
INCOME VERIFICATION:

HOW TO COMPLETE THE VERIFICATION PROCESS

CHILD AND ADULT NUTRITION SERVICES



Melissa

Good morning! Welcome to the Verification Webinar for school year 2022-23! Thank you so much for being here today!

We are here today to do a refresher on the verification process.

VIRTUAL HOUSEKEEPING

1. Change name in Zoom to First Name and Last Name so we know who is here
 - a. Right click on your name in the video view or in the participant pane
 - b. Click “rename”
 - c. Change your name to include yourself and anyone who may be with you
2. Use chat or unmute if you have questions

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Let's first take care of a couple of virtual housekeeping items. Please start by changing your name in Zoom if needed. Right click on your name in the video view or in the participant pane and click Rename. Please change to your first and last name and add anyone else who may be with you.

You may unmute your line or use the chat box to ask questions.

The PowerPoint can be found on the CANS/SNP website under Trainings & Webinars. It was also sent out in an email that contained the Income Eligibility Guidelines and the Error Prone chart. It may be helpful to have those tools available, as we will have some polls throughout the presentation!

LEARNING OBJECTIVES

1. Understand and describe program requirements for:
 - a. Verification for Cause
 - b. Due dates
 - c. Calculating sample size
 - d. Verification collection report
2. Accurately process and identify complete income documentation
3. Utilize the verification tracker to ensure accuracy and compliance
4. Use customer service skills to help families respond to verification

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We want participants to leave this training with confidence to conduct verification compliantly while gaining skills to effectively help families respond, keep students on meal benefits and help streamline organizational processes. The more you understand the program requirements the more successful you will be during a review and the more successful you will be in helping families respond.

Please note that this training is based on a typical year and traditional verification. If you have specific questions, please ask!



VERIFICATION – THE ANNUAL PROCESS



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THE ANNUAL REQUIRED PROCESS

1. Annual requirement: confirmation of eligibility for free or reduced-price school meals based on an application
 - a. If processing free and reduced-price school meal applications, verification **must** be conducted every year
2. Ongoing: conduct verification for cause throughout the school year for questionable applications

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Verification is the confirmation of eligibility for free or reduced-price meals determined through applications. It is an annual USDA requirement and involves selecting a 3% sample from all current year approved applications. Households in the sample size are notified that further income or assistance program documentation is required to confirm the information provided on the application.

VERIFICATION TIMELINE

October 1

- Count all current year approved applications
- Calculate Sample Size

October 31

- Follow-up attempts – throughout the month
- Count students by required categories

November 5

- Send adverse action letters

November 15

- All verification activities must be completed
- Must complete verification collection report in iCAN

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Here are the key dates to the verification timeline. October 1 is an important date as this is the day you count all current year applications to determine the size of your sample pool. This year October 1 is on a Friday, so you will be counting your applications at a time of the day you feel would most accurately reflect total applications as of the 1st. If you have a benefit issuance/free and reduced software calculating your sample size for you, please remember to manually check a few applications to ensure accurate calculations.

We will go over which applications to count in depth later.

October 31 or the last operating day in October is important as well. This is the date you must count the total number of students by specific eligibility. Again, we will cover this in depth later.

November 5 is the latest you can send a notice of Adverse Action to families whose benefits are decreasing. November 15 is the closing date of verification. All verification activities must be complete and entered into iCAN by this date.

The Verification Collection Report in iCAN records the count of applications you have on October 1, the count of students on October 31 and the results of verification. This must be completed by November 15.

VERIFICATION PROCESS

1. Count all approved free and reduced applications as of October 1
2. Calculate sample size
3. Conduct confirmation reviews (replace applications if necessary)
4. Notify households (follow-up attempts)
5. Review submitted documentation
6. Send results to households and update student statuses
7. Complete the Verification Collection Report in iCAN

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It's best to understand verification as the structured process shown here. These are the steps taken in the following order and will correlate to the dates previously shown.

1. Count all approved free and reduced applications as of October 1.
2. Calculate the sample size.
3. Conduct confirmation reviews and replace applications if necessary.
4. Notify households and conduct follow-up attempts as needed.
5. Review submitted documentation.
6. Send results to households and update student statuses.
7. Complete the Verification Collection Report in iCAN.

VERIFICATION FOR CAUSE

- Ability to verify any questionable application **at any time during the school year**
- Must first approve the application at face value
- Follow the same process as annual verification
- Examples of questionable applications:
 - Report of fraud
 - Cannot directly certify a case number application
 - Outside knowledge/questionable information on the application

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As mentioned at the beginning of this training, in addition to Verification being required as part of the annual process, it is also required to be conducted for any application that is questionable. The SFA has the obligation to verify any questionable application.

When an application is submitted and is questionable, it still must be taken at face value and processed. However, the SFA can then go about verifying the application for cause.

To verify for cause, the SFA will follow the same procedure as the annual process. Verification for cause may be conducted any time during the school year.

Keep in mind that Verification for Cause is conducted separately and in addition to the annual process. Therefore, any applications verified for cause cannot be included as part of the annual sample size. So, exactly why would an application be considered questionable, thereby making it subject to Verification for cause? There could be several reasons.

There may be questionable information on the application. Do Aunt Sally and Uncle Frederick, both with no income, really live in the household? Does Mom really make just \$2.00 per week?

