

Verification Process

Jamie Curley

Summer and School Meals Consultant

Overview

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Purpose

Verification is a part of the eligibility certification process, where a sample of applications are selected and back-up documentation provided by households to confirm the information/income reported on their applications, which is taken at face value, aside from this process.

Eligibility Certification vs. Verification

- **Eligibility Certification Process**

approving application as submitted based on face value

- **Verification Process**

verifying income reported on the application with back-up documentation

Centralizing Eligibility Certification

- It is not required, but recommended that eligibility certification process take place at the central office.
- This allows for a more coordinated eligibility certification process and verification process.

SFA-Wide

- The verification process is performed School Food Authority (SFA)-wide.
- Even if the eligibility certification process is not done at the central office level, verification is based off of all the applications from all eligible schools.

Reduced-Price Category

- In Vermont, the state pays the difference of the reduced-price breakfast and lunch amount, 30 cents for breakfast and 40 cents for lunch, so those households can receive meals at no cost to them.
- However, meals are still federally-reimbursed based on the category for which they qualify, so this is still a meaningful and important distinction.

Verification is not required for:

- Students who are directly certified
- Students in an RCCI – except for the day students
- Schools operating Community Eligibility Provision (CEP)
- Schools with Provision 2 Breakfast and Lunch- except in the base year
- Schools with non-pricing programs that claim only paid meal reimbursement

Verification Report is Required Even When the Process is Not

- Even when the Verification Process is not required, the report is still required.
- *The only exception is for School Food Authorities/schools that only operate the Special Milk Program.

Resources

- <http://education.vermont.gov/student-support/nutrition/school-programs/free-and-reduced-meals>
- Eligibility Manual for School Meals
Determining and Verifying Eligibility
- Income Eligibility Guidelines 2019-2020

Free and Reduced Meals Webpage of Vermont Agency of Education Website

- Contains the Vermont version of the Application for Free and Reduced-Price Meals (includes Vermont names for SNAP/TANF)
- Meal Programs Household Letter and Instructions to accompany the application
- Notification of Approval or Denial
- Verification materials
 - Verification Notice letter to inform households they have been selected
 - Verification Results Letter
 - Error-Prone Income Eligibility Guidelines

Eligibility Manual for School Meals

Determining and Verifying Eligibility

- Sample scenarios
- Key terms
- Sources of acceptable documentation
- Special situations

Income Eligibility Guidelines 2019-2020

- The free category is based on 130% of federal poverty level and the reduced-price category is based off of 185%
- Do not use the guidelines on the back of the Free and Reduced-Price Meal Application, this only contains the reduced-price guidelines to act as a framework for households

Confidentiality

- In all aspects of the Eligibility Certification Process and Verification Process, confidentiality is critical.
- Maintain confidentiality and anonymity and prevent overt identification of benefit status.

Document, Document, Document

- Document all communication with households and all steps of the Verification Process.

Categorically Eligible Assistance Programs

- Supplemental Nutrition Assistance Program (SNAP), known as 3SquaresVT in Vermont
- Temporary Assistance for Needy Families (TANF), known as Reach Up in Vermont

Other Source Categorically Eligible

- Homeless
- Migrant
- Foster

Verification Timeline

- Approved applications on file as of October 1st
- Complete Verification Process by November 15th
- Complete Verification Report by December 15th

Change in Timeline

- The SFA may request an extension of the November 15 deadline, in writing, from the State Agency.
- The State Agency may approve, in writing, an extension up to December 15 of the current school year, due to natural disaster, civil disorder, strike, or other circumstances.
- A request for an extension beyond December 15 must be submitted by the State Agency to NERO for approval

Key Personnel

- Determining Official
- Confirmation Official
- Verification Official
- Hearing Official

Determining Official

- Ensures applications are complete
- Approves household meal applications for free, reduced, or paid status
- Notifies households
- Ensures historical data of student status is tracked through data system or master list
- Ensures student status is communicated to food service and on the Benefit Issuance List

Confirmation Official

- This person must be different than the Determining Official, but can be the same as the Verification Official.
- They are responsible for conducting the confirmation review to ensure the application was correctly approved by the Determining Official.

