# Verification: The Process September 2024

presented by:

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#### **Key Terms**

# Learning Objectives

#### What is Verification?

#### Important Verification Dates 2024-2025

#### **Initial Verification**

- Establishing the Sample Pool
- Establishing the Sample Size

#### **Application Selection Procedures**

- Standard
- Alternate 1
- Alternate 2
- Completing the Sample Size

# Learning Objectives

#### Qualifying to Use an Alternate Sample Size

- Lowered Non-Response Rate
- Improved Non-Response Rate

#### **Post Selection Procedures**

- Confirmation reviews
- Replacing applications

#### Household Notification of Selection

• Contacting the household

#### **Sources For Verification**

- Collateral Contacts
- Agency Records

# Learning Objectives

#### Households that Re-apply for Program Benefits

Documentation

#### Recordkeeping

• Individual Applications

#### Verification for Cause

- General
- Verification for Cause for School District Employees

#### Common Misunderstandings

# **Key Terms**

#### **Direct Verification**

Using records from public agencies to verify income and/or program participation.

(The State Agency's Direct Verification Module is

https://schoolnutrition.dpi.nc.gov/snp/NcidLogin.aspx

Applications Claims Compliance Re		Programs   Year   Help   Log Out	
Applications > School Yea		School Year: 2021 - 20	
Item	Description		
SFA Manager	SNP SFA's Profile, Site and Hold	SNP SFA's Profile, Site and Hold Information	
Application Packet	Applications Forms (SFA and Sit	Applications Forms (SFA and Site)	
Application Manager Dashboard	Application Management Tool	Application Management Tool	
Meal Pattern Compliance Summary	Number of Menu Pattern Certifications by SFA Summary		
Verification Report	Mandatory Annual Verification R	Mandatory Annual Verification Report	
Verification Summary	Mandatory Annual Verification Report (FNS-742) Summary		
Food Safety Inspections	Number of Food Safety Inspection	Number of Food Safety Inspections by Site	
Food Safety Inspections Summary	Number of Food Safety Inspection	Number of Food Safety Inspections by Site Summary	
Paid Lunch Equity Tool	Paid Lunch Equity Tool	Paid Lunch Equity Tool	
Paid Lunch Equity Tool Summary	Paid Lunch Equity Tool Summary	Paid Lunch Equity Tool Summary	
Financial Report	School Food Annual Revenues and Expenditures Report		
FFVP Grant Overview	Fresh Fruit and Vegetable Program Grant Information by Site Overview		
FFVP Grant Allocations	Fresh Fruit and Vegetable Progra	Fresh Fruit and Vegetable Program Grant Allocations	
FFVP Invitations and Approvals	Fresh Fruit and Vegetable Progra	Fresh Fruit and Vegetable Program Invitations and Approvals	
FFVP Application Packet	Fresh Fruit and Vegetable Progra	Fresh Fruit and Vegetable Program Application Forms (SFA and Site)	
Capital Expenditure Request	Request for funds to purchase capital items >= \$5,000		
Site Enrollment	Site Enrollment and Eligibility	Site Enrollment and Eligibility	
Free/Reduced Student List	Free/Reduced Student List		
Community Eligibility Provision	Enrollment and Eligibility for Community Eligibility Provision		
USDA Waivers	USDA Waivers available for participation		
USDA Waiver Manager Dashboard	USDA Waiver Participation, Trac	USDA Waiver Participation, Tracking, and Reporting	
Download Forms	Forms Available for Downloading	Forms Available for Downloading	
Direct Certification	Direct Certification List and Individual Student Lookup		



# Key Terms:

Error Prone

Applications within \$100 per month of the applicable Income Eligibility Guidelines.

Random Sampling

Each application has an equal chance of being selected.

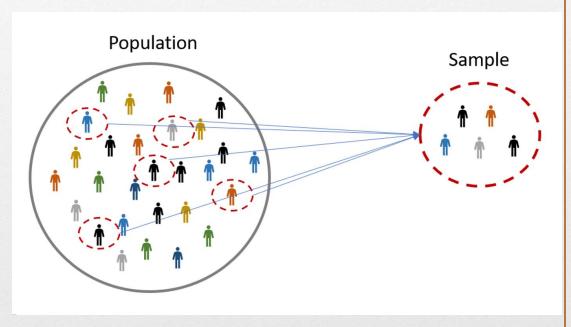
# Key Terms:

