Verification Process

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Note on Special Provisions

- Schools participating in a Provision 2 base year must complete the Verification Process because they are collecting F&R applications.

- Schools participating in Provision 2 in a non-base year or in the Community Eligibility Provision (CEP) do not collect applications and thus do not complete the Verification Process, but they must complete the Verification Report Data Collection.

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Topics

- Purpose/Overview
- Timeline
- Key Personnel
- Standard Method of Verification- Error Prone
  - Sample Pool
  - Sample Size
  - Error Prone
- Confirmation Review
- Direct Verification
- Household Notification
- Sources of Verification
- Verification Completion
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- Verification Report Data Collection
- Verification Errors

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Purpose and Overview

Purpose

Verification is a part of the eligibility certification process, where a sample of approved 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

Verification Process is 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.

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Centralizing Eligibility Certification

- It is not required, but recommended that the eligibility certification process take place at the central office.

- This allows for a more coordinated eligibility certification process and verification process.

A Note on the Reduced-Price Category

- In Vermont, in the School Breakfast Program and National School Lunch Program, the state pays the reduced-price status household contribution of 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.

Universal Meals Supplement

- Additional funding from the state to cover the paid status meals is the School Breakfast Program and National School Lunch Program is provided for all public schools operating Provision 2 or CEP and independent schools operating Provision 2 or CEP for their publicly-tuitioned students only.

- However, meals are still federally-reimbursed based on the applicable eligibility category.

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Verification is not required for:

- Students who are directly certified
- Students in a Residential Child Care Institution (RCCI) – except for the day students
- Schools operating Community Eligibility Provision (CEP)
- Schools with Provision 2 Breakfast and Lunch in a non-base year
- Schools with non-pricing programs that claim only paid meal reimbursement
- Schools that only operate the Special Milk Program (SMP)

Verification Report Data Collection is Required Even When the Verification Process is Not

- Even when the Verification Process is not required, the Verification Report Data Collection is still required. This is a federal requirement.

- *The only exception is for School Food Authorities/schools that only operate the Special Milk Program (SMP). They do not need to complete the Verification Report Data Collection.

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Resources

- [VTAOE CNP Free and Reduced Meals Webpage](#)
  - [School Meals Programs Timeline of Important Dates School Year 2023-2024](#)
  - [Free and Reduced-Price Meal Application](#) & [accompanying documents](#)
  - [Income Eligibility Guidelines 2023-2024](#)
  - [Error Prone Income Eligibility Guidelines for School Year 2023-2024](#)
  - [Verification Documents for Programs in Provision 2 Base Year](#); includes notice and results letters
  - [Verification Documents for Independent School Pricing Programs](#); includes notice and results letters
  - [Verification Log Worksheet](#)
- [Eligibility Manual for School Meals: Determining and Verifying Eligibility](#)

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Verification Process Letters

- [Verification Documents for Programs in Provision 2 Base Year](#)

- [Verification Documents for Independent School Pricing Programs](#)

- These include the Verification Notice Letter and Verification Results Letter.

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Income Eligibility Guidelines 2023-2024

- The free category is based on 130% of the federal poverty level and the reduced-price category is based on 185% of the federal poverty level.

- When approving applications, do not use the guidelines on the back of the Free and Reduced-Price Meal Application, this only contains the reduced-price guidelines, which act as a framework for households.

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Eligibility Manual for School Meals: Determining and Verifying Eligibility

[The Eligibility Manual for School Meals: Determining and Verifying Eligibility](#) contains information on the Eligibility Certification Process and Verification Process, including:

- definitions of key terms

- helpful sample scenarios of common situations and special situations

- questions and answers

- thorough rundown of acceptable sources of documentation for verification.

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Document, Document, Document

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

- You can use the [Verification Log Worksheet](#) to help track your progress.

- Keep copies of the letters sent to households.

- Document any phone calls with households.

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Confidentiality

- In all aspects of the Eligibility Certification Process and the Verification Process confidentiality is critical.

- Maintain confidentiality and anonymity and prevent overt identification of benefit status in all aspects of program operation.