The SFA may also have outside knowledge that conflicts with what is on the application. For example, maybe Dad owns a Fortune 500 company, and he reported receiving only \$2,000 per month. Or maybe the household buys a new yacht every other week and therefore likely has a plethora of income, while they listed only \$1400 twice per month. Unfortunately, in a small town, it can be true that everyone knows everyone

else – and everything about them. Regardless, if the SFA has outside information that conflicts with the application, they are still required to complete Verification for Cause.

An SFA is also required to verify an application for cause if there is any report of fraud made to the SFA. Yes, even if Dad calls up to complain about ex-wife Mom, who is apparently receiving benefits “fraudulently.”

Multiple applications submitted – with varying information – can also be a good reason to verify for cause, as can the fact that a child has an application with a SNAP number – but does not come up on Direct Cert. One note of caution about this, though: if a child is on a SNAP application but does not come up on Direct Cert, this could be because of a data glitch, or it could be a timing issue; it does not necessarily mean that the household is not on SNAP.

Finally, if the verifying official has information on other programs in the district that collect household size/income information, and this information does not match up with the F&R application, the application should be verified for cause.



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Poll 1:

All SFAs must conduct verification.

True

False

Add why.... ? CEP schools do not collect apps so do not conduct verification



COUNTING APPLICATIONS AND CALCULATING SAMPLE SIZE



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COUNT OF APPLICATIONS

- Count the total number of approved applications on file as of October 1 and keep record of:
 - # of free categorical applications
 - # of free income applications
 - # of reduced applications
- Review a complete list of applications not to include in sample pool found in the Eligibility Manual

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The first step of the annual verification process is the count of applications. This count must be accurate as of the **close of business on October 1**, and it is to entail the counting of all approved free and reduced-price applications for the current year. This year October 1 is a Friday.

The count does not include paid applications, and if the SFA is still in the carryover period, it does not include applications from the previous year. This count is conducted primarily so that SFAs will know how many applications must be verified. Further, the data from this count will later be reported in the Verification Report in iCAN. The SFA's count must break out the following information:

- number of free categorical applications,
- number of free income applications,
- number of reduced applications

TO COUNT...OR NOT TO COUNT...

- Student is directly certified prior to October 1 and on an application?
 - Do not count the application
- Student is on an application, but his sibling is directly certified prior to October 1?
 - This student should be extended eligible; do not count the application
- Student is on a foster only application?
 - This application must be counted
- The application has some students approved based on income and some students other source categorically eligible?
 - Count the application

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If a student is on an application and on Direct Certification, Direct Certification takes precedence, and so the application is not counted.

If a student is on an application along with another student who has been directly certified, this status should extend to them; as such, he or she is also considered directly certified, and the application is not counted.

If a student is on a foster application, the application is counted. The only exception to this would be if the SFA also receives foster lists from a liaison, and the student is also on that list. In that case, the application would not be counted.

What if the application has some students approved based on income and other students are Other Source Categorical? Then you would count the application.

SAMPLE SIZE TYPES

- 3 Types
 1. Standard Sample is 3% of approved applications selected from ***error-prone first***
 2. Alternate 1 is 3% of approved applications selected at random
 3. Alternate 2 is 1% of applications selected from error prone first and 0.5% selected from case number/foster only applications (categorical)
- When calculating your sample size, ***ALWAYS ROUND UP***

Must Qualify to use Alternate Sample Sizes

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There are three types of verification that can be conducted.

The most important logistical step is to determine the sample pool from which a certain number of applications will be chosen for verification.

The standard sample, a sample that randomly chooses, 3% of the approved applications that have been counted as of October 1. These applications are selected first from error prone applications, which will be covered in the next slide.

SFAs can qualify to use two other sample sizes which help them verify fewer applications. To qualify, an SFA must have had a non-response rate of less than 20% for applications verified in the preceding year. SFAs required to conduct Standard Verification were notified on September 2.

Regardless of which sample size is chosen, SFAs are reminded to check your electronic systems for accuracy, if using a system to pull the sample. Most SFAs with errors in sample size have had these errors because of mistakes in the systems. We have seen software systems pulling extra applications as a “buffer” for replacement of withdrawn students. Per USDA this is not allowed.

ERROR PRONE

- Error Prone application is any income application that is close to the thresholds of the Income Eligibility Guidelines (IEGs)

Frequency	Threshold for Error Prone
Yearly	EP = Apps with income within \$1,200 of the yearly IEGs
Monthly	EP = Apps with income within \$100 of the monthly IEGs
Twice per Month	EP = Apps with income within \$50 of the twice per month IEGs
Every 2 Weeks	EP = Apps with income within \$46.15 of every 2 weeks IEGs
Weekly	EP = Apps with income within \$23.07 of weekly IEGs

- Non-error prone includes all other applications, including income and categorical

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Before we look at the different sample sizes in more detail, we must first have an understanding of what error prone and non-error prone applications are. Error prone applications are simply those applications that fall, depending on frequency, within

- \$1200 of the yearly Income Eligibility Guidelines (IEGs)
- \$100 of the monthly IEGs,
- \$50 of the twice per month IEGs
- \$46.15 of the every two weeks IEGs OR
- \$23.07 of the weekly IEGs.

A non-error prone application is any other application, including income or categorical applications.

Most electronic free and reduced software systems do flag applications if they are error prone. However, as with anything with an electronic system, you should always spot check the system for accuracy.