#### Sample Pool

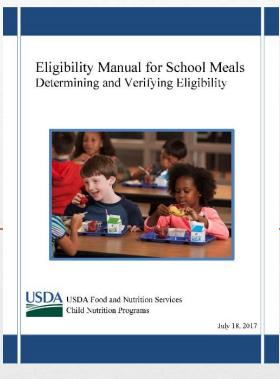
The total number of free and reduced applications approved as of October 1

#### Sample Size

The number of applications subject to Verification;



### What is Verification?



VERIFICATION is the confirmation of eligibility for Free and Reduced Price meals. For complete instructions refer to the Eligibility Manual for School Meals, July 2017 Section 6, pages 96-115.

https://fns-prod.azureedge.us/sites/default/files/cn/SP36\_CACFP15\_SFSP11-2017a1.pdf

Confirmation of either income eligibility **OR** 

What

Must

Verification

include?

The child or <u>any member of the household</u> is receiving assistance under FNS, FDPIR, or TANF/Work First Cash Assistance **OR** 

The child is Other Source Categorically Eligible.

# When is Verification not required?

Children certified under Direct Certification

#### Children in RCCIs

Does not include day students

Schools are approved for special cash assistance

Special Milk Program (SMP) Sponsors

# When is Verification not required?



Schools with Non-Pricing Programs



100% Community Eligibility Provision or in Provisions 1, 2, 3



Other FNS determined exemptions

# Important 2024-2025 Verification Dates



• Verification Begins



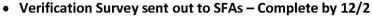
Verification Ends



 Verification Collection Report opens in the SN Technology System (SNTS)



Begin tracking households that did not respond initially.





 Final Day to complete the Verification Collection Report in the SNTS



Stop Tracking date of those that did not respond initially



• Survey open to report the non-responding changes

# When does Verification begin?

• Each SFA must verify a sample that is selected from all approved free and reduced applications as of **Tuesday October 1** for the 2024-25 school year.

October 1 Verification Begins

> November 15 Verification Ends

#### When does Verification end?

Verification of the selected applications must be completed by **Friday November 15, 2024** 

(If the SFA knows in advance the deadline cannot be met, a written request for an extension must be made to the State Agency).

October 1 Verification Begins

> November 15 Verification Ends

# Online Verification Report Opens

Monday November 18, 2024

- The online Verification Report opens in the School Nutrition Technology System AND
- Online survey the SFA must report to the State Agency that verification activities

October 1 Verification Begins November 18 Online Verification Report Opens AND Online Survey to SFAs

November 15 Verification Ends

# Online Verification Report Closes

Friday December 13, 2024

the online Verification Collection Report closes in the School Nutrition Technology System.

October 1
Verification
Begins

Online
Verification
Report Open
AND Online
Survey to SFAs

November 15 Verification Ends December 13
Online
Verification
Report
Closes

### Survey - Verification Households Reapply

Data must be collected from November 16, 2024 - February 15, 2025 for the households that did not respond to verification.

16 Nov. 2024 – 15 Feb. 2025

#### 17 Feb. 2025

The data must be reported on a survey to be distributed online on February 17, 2025.

## Recap of Verification Dates 2024-25

- October 1 Verification begins
- November 15 Verification ends
- November 18 (Verification online survey report/Verification Report open in SNTS)
- December 13 (Verification Report closes in the SNTS)
- February 17 (Collection of data {applications and students} for the non-response households that Reapplied or were Reapproved between November 16 and February 15)
- February 19 Online survey to report the above

October 1 Verification Begins November 18 Verification Summary Report Opens/Online Survey

February 17 Data Collection







INITIAL

VERIFICATION

**PROCESS** 

# How do I establish the Sample Pool?

Total number of approved applications on file as of October
 1 of the current school year.

• The sample pool depends on the number of <u>applications</u> (paper or electronic)

Mixed Household applications

## How do I establish the Sample Size?

- The SFA calculates the sample size (number of applications to be verified)—ALWAYS ROUND UP
- You must verify at least **one** application.
- NEVER verify 100% of the applications!





#### **APPLICATION**

**SELECTION** 

**PROCEDURES** 

# What Verification Method should I use?

The **State Agency (SA)** provided each School Food Authority (SFA) with the Verification Method they should use for SY 24-25.

