

Instructions for the Verification Process, Verification Summary Report, & Record Keeping

Verification of free and reduced-price meal applications is an annual requirement for all local education agencies (LEAs) that include public school districts, private schools, and Residential Child Care Institutions (RCCIs) that collect eligibility applications to determine free and reduced-price meal benefits for students. LEAs must complete verification in accordance with the U.S. Department of Agriculture (USDA) regulation 7 CFR 245.6(a). Verification is **not** required for LEAs that operate only the Special Milk Program or RCCIs that do not have day students or claim all students in the paid category.

These general verification instructions highlight some of the verification requirements. More detailed instructions should be referenced in the [USDA Eligibility Manual for School Meals](#), Part 9. The most current version of the Eligibility Manual is dated July 2016 and is available on USDA's website.

LEAs must count the number of applications on file on October 1 and complete the entire verification process by November 15. In addition, LEAs are required to enter verification results on the Verification Summary Report by February 1.

VERIFICATION PROCESS

VERIFICATION INSTRUCTIONS, TOOLS, AND LETTERS

Verification instructions, tools and sample letters, may be found on the [Office of Superintendent of Public Instruction-Child Nutrition Services \(OSPI-CNS\)](#) website.

TIMELINE FOR COMPLETING VERIFICATION TASKS

Tool 1: Timeline for Completing Verification Tasks provides an outline of tasks that must be completed in the verification process and may be used as a checklist.

VERIFICATION SAMPLE METHOD

LEAs with a non-response rate 20% or greater are identified in *Tool 2: Verification Non-Response Rate 20%*.

- LEAs with a verification non-response of 20% or greater must use:
 - 3% Focused Sampling method (Tool 3)
- LEAs with a verification non-response of less than 20% may choose to use:
 - 3% Focused Sampling method (Tool 3) OR
 - 3% Random Sampling method (Tool 4) OR
 - 1% Plus ½% Focused Sampling method (Tool 5)

SECOND PARTY CONFIRMATION REVIEW AND WAIVERS

The Second Party Confirmation Review is required for all LEAs that approve free and reduced-price meal applications. This review ensures that the original approval for meal benefits was correct on applications selected for verification.

LEAs that use electronic software to approve free and reduced-price meal applications may receive a waiver for the Second Party Confirmation Review. OSPI CNS will send an email update to all LEAs in September which serves as the waiver for commonly used software.

LEAs using software not listed on *Tool 7: OSPI-CNS Approved Automated Systems Waiver of Second Party Confirmation Review* must send a test application showing that the system correctly approves a

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household of four persons with an income \$2,723.00 monthly as eligible for reduced-price meals. The test application must be sent to Wendy Barkley, Supervisor, School Nutrition Programs, at wendy.barkley@k12.wa.us. LEAs must retain the waiver for administrative reviews and the State Auditor. We encourage all districts using approved software systems to run a test to be sure the system is functioning properly.

DIRECT VERIFICATION

Direct Verification (DV) is an optional, but highly encouraged, method to “directly” verify free and reduced-price income applications using Medicaid data. DV saves LEA time, makes it easier to verify applications, and may lower the non-response rate. LEAs that use DV to verify a student’s eligibility do not have to contact the household to verify eligibility.

DV is available to all LEAs and can be accessed in the [Educational Data System](#) (EDS). Once in EDS, select the tab titled Direct Verification. Do not choose Direct Certification as the Direct Certification list may not be used for verification. Additional DV instructions can be found in *Tool 1: Timeline for Completing Verification Tasks*.

FIRST HOUSEHOLD LETTER - WE MUST CHECK YOUR APPLICATION

Households selected for verification are required to submit documents or other forms of evidence to document eligibility. LEAs must send a letter informing households of their selection and the types of acceptable documentation. Use *Letter 1: We Must Check Your Application*.

LIMITED ENGLISH PROFICIENCY (LEP)

LEAs must ensure LEP households are provided adequate language assistance and understand the need to respond to the verification request. Verification materials in 34 languages are available on the [USDA website](#). When opening the application in the desired language, the verification materials may be found by scrolling through the pages. Note the English description at the bottom left-hand corner of each page.

DOCUMENTATION OF INCOME

The household submitted income and supporting documentation may be from any point-in-time between the month prior to the date the application was received and the time the household is required to provide income documentation. For example, a household submits an application in August and is selected for verification in October; the household may submit proof of income for any of the following months: July, August, September, or October.

VERIFYING FOSTER CHILDREN

Foster children found on the Direct Certification list are not subject to verification. Foster children on an eligibility application, accompanied by written proof the foster child was placed in care by a court or state agency, are not subject to verification.

Eligibility applications for foster children that are not accompanied by written proof are subject to verification:

- ✓ For eligibility applications with only foster children, the foster parent must provide documentation from the state or local foster agency.
- ✓ For eligibility applications with both foster children and non-foster children, documentation from the state or local foster agency and documentation of the family’s income are required.

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- ✓ For eligibility applications with both foster children and non-foster children when documentation has already been provided for the foster child, the application is still part of the verification pool, but only documentation of the family's income must be provided.

