- Calculate 3% of total applications:
 $868 \times 0.03 = 26.04$
- Always round UP
- 27 Applications, selected from error-prone applications



Example Calculations

Example District

836	Income Applications • 23 of them are error-prone
30	Case Number Applications
2	Foster Applications
868	Total Applications

Alternate 1 Sample Size Calculations

- Calculate 3% of total applications:
 $868 \times 0.03 = 26.04$
- Always round UP
- 27 Applications, Selected randomly



Example Calculations

Example District

836	Income Applications • 23 of them are error-prone
30	Case Number Applications
2	Foster Applications
868	Total Applications

Alternate 2 Sample Size Calculations

Calculate 1% of total applications:
 $868 \times 0.01 = 8.68$
(Always round UP)

9 Applications,
 Selected from error-prone

Calculate 0.5% of case number applications:

$$30 \times 0.005 = 0.15 \text{ (Round UP)}$$

1 Case # application

Total:

9 error-prone + 1 Case # application



Confirmation Review

Prior to any verification activity, a confirming official must review each application selected for verification to ensure that the initial determination was accurate

Confirming official

- Must be different from the determining official
- Sign the application to document confirmation review was conducted

This requirement can be waived if the LEA uses a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination. LEAs must contact the State Agency



Confirmation Review

Result of Confirmation Review	Action
No change in status	LEA proceeds with verification
Change from reduced to free (increased benefits)	LEA increases benefits immediately, notifies the household of changed benefits, proceeds with verification
Change from Free to Reduced (decreased benefits)	LEA does not change benefits and verifies the application. If free status is verified, LEA does not notify the household. If status changes, the household is sent a notice of adverse action
Change from Free or Reduced to Paid (decreased benefits)	LEA immediately sends household notice of adverse action, does not verify the application, selects a similar application for verification, and conducts confirmation review of newly selected application



Replacing Applications

- After completing the confirmation reviews, the LEA may on a case-by-case basis replace up to 5% of applications selected
 - When the LEA believes that the household would be unable to satisfactorily respond to the verification request
 - Application must be replaced with an application selected on the same basis (ex. error-prone)
 - Newly selected application must have a confirmation review
 - If 5% is less than 1, one application may still be replaced
 - All results of the 5% calculation are rounded up



Direct Verification

Verification Using Agency Records aka “Direct Verification”

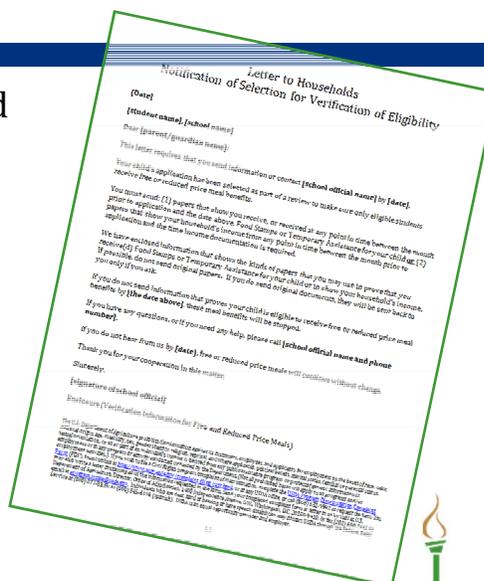
Direct Verification ≠ Direct Certification

- ❑ Not required by the LEA
- ❑ May be used with applications approved based on Case Number
- ❑ Prior to contacting household
- ❑ Records for one month, at any point in time between 180 days prior to application and verification ; OR
- ❑ Records for all months from the month prior to the application through the month of verification
- ❑ Proceed with regular verification activities if documentation from agency doesn't verify eligibility
- ❑ Verification Report: section 5-7; do not report in 5-8



Verification

- ❑ Contact the household with a letter or email
 - Letter must contain required information
 - Example in Verification Manual, “Letter to Households”



Verification

- Sources of responses to verification
 - Written Evidence
 - Collateral Contacts (outside of household)
 - Agency Records
 - Pay Stubs
- No Income
 - Must request an explanation of how living expenses are met
 - May request additional written documentation or collateral contacts.