The SFA used this information to complete the electronic application (Question #54)

- 52. Is the Verification Process completed at the Central Office?
- 53. Will the NCDPI Direct Verification automated system be used?
- 54. Which Verification Method will be utilized? Alternate Two
- 55. Will the prototype Verification Plan provided by the NCDPI be used?
- List the Verification Official for Free and Reduced Price School Meal Benefits.

# How To Determine Sample Size

#### Three Methods:

- Standard
- Alternate One
- Alternate Two



# Standard Sample Size

#### Verify the lesser of:

3% of all applications approved as of October 1 (error prone) **OR** 

**3,000** (error prone) approved applications as of October 1



# Example # 1 for Standard

245 approved free and reduced applications on file

50 applications (Error Prone)

You would select 8 applications randomly from the 50 **error prone** applications.

Example: 3% X 245 = 7.35 # to verify = 8

# Example # 2 for Standard

- 135 approved free and reduced applications on file
- 3 applications make up the Error Prone Sample

#### Example:

3% X 135 = 4.05# to verify = 5





3% or 3,000

# Alternate One Sample

#### Verify the lesser of:

• 3% of all approved applications selected at random as of October 1

#### OR

• 3,000 applications selected at <u>random</u> from all the applications approved as of October 1

# Example of Alternate One

• 2001 approved free and reduced applications on file

Example:

3% X 2005 = 60.15

# to verify = 61

# Example of Alternate Two

•The lesser of the sum of:

**1000** applications approved as October 1

• OR

1% all applications approved as of October 1

#### PLUS

The **lesser of 500 or .5%** of all applications approved as of October 1 that provided a case number



1500 Approved Free and Reduced Applications (on file)	102 Applications are approved using case number
1% of 1500 = 15 applications	.5% of 102 applications = .51 applications
15 applications	1 application
**Select applications from error prone applications**	**Select application randomly from the approved case number applications**

15 applications + 1 application = 16 applications to VERIFY

# Example of Alternate Two

## How Do I Complete the Sample Size?

- Error prone applications?

  Select applications at random
  from all approved applications
  including income and case
  numbers.
- If the number of error prone applications exceed the amount required, then randomly select the sample size from the error prone applications.



# How do I qualify for an Alternate Sample Size?



Lowered Non-Response Rate

- The non-response rate for the previous year is less than 20%
- Improved Non-Response Rate

The non-response rate for Year 2 is 10% below the non-response rate for the Year 1.

## How do I qualify for an Alternate Sample Size?

- From Year 1 to Year 2
- Must improve non-response by 10%

YEAR 1	YEAR 2
21,000 Children (6,000 Applications)	21,000 Children (6,000 Applications)
180 Applications Verified (3% X 6,000)	180 Applications (3% X 6,000)
180 Applications – 45 Households did not respond	<ul><li>180 Applications</li><li>- 40 Households did not respond</li></ul>
Non-Response Rate = 25%	Non-Response Rate = 22.2%



# Before you contact the household...

#### **Post Selection Procedures**

#1 Required Confirmation Reviews

# 2 Optional Replacement of certain applications

# Required Confirmation Reviews

Confirming Official must confirm

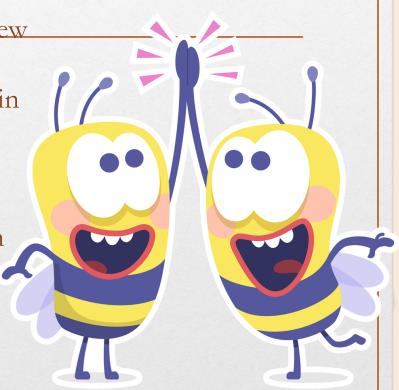
The eligibility status of application was approved correctly.

This person must initial or sign the selected application(s) prior to mailing letter to the household.

#### 2<sup>nd</sup> Review of Applications

All SFAs are conducting the 2<sup>nd</sup> review of applications, this process is complete (ensure the signature is in place).

Look one last time at the application to ensure the eligibility determination is correct!



#### Replacing Applications

After completing the confirmation review, the SFA may on a case-by-case basis replace up to 5% of the applications selected.



Example: 60 applications approved replace up to 5% = 3

## Verification Selection Letter

The letter must include the following:

- Household was selected for verification;
- Types of acceptable information that may be provided to confirm current income including:
  - Pay stubs
  - Award letters from assistance agencies

#### Letter of Intent Template

#### You've Been Selected

[Your Street Address] [Your City, ST Zip Code]

[Month Day, Year]

[Recipient Name]

[Title

[Company Name]

[Street Address of Company]

[City, ST Zip Code of Company]

To Whom It May Concern:

This letter is written as a reply to any advertisement in [Source of Information] that appeared on [Date of Advertisement].