Timeline

Verification Timeline

*Track which applications are Error Prone throughout the Eligibility Certification process

- Approved applications on file as of October 1st, in 2023, this is a Sunday, so SFAs should use the next operating day to establish the sample pool (this is addressed on page 98 of the Eligibility Manual)

- Complete Verification Process by November 15th

- Complete Verification Report Data Collection in the [Harvest Child Nutrition System](#) by December 15th

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Change in Timeline

- The SFA may request an extension of the November 15th deadline by emailing Rosie Krueger, State Director of Child Nutrition Programs, mary.krueger@vermont.gov.

- The State agency may approve, in writing, an extension up to December 15th of the current school year, due to reasons such as natural disaster, civil disorder, strike, or other circumstances.

- A request for an extension beyond December 15th must be submitted by the State agency to the Northeast Regional Office (NERO) for approval.

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Key Personnel

Verification Process Personnel

- Determining Official
- Confirming Official
- Verifying Official
- Hearing Official
- All of these positions, except for the Confirming Official, are reported in the Determining and Hearing Official tab of the Organization Application in the School Meals Application Packet in the Harvest Child Nutrition System.

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Determining Official

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

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Confirming Official

- This person must be different than the Determining Official, but can be the same as the Verifying Official.

- They are responsible for conducting the confirmation review to ensure the application was correctly approved by the Determining Official.

Verifying Official

- Establishes the Sample Pool
- Determines the Sample Size; 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 Data Collection in the [Harvest Child Nutrition System](#)

Assigning Roles

- The Determining Official and the Verifying Official can be the same person.

- The Determining Official and the Confirming Official cannot be the same person.

- The Confirming Official and the Verifying Official can be the same person.

Hearing Official

- The Hearing Official is the person who presides over households' appeal of the verification decision and are not involved in any other part of the Eligibility Certification Process or Verification Process.

- This is typically the superintendent or head of school for independent schools.

Standard Method of Verification
aka Error Prone

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Standard/Error Prone Method

- As of School Year 2018-2019, every SFA in Vermont conducting Verification is required to use the Standard Method of Verification, also known as the Error Prone method of Verification.

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Error Prone Income Eligibility Guidelines

- Error prone applications are 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
  - $1,200 of the annual income guidelines
- [Error Prone Income Eligibility Guidelines for School Year 2023-2024](#)

![Vermont Agency of Education logo]

Tracking Error Prone

- It is critical to mark or tab or notate in some way which applications are error prone during the Eligibility Certification Process, so that you do not have to go back and do this step later on.

Sample Pool and Sample Size

- **Sample Pool:** The total number of approved F&R applications on file as of October 1st (or when this a weekend, the following operating day)

- **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 F&R, not incomplete or denied, household applications on file for the current year as of October 1st (or when this is a weekend, the following operating day)

- This is based on number of applications, not number of students on the applications.

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Removing the applications that qualify via Direct Certification (DC)

- Applications that have a 3Squares VT/SNAP or Reach Up/TANF case number that you find on the DC List from the State or are Directly Certified some other way are removed when creating the Sample Pool.

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Direct Certification (DC) List from the State

- Provides the information that students are eligible to receive free meals based on their participation in the Supplemental Nutrition Assistance Program (SNAP), known as 3SquaresVT in Vermont, or Temporary Assistance for Needy Families (TANF), known as Reach Up in Vermont, or eligible to receive free or reduced meals through Medicaid.

- Every month, we send a notification on the Food Service Managers ListServ when the report is available

Other Source Categorically Eligible Direct Certification

- Information from Homeless Coordinator that student is Homeless or Runaway

- Letter from Migrant Coordinator at VTAOE

- Information from the state that the student is Foster

- List of Head Start students from Head Start teacher

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Administrative Approval

- Meal applications completed by school officials, on behalf of the household, often referred to as "Administrative Approval", are excluded from verification.

- Do not include these applications in your Sample Pool.

- This is addressed on page 42 of the Eligibility Manual.

