



COMMONWEALTH of VIRGINIA

DEPARTMENT OF EDUCATION

P.O. BOX 2120

RICHMOND 23218-2120

SNP Memo #10-11-05

TO: Directors, Supervisors, and Contact Persons
School Nutrition Programs

FROM: Catherine Digilio Grimes, MS, RD, LDN, SNS
Director, Office of School Nutrition Programs

Catherine Digilio Grimes

DATE: September 28, 2010

SUBJECT: Verification of Households' Eligibility for Free or Reduced Price Meals

Federal regulations governing the National School Lunch Program and the School Breakfast Program require school divisions to verify the eligibility of approved free and reduced price meal applications that are on file as of October 1, 2010. This process is known as "Verification." This memo provides information required for the annual verification process.

Deadlines

- October 1, 2010 — The number of approved applications on file on October 1 (excluding all previous year's carryover eligibility) must be used to calculate the required sample size.
- November 15, 2010 — All Verification activities and processes must be completed.
- December 15, 2010 — The deadline for reporting the results of verification in SNPWeb.
- February 15, 2011 — Must document the number of households that reapply from November 15, 2010 through February 15, 2011.
- March 15, 2011 — Submit SNPWeb report of the results of reapplication.

Forms

The Virginia Department of Education's (VDOE) prototype verification forms (i.e., SNP200-220), including the required Racial/Ethnic Data Report are posted on SNPWeb in the On-line Forms section. School divisions should use these prototypes if possible. However, if the division uses verification forms that are generated from their eligibility software or other sources, those forms must be updated to reflect the current year

information and incorporate all required information from the prototype forms. It is recommended that the DOE school nutrition specialist assigned to your division review and approve the documents prior to sending them to households.

Sampling Method and Use of the Verification Summary Worksheet

The basic sample size for verification is three (3) percent of all approved applications on file as of October 1, 2010, or 3,000 applications, whichever is less. The law requires school divisions to draw the sample from error-prone applications. Error-prone applications are those that report total household income within \$100 monthly, or \$1200 annually, of the income eligibility guidelines for free or reduced price meals for the applicable household size.

In lieu of the basic sample size, school divisions may be eligible to use an alternate sample size if they meet the following conditions:

1. The division's non-response rate for verification in the preceding year was less than 20 percent; or
2. For school divisions with more than 20,000 students approved by application (excluding direct certification) as of October 1, 2010:
 - a. The verification non-response rate for the preceding school year was at least 10 percent below the non-response rate for the second preceding year.

If interested, school divisions should contact the DOE School Nutrition Programs (SNP) office to determine if they meet the conditions established for alternate sample size.

School Nutrition Program's Web system (SNPWeb) Verification Summary Worksheet is a tool designed to automatically calculate and display the required sample size based on the information entered. School divisions should use this tool on SNPWeb to determine and confirm the size of the sample required to be verified.

The federal regulations specifically prohibit school divisions from verifying more than the required minimum sample size, with the exception of those applications verified for cause. If a household application selected to be verified as part of the original sample is subsequently determined to be withdrawn or otherwise ineligible prior to the completion of verification, the application must be replaced with a similar application to assure the required minimum sample size is verified.

Verification Sample Confirmation Review

Prior to conducting verification, school divisions are required to conduct a confirmation review of all applications selected for verification. The purpose of the review is to check the accuracy or confirm the initial free or reduced price eligibility determination. An individual other than the one who made the initial eligibility determination must do the confirmation review.

If the initial determination is found to be incorrect, the school division must correct the household eligibility status and notify the household of the change in eligibility using the notice of adverse action letter. A sample notice of adverse action letter is included in the prototype verification forms available on SNPWeb. If the correction results in the application no longer being eligible for verification it must be replaced by another eligible application (i.e., a correctly approved application within \$100 of the monthly

eligibility limit). After completing the confirmation review, school divisions may replace up to five percent or less, of the applications selected, in the verification sample. Any application removed from the sample pursuant to this provision must be replaced with a similar application. School divisions may consider factors such as communication difficulties and household stability when declining to verify selected applications. Upon completing the confirmation review, the division should proceed with verification of applications with confirmed eligibility and those with corrected eligibility that remain eligible for benefits. Written documentation of the confirmation review and any resulting changes in eligibility status must be maintained.

Follow-up Activities

Households selected for verification must be provided with a telephone number that they may call for assistance. This phone number must be provided to the household in the "notice of selection" letter. A prototype "notice of selection" letter can be found in SNPWeb (forms SNP # 200 to 210). The phone number must permit the call to be free for all households in the division. The division may provide different phone numbers for each local calling area within the school division or they may establish a toll-free number for households outside of the local calling area. This letter must also include the name of a school official(s) point of contact for the household to either directly assist them or to refer the caller to a specific person for help.

A second follow-up is required for households that fail to respond to the initial request for verification information. At least one attempt, through mail, by telephone, or personal contact must be made. Written documentation of all follow-up attempts and the results must be maintained. If the household's eligibility status cannot be verified after the follow-up attempt(s), the household's benefits must be terminated through a "notice of adverse action" letter.

Reapplication

When the Verification process is completed on November 15, school divisions are required to track the number of households that were terminated as a result of verification and who reapply for benefits through February 15. Households that were terminated due to non-response to a verification request must provide documentation of their household income upon reapplication at any time during that school year. The number of these households that reapply through February 15 and provide documentation of the household income must be summarized and the results of the reapplication (approved free, approved reduced, denied) must be reported in the SNPWeb Verification Summary Worksheet after February 15 but no later than March 15.

Detailed guidance can be found in the USDA Eligibility Guidance Manual Part 8 at http://www.fns.usda.gov/cnd/Guidance/eligibility_guidance.pdf. If there are any questions, please contact the school nutrition program specialist assigned to your division.

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