In this paragraph you will write your intent for writing this letter or state what you have decided to respond in response to that specific advertisement etc. In this paragraph you will write your intent for writing this letter or state what you have decided to respond in response to that specific advertisement etc. In this paragraph you will write your intent for writing this letter or state what you have decided to respond in response to that specific advertisement etc. In this paragraph you will write your intent for writing this letter or state what you have decided to respond in response to that specific advertisement etc.

In this paragraph try to convince the recipient that you can best perform that job or how your intention can be beneficial for the advertising person. In this paragraph try to convince the recipient that you can best perform that job or how your intention can be beneficial for the advertising person. In this paragraph try to convince the recipient that you can best perform that job or how your intention can be beneficial for the advertising person. In this paragraph try to convince the recipient that you can best perform that job or how your intention can be beneficial for the advertising person. Thankyou.

Sincerely

[Signature]

[Your Name]

# Verification Selection Letter

Requirements of the Selection Letter cont.



Proof of benefit(s)



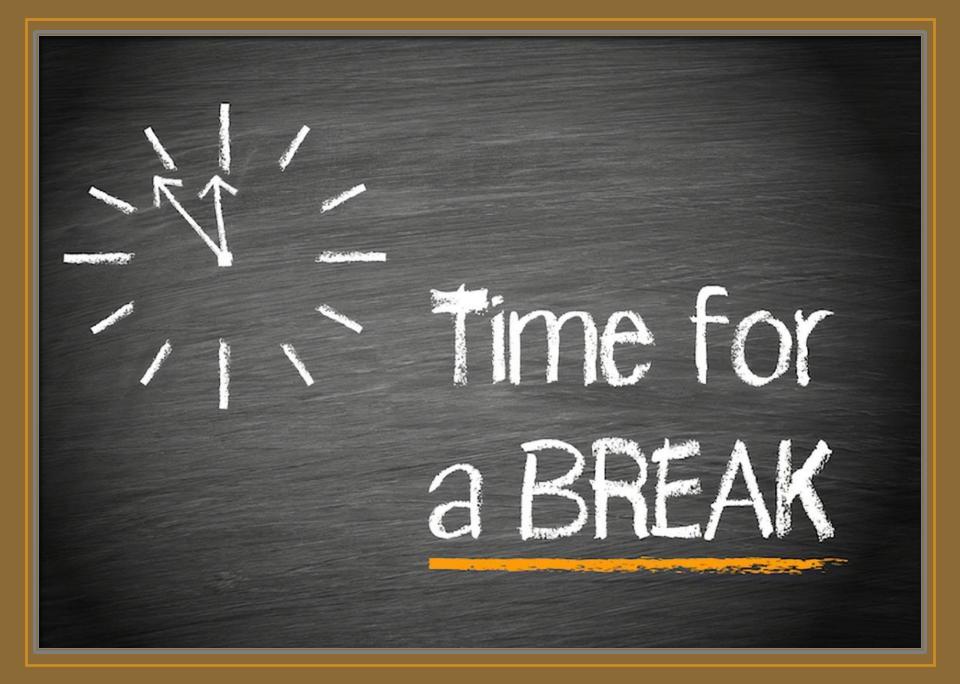
Date information is required;



Name of an SFA official who can answer questions; and



No-cost telephone number



# Foreign Language Translations



The SFA is responsible for ensuring meaningful access.



All materials must be provided in an understandable language.



Simply offering the most common non-English language is not sufficient.

## SOURCES FOR

#### **VERIFICATION**

#### Written Evidence

- •Primary Source of Verification is most often pay stubs, award letters from welfare departments or governmental agencies
- Acceptable written evidence for income eligible households
- Name of household member
- Amount of income received
- Frequency received
- Date received





### Written Evidence (cont.)

Acceptable written documentation for Assistance Programs and Other Source Categorical is an official letter from the program.