Error-Prone Chart for FREE Eligibility Applications July 1, 2022 - June 30, 2023												
How Often Income Was Received												
Family Size	Yearly Error-Prone		Monthly Error-Prone		Twice a Month Error-Prone		Every Two Weeks Error-Prone		Weekly Error-Prone			
1	16,467	to 17,667	1,373	to 1,473	687	to 737	633.85	to 680	316.93	to 340		
2	22,603	to 23,803	1,884	to 1,984	942	to 992	869.85	to 916	434.93	to 458		
3	28,739	to 29,939	2,395	to 2,495	1,198	to 1,248	1,105.85	to 1,152	552.93	to 576		
4	34,875	to 36,075	2,907	to 3,007	1,454	to 1,504	1,341.85	to 1,388	670.93	to 694		
5	41,011	to 42,211	3,418	to 3,518	1,709	to 1,759	1,577.85	to 1,624	788.93	to 812		
6	47,147	to 48,347	3,929	to 4,029	1,965	to 2,015	1,813.85	to 1,860	906.93	to 930		
7	53,283	to 54,483	4,441	to 4,541	2,221	to 2,271	2,049.85	to 2,096	1,024.93	to 1,048		
8	59,419	to 60,619	4,952	to 5,052	2,476	to 2,526	2,285.85	to 2,332	1,142.93	to 1,166		

Error-prone Chart for REDUCED Eligibility Applications July 1, 2022 - June 30, 2023												
How Often Income Was Received												
Family Size	Yearly Error-Prone		Monthly Error-Prone		Twice a Month Error-Prone		Every Two Weeks Error-Prone		Weekly Error-Prone			
1	23,942	to 25,142	1,996	to 2,096	998	to 1,048	920.85	to 967	460.93	to 484		
2	32,674	to 33,874	2,723	to 2,823	1,362	to 1,412	1,256.85	to 1,303	628.93	to 652		
3	41,406	to 42,606	3,451	to 3,551	1,726	to 1,776	1,592.85	to 1,639	796.93	to 820		
4	50,138	to 51,338	4,179	to 4,279	2,090	to 2,140	1,928.85	to 1,975	964.93	to 988		
5	58,870	to 60,070	4,906	to 5,006	2,453	to 2,503	2,264.85	to 2,311	1,132.93	to 1,156		
6	67,602	to 68,802	5,634	to 5,734	2,817	to 2,867	2,600.85	to 2,647	1,300.93	to 1,324		
7	76,334	to 77,534	6,362	to 6,462	3,181	to 3,231	2,936.85	to 2,983	1,468.93	to 1,492		
8	85,066	to 86,266	7,089	to 7,189	3,545	to 3,595	3,271.85	to 3,318	1,635.93	to 1,659		

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Here is the current year error prone chart. While you're approving current year applications, it will be a good idea to also flag them as error prone (or make sure your software is flagging error prone applications correctly).

For example, if we just processed an application for a household of 5 with an annual income of \$41,500 we can see this application would qualify for free meals and will also be considered an error prone application.



Melissa

Poll 2:

Household of 3; monthly income of \$2,200
Is this Error-Prone?

Yes

No

CALCULATION EXAMPLE

Standard Sample Size of 3%

- On October 1 – counted 123 free income, reduced income and categorical applications
 - Of these 3 were error prone
- Multiply 123 by 3% (0.03) = 3.69
 - ALWAYS ROUND UP = 4 applications must be selected for verification
- Select from error prone first to meet the sample size
 - All 3 error prone will be selected first
- Select the remaining 1 application at random from the non error prone applications ¹⁷

Diana

To determine the number of applications to verify using the standard sample, the SFA will need to:

- Determine the number of applications that were counted as of October 1
- Multiply this number by 3%
- Round the result up to the nearest whole number
- Begin selecting applications to verify from the error prone applications
- If needed, complete the sample size by choosing the remaining applications from the non-error prone applications

The SFA has 123 approved applications on file that were counted. Of these, 3 are error prone and the rest are non-error prone.

Multiply 123 by 3%, which is 3.69.

This number must be rounded up, so it becomes 4.

The SFA will first need to select from the error prone applications. So, the LEA will include all 3 error prone applications, and to complete the sample size of 4, the SFA will choose one additional application from the non-error prone applications.



Diana

Poll 3:

You count 328 applications on October 1 and are calculating a standard sample size of 3%. How many applications must be selected for verification?

- a. 10**
- b. 9
- c. 8
- d. 11

VERIFICATION PROCESS

1. Count all approved free and reduced applications as of October 1
2. Calculate sample size
3. Conduct confirmation reviews (replace applications if necessary)
4. Notify households (follow-up attempts)
5. Review submitted documentation
6. Send results to households and update student statuses
7. Complete the Verification Collection Report in iCAN

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Let's review. We've defined verification and why we conduct this process annually. We've covered which applications to count on October 1 to determine our sample size. Lastly, we walked through how to calculate our sample size and identify what an error prone application is.

Next, we will look at steps 3, 4, 5 and 6!