Verification Official

- Establishes Sample Pool
- Determines the number of applications to verify
- Selects the necessary applications
- Notifies and communicates with households
- Makes any necessary changes to benefit statuses
- Completes the Verification Report

Assigning Roles

- The Determining Official and the Verification Official can be the same person.
- The Determining Official and the Confirmation Official cannot be the same person.
- The Confirmation Official and the Verification Official can be the same person.

Hearing Official

- The Hearing Official is the person who presides over households' appeal of the verification decision and is typically the superintendent.

Sample Pool and Sample Size

- **Sample Pool:** The total number of approved applications on file as of October 1st.
- **Sample Size:** The number of applications subject to verification. It is 3% of the sample pool. They are selected from the error prone applications.

Sample Pool

- Actual number of approved, not incomplete or denied, household applications on file for the current year as of October 1st .
- This is based on number of applications, not number of students on the applications.

Removing the applications that qualify via Direct Certification

- Applications that have a case number that you find on DC List or are Directly Certified some other way are removed when creating the sample pool.

Administrative Approval

Applications completed by school officials, on behalf of the household, often referred to as “Administrative Approval”, are excluded from verification.

Please see Page 42 of the Eligibility Manual.

Standard/Error Prone Method

- As of School Year 2018-2019, every SFA is required to use the Standard/Error Prone method of verification.

Replacing Applications when pulling Sample Size

- Applications may be replaced when the SFA believes the household would be unable to satisfactorily respond to the verification request.
- After completing the confirmation reviews, the SFA may replace up to 5% of applications selected. The confirmation review will be addressed later in this training.

Replacing Applications Continued

- If five percent of total applications results in less than one application, one application may still be replaced. All results of the 5% are rounded up to the next whole number.

Sample Size

- All decimals must be rounded up to the nearest whole number.
- Must verify a minimum of one application.
- Do not verify more or less applications than the required amount the only exception is verification for cause.
- Do not verify all applications.

Sample Size Example 1

- 96 approved applications on file
 - $96 \times .03 = 2.88$
 - 2.88 rounds up to 3
- Select the 3 from the error prone applications
 - If there are not enough error prone, randomly pull the additional applications as necessary.

Sample Size Example 2

- 151 approved applications on file
- $151 \times .03 = 4.53$
- 4.53 rounds up to 5
- Select the 5 from the error prone applications
 - If there are not enough error prone, randomly pull the additional applications as necessary.

Sample Size Example 3

- 376 approved applications on file
 - $376 \times .03 = 11.28$
 - 11.28 rounds up to 12
- Select the 12 from the error prone applications
 - If there are not enough error prone, randomly pull the additional applications as necessary.

Error Prone Income Eligibility Guidelines

- Approved applications that fall within:
 - \$23.07 of the weekly income guidelines
 - \$46.15 of the bi-weekly income guidelines
 - \$50 of the twice per month income guidelines
 - \$100 of the monthly income guidelines
 - \$1200 of the annual income guidelines
- Error Prone Income Eligibility Guidelines

<https://education.vermont.gov/documents/error-prone-income-eligibility-guidelines>

Error Prone

- Free, but almost reduced
- Reduced, but almost free
- Reduced, but almost denied

Tracking Error Prone

- It is critical to mark or tab or notate in some way which applications are error prone during the application approval process

Confirmation Review

- This is the first step after an application has been selected for verification to determine if it was correctly approved in the first place.
- Indicate on the application with signature and date to indicate they conducted the review.

Changes in Status Due to Confirmation Review

- No change in status; continue with verification
- Changes from reduced to free; change status immediately; continue with verification
- Changes from free to reduced; do not change; continue with verification
- Changes from free or reduced to paid; notify household of adverse action; select another application for verification

Attempt to Directly Verify

- DC List
- Documentation
- Fax the Child Nutrition office at (802)-479-1822 to check individual students' SNAP or TANF status

Notify Household

- Using the Verification Notice Letter from the Free and Reduced Meals webpage of the Agency of Education website.
- Must provide a toll-free number households can use to call.
- Allow households to designate a Collateral Contact.

Collateral Contact

- A person outside of the household who is knowledgeable about the household's circumstances and can confirm a household's income level or participation in Assistance Programs or Other Source Categorical Eligibility Programs.
- Please see Page 108 of the Eligibility Manual

One Follow-Up Attempt to Household

- If households do not respond to your first notice, you are required to conduct one follow-up attempt. This can be a letter, email, or phone call.
- If it is a phone call, it must be documented in some way.

