

# Verification

How to Complete the Verification Process

Child and Adult Nutrition Services – DOE  
SY 2016-2017

This institution is an equal opportunity provider.

The following webinar is regarding the verification process for the National School Lunch Program.

As a friendly reminder, please keep your phones muted during the webinar, unless asking a question or providing feedback.

## Verification

- Confirmation of eligibility for free and reduced price meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP)
- Only required when eligibility is determined with an application
  - Not through direct certification conducted with an Assistance Program (SNAP, TANF, FDPIR)
  - Not through documented Other Source Categorical Eligibility (foster, homeless, migrant, runaway) or Head Start
- May include confirmation of any other information required on the application, such as household size

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First, What is verification?

Verification is a process to determine that reported information is correct, to ensure eligible families receive the correct benefits.

As defined in the Eligibility Manual, on pg. 79:

*VERIFICATION* is confirmation of eligibility for free and reduced price meals based on applications. Verification is only required when eligibility is determined through the application process, not through direct certification conducted with an Assistance Program such as (SNAP, TANF, FDPIR) or officials or agencies that documented Other Source Categorical Eligibility such as (foster, homeless, migrant, runaway, or Head Start). Verification must include confirmation of either income eligibility or confirmation that the child or any member of the household is receiving assistance under SNAP, TANF, or FDPIR or that a child is Other Source Categorically Eligible. Verification may include confirmation of any other information required on the application, such as household size.

We will touch on all of these areas throughout the presentation.

## Topics for Today

- Eligibility Manual for School Meals
- Exemptions from Verification
- Establishing Sample Size
- Non-response Rate
- Choosing the Method
- Confirmation Review
- Household Letters
- Important Definitions
- Common Problems
- Verification for Cause
- Deadlines
- Questions & Answers

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As previously stated, this webinar will talk about the process of verification. For assistance on how to fill out the verification form for reporting to the CANS office, please observe the Verification Reporting webinar, which will be held on October 25th.

The areas that will be reviewed are listed on this slide.

# Verification Guidance

Eligibility Manual for School Meals  
Determining and Verifying Eligibility  
*School Year 2016-2017*



**USDA** USDA Food and Nutrition Services  
Child Nutrition Programs

July 29, 2016

- Updated version July, 2016
  - See Part 6 (Page 79)
- NSLP Memo #51.8

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The eligibility manual is your guidance/policy for completing verification in addition to the regulations.

NSLP Memo #51.8 on the CANS-NSLP page features more information for verification, including prototype letters. This presentation will focus on the verification process.

# Eligibility Manual Location: doe.sd.gov/cans

**Child And Adult Nutrition Services**

In South Dakota, the Child and Adult Nutrition Services is responsible for administering the U.S. Department of Agriculture's Food and Nutrition Services and Food Distribution Division programs. These programs furnish resources to eligible local agencies who provide food in meals or commodities to participants.

**Programs Include:**

- Child and Adult Care Food Program
- Commodity Supplemental Food Program
- Fresh Fruit and Vegetable Program
- National School Lunch, School Breakfast Program
- Special Milk Program
- Summer Food Service Program
- Team Nutrition
- The Emergency Food Assistance Program
- USDA Food Distribution for Child Nutrition Programs



Schools must be accredited in accordance with Department of Education policies, Residential Child Care Institutions must meet licensing criteria, and Day Care Homes/Centers must be registered or licensed. All local agencies annually renew the agreement and meal policy statement. Upon filing accurate and prompt claims/orders with CANS, agencies receive federal reimbursement for meals and snacks and/or commodities based on participation.

**Child Nutrition Program Integrity**

USDA CN Integrity Proposed Rule slides - 3/2016

**Documents**

2016-17 Income Eligibility Guidelines	2016-17 Participating agencies
Free Lunch - press release	Numbered Memos
South Dakota Enrollment Site List October 2015	<b>USDA Eligibility Manual</b>
Nutrition Bulletin	

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The eligibility manual is located on the CANS website, under the Documents heading, labeled 'USDA Eligibility Manual.' We will reference the eligibility manual multiple times during the webinar.

## Purpose of Verification

Each Local Education Agency (LEA) must annually verify eligibility of children from a sample of household applications approved for free and reduced price meal benefits for that school year.



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Each Local Education Agency, or (LEA) must annually verify eligibility of children from a sample of household applications approved for free and reduced price meal benefits for that school year.

All LEAs that gather applications must complete the verification process.

Verification asks selected families to provide documentation to support all information reported on their household application.