#### **PROOF OF INCOME LETTER**

RE: VERIFICATION	OF SALARY	
To TFG (The Foschi	ini Group)	
This letter is to infor	m youthat	migRayuse Full Hamas
		emoloyed by/with
since Sale at	AGENCY L	ETTERHEAD
The employees curr	rent position is	Add Tile
And his/her current	salary or wage is R	per month (Including salary,
His/Her aross salary	and overtime).	ecu.
His/Her gross salary	for the last 3 months has b	een:
His/Her gross solary		een:
	for the last 3 months has b	een:
Estura (No.31)	for the last 3 months has b	een:
Estatz Mooti Monte Age E Nord Coupe	For the last 3 months has being R R R	
Const North	For the last 3 months has being R R R	
Should you have an defails below.	For the last 3 months has being R R R	
Should you have an defails below.	R R R questions or need further i	reen:

Acceptable written documentation for Other Source Categorical Eligibility Programs is an official letter, notice, or list



#### **Collateral Contacts**

## A person who is outside of the household

• The household's circumstances or confirmation of a households' income

Agencies, and Religious or Civic Organizations Collateral contacts should only be contacted when the household is unable to provide information.



## **Agency Records**

A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the State agency, SFA, or school has legal access.

#### Acceptable timeframe

#### 2024



- Acceptable
  documentation of income
  or receipt of assistance
  from any of the stated
  sources
- Provided for any point in time between the month prior to application and the time the household is required to provide income documentation.



When a Household Provides Pay Stubs

- If the household is paid weekly, one pay stub is sufficient
- If the pay stub includes overtime, the determining official should work with the household to determine whether the overtime is received in other pay periods.

#### No Income



Zero income?



How are living expenses met?



May request additional written documentation or collateral contacts.



#### **Direct Verification**



Direct Verification (DV) is using records from public agencies to verify income or program participation.



In North Carolina, the DV process is in the DCV system



Conducted prior to sending out verification selection letters to the household.

# When is Verification considered complete for DV Applications?

Application Selected for Verification	What do we do now?
Original Determination – Free meal benefits In DV System – Free meal benefits Exact match (free application/free in DV)	Verification is complete
Original Determination – Reduced benefits In DV System – Free benefits	Verification is complete once the status letter is sent to household within three days.
Original Determination – Free meal benefits In DV System – Reduced meal benefits	Verification must be completed through regular verification activities

# CONTINUING THE VERIFICATION PROCESS

### Follow Up Required? Yes!

#### The SFA must make a follow-up attempt:

- √ No response from household
- √ Insufficient evidence from household
- √ No designated collateral contacts or
- V Collateral contacts unable or unwilling to provide requested information

#### Follow Up Attempt:

The household responds and provides all needed evidence, verification is considered complete for this household:

\* Inform household there is no change in benefits;

\* Notify household that its benefits will be increased OR

\* Send notice of adverse action.



#### Follow Up Attempt:



The SFA is unable to continue its verification activities because the household fails to provide adequate written evidence or knowledgeable collateral contacts, verification is considered complete for this household:



When the notice of adverse action is sent.

#### When is Verification considered complete?

Demonstration of Completion	Follow Up Action, If Required
The household submits adequate evidence of income or categorical eligibility	Verification is complete
The household submits adequate evidence of income which indicates that the child(ren) should receive a greater or lesser level of benefits	Verification is complete when the adverse action is sent OR the household is notified that its benefits will be increased or decreased

#### When is Verification considered complete?

Demonstration of Completion	Follow Up Action, If Required
The household indicates that it no longer wishes to received free or reduced price meals	Verification is complete when the notice of adverse action is sent
The application provides case numbers and it is determined that no household member is receiving benefits from an Assistance Program	Verification is complete when the notice of adverse action is sent

Effective
Time of
the
Change



HIGHER BENEFITS Effective immediately and implemented no later than THREE operating days and household is notified.



LOWER BENEFITS - TEN calendar days adverse action notice



Notice of Adverse Action

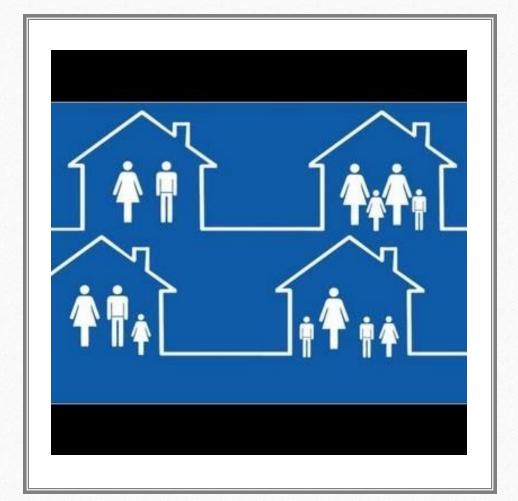
 The first day of the advance notice period is the day the notice is sent.
 The notice must advise the household of the following:

01	•	1	~
Change	110	hene	tite.
Change	111	DUIL	1112
0			,

Reasons	for	the
change;		

	Instructions	on	how	tc
appe	al;			

	That	the	house	ehol	d
may	reapp	ly fo	or ben	efit	S



#### Households that Reapply for Program Benefits

Households with a reduction or termination in benefits may reapply during the school year.