NOTIFYING HOUSEHOLDS AND REVIEWING INCOME DOCUMENTATION



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STEPS PRIOR TO NOTIFICATION

Replace Applications

Confirmation Reviews

Limited English Proficiency Services

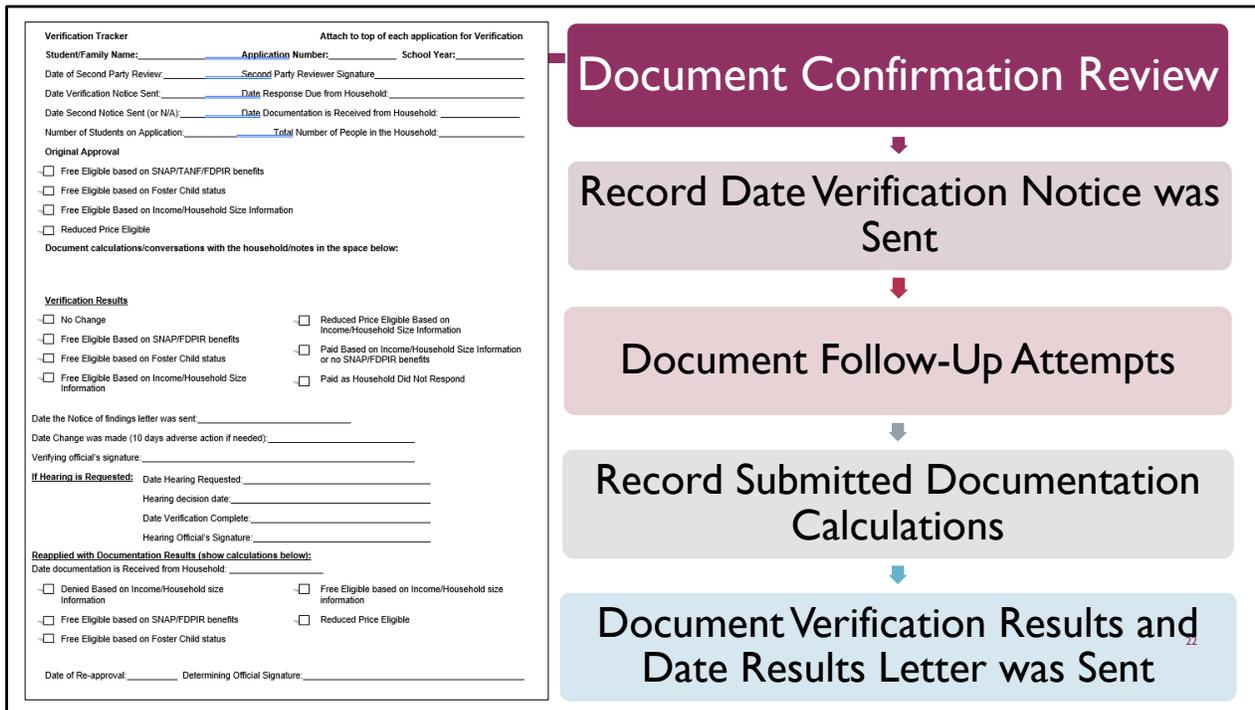
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Diana

One lesser-known provision of verification is that applications selected to be verified can be replaced, on a case-by-case basis. If you know the household cannot respond or has been selected year after year, you can replace up to 5% of applications. If an SFA replaces an application with another, the replacement application must be selected on the same basis. For example, if the original application was error prone, the replacement application must also be error prone (assuming there are still enough error prone applications remaining in the pool). Often, students have left the district or moved. If this is known, you must replace the application. If the household has become directly certified since submitting the application, you **do not have to replace the application**. You can send the direct certification notification and the verification for that household is considered complete.

Once the SFA has determined which applications to verify, they must conduct confirmation reviews on the applications selected. A confirmation review means that a person, **other than the person making the initial eligibility determination**, checks the application to ensure that it was approved correctly. It is critical that the confirmation review must be documented – meaning that the confirming official must sign off – and date – that the review took place. **There is a space on the application for this documentation.**

It is extremely important that services are provided for households that do not speak English. If you have a high population of non-English speakers, we highly recommend sending verification notices in English and a translated version in the language that is prominent in your community.



Diana

Here is the verification tracker. This resource will be a huge help during verification season to stay organized. It's posted on the CANS Memos page with the Verification memo. Use this as a cover page for each application that you have selected for verification and you can track your process, income calculations, communication with households and any pertinent notes needing to be documented.

Conducting verification this way will also help for review season. If you document everything on your tracker for each application, you can keep each year in a binder and you will have all required documentation needed for an administrative review!

HOUSEHOLD NOTIFICATIONS

- Use approved template
 - Can be found in your iCAN application
- Clarify what is required and acceptable documentation
- Emphasize it is a required process and households are chosen at random
- Send notifications in early October
 - Run a Direct Certification upload prior to sending notifications
- Postal mail or email

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Once households have been selected, the SFA must send out the notification they have been selected for verification. This letter should be sent out in early October and must contain the following information:

- That the household was selected for Verification
- The types of acceptable information that may be provided to confirm current income
 - Paystubs, benefit award letters, support payment decrees from courts
 - Information on the receipt of benefits under SNAP, FDPIR, or TANF
 - Proof that a child is homeless/migrant/runaway/foster/Head Start
 - Current income means any time between the month prior to application and the time the household is being verified
- That information must be provided by a certain date & that failure to do so will result in termination of benefits
- Name of LEA contact & no-cost telephone number
- Non-discrimination Statement

FOLLOW-UP ATTEMPTS

- Before November 15, at least one additional attempt to obtain necessary verification information is required
- Follow up if the household does not respond or submits insufficient documentation
- May be via phone, mail, text, email
 - Recommend follow up is done by phone
- All communication should be documented
 - Can use verification tracker found on the CANS website

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Once households have been notified that they must submit documentation for verification, the SFA will need to track of households that are not responding. The SFA must make a follow-up attempt before the verification deadline of November 15. It is recommended initially giving households one month to submit documentation – and providing the follow-up notice two weeks before that deadline. This still gives the households adequate time to respond before their documents are due.