## Verification Exemptions - Agencies

- **RCCIs** with only residential students
- Agencies beyond their base year in **Provision 2 or 3**
- Agencies **fully participating in CEP**
  - **CEP approved sites** within an agency are exempt
- Agencies where all children are served with no separate charge for food services (non-pricing programs)
- Agencies with only Special Milk Program

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Next, let's talk about some exemptions. If your agency is exempt from verification activities, there is still information for you to report on the verification form.

- RCCIs with only residential students, agencies that are beyond the base year for Provision 2 or 3, and agencies that are fully CEP are exempt from verification activities.
- Also, schools where all children are served with no separate charge for food service and no special cash assistance is claimed (for example, non-pricing programs claiming only the paid rate of reimbursement), are also exempt.

## Verification Exemptions - Students

- **Directly Certified students** (SNAP, TANF, FDPIR)
- Students who have been certified as:
  - Migrant
  - Homeless
  - Foster
  - Runaway
  - Head Start



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Next, we are going to talk about students that should not be included in the verification pool. Do not consider these students for verification.

- Students that are directly certified are NOT to be included in the verification pool, and should not be selected by the agency for verification. SNAP, TANF, or FDPIR, students in the same household as a student that is directly certified under one of these programs are also not to be included in the verification pool, due to extending of household eligibility.
- To touch on Other Source Categorically Eligible, such as migrant, homeless, runaway, and head start, if a household applies for benefits as one of these distinctions, you must follow up and obtain evidence prior to providing benefits.
  - Once evidence is provided, Other Source Categorically Eligible students including migrant, homeless, runaway, or head start are exempt from the verification pool.

We will discuss this in greater detail later.

## Establishing Sample Size

- Count total number of approved free and reduced applications on file as of **October 1**
  - Based on number of **paper applications**, not number of students eligible for free/reduced meals
  - Do not include directly certified students
  - Do not include applications still on carryover benefits from last school year

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Next, let's establish a sample size.

To determine sample size, we must consider a couple things.

- the applications eligible for verification, also known as our verification pool.
- the method of verification to be used.

We will first count the total number of approved household applications on file as of October 1 for this school year. Again, this is based on the number of household applications, not the number of students eligible for free or reduced meals. Also, do not include directly certified students.

- The household applications to consider for the verification sample are from the current year that are based on income or categorically eligible.
- Do not use last year's applications that are still on carryover eligibility from the prior year.

## Establishing Sample Size cont.

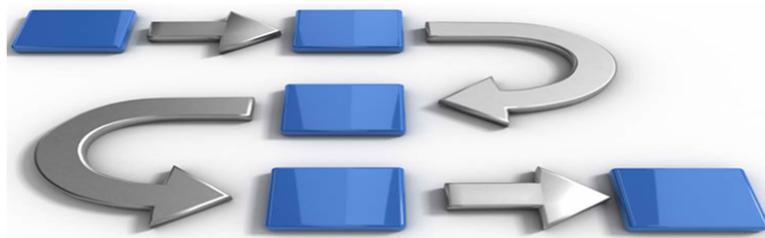
- Do include Mixed Household Applications
- Do include Colony applications, if applicable to your SFA
- Must **NOT** verify more than or less than established sample size
- Must **NOT** verify 100% of applications

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- If applications are submitted for “mixed households,” which include children who are eligible based on income and others based on Other Source Categorical Eligibility, these applications are subject to verification and are included in the sample pool.
- Also, do not verify more or less than the established sample size, and do not verify all applications.

## Choosing a Verification Method

- No response rate from prior year
- Review requirements and options
- Determine numbers needed



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The sample size will be determined based on the method of verification that you choose. When selecting a method, you must consider the non-response rate.

On the coming slides, we will review the non-response rate from the prior year, review requirements and options, and then determine numbers needed to fill the sample size.

## Non-Response Rate Defined

- Means households that did not respond to request for information
- If non-response was 20% or greater and the LEA must use **Standard Verification**



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First, what does Non-response rate mean?

Non-response means that a household did not respond to the request for information from verification activities.

If the non-response from the previous year was 20% or greater, you must use the Standard Verification Method.

## Non-Response Rate – Determine Rate %

- To determine rate:
  - Divide the number of non-responses by the total number of applications that were chosen to be verified
  - From 742 form, section 5-8

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Before choosing a method, the non-response rate must be determined.

To determine this rate: Divide the number of non-responses by the total number of applications that were chosen to be verified. The numbers can be found in section 5-8 of the 742 form.

