

## Topic: Verification

### Overview/What is?

Verification is the annual, mandatory process that confirms the eligibility of a sample of completed household meal eligibility applications in the National School Lunch and School Breakfast Programs. Each Local Educational Agency (LEA) must select and verify a sample of applications approved for free and reduced-price meal benefits. The required sample size of applications to be verified is based on the number of approved applications on file on October 1.

### Process:

#### Requirements:

- ✓ LEAs must annually verify eligibility of children from a sample of household applications submitted prior to October 1 that were approved for free and reduced price meal benefits
- ✓ LEAs must complete the annual verification process by November 15
- ✓ The Verification Collection Report must be submitted annually to ODE CNP by February 1

### Step 1.

The first step in the verification process is establishing the sample pool. The sample pool is the total number of approved applications on file as of October 1 of the current school year. The sample pool:

- Is the number of approved applications, including paper and electronic applications.
- Is **not** based on the number of children eligible for free and reduced priced benefits, as some eligible students will have established eligibility through the direct certification process and will not have an application on file.

### Step 2

Once the sample pool has been determined, LEAs must then determine the sample size based on the method of verification. **ODE CNP will instruct each LEA which method must be used.**

There are three methods:

- Standard (3% error prone method)
  - In this method the Sponsor must choose either 3% of the approved applications (previously identified in the sample pool) which are error prone, or 3,000 error prone applications, whichever is least. As a reminder, error prone means the monthly income eligibility of the household is within \$100 of the qualifying threshold.
- Alternate one
  - Alternate one is a method that requires a sample size that is equal or the lesser of the following:
    - Three percent of all applications approved by the LEA for the school year, as of October 1 of the school year, selected at random; or

- 3,000 applications approved by the LEA for the school year, as of October 1 of the school year, selected at random. As a reminder, LEA organizations must qualify to use this method.
- Alternate two
  - The Alternate two method of verification allows the LEA to select a sample size that is the lesser of the sum of either:
    - 1,000 of all applications approved by the LEA, as of October 1 of the school year, selected from error prone applications; or
    - One percent of all applications approved by the LEA, as of October 1 of the school year, selected from error prone applications. **PLUS the lesser of:**
      - 500 applications approved by the LEA, as of October 1 of the school year, which provide case numbers in lieu of income information; or
      - One-half of one percent (.05 percent) of applications approved by the LEA, as of October 1, of the school year that provide case numbers in lieu of income information. LEAs must qualify to use this method.

### Step 3.

There are two procedures the LEA must complete prior to contacting the household to obtain documentation of eligibility. LEAs must complete the required confirmation reviews and the optional replacement of certain applications.

- Confirmation Review:
  - Prior to any other verification activity, a determining official must review each approved application selected for verification to ensure the initial determination was accurate. Any LEA that conducts a confirmation review of all applications at the time of certification is not required to conduct confirmation reviews prior to verification
  - An individual other than the individual who made the initial eligibility determination must do the confirmation review. This requirement is waived if the LEA uses a technology-based system with a high level of accuracy in processing an initial eligibility determination.
- Optional Replacement of Selected Applications:
  - When the need arises, a LEA may replace, on a case-by-case basis, up to five percent of the applications selected for verification.
  - This option may be used when the LEA believes the household would be unable to satisfactorily respond to the verification request.
  - Any application removed must be replaced with another approved application selected on the same basis.

### Step 4

Begin verification of applications by conducting direct verification.

- Direct verification involves using records from public agencies to verify household income or household participation in an eligible program, helping relieve families of additional paperwork and reducing the gap in meal benefits for eligible children resulting from non-response.
- LEAs are not required to conduct direct verification but are encouraged to do so.
- Direct verification must be completed prior to contacting the household for documentation.
- Direct verification can be done by accessing a list of Medicaid recipients that ODE CNP posts annually during the verification time period. This data can be used to verify income or program participation.

### Step 5

When a household is selected for verification, the LEA must inform the household, in writing, of its selection and must provide a list of the documents or other forms of evidence the household must submit to the LEA.