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Sample Size

- The number of applications subject to verification is 3% of the Sample Pool. They are selected from the error prone applications.
- 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.
- If there are not enough error prone, randomly pull the additional applications, as necessary.

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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.

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Replacing Applications Continued

- If 5% 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.

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Sample Size Example 1

- 96 approved applications on file
  - 96 x .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 from the rest of your Sample Pool.

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Sample Size Example 2

- 151 approved applications on file
- 151 x .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 from the rest of your Sample Pool.

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Sample Size Example 3

- 376 approved applications on file
  - 376 x .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 from the rest of your Sample Pool.

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Confirmation Review

Confirmation Review Step

- Prior to any other Verification activity, this is the first step after an application has been selected for verification to determine if it was correctly approved in the first place.

- The Confirming Official should indicate on the application with signature and date to indicate they conducted the review.

- If the SFA conducts a confirmation review of all applications at the time of certification, such as if they are on the Independent Review List, it is not required again as part of the Verification Process.

- Confirmation Reviews are addressed on page 103 of the Eligibility Manual.

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 the status; continue with verification
- Changes from free or reduced to paid; notify household of adverse action; select another application for verification
- This is addressed on page 104 of the Eligibility Manual.

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Direct Verification

Attempt to Directly Verify

- Check the DC List from the state to see if the student is eligible though 3SquaresVT, Reach Up, or Medicaid or documentation from personnel such as the Homeless Liaison, Migrant Coordinator, Head Start teacher, or state-placed foster official.

- To check an individual student's 3SquaresVT, Reach Up, or Medicaid status, email AOE.SLDSSupportGroup@vermont.gov, to initiate a secure email chain to request the information that way, but it may only be requested via secure email. Please use the [Direct Certification Status Form](). We no longer accept faxed forms.

- If they are not eligible this way, use the "3SquaresVT/Reach Up/ Foster Child Verification for School Meals Program in the Verification Process Documents.

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Household Notification

Notify Household

- Using the Verification Notice Letter in the [Verification Documents for Programs in Provision 2 Base Year](#) or the [Verification Documents for Independent School Pricing Programs](#).

- Must provide a toll-free number households can use to call.

- Allow households to designate a Collateral Contact.

- This is addressed on pages 105 and 106 of the Eligibility Manual.

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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.

- This is addressed on 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.

Sources of Verification

Acceptable Sources of Documentation

- Acceptable Sources of Documentation for Verification are addressed 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 date the income was received

- Must submit documentation for all income reported on the application.

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Self-Employed

- Self-employed persons may use their previous year's income, unless their current net income provides a more accurate picture.
- Self-employed persons should submit Schedule C (Form 1040 or 1040-SR) Profit or Loss From Business and SFAs should use line 31 "Net profit or (loss). Subtract line 30 from line 29."
- Income for the Self-Employed is addressed on pages 27 and 28 of the Eligibility Manual.

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Schedule C (Form 1040), Profit or Loss from Business

Indication of "No Income"

- Although you are initially selecting error prone applications, you might have to randomly select additional applications if you do not have enough error prone you are and if the household's application indicates zero income, the SFA must request an explanation of how living expenses are met.

- The SFA 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.

- This is addressed on page 109 of the Eligibility Manual.

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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 enough 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.

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

"Zero Benefit" Households

- Letter from 3SquaresVT or Reach Up must have a benefit amount.

- "Zero benefit" households are not eligible for free meals.

- This is addressed on page 67 of the Eligibility Manual.

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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

Verification Completion

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 changing student(s) to paid status

- Does not respond after two attempts and student(s) status change to paid

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Status Stays the Same

- If after the back-up documentation has been assessed and the household's eligibility status has determined to be the same, send out the Verification Results Letter and check off that "Your child(ren)'s eligibility has not changed."

Status Changes for the Worse

- If, as a result of verification, there is a reduction in benefits (free to reduced, free to paid, or reduced to paid) a notice of adverse action, in the form of the Verification Results Letter, must be sent.

- Households must be provided notice 10 calendar days prior to the actual reduction or termination of benefit status.