## Non-Response Rate – Determine Rate % cont.

- If 5 applications were pulled for verification and 1 or more families did not respond:
  - Rate is 20% or greater and must use Standard Verification
- If 10 applications were pulled for verification and 2 or more families did not respond:
  - Rate is 20% or greater and must use Standard Verification

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For example, if you verified 5 total applications, and at least 1 of the 5 did not respond – the rate is 20% or greater and you must use standard verification.

The CANS Office sent a reminder email on September 9 for those LEA's that reported a greater than 20% non-response rate.

## Type of Verification: **Standard**

Guidance Page 83, SD Memo 51.8

- Any LEA may use Standard Verification
- LEAs must use if non-response rate prior year was 20% or more
- USDA preferred method – looks at error prone applications



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Now, we will get into the different methods of verification.

The first type of verification we will talk about is Standard.

- Any school may use standard verification, however, as previously indicated, schools with a non-response rate of 20% or more must use the Standard verification type.
- Standard verification is the USDA-preferred method, as it initially looks at error prone applications.
- Error prone applications are those that are close to the guideline cutoff of the income eligibility guidelines. An error on an error-prone application would be more apt to impact the eligibility category than an error on an application that is not near a guideline cutoff.

We will talk more about this on the following slide.

## Type of Verification: **Standard**

Guidance Page 83, SD Memo 51.8

- Verify 3% of all approved free/reduced applications on file as of October 1
- Determine sample size (# apps x .03), increase to a whole number
- Choose first from error prone applications on random basis
  - Error prone = applications with income within \$100 monthly or \$1200 annually of the appropriate Income Eligibility Guidelines

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The process with Standard type verification is to verify 3% of all approved applications on file, as of October 1.

So, we would determine a sample size by taking the number of approved applications on file x .03. This will give us the number of applications to verify.

Remember, if the number of applications to verify comes out as a fraction, always increase to the next whole number.

- This means that if the sample size of applications to verify comes out to 1.3 applications, you must verify 2 applications.

After a sample size is determined, we need to randomly select applications. For the Standard method, we first want to randomly select from the error-prone applications.

- Applications within \$100 monthly or \$1200 annually of an eligibility cutoff within the income eligibility guidelines are considered 'error prone.'

If you do not have enough error prone applications to complete the sample size, select applications at random from the remaining applications.

If the number of error prone applications exceeds the required sample size, only select enough applications to fill the sample size. Do not verify more than you need to, unless you are verifying for cause, and have a reason to do so.

## Type of Verification: **Alternate 1 (Alternate-Random)**

Guidance Page 83, SD Memo 51.8

- LEAs non-response rate in prior year less than 20% may use this method
- LEA must verify 3% of all approved free/reduced applications on file as of October 1
- Once the sample size is determined, applications are selected at random

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Next, we will talk about the Alternate 1 method. This method is also known as Alternate-Random.

Schools with less than 20% non-response rate from the previous program year may use this method.

- Like the Standard method, the school must verify 3% of all approved applications on file, as of October 1. Once the sample size is determined, applications are selected at random.
- However, the difference with this method is that the school considers all applications at random to fill the sample size, rather than initially focusing on just the error-prone applications, as directed in the standard method instructions.

## Type of Verification: **Alternate 2 (Alternate-Focused)**

Guidance Page 83, SD Memo 51.8

- LEAs non-response rate in prior year less than 20% may use this method
- LEA must verify:
  - 1% of all free/reduced applications approved as of October 1, selected from error prone applications
  - **PLUS** .05% (one-half percent) of all applications approved as of October 1 that provided a case number in lieu of income
- Use random selection

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The 3<sup>rd</sup> and final method that can be considered for verification is Alternate 2, also known as Alternate-Focused.

- Schools with less than a 20% non-response rate in the previous program year may use this method.

To use this method, the school must verify:

- 1% of all free/reduced applications approved as of October 1, selected from the error prone applications
- Plus, .05% (or 1-half percent) of all applications approved as of October 1 that provided a case number in lieu of income.
  - As a reminder, if a student appears on an application, but also appears on a direct certification list, the child is considered as directly certified, and the application is exempt from verification activities.
  - The only applications that could be considered to fulfil this requirement of the alternate-focused verification method would be those applications that feature a case number, but the student does not appear on the direct certification list.
- An application that includes a case number is to be considered as categorically eligible, and subject to verification activities, until the student, or member of the household is directly certified, such as appearing on a direct certification list. Once the student or other member of the household appears on the direct certification list, all students within the household are to be considered as directly certified, and are not subject to verification.