(NOTICE: These are not considered new applications...but the original application not verified by November 15 is null.)

#### Recordkeeping at SFA Level

- The SFA should maintain:
  - \*The Verification Plan
  - \* The approved Verification Selection Method
  - \* The Verification Sample Pool & Size
  - \* Documentation of Replaced Files
  - \* The Confirmation

#### Individual Applications Recordkeeping

- For each application verified the SFA must retain either:
- Copies of all relevant correspondence between the households selected for verification and the SFA;



- All documents submitted by the household or reproductions of those documents; or
- In cases where the actual documents or photocopies cannot be kept, the verifying official must make a written record of the documents

#### Individual Applications Recordkeeping

- Document the reason for the change, the date the household was notified, if necessary, and the date it became effective; and
- If applicable, records of follow-up attempts and results. LEAs should also record:
  - Any additional information necessary to show the efforts made by the LEA to meet the verification requirements;
  - Title and signature of the verifying official; and
  - Criteria for replacing applications for verification.

#### Verification and Extended Benefits

 Refer to USDA Policy Memo SP51-2014 on Extending Categorical Eligibility to Additional Children in a Household.

• Remember that extending benefits has to be documented by the SFA.

#### What is Verification for Cause?



The SFA has an obligation to verify all questionable applications which is known as **Verification for cause**.



Once the verification information is requested the verification process must be completed.

Students directly certified as Medicaid Free must be included in reporting

## Verification Reporting (FNS 742)

Student data cannot include the Medicaid Reduced students

Section 3 - Include the number of students directly certified with Medicaid for Free meals (along with other direct certifications.

Section 4 must only include counts of students certified for Free and Reduced via an application.

## Verification Reporting (FNS 742)

"Verification for cause" must be recorded on the Verification Report in the School Nutrition Technology System (SNTS).

\*DO NOT add to the number in the verification sample size.

### Special Cases - School District Employees

• SFAs can conduct verification for cause when known or available information indicates school district employees may have misrepresented their incomes.



• USDA recommends consultation with the SFA's legal counsel to address integrity concerns





• The verification process did not begin or end on time (October 1, November 15)

• SFA uses the incorrect verification method.

SFA does not understand the sample size



- The software did not select the correct number of applications for the sample size.
- Verification software is not compliant.
- The sample size was not rounded up therefore there are not enough applications verified



The confirmation process did not take place

## **Common Misunderstandings**

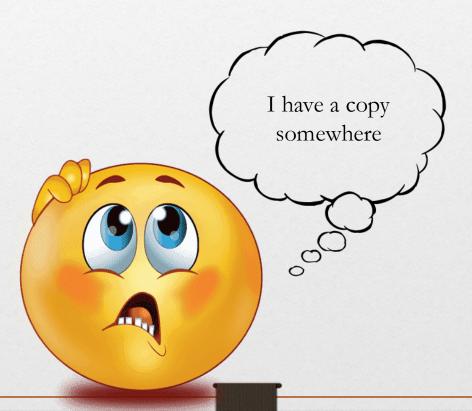
An application was pulled for Directly Certified student.

Only one attempt made to collect the verification information.

- Documentation was not maintained for the second attempt.
- A student withdraws during the verification process the process cannot be completed
- Households that reapply must provide another application with current income or proof of FNS.



• Proper and accurate record keeping is not available (i.e. selection letters are not in the verification file)



# Thank you for participating in the Verification Webinar.



## Questions?

Reminder: Your Area Consultant should always be your first line of communication

or

Jacquelyn McGowan, School Nutrition Consultant jacquelyn.mcgowan@dpi.nc.gov or call 984-236-2909 To obtain your certificate of completion please complete the webinar evaluation at:

https://forms.gle/Y2qhHN7cFse8F3 Au8

or scan this QR code





SY 2024-2025 Verification Process Annual Continuing Education

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civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

#### mail:

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fax: (833) 256-1665 or (202) 690-7442; or

email: Program. Intake@usda.gov

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