

Verification: The Process September 2022

presented by:
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Learning Objectives

- Key Terms**
- What is Verification?**
- Important Verification Dates 2022-2023**
- Initial Verification**
 - Establishing the Sample Pool
 - Establishing the Sample Size
- Application Selection Procedures**
 - Standard
 - Alternate 1
 - Alternate 2
 - Completing the Sample Size

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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

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Population

Sample

Sample Pool
The total number of free and reduced applications approved as of October 3

Key Terms:

Sample Size
The number of applications subject to Verification;

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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

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What Must Verification include?

- Confirmation of either income eligibility **OR**
- The child or any member of the household is receiving assistance under FNS, FDPIR, or TANF/Work First Cash Assistance **OR**
- The child is Other Source Categorically Eligible.

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When is Verification not required?

- Children certified under Direct Certification Procedures
- Children in Residential Child Care Institutions (RCCIs)
 - Does not include day students
- Schools where FNS has approved special cash assistance claims
- Schools participating only in the Special Milk Program (SMP)

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When is Verification not required?

-  Schools with Non-Pricing Programs
-  LEAs where all schools participate in the Community Eligibility Provision or in Provisions 1, 2, 3
-  Other FNS determined exemptions

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Important 2022-2023 Verification Dates

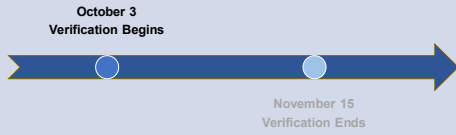
- October 3** - Verification Begins
- November 15** - Verification Ends
- November 17** - Verification Collection Report opens in the SN Technology System (SNTS)
 - Begin tracking households that did not respond initially.
 - Verification Survey sent out to SFAs - Complete by 11/30
- December 9** - Final Day to complete the Verification Collection Report in the SNTS
- February 15** - Stop Tracking date of those that did not respond initially
- February 17** - Survey open to report the non-responding changes

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When does Verification begin?

- Each SFA must verify a sample that is selected from all approved free and reduced applications as of **Monday October 3** for the 2022-23 school year.



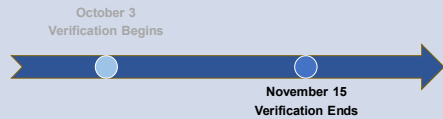
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When does Verification end?

Verification of the selected applications must be completed by **Tuesday November 15**.

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



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Online Verification Report Opens

Thursday November 17, 2022

- 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



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Online Verification Report Closes

Friday December 9, 2022
the online Verification Collection Report closes in the School Nutrition Technology System.

Timeline events:

- October 3: Verification Begins
- November 15: Verification Ends
- November 17: Online Verification Report Open AND Online Survey to SFAs
- December 9: Online Verification Report Closes

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Survey - Verification Households Reapply

Data must be collected from November 16, 2022 - February 15, 2023 for the households that did not respond to verification.

16 Nov. 2022 – 15 Feb. 2023

17 Feb. 2023

The data must be reported on a survey to be distributed online on February 17, 2023.

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Recap of Verification Dates 2022-23

- **October 3** Verification begins
- **November 15** Verification ends
- **November 17** (Verification online survey report/Verification Report open in SNTS)
- **December 9** (Verification Report closes in the SNTS)
- **February 15** (Collection of data {applications and students} for the non-response households that Reapplied or were Reapproved between November 16 and February 15)
- **February 17** Online survey to report the above

Timeline events:

- October 3: Verification Begins
- November 15: Verification Ends
- November 17: Verification Summary Report Open/Online Survey
- December 9: Verification Report Closes
- February 15: Data Collection
- February 17: Online Survey

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INITIAL VERIFICATION PROCESS

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How do I establish the Sample Pool?

- Total number of approved applications on file as of **October 3** of the current school year.
- The sample pool depends on the number of **applications** (paper or electronic)
- Mixed Household applications




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How do I establish the Sample Size?

- The SFA calculates the sample size (number of applications to be verified)—**ALWAYS ROUND UP**



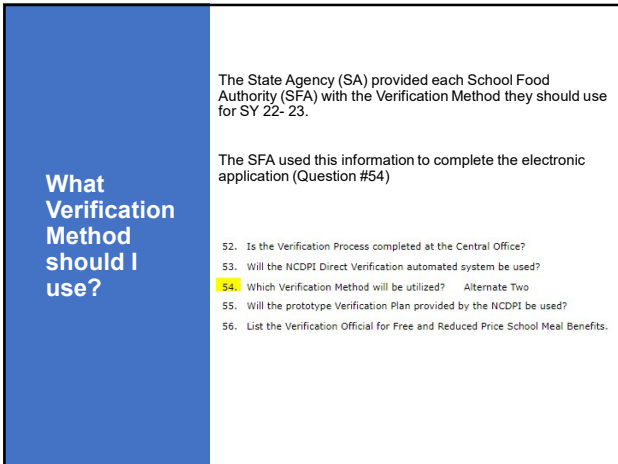
- You must verify at least **one application**.
- **NEVER** verify 100% of the applications!

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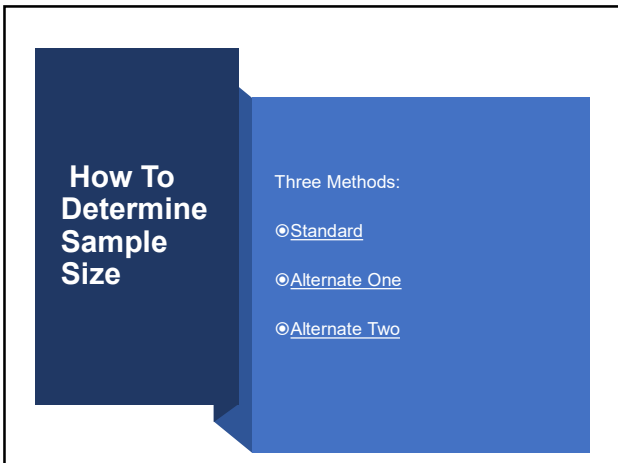
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Standard Sample Size

Verify the lesser of:
3% of all applications approved as of October 1 selected from error prone for the school year **OR**
3,000 error prone approved applications as of October 3 for the school year.