## Type of Verification: No Verification Performed

- Allowed for:
  - RCCIs with no day students
  - Provision 2 or 3 LEAs **beyond base year**
  - Agencies that are fully CEP
- Applications of students that were:
  - Later directly certified by iMATCH system
  - Direct notification from an assistance program like SNAP or TANF

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As previously discussed, verification activities do not need to be performed for RCCIs with no day students, Provision 2 and 3 LEAs that are beyond their base year, and agencies that are fully CEP. These agencies must only report enrollment information.

Additionally, applications which include students that are directly certified to receive meal benefits are exempt from verification selection.

**For directly certified students, the LEA must have documentation on hand to prove that a student is eligible for free meal benefits. Examples of this documentation would be: the student showing up on the iMatch system or direct notification from an assistance program like SNAP or TANF.**

## Confirmation Review



Prior to any verification activity, a second set of eyes, not the person who made initial eligibility determination, must review each approved application selected for verification to ensure that the initial determination was accurate.

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Prior to any verification activity, an LEA official, not the official who made the initial eligibility determination, must review each approved application selected for verification to ensure that the initial determination was accurate. This person is known as the Confirmation reviewer – which can be found in the Verification and On-Site Monitoring Checklist Item of your annual agreement with CANS.

- This requirement is waived if the LEA uses a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination.

### **Just to review the players in verification:**

**Determining official** – person who reviews applications to determine eligibility at the beginning of the year.

**Verification official** – person conducting verification activities, such as sending notification letters, and reviewing incoming verification documentation – this person is commonly also the determining official, but is not required to be.

**Confirmation official/reviewer** – any person that is not the determining official that checks the applications selected for verification for accuracy.

**Hearing official** – person that is in a position of higher authority than determining official, that is designated to hear complaints about original eligibility determination.

## Confirmation Review-Outcome

- No change in status:
  - Initial eligibility status was correct
  - LEA verifies application
- Status change from Reduced to Free
  - LEA makes increased benefits available immediately
  - LEA notifies household of the change
  - LEA verifies application

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We will now review the different outcomes during a confirmation review, and what must be done in each scenario if errors are found.

**If there is No Change in Status:**

The Initial eligibility status was correct; the LEA verifies the application.

**If there is a Status Change from Reduced to Free:** The LEA:

Makes the increased benefits available immediately

Notifies the household of the change in benefits

Verifies the application

We will continue on the following slide.

## Confirmation Review-Outcome

- Status change from Free to Reduced
  - LEA does not change child's status
  - LEA verifies application
- Status change from Free or Reduced to Paid
  - LEA immediately sends household a Notice of Adverse Action
  - LEA does not verify application
  - LEA selects a similar application for verification
  - LEA follows confirmation review procedures for newly selected application
- If the child's status changes from Free to either Reduced or Paid, the household is sent a Notice of Adverse Action

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To continue with the outcome of Confirmation Reviews,

### **Status change from Free to Reduced**

LEA does not change child's status  
LEA verifies application

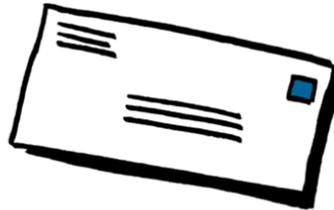
### **If the Status Changed from Free or Reduced to Paid: The LEA:**

Immediately sends the household a notice of adverse action  
Does not verify the application  
The LEA then selects a similar application for verification  
Follows the confirmation review procedures for the newly selected application

If the child's status changes from Free to either Reduced or Paid, the household is sent a Notice of Adverse Action

## Household Notification

- Refer to NSLP **Memo #51.8** for prototype notification materials
- **Verification and Monitoring form** in CANS Agreement contains your calendar plan



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Next, we will talk about household notification. Once an application is selected for verification, after the confirmation review is completed, a notification letter must be sent to the household. Please refer to NSLP memo 51.8 for prototype notification materials. This memo can be found on the CANS-NSLP webpage.

When filling out the agreement, we asked you to provide a calendar plan in regard to verification. This can be found on the Verification and Monitoring form. If you do not strictly follow your calendar plan and are few days different, as long as you are done by the deadline, **there is no need to contact our office.**

For verification inquiries, **the LEA must provide a telephone number that is available at no cost to the household.** The LEA may establish a toll-free number or allow the household to reverse the charges if any households in that LEA are outside the local calling area. The LEA may also provide different telephone numbers for each local calling area within the LEA.