A follow-up must also be given if the household has responded but has not given sufficient written evidence. For example, maybe a household sent in proof of one income but not another, or perhaps the frequency was missing on the paystub. If this is the case, the LEA must follow up.

Follow-ups must especially be sent to Limited English Proficient households, to ensure they have the resources needed to complete the request.

Follow-ups may be conducted by phone, mail, or email, but they must always be documented – and the Verification Tracker is a great place for this documentation! Phone calls are highly recommended as this can provide better customer service to households and give you an idea of what the household is confused about and/or if they are going to respond.

SUBMITTED DOCUMENTATION

- Ensure all required documents are submitted
 - Household members form
 - Proof of income or enrollment in qualifying assistance programs
- Ensure information is correct
 - Month prior to submission of application and up until time of verification
- Documentation must include
 - Name of household member
 - Gross income received and/or assistance program agency documentation
 - Acceptable date range

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When the SFA receives information from the families, they must ensure that all required documents have, in fact, been submitted. This includes the proof either of income or of enrollment in Assistance Programs like SNAP or TANF, or in other categorically eligible programs like homeless, migrant or foster.

Once all paperwork has been submitted, the next question is, **“Is the information current?”** For purposes of verification, current refers to the **month prior to the time of application, the month in which the application was submitted, or any month after that, up until the time the application is being verified.**

Next, the SFA will need to ensure that the documentation includes the name of the person for whom it was submitted. For example, does the paystub have the name of the employee who lives in the household, or does the SNAP letter have the name of someone in the household who is receiving the benefits?

EMPLOYMENT

- Pay stubs, letter from employer or statement of earnings signed by employer
 - Must include name, date, frequency, gross amount and pay date
 - Self-employed or farming income is calculated as net income
- Determine eligibility status as if processing an application
 - Compare household income and size to EIGs
- Document calculations on verification tracker and any changes in status

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Let's now look through the different types of documentation that must be submitted, depending on the household's circumstances – and at how the SFA will need to process it.

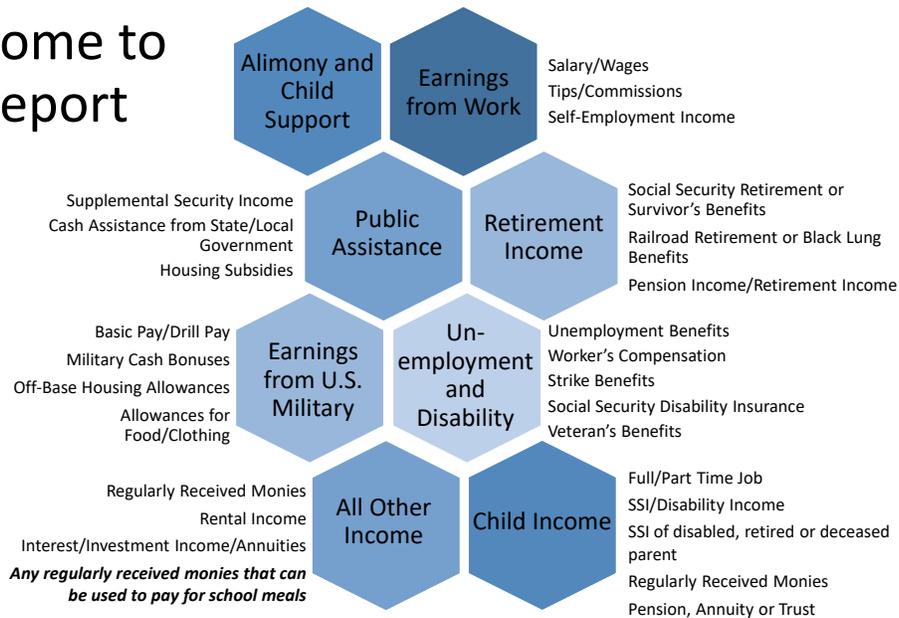
If a household receives income from employment, they must send in a pay stub or signed letter from the employer. Again, the documentation must include the **person's name, the date, frequency, and amount**. The frequency must be indicated by the employer on the paystub or in the letter; the household cannot self-indicate this.

If income documentation is submitted, it must also have the frequency and the amount, for one month's worth of income. If a weekly pay stub, for example, is representative of what the household normally receives each week, **one pay stub is sufficient**. Self employed and farming income is reported as net income.

The SFA will need to calculate the total income the same as if they were processing an application. If there is just one income, or if all income is received at the same frequency, the income must be determined at that specific frequency. If income is received at different frequencies, it must be annualized.

Once the SFA knows the total amount of the income, the SFA will compare it to the IEG chart, determine the eligibility status, and document all calculations. The Verification Tracker tool is a great place for this documentation!

Income to Report



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This slide shows all income that is required to be submitted. Alimony & child support, earnings from work, public assistance, retirement income, earnings from the US Military, unemployment and disability, all other income, and child income.

