



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF EDUCATION

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SNP Memo #08-09-04

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

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Date: October 1, 2008

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

## Deadlines

The date for determination of the verification sample size is October 1. 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. The deadline for completion of verification activities is November 15. In 2008, November 15 falls on a Saturday; school divisions are strongly encouraged to complete verification activities by Friday, November 14. The deadline for reporting the results of verification in SNPWeb is being moved to December 15 in order to assure reporting activities are completed prior to the holiday break. The date for reporting the number of households that reapply from November 15 through February 15, and the results of reapplication, is March 15.

## Forms

VDOE prototype verification forms, including the required Racial/Ethnic Data Report, are posted to SNPWeb, Online Forms, SNP200 through SNP220. If the division uses verification forms other than the DOE prototypes, from eligibility software or other sources, those forms must be updated and all required information from the prototypes must be included.

## Sampling Method and Use of the Verification Summary Worksheet

The basic sample size for verification is 3 percent of all approved applications on file as of October 1, or 3,000 applications, whichever is less. School divisions are required 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.

School divisions should use the SNPWeb Verification Summary Worksheet to determine and confirm the size of the sample required to be verified. School divisions should enter the number of approved applications on file as of October 1 in Questions 7 and 8, Column B. The number of applications that must be verified will then display in Question 10. If there are discrepancies between the required sample size displayed in Question 10 and the sample size the division calculated by another method, the SNPWeb software takes precedent. Questions should be directed to the assigned specialist.

Please note the following: changes in USDA regulations as a result of the 2004 Child Nutrition and WIC Reauthorization Act prohibit school divisions from verifying more than the required minimum sample size, with the exception of those applications verified for cause. School divisions should not select more applications than the minimum sample size required unless they will be verified for cause. Question 12, Column B on the Verification Summary Worksheet should always be "0". 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 of 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). 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.

School divisions may decline to verify 5 percent, or less, of the selected applications in the sample. Any application that is removed from the sample pursuant to this provision must be replaced with a similar application (i.e., a correctly approved application within \$100 of the monthly eligibility limit). School divisions may consider factors such as communication difficulties and household stability when declining to verify selected applications.

#### 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 sample notice of selection letter is included in the prototype verification

forms on SNPWeb. The 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.

The “notice of selection” letter must include the name of a school official(s) who can serve as a 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

After completion of verification on November 15, school divisions are required to track the number of households terminated as a result of verification 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.

Questions regarding verification should be directed to the school nutrition program specialist assigned to the division, or Lynne Fellin, associate director, at (804) 225-2074.

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