## Written Evidence: Income Evidence



- Name of household member
- Amount of income received
- Frequency of income received
- Date the income was received
  - A paystub without dates is not sufficient

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After the verification notification letter is sent out and the household provides documentation, we must determine if the evidence provided is sufficient for verification requirements.

When verifying an income application, evidence must include:

- Name of household member
- Amount of income received
- Frequency received
- Date the income was received
  - A pay stub without dates is not sufficient

## Written Evidence

- Income Evidence Examples
  - Pay stubs
  - Collateral contacts
    - Employers, social service agencies, etc.
  - Agency records
    - Wage and benefit information maintained by the State employment agency

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Some examples include:

Pay stubs

Collateral contacts (employers, social service agencies, etc.)

Agency records (wage and benefit information maintained by the State employment agency)

## Written Evidence: Assistance Program Evidence

- Official letter or notice from the benefit program indicating the child or any household member is receiving benefits
  - Example: notice of eligibility or statement of benefits



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When verifying categorical applications with a case number that does not appear on a direct certification list, an official letter or notice from the benefit program indicating that the child or any household member is receiving benefits would suffice for evidence. **An example of this would be a notice of eligibility directly from an assistance program.**

## Written Evidence: Other Source Categorically Eligible



- Official letter, notice, or list from:
  - The appropriate state agency
  - Social services agency or court system for foster children
  - Program coordinator for Head Start enrollees
- Make sure document provided for child is part of a household currently participating in an acceptable assistance program

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In regard to Other Source Categorically Eligible applications,

Acceptable written evidence is an official letter, notice, or list from:

- The appropriate State agency**
- Social services agency or court system for foster children**
- Program coordinator for Head Start enrollees**

Make sure the document provided for the child is part of a household currently participating in an acceptable assistance program.

The verifying official should examine the document provided to ensure that the child for whom the application was made is part of a household currently participating in any of these programs previously noted.

## What if...

The family calls in and declines to respond to verification – is this considered a response or a non-response?



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If the family calls in and declines to respond to verification. Is that considered a response or non response?

## What if... Answered!

- If you speak to the family and let that family know that by not providing the required documentation their children will no longer be eligible for free or reduced price meals.
- Ask the parent, do you wish to decline the free and reduced price meals?
- The SFA must document the phone conversation to include the statement “the family declined meal benefits” on the families verification paperwork.
- **This can be considered a response.**

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- If you speak to the family and let that family know that by not providing the required documentation their children will no longer be eligible for free or reduced price meals.
- Ask the parent, do you wish to decline the free and reduced price meals?
- The SFA must document the phone conversation to include the statement “the family declined meal benefits” on the families verification paperwork.
- This can be considered a response.

## What if... Answered!

- If you speak to the family and let that family know that by not providing the required documentation, their children will no longer be eligible for free or reduce price meals:
  - Ask parent, “Do you wish to decline free or reduced price meals?”
- If the family does not wish to decline free or reduced price meal benefits, or hangs up, or simply refuses to submit the requested paperwork:
  - This is ***not*** considered a response

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However,

- If you speak to the family and let that family know that by not providing the required documentation their children will no longer be eligible for free or reduced price meals.
- Ask the parent, do you wish to decline the free and reduced price meals?
- If the family does not wish to decline the free and reduced price meal benefits, or hangs up, or simply refuses to submit the requested paperwork.
- This is not considered a response.

# Verification for Cause

## Guidance Page 81

- LEA has obligation to verify all questionable applications
- Cannot delay approval of complete application
  - Approval at face value then proceed with Verification



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### Verification for Cause –

If you receive an application where something about the information reported on the application seems incorrect, or sometimes in small towns you know inside knowledge about the family that indicates something on the application is incorrect, the LEA has an obligation to verify those applications for cause. This process is **in addition** to the applications selected for the verification process.

Verification for Cause is not counted in the verification process and is completed for all questionable applications.

Only after the determination of eligibility has been made can the LEA begin the verification process. Determining 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 proceeding with verification for cause. Once households have been requested to provide documentation for cause, the LEA must complete the verification process for these households.

FNS supports use of verification for cause where appropriate as a method for LEAs to address integrity concerns.

Remember, you cannot delay the approval of a complete application, so approve the application at face value, then verify.

# Verification for Cause

## Guidance Page 81

- Use same letter templates as the regular Verification process
- If family does not respond or is not eligible, LEA must terminate benefits
  - Use Notice of Adverse Action



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For Verification for Cause, you would use the same notification letter as you would for a regular verification. If the household does not respond, or is not eligible, you must terminate benefits.

