



COMMONWEALTH of VIRGINIA

DEPARTMENT OF EDUCATION

P.O. BOX 2120

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SNP Memo #2016-2017-03

TO: Directors, Supervisors, and Contact Persons Addressed

FROM: Sandra C. Curwood, MS, RDN
Director, School Nutrition Programs

DATE: September 30, 2016

SUBJECT: Verification of Households' Eligibility for Free or Reduced Price Meals – School Year 2016-2017

Federal regulations governing the National School Lunch Program require school divisions to verify the eligibility of a sample of the total number of approved free and reduced price meal applications on file as of October 1, annually. This memorandum provides information regarding the verification process and verification reporting requirements for the current school year.

Timelines – Annual

- October 1 - The number of approved applications on file on October 1 (excluding previous year's applications carried over into the current year) must be used to calculate the required “basic” or “standard” verification sample.
 - In 2016, October 1 falls on a weekend. The USDA Eligibility Guidance Manual, pg. 81, provides the following: “If October 1 falls on a weekend, use the next operating day to establish the sample pool.” For 2016, that would be Monday, October 3.
- November 15 - Deadline for verification activities and processes to be completed.
- December 15 - Deadline for reporting the results of verification in SNPWeb.
- December 16 - SNPWeb Verification Worksheet locked. Divisions cannot enter data after this date without contacting DOE.

Forms

Virginia Department of Education (DOE) prototype verification forms, including the required Racial/Ethnic Data Report, are posted on SNPWeb in *Online Forms*, form numbers SNP200 through SNP220. School divisions should use these prototypes. If the division elects to use alternate verification forms, from their eligibility software or other sources, those forms must be reviewed annually by the division and updated to reflect all current required information from the DOE prototype forms.

Sample Size and Method to Calculate

The required “basic” or “standard” sample size for verification is three percent of all approved applications on file as of October 1, or 3,000 applications, whichever is less. The law requires school divisions to draw the sample from error-prone applications. Error-prone applications are those that report total household income within \$100 per month or \$1,200 per year of the income eligibility guideline limits for free or reduced price meals for the applicable household size.

To confirm the correct sample size is selected, school divisions are strongly encouraged to enter the number of approved free and reduced price applications on file as of October 1 into the SNPWeb Verification Worksheet, questions 7-2, 7-3 and 8, Column B. The SNPWeb worksheet will calculate the required number of applications to be verified and display

the results in question 10. The verification worksheet will display a long list of red ink errors at the beginning of the worksheet because only the data required to calculate the sample size has been entered. That is expected and those errors will be resolved when the remaining verification data as of November 15 is entered. Any error messages that are not resolved after the final verification data is entered require resolution before the verification report is accepted by DOE.

School divisions must determine the number of approved applications on file as of October 1 and use that number to determine or confirm the number of applications to be verified to meet the required sample size. If the verification process is started after October 1, the division must track the number of approved applications on file back to October 1 to comply with verification requirements.

		A. Number of Students as of October 31, as reported on the October claim	B. Number of Approved Applications as of October 1
7.	Total FREE ELIGIBLE reported	<input type="text"/>	<input type="text"/>
	7-1a Number of students directly certified through Supplemental Nutrition Assistance Program (SNAP)	<input type="text"/>	
	7-1b Number of students directly certified through other programs: include directly certified through Temporary Assistance for Needy Families (TANF), those documented as homeless, migrant, runaway, foster, Head Start, or Pre-K Even Start. (Do not include SNAP reported in 7-1a.)	<input type="text"/>	
	7-2 Number approved as FREE ELIGIBLE based on a SNAPTANFFDPR case number or a foster child submitted on an application (Categorically Eligible)	<input type="text"/>	
	7-3 Number approved as FREE ELIGIBLE based on income/household size information submitted on an application.	<input type="text"/>	
8.	Total REDUCED PRICE ELIGIBLE reported	<input type="text"/>	<input type="text"/>
7A & 8A.	Total Number of ERROR PRONE applications: Report all applications as of October 1st considered Error prone.	<input type="text"/>	<input type="text"/>
9.	Total Number of Applications DENIED	<input type="text"/>	<input type="text"/>
Calculation of Verification Sample Size			
Using the information from questions 7 and 8 above, the system will calculate the required basic sample size.			
10.	Based on the number of applications entered above, the minimum required sample size is:	<input type="text" value="0"/>	
Basic Sample - Applications must be selected from "error prone" income eligible applications within \$100 monthly or \$1,200 per year of the income eligibility guidelines.			