INCOME DOCUMENTATION

- Calculate average total for multiple paystubs
 - Average will be associated to the frequency received
- Can accept one paystub if confirmed the average gross amount is regularly received
- Tax return documentation can be used
 - Calculate gross income received for the year (net income for self-employed)

All regularly received income MUST be reported, whether it is federally recognized or not.

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Income documentation must be current, show who it belongs to and show gross income. This will come in a variety of forms, and it is important to remember the intent of the verification request is to prove the household's income is within the free and reduced guidelines. Here are some basic requirements as well as good reminders when evaluating income documentation.

Calculate average total for multiple paystubs. The average will be associated to the frequency received.

You can accept one paystub if confirmed the average gross amount is regularly received.

Tax return documentation can be used. Calculate gross income received for the year or net income for self-employed.

All regularly received income MUST be reported, whether it is federally recognized or not.

LETTER HOUSEHOLD MAY HAVE EMPLOYER COMPLETE

STATEMENT OF EARNINGS

This statement is to confirm that the employee Mickey Mouse received the following amount of gross income before deductions for taxes, social security insurance, etc. \$ 100. This income is received:

weekly
 every two weeks
 twice a month
 monthly
 other _____

The date of the paycheck listed above was issued August 1, 2021.


 Signature of Employer 8/27/2021
 Date

500 S Buena Vista St., Burbank, CA 91521
 Address

605-555-1234 walt.disney@disney.com
 Telephone Number Email

1 | NSLP Memo 51.10 2/2020

A Corporation

Employee Name	
Mickey Mouse	
Earnings	Rate
Regular Income	18.00
YTD Gross	YTD D
\$24,480.00	\$4

Earnings Statement

Pay Date	
5/2021	09/16/2021
rent	Year to Date
44.76	2,460.92
89.28	1,517.76
20.88	354.96
ctions	Net Pay
	\$1,185.08

Diana

Here are examples of types of income documentation you may receive. Ensure the documentation contains all the requirements:

1. Name of household member
2. Date
3. Gross income and/or net income for self-employment
4. Frequency or date range
5. Current date ranges

In this first example of a pay stub, you can see the date range is current and indicates a pay range of the 1st through the 15th. More than likely this household member is paid on a bi-monthly schedule. If you only receive one paystub, please contact the household to confirm their pay schedule and if the amount sent is the amount that is normally received. If you received more than one paystub you will be able to confirm the pay frequency and should take an average of gross pay if they differ.

The statement of earnings form can be signed by an employer as documentation. If you feel the household may be forging this document, ask for a business card or company letter head to be submitted with this form.

With all income documentation you will be making a new determination based on the income documentation submitted for all household members.

ASSISTANCE PROGRAM RECORDS

- Benefit programs:
 - Letter from appropriate agency
- Assistance programs (SNAP/TANF/FDPIR)
 - Certification notice showing current dates
- Foster
 - Documentation verifying the child is under the legal custody of the agency, state or court
- Other Source Categorical (homeless/migrant/runaway/Head Start)
 - District liaisons can provide documentation

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Diana

During Verification, many SFAs come across households receiving benefits. This includes benefits from Social Security, pensions, retirement, unemployment, disability, worker's comp, and welfare payments. Appropriate documentation that the households may submit includes notices of eligibility, benefit letters, statements of benefits received, or check stubs.

The SFA will need to ensure that a household member's name is listed on this documentation, and that it is current. If the household does not have current documentation, they will need to contact the appropriate agency to obtain a letter for the amount and frequency they are receiving.

Another main type of documentation that may be submitted is proof of enrollment in Assistance Programs or in other source categorical eligibility. If an SFA chooses one of the alternate sample sizes, this increases the chances that one of these types of applications will be verified.

If an application being verified was determined eligible based on SNAP, TANF or FDPIR benefits, the household must submit either a certification notice or a letter showing that benefits are being received by someone in the household. It must also show that the benefits are current.

If an application being verified was determined based on foster status, the household will need to submit either written documentation or the name and contact information of a person at the agency or court. The documentation or this person must be able to verify that the child is in the custody of the state – during the current timeframe.

Finally, if a household is being verified and has a student who may qualify based on other source categorical eligibility, such as homeless, migrant, runaway, or Head Start, households should be encouraged to contact the district. Then the appropriate liaison can provide the information, for example, a homeless list, needed to show that the child has been identified under these programs. This documentation will serve as proof of the student's status and is sufficient for satisfying the requirements of verification.

SPECIAL SITUATIONS & OTHER FORMS OF INCOME



Seasonal Workers: use annual income



Zero Income: provide signed statement explaining how food, clothing, and housing is provided and when family expects to receive income



Child Support: court decree, child support registry, copies of checks received



Military Housing Privatization Initiative: letter or rental contract showing housing is part of the Military Housing Privatization Initiative



Collateral Contacts

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Diana

As with determining income during the F&R application process, the verification process also includes several special circumstances. These include income for seasonal workers, those who have no income, child support, and military housing.

A seasonal worker's current income may distort his actual income circumstances. Accordingly, the Eligibility Manual allows for annual income to be used for seasonal workers, including prior year, if it is still current. Therefore, 1040 tax forms would be an allowable form of documentation.