# Verification for Cause

## Guidance Page 81

- Do not count these applications in the Verification process
- Keep track of Verification for Cause results
  - Will be reported – will discuss more during reporting webinar

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Do not count Verification for Cause applications as part of your sample in the verification process. However, please keep track of the Verification for Cause applications, as they will be tracked within the 742 form.

- See page 81 in the eligibility manual for more information on verification for cause.

# Verification for Cause for School District Employees

Guidance, Page 82

- Cannot be used to automatically verify the households of all school district employees whose children are certified for free or reduced price meals

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Next, we will talk about Verification for Cause for school district employees.

- Verification for cause must not be used to **automatically** verify the households of **all school district employees** whose children are certified for free or reduced price meals.

## Verification for Cause for School District Employees cont.

Guidance, Page 82

- However, from among the list of children approved for free or reduced price meals, an LEA could:
  - Identify children of school district employees
  - Use LEA salary information available to them to identify questionable applications
  - Conduct Verification for Cause on those questionable applications

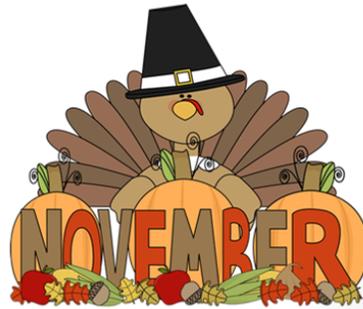
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- From the list of children approved for free or reduced price meals, an LEA can identify children of school district employees and use LEA salary information available to them to identify questionable applications, and then conduct verification for cause on those questionable applications.
- LEAs can use verification for cause to review approved applications for free or reduced price meals **when known or available information indicates school district employees may have misrepresented their incomes** on their applications to receive free or reduced price meals for their children. It is recommended that an LEA consult with legal counsel in establishing the parameters of verification for cause for school district employees.
- The Income Eligibility Manual specifically discusses Verification for Cause for School District Employees on page 82.

# Verification Completion Deadline

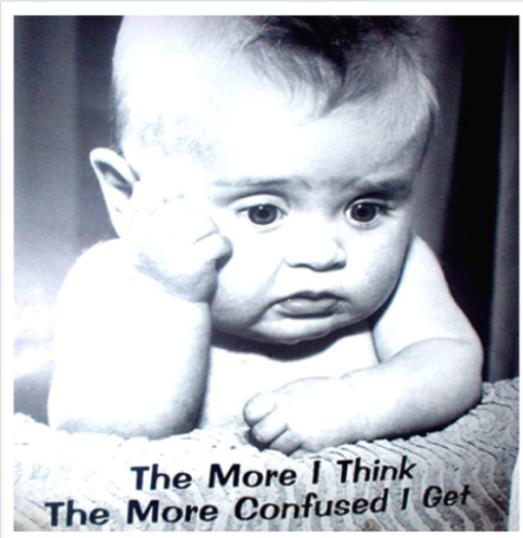
LEAs must **complete**  
**and report verification**  
**activities** annually by:

**November 15**



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You must be **done** with verification of applications and have the results reported by November 15.



## Helpful Info & Definitions

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The following slides include additional information and definitions of some terms that may be helpful.

## *DIRECT CERTIFICATION FOR ASSISTANCE PROGRAMS*

- Assistance Programs:
  - Supplemental Nutrition Assistance Program (SNAP)
  - Temporary Assistance for Needy Family (TANF)
  - Food Distribution Programs on Indian Reservations (FDPIR)

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### ***DIRECT CERTIFICATION FOR ASSISTANCE PROGRAMS***

CANS allows direct certification through the Assistance Programs with SNAP, TANF, FDPIR

## *DIRECT CERTIFICATION FOR ASSISTANCE PROGRAMS*

- Using iMATCH, a computer system between the Assistance Programs and the State or LEA
- No application needed if eligibility is determined through the direct certification process

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- Direct Certification must use a computerized system or Excel
  - SD uses a computerized system called iMATCH
- Household applications are **not** involved in direct certification.

We will continue with direct certification info on the coming slides.

## *DIRECT CERTIFICATION FOR ASSISTANCE PROGRAMS*

- Direct certification for **SNAP** households **must** be conducted using the electronic data match process (iMATCH)
  - SNAP letters to households do not meet the requirement for SNAP direct certification
  - If a household provides a SNAP eligibility letter it must be used to establish eligibility but is not considered direct certification

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- Direct certification for **SNAP** households **must** be conducted using the electronic data match process (iMATCH)
  - SNAP letters to households do not meet the requirement for SNAP direct certification.
  - If a household provides a SNAP eligibility letter it must be used to establish eligibility but is not considered direct certification.