If the number of applications selected by the division for verification differs from the number calculated in the SNPWeb worksheet, check for errors in data entry in SNPWeb or selection of an incorrect type of verification in the division's local eligibility software. If all information is correct, the number calculated by the SNPWeb worksheet is the number of applications required to be verified to meet federal regulations. Contact the assigned SNP specialist for assistance.

Federal regulations prohibit school divisions from verifying more than the required minimum sample size, with the exception of those applications verified for cause. 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 met.

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 or confirm the initial free or reduced price eligibility determination. An individual other than the one who made the initial eligibility determination must conduct the confirmation review. Documentation of the confirmation review and any resulting changes in eligibility status must be maintained.

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 through a notice of adverse action letter. A sample letter is included in the DOE prototype verification forms. 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 income eligibility limit).

After completing the confirmation review, school divisions may replace up to five percent of the applications selected in the verification sample. Any application removed from the sample pursuant to this provision must be replaced with a similar application. School divisions must consider specific factors, such as communication difficulties and household stability, when declining to verify selected applications. 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, as well as those selected to replace incorrectly determined applications.

Follow-up Activities

Households selected for verification must be provided with a telephone number they may call for assistance. This phone number must be provided to the household in the notice of selection letter. Prototype letters can be found in SNPWeb, *Online Forms*. The phone 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. This letter must also include the name of a school official(s) to act as a point of contact for the household either to 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 the required second notification, including 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

Households that were terminated due to non-response to verification must provide documentation of their household income upon reapplication and this documentation and household size must be used to determine eligibility status. All households terminated as a result of non-response to verification who reapply at any time during the school year they were selected for verification must meet all requirements of the verification process, including submission of documentation of all sources of household income. School divisions must track those households terminated as a result of non-response to verification for the remainder of the current school year to assure the household is required to produce income documentation if they apply for benefits during the same school year.

Verification Reporting

The Verification Worksheet in SNPWeb is the data collection tool DOE uses to report the required verification information to USDA via their FNS-742 report.

To prepare for completing the required verification reporting in the SNPWeb worksheet, school divisions are reminded of the following:

- School divisions must be able to track “other” directly certified (DC) separate from SNAP DC/extended SNAP DC in their eligibility database and be prepared to report the different types of DC separately in the Worksheet.
- Students directly certified using SNAP case numbers provided by DOE/DSS, and other students in the household directly certified through extension of this SNAP DC, will be reported together in question 7-1a, column A.
- Students directly certified by any other method, including TANF case number, homeless, migrant, runaway, foster, or Head Start, will be reported in question 7-1b, column A.
- Students who have been approved Free by any method, including household application and “Other DC,” and are later found to be DC by SNAP, should be included as SNAP DC for October 31, in question 7-1a, column A.
- School divisions must determine the total number of approved income applications as of October 1 that were error-prone (income within \$100/month or \$1,200/year of the income guideline upper limit for household size for the category in which they were approved).
- The total number of error-prone applications approved by the division as of October 1 must be reported in question 7A & 8A, column A of the Worksheet. This is NOT the number of error-prone applications selected to be verified. It is the total of all approved applications that were within \$100 per month or \$1,200 per year of the income limit for household size.

Detailed verification guidance can be found in the *USDA Eligibility Guidance Manual*, revised August 2016, *Section 6: Verification*. Download the manual at: <http://www.fns.usda.gov/2016-edition-eligibility-manual-school-meals>

If you have questions, please contact the school nutrition programs staff member assigned to your division or Office of School Nutrition Programs staff at (804) 225-2074.

SCC/LAF/cc

Attachment A: Provision 2 Guidance for Verification

Attachment B: Community Eligibility Guidance (CEP) for Verification

Provision 2 Guidance for Verification

Participation in Provision 2 for the School Breakfast Program (SBP) ONLY does not change the way the division conducts the verification process or reports information on the SNPWeb Verification Worksheet. Do not report any information in questions 5-1 or 5-2 for Provision 2 SBP ONLY schools – report “0”.

Information for Provision 2 schools that participate in Provision 2 for BOTH breakfast and lunch (SBP and NSLP) must be reported in either question 5-1 or 5-2, depending on if it is a Base Year or Non-Base Year.

If the Provision 2 SBP/NSLP school is in a Base Year:

- Complete question 5-1, col. A and col. B
- Include the applications and direct certification information for the Provision 2 school with information reported for all other schools in questions 7 through 9

If the Provision 2 SBP/NSLP school is in a Non-Base Year:

- Do not complete question 5-1
- Complete questions 5-2a and 5-2b, columns A and B with the free and reduced eligibility information from the base year
- Do not include base year applications and direct certification information for the Provision 2 school in a non-base year in questions 7 through 9

There is only one school in Virginia reporting in SNPWeb as a Provision 2 school for both SBP and NSLP. All other Provision 2 schools are SBP only and should follow the instructions for Provision 2, SBP only, which are unchanged and do not require any Provision 2 reporting on the Verification Worksheet.