Verification

- No Response
 - LEA must make at least one follow-up attempt to contact the household
 - Inform the household that failure to provide required information will result in termination of benefits
 - The follow up may be in writing, by email, telephone, or text message
 - Unable to verify the household's eligibility status after the follow-up attempt(s), the household's benefits must be terminated through a written notice of adverse action



Notice of Adverse Action

- All households for whom benefits are to be decreased or terminated **MUST** be given **10 calendar** days advance notice of the change
- The first day of the advance notice period is the day the notice is sent
- The notice **MUST** include all required information
 - Attachment in Verification manual

Letter of Verification Results and Adverse Action for Income Households

(Note: Make changes as applicable for the School Breakfast Program)

[Date]
[student name], [school building name]

Dear **[parent/guardian name]**:

We have completed verification of your child(ren)'s eligibility.

Starting on **[insert date 10 days from the date sent - date notice was sent counts as the first day]** your child(ren)'s eligibility for meals benefits will be:

Changed from free to reduced price because your income is over the allowable amount. The reduced price charge is **[charge for lunch]** for lunch and **[charge for breakfast]** for breakfast.

Stopped for the following reason(s):

- Your income is over the allowable amount for free or reduced price meals;
- You did not provide proof of eligibility. The following information is missing: _____

Starting immediately your child(ren)'s eligibility for meal benefits will be:

Changed from reduced price to free because your income is within the free meal eligibility limits. Child(ren) will receive meals at no cost.

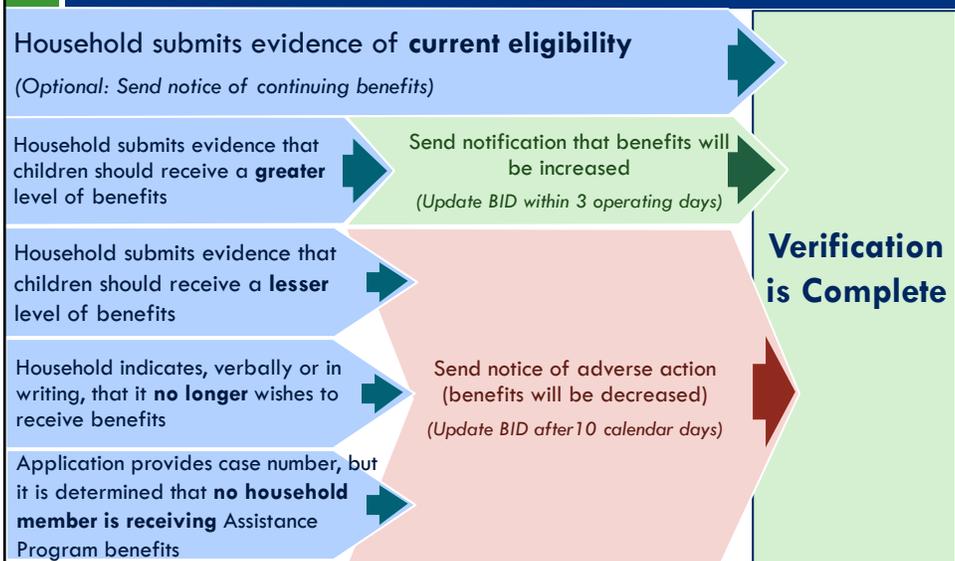
If you are not eligible for benefits now, but have a decrease in household income, become unemployed, or have an increase in the size of your household, you may fill out an application at that time to qualify for benefits.

If you do not agree with the decision, you may discuss it with **[school official]**. You also have the right to a fair hearing. If you request a hearing by **[date]** your child(ren) will continue to receive free or reduced price meals until the decision of the hearing official is made. You may request a fair hearing by calling or writing **[school official]** at **[phone number]** or **[address]**.

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Verification Complete



Verification for Cause

- Verification of questionable applications
 - Used as a way to address integrity concerns
- If an application is complete, it must be approved at face value
- Determining officials are strongly encouraged to contact households to clarify unclear or questionable information prior to verifying for cause



Right to Re-apply

- Households have the right to re-apply at any time during the school year
- If benefits to a household have been decreased because of failure to complete verification:
 - Required to submit documentation if they re-apply in the same year
 - Income documentation
 - Proof of participation in Assistance Programs
 - If benefits were terminated because they weren't participating in an Assistance Program,
 - complete new income application
 - must provide evidence of current household income



