

# Verification Tool 1: Timeline for Completing Verification Tasks

This Verification Timeline provides an outline of tasks that must be completed to successfully carry out the annual process of verification.

## START OF SCHOOL YEAR

- 1. Prepare necessary verification materials (letters to households, etc.). Letters must contain the full nondiscrimination statement.
  - 2. Check Verification Tool 2. Local Education Agencies (LEAs) listed on Tool 2 had a non-response rate at 20% or greater and must use 3% FOCUSED. All other LEAs may choose 3% RANDOM, 3% FOCUSED or 1% plus ½% FOCUSED.
  - 3. Separate applications based on sampling method chosen:
    - a. If using 3% Focused, separate error-prone\* applications from other applications.
- \*Error-prone: applications with listed income within \$100 of monthly; \$1,200 yearly income; \$50 for twice monthly income; \$46 for income paid every two weeks; and \$23 for income paid weekly

OR

- b. If using the 1% plus ½% Focused, separate applications approved by Basic Food, TANF, and FDPIR case numbers and foster children without documentation from a state or local foster care agency from other applications.

**NOTE:** It is helpful to separate applications at the beginning of the year during the approval process.

- 4. LEAs are required to provide a telephone number that is available at no cost to the household if any household lives or works outside the local calling area. The LEA may establish a toll-free number or allow the household to reverse the charges. Determine how this regulation will be accomplished, should it apply to you.

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## COUNT APPLICATIONS – OCTOBER 1

- 1. Determine the total number of approved free and reduced-price meal applications (pieces of paper) on file as of October 1. Exclude the following:
  - Students included on the Direct Certification list (Basic Food, TANF, Foster, Migrant).
  - Students certified for free or reduced price meals on the Direct Certification Medicaid list.
  - Students certified as migrant via migrant list or homeless via homeless liaison list.
  - Income eligible Head Start, Even Start, and ECEAP.
  - Students receiving TANF benefits from a recognized federal Tribal TANF Program-LEA obtained a list.
  - Meal applications submitted by a household and one or more students are identified on the Direct Certification list or Direct Certification Medicaid list.
  - Students identified on a list from a residential child care institution (RCCI), as having spent at least 24 hours in residency.
  - Previous year's applications carried over for the first 30 operating days of this school year.
  - Foster students whose application was submitted with documentation from a state or local foster care agency.

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- 2. If using 1% plus ½% Focused, count the total number of applications approved with a case number from Basic Food, TANF, and FDPIR households and applications for only foster children that were not accompanied by documentation from a state or local foster care agency.

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### DETERMINE THE NUMBER OF APPLICATIONS TO BE SELECTED FOR VERIFICATION

- Calculate the number of applications to be verified based on the sample method that applies using one of the three options below (See Tool 2 for LEAs with non-response rates 20% or greater).
  - a. 3% Focused (for those LEAs with a non-response rate 20% or greater last school year use Tool 3 to complete calculations).
  - b. 3% Random (for those LEAs with a non-response rate of less than 20% use Tool 4 to complete calculations).
  - c. 1% plus ½% Focused (for those LEAs with a non-response rate of less than 20% use Tool 5 to complete calculations).

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### SELECT APPLICATIONS TO AND CONDUCT CONFIRMATION REVIEW

- 1. Select applications for verification. Make copies of the selected applications and file these and all other verification materials used in a “verification” folder or notebook. Use Tool 6 to document the method used to determine the number of applications to be verified.

- 2. If you do not use an electronic software system to approve applications, conduct the confirmation review. Prior to any other verification activity, the LEA must conduct the confirmation review. This is to determine the accuracy of the initial approval of eligibility for the applications selected. If you use an electronic software system to approve of free and reduced-price meal applications you may apply for a waiver of the second party confirmation review requirement. Tool 7 explains the waiver process.

**NOTE:** Any LEA that conducts a confirmation review of all applications at the time of approval of meal eligibility is not required to conduct a confirmation review.

- 3. Replacing Applications. After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications selected. Applications may be replaced when the LEA believes that the household would be unable to satisfactorily respond to the verification request.
  - a. Any application removed must be replaced with another approved application selected on the same basis (same sampling method) and then have a confirmation review.
  - b. Even in LEAs where five percent of the total applications result is less than one, one application may still be replaced.
  - c. All results of the five percent calculation are rounded up to the next whole number.

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4. Action Based on Outcome of Confirmation Reviews. Depending on the outcome of each confirmation review, the LEA takes one of the following actions:

<b>Confirmation Review</b>		
<i>Application is</i>	<i>Confirmed as</i>	<i>What to do next</i>
Free	Free	Continue with verification process.
Reduced	Reduced	Continue with verification process.
Reduced	Free	Increase benefit immediately. Notify household. Continue with verification process.
Free	Reduced	Do not change. Continue with verification process.
Free or Reduced	Paid	Notify household. Do not verify. Select another application.