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Application based on Assistance program special scenario

- When households that applied based on Assistance Program participation are terminated because no member receives benefits from an Assistance Program, the SFA should inform the household that they may submit an application containing household names, income information, and documentation of current household income [7 CFR 245.6a(f)(7)]

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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.

- This is addressed on page 59 of the Eligibility Manual.

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Verification for Cause

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 addressed 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 use available salary information for school district employees to identify questionable applications, and then conduct Verification for Cause on those applications.
- SFAs are strongly encouraged to consult their legal counsel prior to undertaking Verification for Cause for school employees.
- This is addressed on page 100 of the Eligibility Manual.

Verification Report
Data Collection

Completing the Verification Report Data Collection

- The Verification Report Data Collection is in the [Harvest Child Nutrition System](#).

- Go to Data Collections then Verification Report and ensure the correct School Year, 2023-2024, is displayed.

- Make sure the information reported is accurate.

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Verification Report Data Collection SNAP Information

- Question 3-2 asks for "Students directly certified through 3SquaresVT. Do NOT include students certified with 3SquaresVT through the letter method."

- Include all of the students listed in the SNAP column on the Direct Certification (DC) List. Also include any student deemed eligible based on extended categorical eligibility via a student in the household directly certified through SNAP.

- 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.

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FPRS Report FNS-742

- The data that each SFA submits in the Verification Report Data Collection is pulled out of the [Harvest Child Nutrition System](#) and submitted to the USDA Food Program Reporting System (FPRS) which analyzes it for errors.

- We then contact SFAs to correct these errors before the report can be fully submitted.

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Additional Questions Related to Medicaid

- We are in the process of adding questions to the report to determine how many students were determined reduced and free through Medicaid Direct Certification.

- The Medicaid under 130 column is free and the Medicaid under 185 column is reduced.

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Verification Report Data Collection Medicaid Questions

- Includes the clarification on question 3.3, "Do not include students directly certified due to Medicaid or students eligible based on extended eligibility from a Medicaid student."

New Questions:

- 3.5: Students directly certified for free meals through Medicaid. Also include any student deemed eligible based on extended eligibility from a student in the household directly certified for free meals through Medicaid.

- 3.6: Students directly certified for reduced-price meals through Medicaid. Also include any student deemed eligible based on extended eligibility from a student in the household directly certified for reduced-price meals through Medicaid.

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Verification Errors

Assessing Verification Process during the Administrative Review

The State agency will check to see if the SFA:

- Selected the correct Sample Size
- Completed a confirmation review
- Made follow-up attempts
- Kept all letters and communication documentation on file
- Followed the required timeline
- Completed the Verification Report Data Collection correctly and on time

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Common Verification Errors

- Lack of Confirmation Review and/or documentation
- Lack of attempt to Directly Verify
- Not all income reported on the application was verified
- Verification Report Data Collection not correct
- Copies of letters to household(s) not kept on file

Ameliorative Action List

- Errors in the SY2022-2023 Verification Report Data Collection require the SFA participate in Verification Training prior to the Verification Process in School Year 2023-2024, as corrective action.

- These errors include:
  - greater than 90% of applications verified resulted in students losing meal benefits;
  - the SFA verified the incorrect number of applications;
  - the SFA did not complete verification, or did not complete verification on time.

- Jamie Curley has notified the SFAs on this list.

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Ameliorative Action List Caveat

- One of the USDA requirements for being on the Verification ameliorative action list is, per 7 CFR 245.12(i), "local educational agencies with high levels of applications changed due to verification".
- We tried to interpret this requirement the most favorable way possible and only place SFAs on the list if they had 90% or more of applications lose benefits due to Verification.
- We understand that it is strange to seemingly "penalize" the SFA, when it is due to households not responding to the request for Verification.
- Could share [Benefits of Having Higher Free and Reduced Percentages](#).
- That is why the only consequence for being on the list is required training.

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Record Retention

- All records must be kept confidential, as necessary, 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 of their eligibility status. There are no currently no SFAs on this list. This is different than the Verification Process.

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