- The notification **MUST** contain all information and statements listed in the Eligibility Manual.
- Any communications with households concerning verification must be in an understandable and uniform format and, to the maximum extent practicable, in a language that parents and guardians can understand.

### Step 6

The LEA must make at least one attempt to contact the household when the household does not adequately respond to the request for verification.

- “Non-response” includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children’s eligibility for free and reduced price meals.
- The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message
- The LEA must document contact was attempted
- The LEA must ensure Limited English Proficiency households are provided adequate language assistance and understand the need to respond to the verification request.

### Step 7

When a household submits the required documents, the LEA must review the submitted documents to ensure they adequately address the verification request.

For categorically eligible assistance program applications:

- An official letter or notice indicating the child or any household member is receiving benefits from the program, such as a notice of eligibility.
- A document from an assistance program that does not specify the certification period does not meet the documentation requirement.

For Other Source Categorically Eligible applications:

- An official letter, notice, or list from the appropriate state agency, social service agency, program office or coordinator, or court would be acceptable written evidence.

### Step 8

Sponsors must conclude the verification process with the selected households and notify them of the outcome. This must be concluded by **November 15** of each year. Verification is considered complete when:

- Adequate evidence is submitted of income or categorical eligibility
- Adequate evidence is submitted indicating the household should receive either a greater or lesser level of benefits and the household is notified of the change in benefits. If benefits are decreased, a notice of adverse action must be sent before verification is considered complete.
- The household indicates either verbally or in writing that it no longer wishes to receive meal benefits. A notice of adverse action must be sent before verification is considered complete.
- It is determined that the case numbers provided do not have a household member receiving assistance program benefits. A notice of adverse action must be sent before verification is considered complete.

### Step 9

The LEA has completed the entire process once the Verification Collection Report, FNS-742, has been submitted to ODE CNP. This report is due annually by February 1.

### Verification for cause

Apart from the required verification of a specified number of approved applications, LEAs are required to verify any questionable application. Eligibility officials are encouraged to contact the household to clarify any information that is unclear or questionable before certifying the application and proceeding with verification for cause.

### Helpful Resources:

- ✓ [Eligibility Manual for School Meals](#)
- ✓ [ODE CNP Verification Webpage](#)

### Regulatory Reference:

- ✓ [7 CFR 245](#)