### CONDUCT DIRECT VERIFICATION

1. Conduct Direct Verification using the Educational Data System (EDS).

<b>Direct Verification (DV)</b>		
<i>Student on application is</i>	<i>On DV list student is</i>	<i>What to do next</i>
Free	Free	Done.
Reduced	Reduced	Done.
Reduced	Free	Done – verified as reduced.
Free	Reduced	Not verified – continue with regular verification process.
Free or Reduced	Not on list	Not verified – continue with regular verification process.

2. If the LEA uses direct verification to confirm eligibility, a letter informing the household of its selection for verification is not required, unless otherwise indicated in the chart above, since the household will not have to provide documents.

### NOTIFY HOUSEHOLDS

1. Household Notification. Use sample Letter 1 to send out the first notice of verification to selected applicants. The household must be sent a letter informing them of their selection and of the types of information acceptable to be submitted.

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- 2. Follow-up/Second Notice attempt requirements. The LEA must make at least one follow-up attempt to contact the household when the household does not adequately respond to the request for verification. The follow-up attempt may be in writing (including e-mails) or by telephone. Use sample Letter 2 for follow-up notice. The LEA must document that a contact was attempted. If after at least one follow-up attempt:
    - a. The household responds and provides all needed evidence. Verification is considered complete for this household when:
      - i. There is no change in benefits;
      - ii. The household is notified that its benefits will be increased; or
      - iii. The notice of adverse action is sent.
    - b. The household does not respond. Verification is considered complete for this household when the notice of adverse action is sent.
    - c. The LEA is unable to continue its verification activities because the household fails to provide adequate written evidence. Verification is considered complete for this household when the notice of adverse action is sent.
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### REVIEW DOCUMENTS AND DETERMINE RESULTS OF VERIFICATION

- 1. Review income documentation. The LEA must determine:
  - a. If the household has submitted adequate information to complete the verification process.
  - b. If follow-up with the household is needed.
- 2. Households with no income. If a household is selected for verification and the application indicates no income, the LEA must request an explanation of how living expenses are met.
- 3. The LEA may determine that the household has adequately responded and follow-up is not required when:
  - a. The household submits the required documents and there is either adequate written evidence or collateral contact corroboration (third Party contact) of income or categorical eligibility.
  - b. The household submits the required documents and there is either adequate written evidence or collateral contact corroboration of income which indicates that the child(ren) should receive either a greater or lesser level of benefits. Verification is complete or the household is notified that its benefits will be increased or when the notice of adverse action is sent.
  - c. The household indicates, verbally or in writing, that it no longer wishes to receive free or reduced-price benefits. Verification is considered complete when the notice of adverse action is sent.

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- d. When it is determined that a child is not part of a household currently certified to receive Basic Food, TANF, or FDPIR by using outside agency contacts. Verification is considered complete when the notice of adverse action is sent.
  - e. Household does not respond after 2nd notice was sent. Verification is considered complete when the notice of adverse action was sent.
5. Indicate results of verification using Tool 8 or another system you may have developed.
6. Notice of Adverse Action. All households for whom benefits are to be reduced or terminated must be given 10 calendar days written advance notice of the change. The first day of the advance notice period is the day the notice is sent. Use sample Letter 3 to notify households of the results of verification.
- NOTE:** Households receiving a Notice of Adverse Action must also be informed of their appeal rights and instructions on filing an appeal.
- Optional:* Send notification of continuation of benefits as a result of verification to households.
7. Terminate or change benefits, if required, in the point of service (POS) system for all students as a result of the verification process. Reduction or termination of benefits must take place on the date immediately following the 10-day advance notice period.
8. Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. However, if benefits to a household have been terminated and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in Basic Food, TANF, or FDPIR programs at the time of reapplication.

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### COUNT STUDENTS - LAST OPERATING DAY OF OCTOBER

USDA requires that LEAs submit a summary report – Verification Summary Report annually by February 1. A count of students as of the last operating day in October is required for the report. It may be helpful to gather this data while you are working through the verification process.

1. Number of students that are not subject to verification which were directly certified through Basic Food.
2. Number of students that are not subject to verification which were directly certified Medicaid – Free.
3. Number of students that are not subject to verification which were directly certified Medicaid – Reduced.
4. Number of students that are not subject to verification 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

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- 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.

- 5. Number of students approved as categorically eligible for free meals based on documentation submitted on a meal application.
- 6. Number of enrolled students with access to NSLP/SBP.
- 7. Number of students eligible for free meals.
- 8. Number of students eligible for reduced-price meals.

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### COMPLETE VERIFICATION PROCESS – BY NOVEMBER 15

- The LEA must have completed the verification process by November 15. This means that all applications have been verified and letters of adverse actions have been sent. It does not mean that all households have been reduced in benefits or terminated.

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### RECORD RESULTS OF VERIFICATION PROCESS ON VERIFICATION SUMMARY REPORT – BY FEBRUARY 1

- Enter the results of the verification process on the Verification Summary Report. Separate instructions are sent by e-mail each year.

Verification documents must be available during Administrative Reviews and must be retained according to record retention schedules.