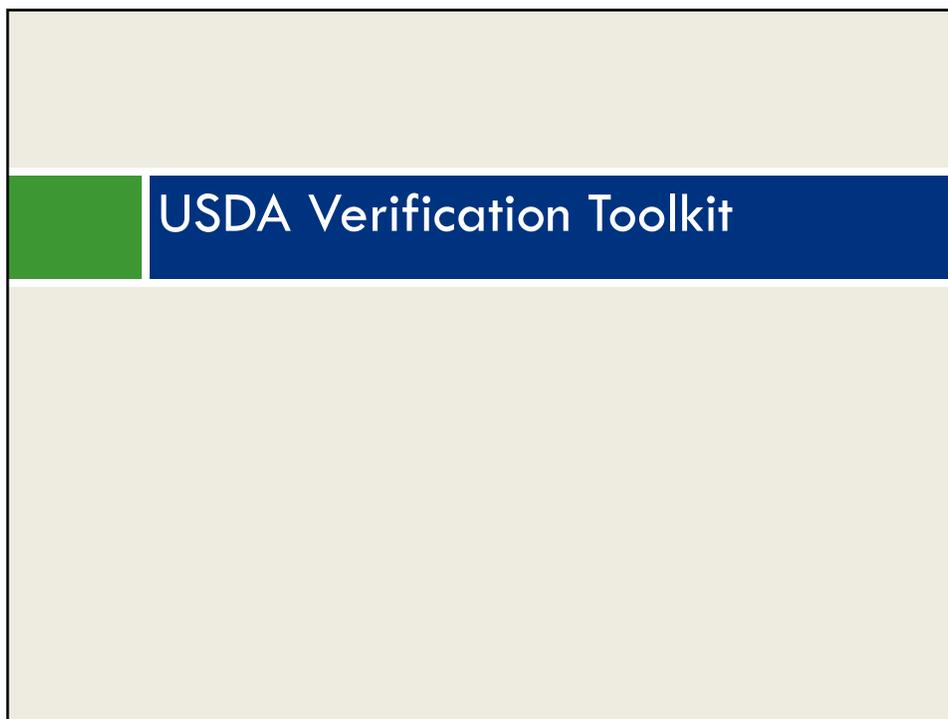
Verification Process Summary

1. Establish the sample pool (*approved applications as of Oct. 1st*).
2. Establish the sample size (*Calculate the number of applications that must be verified*).
3. Select the applications for verification.
4. Conduct Confirmation Review.
5. Notify households of selection for verification; and/or conduct Direct Verification.
6. Examine documents.
7. Notify households of continued benefits or changes in benefit level. (*Verification must be completed by November 15th*.)
8. Update Benefit Issuance Document/Point of Service. If benefits decrease, update 10 calendar days after notice of adverse action.
9. Complete and submit the LEA Verification Collection Report on Web Applications by December 15th.

Verification Guidance

- *Verification Guidance* will be updated. Located under Handbooks on the Food and Nutrition Services website - <http://dese.mo.gov/financial-admin-services/food-nutrition-services/handbooks>
- *USDA's Eligibility Manual for School Meals* is also located under Publications and provides guidance for verification.
- Emails to Authorized Representatives of the program will also be sent.
- Serving with Success e-Learning Module





Verification Toolkit

□ New Resource

- <https://www.fns.usda.gov/school-meals/verification-toolkit>





Submit your verification documents without a trip to the post office or school! Use the **camera** on your **phone** or tablet to take pictures of them and **e-mail** the pictures and your child's name to **[email@schooldistrict.edu]**

Be sure to submit your information by:
[Month] [xx], 20[xx]