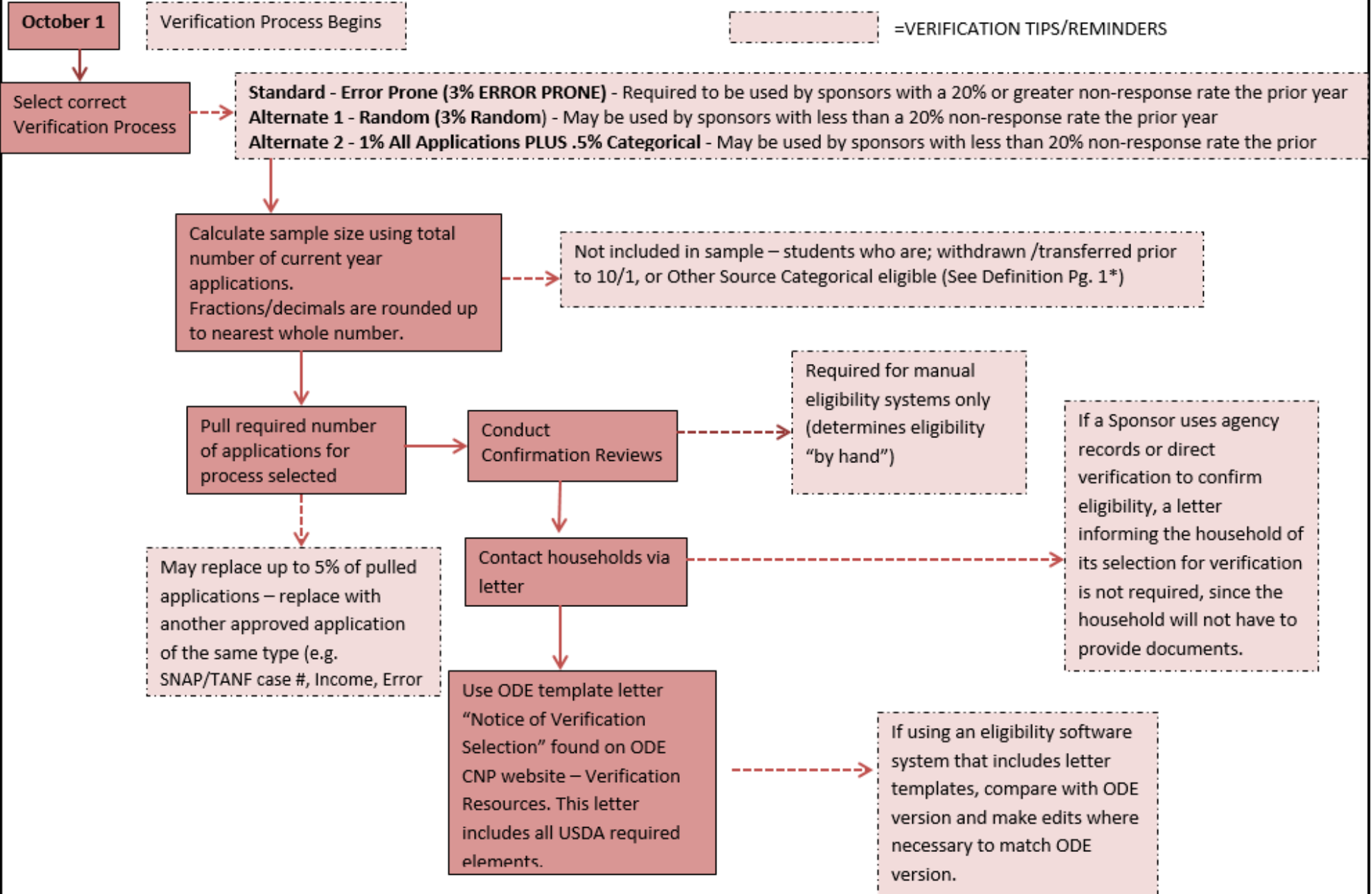
This institution is an equal opportunity provider.

#### Acronym Reference and Definitions

-CFR                      Code of Federal Regulation

## VERIFICATION TIMELINE

**REQUIRED VERIFICATION STEPS**  
**VERIFICATION TIPS/REMINDERS**



**VERIFICATION TIMELINE CONTINUED**

= REQUIRED VERIFICATION STEPS  
 = VERIFICATION TIPS/REMINDERS

*Notice of Selection for Verification*  
letter has been sent

**FOLLOW UP**-Sponsors must make at least one follow-up attempt to contact the household when the household does not adequately respond to the request for verification. Document all follow up contacts.

Limited English Proficiency households must be provided adequate language assistance and understand the need to respond to the verification request.

**Household Non-Response**  
 a) Does not provide sufficient documentation  
 b) Household does not respond

**Household Responds**  
 a) Provides sufficient documentation or  
 b) Household indicates they no longer wish to receive

Send  
"Verification Results Non- Response  
Letter-Notice of Adverse Action"

Review submitted information from each household to determine level of benefits.  
 Notify households of results via letter, if  
 a) Changed to higher level (R to F) or  
 b) Reduced or terminated

Change meal benefits in counting/claiming system:  
 Reduced to Free – immediately  
 Free to Reduced } After 10 day  
 Free to Paid } Appeal Period  
 Reduced to Paid }

Send  
"Notification of changing Meal Benefits" letter

**November 15**  
Verification Process Ends

FNS742 -Verification  
Collection Report due to  
ODE CNP by February 1

If non-response household reapplies after Verification timeline, it is not considered a new application. Household must supply income/or assistance documentation with application.

Complete and enter in CNPweb on the "Claim" tab by February 1st