Sometimes, households may not currently be receiving any income at all. If this is the case, they must submit a signed, written notice stating how basic needs, such as food, clothing, and shelter, are being met. There should also be an indication of when the individual expects to start receiving income again. Such a letter is considered sufficient evidence for verification.

Child support can be very tricky, in that the amounts stipulated to be paid are not always received – or are not always received consistently. The best documentation for child support includes a court decree, child support registry, or copies of checks received.

Households in the military do not have to include their housing allowances as income, if they are part of the Military Privatization Initiative. A letter or rental contract can be submitted to show participation in this program.

One final method of documenting eligibility for free or reduced benefits is for the household to designate a

collateral contact. A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances, including household size and income information. Examples include employers, social services, migrant workers agencies, and religious or civic organizations.

A collateral contact may be used only when there is no adequate written evidence that may be submitted by the household. This person may not be contacted by the LEA unless the household has provided prior consent. The information received from the collateral contact may be written or oral, but if oral, the conversation must also be documented, including the date and the initials of the verifying official.



Diana

Poll 4:
A pay stub must contain the frequency of pay.

True
False



RESPONSES AND RESULTS



Andrea

COMPLETE VERIFICATION RESPONSES

Submitted documentation supports, increase, or does not support eligibility, and results letter is sent.

Household becomes directly certified and notification is sent.

Household indicates verbally, or in writing, that they no longer wish to receive benefits, and letter of adverse action is sent.

Household does not respond by the deadline and letter of adverse action is sent.

Households can reapply at any time during the year, but must provide income documentation.

Andrea

Questions often come up about when verification is considered complete.

Verification is considered complete when the SFA sends the results letter. This may be once:

- The household submits documentation that supports, increases or does not support the benefit level, and the SFA sends the results letter
- The household becomes directly certified
- The household indicates verbally or in writing that they no longer wish to receive benefits, and the SFA sends the results letter/adverse action
- The household does not respond by the deadline, and the SFA sends the results letter/adverse action

Remember that if a household does not respond, the family can reapply at any time during the school year. However, if they reapply, they must submit income documentation with the application.

UPDATE BENEFITS AND SEND RESULTS

- Increase the benefit implemented within 3 operating days
- Decrease in benefits must be implemented after 10 calendar days
- Letters of adverse action must be sent to households that did not properly respond, had a reduction in benefits or did not respond at all
 - 10 calendar days benefits are decreasing
 - Reason for the change
 - Instructions on how to appeal
 - Household can reapply at any time during the school year

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Andrea

Once the SFA has verified all the documentation that has been submitted and has made a determination on all applications, the SFA will need to send results to the households.

The Results Letter should include the following information:

- The results of Verification, including no change in status, or a change to a different status)
- The effective date of the change, if any
- The cost of meals, if change in status

Once determinations have been made and letters have been sent, the SFA must update the benefits of any student whose application status changed. If the student is moving from reduced to free, this change must be implemented within 3 operating days, but preferably as soon as possible.

If the student is moving from free to reduced, free to paid, or from reduced to paid, this change must be made within 10 calendar days from the date the letter of adverse action is sent. During the 10 days, the household has the right to appeal. If this is the case, the SFA's hearing procedure must be followed, and the household's benefits must stay the same during the time of the appeal.

If a household has been changed to reduced or denied, they may re-apply at any time. Households that had changed to reduced must submit documentation and update their application, in order to re-apply. Households that had changed to denied must submit documentation but also must submit a new application. Documentation must always be submitted by these households because they are considered in Verification for the entire year.

Record the date the letter was sent on your verification tracker.

VERIFICATION COLLECTION REPORT

- Completed in iCAN
- Contains all the data from the application count, student count, and verification results
- Due November 15
- Detailed instructions will be provided in a live webinar

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Andrea

The verification collection report must be completed by all SFAs whether they conduct verification or not. The verification collection report captures enrollment, free/reduced data based on direct cert and applications, and verification activities. The report is due annually by November 15.

The verification collection report must be submitted no later than November 15.

Please note the following critical information about the verification collection report:

- Detailed instructions on completing the verification collection report can be found on the CANS numbered memos website. Following these will answer most questions and will help ensure that the form is filled out correctly.
- Errors on the verification collection report can lead to a finding on the Administrative Review

The next webinar, scheduled for October 18, will walk through submitting the verification report in iCAN.

VERIFICATION PROCESS

1. Count all approved free and reduced applications as of October 1
2. Calculate sample size
3. Conduct confirmation reviews (replace applications if necessary)
4. Notify households (follow-up attempts)
5. Review submitted documentation
6. Send results to households and update student statuses
7. Complete the Verification Collection Report in iCAN

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Andrea

Now that we have reviewed the verification process, let's summarize one more time to have this all come full circle.

We counted our applications and properly calculated our sample size. Prior to notifying families we reviewed applications needing to be replaced, we conducted our confirmation reviews and we translated materials appropriately to help service our community. We sent notifications to our selected households. All these steps were recorded on our verification tracker.

When households begin to respond via mail, in-person, email, etc. we are evaluating if what they submitted is acceptable. We must ensure the documentation submitted is acceptable. Once a new eligibility is determined we are notifying the households of their results of verification. All our efforts are recorded on the tracker and all activities for verification are completed by November 15.