## *DIRECT CERTIFICATION FOR ASSISTANCE PROGRAMS*

- Direct certification may be conducted using letters provided to eligible participants from **TANF or FDPIR** that the family submits to the LEA/School

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Direct certification may be conducted using letters provided to eligible participants from **TANF or FDPIR** that the family submits to the LEA/school

## *DIRECT CERTIFICATION FOR OTHER SOURCE CATEGORICALLY ELIGIBLE PROGRAMS*

- Homeless, Migrant, Runaway, Foster
- Conducted through officials from source programs and LEA officials such as the LEA's homeless liaison
- No application necessary if eligibility for these programs is determined through the direct certification process

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Now, we will discuss direct certification of Other Source Categorically Eligible programs, such as: Homeless, Migrant, Runaway, Foster.

- Direct certification can be conducted through officials from source programs and LEA officials such as the LEA's homeless liaison
- No application is necessary if eligibility for these programs is determined through the direct certification process

## *DIRECT CERTIFICATION FOR OTHER SOURCE CATEGORICALLY ELIGIBLE PROGRAMS*

- Direct certification for these programs may also be conducted using lists of eligible participants provided to the State or LEA from the appropriate official of Other Source Categorically Eligible Programs
- Letters provided by such programs to eligible participants and contacts with these program officials may also be used as direct certification

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- Direct certification for these programs may also be conducted using lists of eligible participants provided to the State or LEA from the appropriate official, from Other Source Categorically Eligible Programs
- Letters provided by such programs to eligible participants and contacts with these program officials may also be used as direct certification

*DIRECT CERTIFICATION FOR OTHER SOURCE CATEGORICALLY ELIGIBLE PROGRAMS – to summarize...*

- Directly certifying 'Other Source Categorically Eligible' students that are homeless, migrant, runaway, and foster involves the State or local agency that issues those benefits
- Direct certification is not granted based on a household application
- These students are not subject to verification, as they must be directly certified prior to the issuance of benefits

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To summarize for 'Other Source Categorically Eligible':

- Directly certifying 'Other Source Categorically Eligible' students that are homeless, migrant, runaway, and foster involves the State or local agency that issues those benefits. Direct certification is not granted based on a household application. These students are not subject to verification, as they must be directly certified prior to the issuance of benefits.

## *CATEGORICALLY ELIGIBLE CHILDREN*

Children categorically eligible for free meal benefits because they, or any household member, receive benefits under Assistance Programs (SNAP, TANF, FDPIR) or those children who are designated as members of Other Source Categorically Eligible Programs (homeless, migrant, runaway, foster).

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Next, we will discuss *CATEGORICALLY ELIGIBLE CHILDREN*

Categorically Eligible Children are automatically eligible for free meal benefits because they, or any household member, receive benefits under Assistance Programs (such as SNAP, TANF, FDPIR), or those children who are designated as members of Other Source Categorically Eligible Programs (like homeless, migrant, foster, runaway).

- An application that includes a case number is to be considered as categorically eligible, and is subject to verification activities, until the student, or member of the household, is considered as directly certified. Once the student or other member of the household is directly certified, all students within the household are to be considered as directly certified, and are not to be considered for verification.

## *CATEGORICALLY ELIGIBLE CHILDREN*

First of two ways to be classified as categorically eligible:

1. Through participation in Assistance Programs (SNAP, TANF, FDPIR) on a **household application with case number**

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- There are two ways to be classified as categorically eligible:
  1. Through participation in Assistance Programs-SNAP, TANF, FDPIR on a **household application with a case number**

## *CATEGORICALLY ELIGIBLE CHILDREN*

Second of two ways to be classified as categorically eligible:

2. Through Other Source Categorically Eligible designation, children documented under the application definition in this section as
  - Homeless, runaway, migrant
  - Foster children
  - Enrolled in Head Start program

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2. Through Other Source Categorically Eligible designation- children documented under the applicable definition in this section as:
  - Homeless, runaway, or migrant;
  - A foster child; or
  - Enrolled in Head Start Program

## *CATEGORICALLY ELIGIBLE CHILDREN*

The household indication of an Other Source Categorically Eligible status **must be confirmed prior to granting free meals**, except for foster children



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The household indication of an Other Source Categorically Eligible status **must be confirmed prior to granting free meals**, *except for foster children*.