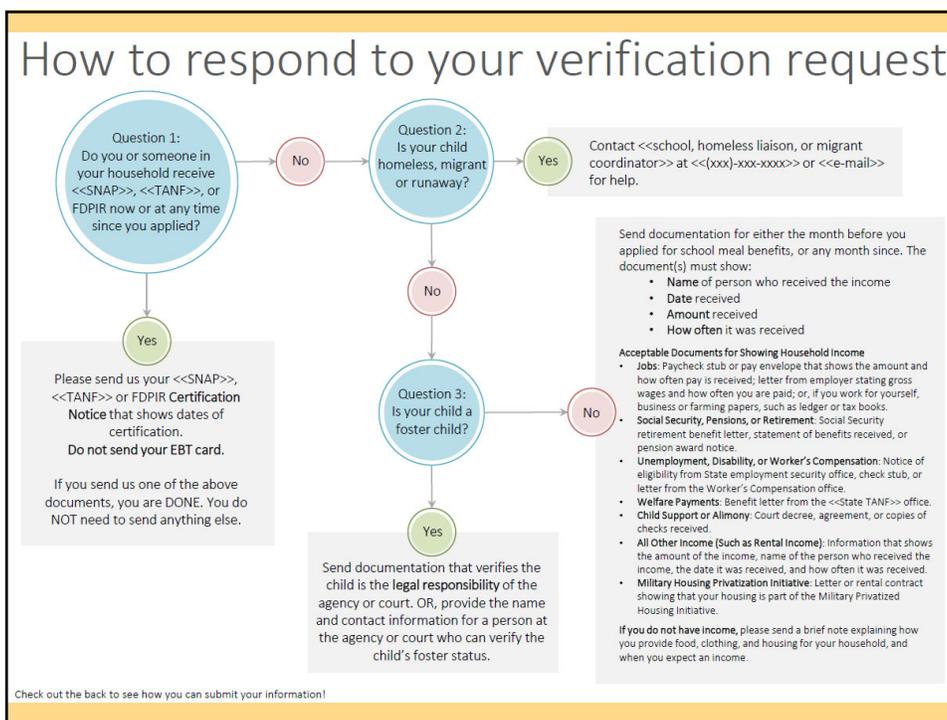







You may also submit your information by mail, or return it in person at your child's school. If you decide to send your documents by mail, please send them to: <<address>>.

If you have questions about the verification process or the types of documents you need to send, contact student eligibility and accountability at <<phone number>>.



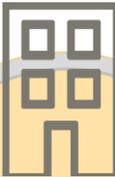
Send information in any of these ways!



Take pictures of the requested documents with your phone/camera and email them to <<e-mail>>. (Be sure to include the name(s) of your children that attend <<school district>> in the email.)



Mail documents, along with a copy of this letter, to <<address>> using the envelope provided. If possible, send copies rather than original documents.
You may also fax your documents to <<(xxx) xxx-xxxx>>.



Come in person to the office located at <<address>> to drop off the documents. Bring this page with you.

If you have questions about the verification process or the types of documents you need to send, contact us at <<phone number>> or <<email>>.

Strategies to Improve Response Rates in Verification

Practices used by School Food Authorities (SFAs) around the country and the research that supports them...

Initial Notice	General
<ul style="list-style-type: none"> ✦ Use envelopes or snap mailers that have a distinct marking, message, or unique color so that they stand out for families⁸ ✦ Send verification packets home with the youngest child in the household – in addition to sending via mail ✦ Make use of highlights, underlines, and boldface text¹ ✦ Include specific examples of acceptable income documentation ✦ Enclose a self-addressed and/or pre-paid envelope to facilitate response^{4, 10} ✦ Call families or send a “pre-notice” letter to let them know that a notice is in the mail¹⁰ ✦ Send materials in the language in which the family applied ✦ Select households and send notices closer to the time they applied (see the “rolling verification” resources in the toolkit) 	<ul style="list-style-type: none"> ✦ Make phone calls before 8am or after 5pm when families are more likely to be home ✦ Send email notices and/or accept emailed responses – this is more convenient than sending hard copies through postal mail for many families ✦ Allow photos of documents to be emailed⁹ (see the “filer for households”) ✦ Incorporate plain language in all communications, and avoid program jargon, such as “direct certification” or “categorical eligibility” wherever possible⁴ ✦ Enlist the help of school secretaries or other school staff to contact families - someone who families are more likely to be familiar with and trust ✦ Give households the option to receive text message notices and reminders ✦ Allow (and advertise) that parents can use a computer in the office to access and/or print documents ✦ Make personal calls in addition to or instead of automated calls to emphasize the importance of the verification process⁵
<h4 style="text-align: center;">Reminders & Follow-Ups</h4> <ul style="list-style-type: none"> ✦ Prominently include a message like “second/follow-up request for information,” so that if previous communications were missed, the family knows it is not the first contact attempt ✦ If you have the time and capacity, follow-up as many times as it takes, by multiple methods, up until the final cutoff date² 	

Questions

<http://dese.mo.gov/financial-admin-services/food-nutrition-services>

Email: Ellen.Rees@dese.mo.gov

Phone: 573-751-3852