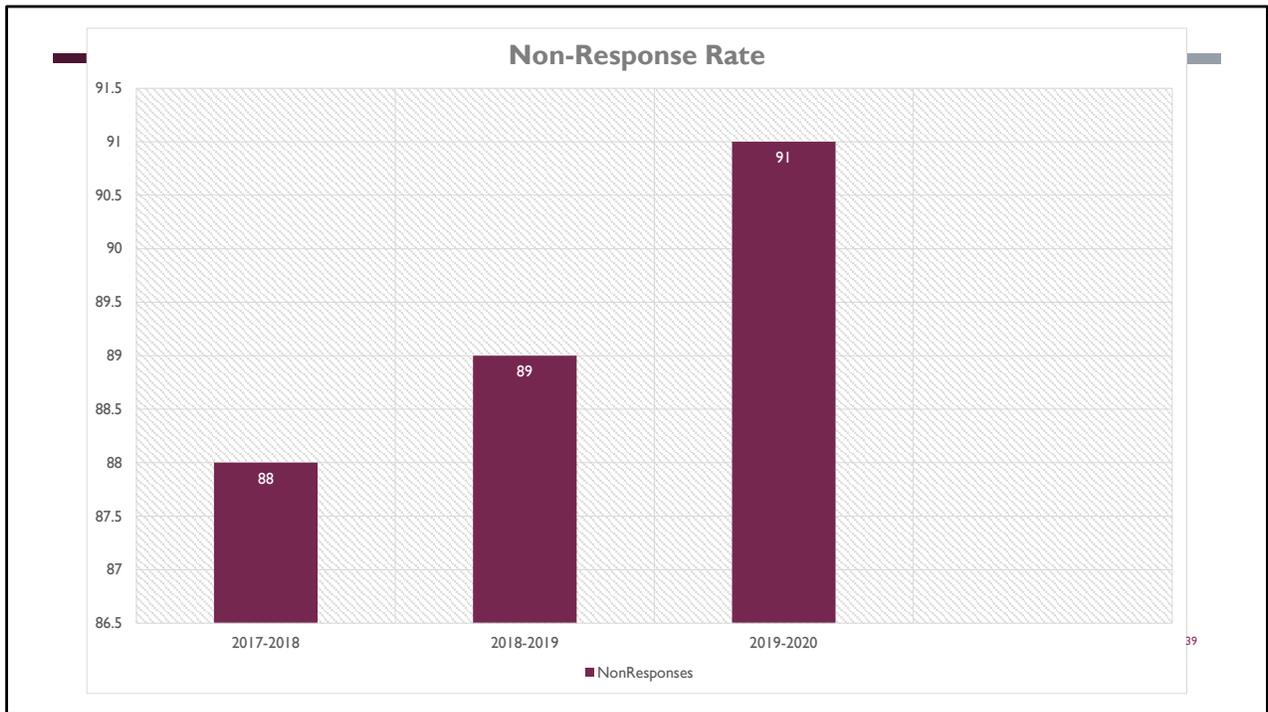
We have until November 15 to submit our verification results, student count and other required information within the verification collection report. Then we are done with verification until the next year!!



BEST PRACTICES



Andrea



Andrea

The non-response rate for South Dakota is trending upward. Does anyone want to take a guess as to how many total students were affected by not responding? This chart shows SY17-18, 18-19, and 19-20 nonresponses. In 17-18, 88 families did not respond; therefore, these students lost benefits. The same for 18-19 having 89 students and 19-20 having 91 students. We want to work hard to ensure all students receive their intended benefits by receiving responses from families.

INCREASE RESPONSE RATE

- Send 2nd and 3rd follow up notices
 - Follow up by telephone
 - Use ELL staff to help non-English speaking families
- Explain process to families (i.e. selected at random, annual process, specific examples of acceptable documentation)
- Accept appointments for families to complete the process in person
- Keep meticulous notes and documentation with Verification Tracker

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Andrea

It is important to see yourself as the liaison to help households complete this process. It is up to you to communicate that their private information is not shared.

VERIFICATION ORGANIZATION

- Mark error prone applications with sticky notes
 - Use the same sticky note to document income and change in status
- Contact verification household to explain notice being sent and the process
 - Use CANS templates
 - Incorporate humor when appropriate (i.e. Congratulations! You have been selected...)
 - Use sticky notes for follow up reminders and track due dates
 - Keep verification tracker and associated documentation in a folder/binder

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Andrea

These are some tips to keep your verification organized:

- Mark error prone applications with sticky notes
 - Use the same sticky note to document income and change in status
- Contact verification households to explain notice being sent and the process
 - Use CANS templates
 - Incorporate humor when appropriate (i.e. Congratulations! You have been selected...)
- Use sticky notes for follow up reminders and track due dates
- Keep verification tracker and associated documentation in a folder or binder

THANK YOU FOR ATTENDING!

- Contact CANS with any questions
 - 605-773-3413
 - DOE.SchoolLunch@state.sd.us
- Please submit the evaluation survey!
 - [Webinar Evaluation](#)
- Unmute or enter questions in the chat box!

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Andrea

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- (1) Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) Fax: (202) 690-7442; or
- (3) Email: program.intake@usda.gov.

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VERIFICATION PROCESS
PROFESSIONAL STANDARDS TRAINING CREDIT

This training credits as 1 hour of training in

Key Area: Administration

3100: Free and Reduced Priced Meal Benefits

Name:

Date of Training:

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Andrea