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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


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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



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Alternate One Sample

Verify the lesser of:

- 3% of all approved applications selected at random as of October 3

OR

- 3,000 applications selected at random from all the applications approved as of October 3

3% or 3,000

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Example of Alternate One

Example:
 $3\% \times 2005 = 60.15$

to verify
 $= 61$

Random

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Alternate Two

Verify the lesser of the sum of:

- 1000 applications approved as October 3

OR


- 1% all applications approved as of October 3
- PLUS
- The lesser of 500 or .5% of all applications approved as of October 3 that provided a case number

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Example of Alternate Two

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	

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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.

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How do I qualify for an Alternate Sample Size?


-  **Lowered Non-Response Rate**
-  An SFA may choose an alternate sample size method when the non-response rate for the previous year is less than 20%
-  **Improved Non-Response Rate**
-  An SFA (20,000+ children) may choose an alternate sample size method if their non-response rate for Year 2 is 10% below the non-response rate for the Year 1.

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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	180 Applications - 40 Households did not respond
Non-Response Rate = 25%	Non-Response Rate = 22.2%

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Before you contact the household...

Post Selection Procedures

- #1 Required Confirmation Reviews
- #2 Optional Replacement of certain applications

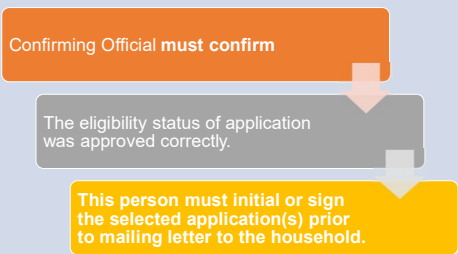
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Required Confirmation Reviews

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.




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2nd Review of Applications

Since all SFAs are conducting the 2nd 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!




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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



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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
 - support payment decrees from courts

You've Been Selected

Your School Address:
(Your City, St, Zip Code)

State/Zip Code:
(State)
(City/Town/Village)
(Street Address/Post Office Box)
(Zip Code)

For Mark in the Comments:
This letter is written as a reply to my advertisement or (source of references) 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 request in response to that specific advertisement. In this paragraph you will write your intent for writing this letter or state what you have decided to request in response to that specific advertisement. In this paragraph you will write your intent for writing this letter or state what you have decided to request in response to that specific advertisement.

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

Sincerely,
(Signature)
(Your Name)

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Verification Selection Letter

-  Proof of benefit(s)
-  Date information is required;
-  Name of an SFA official who can answer questions; and
-  No-cost telephone number

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Time for a BREAK

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Foreign Language Translations

-  Once a school becomes aware of a language need, the school is responsible for ensuring meaningful access.
-  Application materials including Verification letters must be provided in an understandable language.
-  Simply offering the most common non-English language is not sufficient.

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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

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Written Evidence (cont.)

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

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

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Collateral Contacts

A person outside of the household who is knowledgeable about

- The household's circumstances or confirmation of a household's income

Agencies, and Religious or Civic Organizations

Collateral contacts should only be contacted when the household has not been able to provide adequate written evidence.

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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.

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Acceptable timeframe



- 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.

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OVERTIME PAY
ASSOCIATED PRESS

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.

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No Income

- Zero income?
- How are living expenses met?
- May request additional written documentation or collateral contacts.

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DIRECT VERIFICATION

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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.

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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

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CONTINUING THE VERIFICATION PROCESS

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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
- ✓ Collateral contacts unable or unwilling to provide requested information



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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.



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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.

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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


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When is Verification considered complete?


Demonstration of Completion	Follow Up Action, If Required
The household indicates that it no longer wishes to receive 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

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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

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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:
 - Change in benefits;
 - Reasons for the change;
 - That an appeal must be filed
 - Instructions on how to appeal;
 - That the household may reapply for benefits

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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. Current income documentation must be submitted with the re-application process.)



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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




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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;

One of the following for all documentation used to verify eligibility:

- 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




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Individual Applications Recordkeeping

- Any change in eligibility as a result of verification procedures, the reason for the change and 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.




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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.



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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.

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Verification Reporting (FNS 742)

- Students directly certified as Medicaid Free must be included in reporting
- 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.

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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.**

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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.



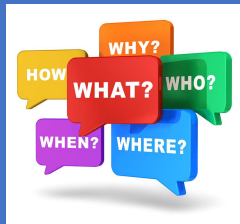
- USDA recommends consultation with the SFA's legal counsel to address integrity concerns



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Common Misunderstandings



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Common Misunderstandings

- The verification process did not begin or end on time (October 3, November 15)
- SFA uses the incorrect verification method.
- SFA does not understand the sample size




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Common Misunderstandings

- 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



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Common Misunderstandings

The confirmation process did not take place

An application was pulled for Directly Certified student.

Only one attempt made to collect the verification information.

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PROOF

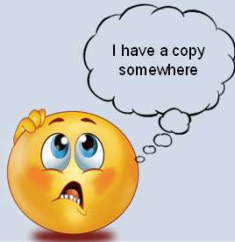
Common Misunderstandings

- 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.

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Common Misunderstandings

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



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Thank you for participating in the Verification Webinar.



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Questions?

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

or

Jacquelyn McGowan, Compliance Specialist
jacquelyn.mcgowan@dpi.nc.gov
or call 984-236-2909

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