VERIFICATION OF BASIC FOOD HOUSEHOLDS THAT RECEIVE ZERO BENEFITS

Zero benefit households do not receive Basic Food dollars through electronic benefit transfer (EBT) cards. When an application with a case number has been submitted and the student is not on the Direct Certification list, the application is subject to verification. If verification documentation is a Department of Social and Health Services (DSHS) benefits letter noting "zero benefits," the family is not categorically eligible for free meals. Instruct the household to send further documentation to determine eligibility based on household size and income.

FOLLOW-UP/SECOND NOTICE

A follow-up/second notice letter must be sent to households that do not respond to the first letter notifying them of their selection for verification. A follow-up/second notice letter must also be sent to households that do not provide sufficient information. The follow-up/second notice may be in writing or by email. The LEA must document that contact was attempted. Use *Letter 2: Follow-Up/Second Notice Letter to Households Who Did Not Respond to the 1st Verification Request for Information*.

NOTICE OF ADVERSE ACTION

The notice of adverse action tells households that verification of eligibility resulted in a decrease or termination of benefits. Notice of adverse action may be in writing or by email to the parent or guardian. Notification of adverse action may not be made by phone call. Use *Letter 3: We Have Checked Your Application*.

VERIFICATION THAT RESULTS IN BENEFIT CHANGES

When verification results in changes to eligibility benefits, the changes become effective according to the criteria below:

- ✓ Reduction or termination of benefits: reduction or termination of benefits must take place immediately following the 10-day (calendar days) advance notice period outlined in the notice of adverse action.
- ✓ Increase in benefits: change is effective immediately. Notify household accordingly.

Changes to eligibility status: eligibility status must be changed for all children in the household enrolled in the LEA.

VERIFICATION FOR CAUSE OUTSIDE OF THE REGULAR VERIFICATION PROCESS

LEAs have an obligation to verify all questionable applications and must have a Verification for Cause procedure in place. The procedure must be used consistently when determining which applications are questionable. When a questionable application is received, it must be approved without delay and Verification for Cause initiated. Verification for Cause may occur at any time during the school year. Verification for Cause is an appropriate method for LEAs to address integrity concerns.

Determining/Approving officials are strongly encouraged to contact the household during the certification process to clarify any information that is unclear or questionable before certifying the application and conducting verification for cause.

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Verification for Cause may not be used to automatically verify district employee households whose children have been approved for free or reduced-price meal benefits. LEAs may, however, use Verification for Cause to review approved applications when known or available information, such as employee salary information, indicates that a school employee may have misrepresented their income on the application.

VERIFICATION SUMMARY REPORT

The Verification Summary Report must be completed by February 1. The summary report captures data about the verification process that was completed earlier in the school year.

Information to be reported in the Verification Summary Report includes:

- 1) The number of students that are **not** subject to verification *as of the last operating day in October* which were directly certified through **Basic Food**
- 2) The number of students that are **not** subject to verification *as of the last operating day in October* which were directly certified through all other methods:
 - Temporary Assistance for Needy Families (TANF),
 - Food Distribution Program on Indian Reservations (FDPIR)
 - Homeless
 - Migrant
 - Head Start
 - Pre-K Even Start
 - Early Childhood Education Assistance Program (ECEAP)
 - Foster children whose care and placement has been arranged by a court or state agency
 - Non-applicant's student applications completed and approved by an LEA official.
- 3) The number of students that were directly certified as Medicaid Free *as of the last operating day in October*.
- 4) The number of students that were directly certified as Medicaid Reduced *as of the last operating day in October*.
- 5) The number of enrolled students with access to NSLP/SBP *as of the last operating day in October*.
- 6) The number of students eligible for free meals *as of the last operating day in October*.
- 7) The number of students eligible for reduced-price meals *as of the last operating day in October*.
- 8) The number of applications *as of October 1* approved as free based on household size and income.
- 9) The number of applications *as of October 1* approved as reduced-price based on household size and income.

RECORD KEEPING REQUIREMENTS

All verified applications must be readily available for review by state or federal officials. Keep an organized file that includes copies of all documents submitted by the household to confirm eligibility and any notes made by the verification official.

Date stamping documents and dating all correspondence with households is recommended.

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There must be documentation of changes made to eligibility, the reason for the change and the effective date of the change due to the verification process. Use *Tool 8: Documentation of the Verification Process* to document the results for applications selected for verification.

COMMON PROBLEMS IDENTIFIED DURING ADMINISTRATIVE PROGRAM REVIEWS

Common problems identified during Administrative Reviews can be avoided by completing the verification process correctly.

To avoid common problems:

- ✓ Count applications on October 1.
- ✓ Use the correct sampling method to select applications for verification.
- ✓ Double check the number of applications selected if using an automated system.
- ✓ Send second notice letters to households that do not respond to the first notice or that send incomplete documentation.
- ✓ Update point of service meal counting system when eligibility changes.
- ✓ Document the results of verification for each selected application.
- ✓ Complete the verification process by November 15.
- ✓ Complete the Verification Summary Report by February 1.
- ✓ Keep good records of the entire verification process.