## *CATEGORICALLY ELIGIBLE CHILDREN – to summarize...*

- Categorically Eligible children are granted free meal benefits based on a household application
- For Homeless, Runaway, Migrant, and Head Start you must confirm with the State or local agency granting student eligibility before granting free meal benefits
  - Documentation must be obtained for Other Source Categorically Eligible students to be considered as directly certified

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To summarize:

- Categorically Eligible children are granted free meal benefits based on a household application.
- For Homeless, Runaway, Migrant, and Head Start you must confirm with the State or local agency granting student eligibility before granting free meal benefits.
  - That means you are required to do the work to get those students considered directly certified by obtaining proper documentation prior to providing benefits
    - Once these students are considered as directly certified, free meal benefits can be granted, and the student is not considered for verification

## *CATEGORICALLY ELIGIBLE CHILDREN – to summarize...*

- Foster students DO NOT need supporting documentation before granting Categorically Eligible Free meal benefits
  - You may request supporting documentation after granting free meal benefits, but you are not required to do so

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- Also, just remember that Foster students DO NOT need supporting documentation before granting Categorically Eligible Free meal benefits.
  - However, you may request supporting documentation after granting free meal benefits, but you are not required to do so. If no direct certification documentation is on file for a foster student, the foster student would be considered in the verification pool
- Again, as a reminder, students considered as directly certified are NOT to be considered for verification.

## *INCOME ELIGIBLE FREE*

- A household application is completed and submitted to LEA
- LEA uses household income to determine eligibility for free benefits
- Household meets Income Eligibility Guidelines in the free category



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Next, we will touch on Eligibility by income.

The definition of income-eligible free is when an application is completed, and the household meets Income Eligibility Guidelines in the Free category.

Income eligibility guidelines are to be considered when determining income eligibility status.

## *INCOME ELIGIBILITY- REDUCED*

- A household application is completed and submitted to LEA
- LEA uses household income to determine eligibility for reduced benefits
- Household meets Income Eligibility Guidelines in the reduced category



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The definition of income-eligible reduced-price is when an application is completed, and the household meets Income Eligibility Guidelines in the reduced price category.

Again, income eligibility guidelines are to be considered when determining income eligibility status.

## Noted Common Problems

- Not rounding up to a complete number of applications to verify
- Considering applications for the verification pool from the previous year that were still in the 30-day carryover
- Adding directly certified student counts into the count of approved free and reduced applications to calculate the Verification sample size

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We will now talk about some common problems that some agencies have run into regarding verification.

First, remember to select the next whole number of applications to verify. When figuring your sample size, if it is determined that 1.3 applications must be verified, you must select 2 applications for verification.

Another problem is using applications from the previous school year that are still on the 30-day carryover. Remember to use current-year applications that are on file as of October 1.

Also, do not add directly certified student counts into the count of approved household applications to calculate the Verification sample size. When determining your sample size, only consider applications on file as of October 1 that do not include directly certified students on the application.

## Noted Common Problems cont.

- Assuming you need to verify 3% of free eligible and also 3% of reduced eligible
- Verifying more than is required or allowed
- “I’ve always verified 3, so I did it again!”
- Counting **Direct Certification** as **Direct Verification**

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To continue, remember to determine your sample size by using the calculations that are specific to the verification method that has been chosen.

If using Standard or Alternate Random verification, your sample size is 3% of total applications.

Also, only verify enough applications to complete the sample size, unless you are verifying for cause. We will discuss this on the following slides.

Additionally, do not have the mindset that a certain number of applications is always selected. Make the determination based off of applications on file as of October 1 and the method selected.

Direct Certification and Direct Verification are two very different parts of verification- please do not confuse them!

## Important Dates



- **October 1**

- Count total number of approved free and reduced applications on file
- Begin Verification of applications



- **November 15**

- Verification process must be complete
- Verification Report 742 must be submitted to CANS Office

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Here we have some important dates, as they pertain to the verification requirement.

### **October 1**

Count the total number of approved household applications on file and begin the Verification of applications process.

### **November 15**

Verification process must be complete.  
Verification report 742 must be submitted to CANS office.

## Summary

- Eligibility Manual for School Meals
- Exemptions from Verification
- Establishing Sample Size
- Non-Response Rate
- Choosing the Method
- Confirmation Review
- Household Letters
- Important Definitions
- Common Problems
- Verification for Cause
- Deadlines
- Questions and Answers

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In summary, we have talked on quite a lot of topic areas regarding verification.

Here we have a list of all of the areas that were discussed.

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.**

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## Thank You!

- Questions now? Later? Contact us!
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