Acceptable Sources of Documentation

- Acceptable Sources of Documentation for Verification are covered on page 107 of the Eligibility Manual

Acceptable Sources 1

- For income eligible applications:
Acceptable written documents contains:
 - The name of the household member
 - The amount of income received
 - The frequency received
 - The data the income was received
- Must submit documentation for all income reported on the application.

Acceptable Sources 2

- For categorically eligible assistance program applications:

Acceptable written documents include:

- An official letter or notice that the child or any household member is receiving benefits from the program

Acceptable Sources 3

- For other source categorically eligible programs:

Acceptable written documentation includes:

- An official letter or notice or list from the appropriate state agency, program office or coordinator, or court

Non-Income Based Documentation

Although you are initially selecting error prone, income-based applications, you might have to randomly select additional applications if you do not have error prone or the household may provide proof that a child or any household member is receiving benefits under an Assistance Programs or that a child is Other Source Categorically Eligible instead of providing income information.

Non-Income Based Documentation Continued

- Letter from SNAP/3SquaresVT or TANF/Reach Up must have amount
- “Zero benefit” households are not eligible for free meals
- Please see Page 67 of the Eligibility Manual

Indication of “No Income”

If the household’s application indicates zero income, the SFA must request an explanation of how living expenses are met and may request additional written documentation or collateral contacts. The collateral contact may be asked to document the duration and type of assistance that is provided to the household.

See Page 109 of the Eligibility Manual

Verification Process Completion

The Verification Process is complete when the household:

- Submits adequate information to support free or reduced-price meal status or;
- Submits documentation to support moving student(s) to paid status
- Does not respond after two attempts and student(s) status change to paid

Change to paid status due to failure to complete the verification or verification for cause process

- If a household changes to paid status due to failure to complete the verification or verification for cause process and the household reapplies in the same school year, they are still subject to verification throughout the school year and must provide back-up documentation with the new application.
- See page 59 of the Eligibility Manual.

Verification for Cause

- Select a questionable application or application with discrepancies.
- Once the application is selected, **the same process is followed.**
- More information on how to handle this is found on Page 99 of the Eligibility Manual.
- See [SP 13-2012 Verification for Cause in the School Meals Programs Memo](#)
- Verification for cause may be conducted at any time during the school year.

Verification for Cause for School District Employees

- The SFA could identify children of school district employees and use available salary information to identify questionable applications, and then conduct verification for cause on those questionable applications.
- SFAs are strongly encouraged to consult their legal counsel prior to undertaking verification for cause for school employees.
- Please see Page 100 of the Eligibility Manual.



Verification Report

- The Verification Report is in the online Child Nutrition application and claiming system.

<https://vt.cnpus.com/prod/Splash.aspx>

- Go to Applications then Verification Report and then select the current year.
- Make sure the information is accurate.

Verification Report SNAP Information

- Question 3-2 asks for “Students directly certified through Supplemental Nutrition Assistance Program (SNAP):
Do not include students certified with SNAP through the letter method.”
- All of the students listed in the SNAP column on the Direct Certification (DC) List
- This is important because states have a goal of ensuring at least 95% of the children that are in SNAP households qualify for free breakfast and lunch

Assessing Verification Process during the Administrative Review

The State Agency will check to see the SFA:

- Selected the correct sample size
- Did a confirmation review
- Made follow-up attempts
- Kept all letters and communication documentation
- Followed the required timeline
- Completed the Verification Report correctly and on time

Common Verification Errors

- Lack of confirmation review and/or documentation
- Lack of attempt to directly verify
- Not all income verified
- Verification Report not correct
- Benefit Issuance List not updated because food service was not notified
- Copies of letters to household not kept on file

Verification Errors During Reviews

- There is no longer a Verification Ameliorative Action List.
- Errors in the Verification Report or discovered during an administrative review will require the SFA participate in Verification Training as the corrective action.

Record Retention

- All records must be kept confidential and maintained on file for 3 years, plus the current year.
- Local rules may require records be maintained longer.

Independent Review

- SFAs that are on the Independent Review List, due to errors found during their Administrative Review, are required to conduct a Confirmation Review of all free and reduced-price applications, prior to notifying the household.
- This is an entirely separate process than Verification.

Contact Information

Jamie Curley

(802)-479-1207

Jamie.curley@Vermont.gov

Questions?

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