If you have questions, please contact the SNP staff member assigned to your division or Lynne A. Fellin, associate director.

CEP Reporting on the SNPWeb Verification Worksheet – School Year 2016-2017

School divisions with one or more schools or division-wide participation in the Community Eligibility Provision (CEP) do not conduct verification of eligibility for the CEP participating school(s). While verification is not conducted for participating CEP schools or division-wide CEP, special reporting is required on the SNPWeb Verification Worksheet to capture information about the CEP school(s) or division. Follow the additional information below when completing the verification worksheet for school(s) or division-wide CEP participation. Refer to the original memo SNP 2016-2017-03 for complete verification information and additional instructions.

The Community Eligibility Provision is a special counting provision alternative similar to Provisions 2 and 3. In the DOE Verification Worksheet, much of the information reported for CEP will be reported in questions that currently use only the Provision 2/3 terminology. The SNPWeb Verification Worksheet has not been updated to include the CEP label on those questions but they are used to capture the CEP information.

Verification Reporting

The Verification Worksheet in SNPWeb is the data collection tool DOE uses to report the required verification information to USDA via their FNS-742 report. Participating CEP school divisions must follow these procedures for completing the required verification reporting in the SNPWeb worksheet:

- School divisions participating in CEP division-wide are not required to conduct any verification activity
 - Division-wide CEP participants must complete Question 2 by selecting the “Yes” radio button
 - YES - 100 % of the Schools operate under provision for both Breakfast and Lunch
 - Division-wide CEP participants should enter “0” in all other fields on the report
 - Division-wide CEP participants must complete Question 25 and submit the worksheet

- School divisions with one or more individual schools, school groups or a combination of individual schools and school groups (school-level CEP), must complete verification activities for all non-CEP schools in the division and report basic information for CEP school(s).
 - School-level CEP divisions must answer Question 2 as “No.”
 - School-level CEP divisions must answer Questions in section 5 for both CEP and non-CEP schools
 - Question 5 include all schools and all enrollment in the division
 - Question 5-1 answer “0” for both Col. A and Col. B Provision schools in a BASE YEAR
 - Question 5-2 “Number of Schools Operating Provision 2/3 in a NON-BASE YEAR”
 - In Col. A report the number of CEP schools participating
 - In Col. B report the current October 31 student membership in these CEP schools

- Question 5-2a “Provision 2/3 students reported as FREE in a NON-BASE YEAR”
 - In Col. B report the number of Free eligible students in the CEP school(s) using either the number of “*identified students*” from the approved, validated CEP application, or the current number of “*identified students*” in the CEP school(s) if that number has been calculated in the current year and has increased (in most cases, divisions will report the original number of identified students from the CEP application.)
- Question 5-2b “Provision 2/3 students reported as REDUCED in a NON-BASE YEAR”
 - In Col. B report “0” for the number of reduced price eligible students in the CEP school(s).

Enrollment, Application, and Eligibility Information (Pre Verification)			
4.	Type of Free/Reduced Price Application Used	Household	
		A. Number of Schools/Sites	B. Number of students in membership as of October 31, as reported on October claim
5.	Number of schools operating the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) and number of students enrolled as of October 31	18	
	5-1. Number of schools operating Provision 2/3 in a BASE year for NSLP and SBP		
	5-2. Number of schools operating Provision 2/3 in a NON BASE year for NSLP and SBP		
	5-2a. Provision 2/3 students reported as FREE in a NON BASE year		
	5-2b. Provision 2/3 students reported as REDUCED in a NON BASE year		
6.	Number of ROC sites operating the NSLP (or SBP for SBP only sites)		
	6-1. ROCs with day students (Report only day students in 6-1B)		
	6-2. ROCs with NO day students		



- Questions 7 through 9
 - Complete the information in these questions for the non-CEP schools only. That would be the information for all students directly certified who attend non-CEP schools and then all other students represented on applications submitted in the current school year.
 - Follow the instructions on the worksheet and in the verification memo.
- Questions 12 through 23
 - Complete the information in these questions based on the applications selected for verification and the results of the verification process.
 - Follow the instructions on the worksheet and in the verification memo.
- Question 25 complete and submit the worksheet by the December 15 deadline.

If there are questions, please contact the school nutrition programs staff member assigned to your division or Lynne Fellin, associate director, at (804) 225-2717.

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