

# Verification

## Overview

Verification is confirmation of income eligibility for free and reduced price meals under the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Households are required to submit proof of income to the verifying school or institution in order to continue to receive benefits. It is only required when eligibility is determined through the application process, not through direct certification or other categorically eligible determination.

Verification must include either confirmation of income eligibility or confirmation that the child or any member of the household is receiving assistance under Food Stamps (SNAP), Food Distribution Program on Indian Reservations (FDPIR), or Temporary Assistance for Families in Idaho (TAFI) or that a child is “other source categorically eligible”. Verification may include confirmation of any other information required on the application, such as household size.

## Terminology

**Categorical eligibility** – Categorically eligible children are those who are automatically eligible for free meals because they, or another member of their household, receive benefits under a specific Assistance Program (SNAP, FDPIR, or TAFI) or any Other Source Categorical Eligible Program.

**Confirming official** – The school district staff member who is charged with confirming that Free and Reduced Income applications, submitted by households and selected for verification, are determined correctly; confirmation is done prior to the sending of a letter notifying the household of their selection for verification.

**Determining official** – The school district staff member who is charged with determining Free and Reduced Income applications submitted by households for school meal benefit qualification.

**Direct certification (DC)** – A method in which a child is eligible for free meals based on documentation obtained directly from the appropriate State or local agency authorized to certify that the child is a member of a household receiving assistance under SNAP, FDPIR or TAFI programs, and/or is a foster or Head Start child or is certified by the proper liaison to be a homeless, migrant, or runaway child.

**Direct verification** – Not applicable in Idaho.

**Error prone** – Applications that are within \$100 per month of the applicable Income Eligibility Guidelines (for free or reduced-price meals).

Non-response rate – The percentage of households selected for verification that did not respond appropriately to the attempts to attain income information.

Other source categorical eligibility – Those children approved without an application for free meals because they receive benefits under a specific assistance program (foster, migrant, homeless, runaway, Head Start, or Even Start). The eligibility does not extend to other household members.

Random sampling – Each application has an equal chance of being selected for verification.

Sample pool – The total number of income and Other Source Categorical Eligible applications approved as of October 1.

Sample size – The number of applications subject to verification.

SNAP – Supplemental Nutrition Assistance Program; in Idaho, this is simply referred to as “Food Stamps.”

SNAP letter method – A letter submitted by the family that originates from the issuing SNAP agency. The letter extends eligibility to any children in the household who are enrolled in the school/district.

Verification – Confirmation of eligibility for free or reduced-price meals; requires a household to submit proof of income to the school or institution operating the NSLP or SBP, or proof of eligibility in SNAP, FDPIR, or TAFI. All SFAs participating in the NSLP or SBP must complete the verification process and report no later than November 15 (schools participating in Provision 2 lunch and breakfast or the Community Eligibility Provision, as well as RCCIs, need only complete the report, not the verification process).

Verification for cause – Confirmation of eligibility for free or reduced-price meals based on questionable applications (these application verifications are not a part of the verification sample/process).

### **What is Verification?**

Verification is confirmation of eligibility for free and reduced-price meals under the NSLP and SBP. Verification must include either confirmation of income eligibility, confirmation that the child is eligible to receive SNAP, FDPIR, or TAFI benefits, or confirmation that the child qualifies as foster, migrant, homeless, or runaway.

All participating sponsors are required to comply with verification requirements by November 15 of each year. These requirements include conducting a confirmation review of all applications selected for verification prior to beginning the verification process, selecting and

verifying income and eligibility for a sample of approved applications received, and submitting the Verification Report in MyIdahoCNP.

### *Confirmation Review*

Applications selected for verification must have determinations confirmed prior to the start of the verification process. Confirmation reviews must be conducted by someone other than the person making the initial determinations. A software program that was used to make the determinations can be used as the confirming official.

### *Type of Verification / Sampling Methods*

Once the sample pool has been established, the sponsor must establish the sample size. When calculating the sample size, all fractions or decimals must be rounded upward to the nearest whole number. The State agency will notify sponsors that are eligible to select alternative methods.

- Standard, or 3% error-prone focused – three percent of all approved applications, selected from those that are error-prone.
- Alternate One (3% random) – three percent of all approved applications (can only be used if the non-response rate was below 20% in the prior year).
- Alternate Two (1% error-prone focused plus one-half of one percent of categorically free) – one-percent of all approved applications, selected from those that are error-prone PLUS one-half of one percent of approved applications that were approved because a case number was provided in lieu of income information (can only be used if the non-response rate was below 20% in the prior year).

If sample sizes are based on error prone applications and there are not enough error prone applications to select, additional applications must be selected from the remaining approved applications. If there are more error prone applications than the required sample size, applications must be chosen at random from the error prone applications.

### *Verification Timeline*

- Begins October 1
- September 29 – Verification notification sent to SFAs via email, reminding that it is time to start
- October 1 – determine the number of **approved applications** for the current school year; applications for directly certified students must be removed, and applications must then be counted as:
  - Income eligible free
  - Income eligible reduced

- Categorical eligible free (based on a food stamp, TAFI, FDPIR number listed on the application)
- Beginning October 1 and continuing through October – select applications to verify, send notification to households (keep a copy of all correspondence), run Direct Certification
- End of October/beginning of November –send second notice to households that have not responded with date benefits will end if no response
- October 31 – determine the number of students approved in these categories:
  - Directly certified through SNAP (food stamps)
  - Directly certified through other qualifying programs (TANF/TAFI, FDPIR, foster, migrant, homeless, runaway
  - Directly certified by letter from food stamp issuing agency
  - Income eligible free
  - Income eligible reduced
  - Categorically eligible
- November 15 – Verification deadline – all verification processes must be complete and reports must be submitted in MyIdahoCNP

**Special Note for CEP and Provision 2 (lunch and breakfast) schools** – it is a requirement to run a Direct Certification match in mid to late October, but no later than October 31, for all schools not taking F/R applications

Verification documentation, including notification letters (English) and instructions on completing the report can be found in Download Forms; additional information regarding Verification can be found in the Eligibility Manual for School Meals (also located in Download Forms), and by contacting the State Agency office at [macook@sde.idaho.gov](mailto:macook@sde.idaho.gov) or 332-6830.

#### *Verification for Cause*

The Local Educational Agency (LEA) has an obligation to verify all questionable applications (“verification for cause”). Such verification efforts cannot delay the approval of applications. If an application is complete and indicates that the child is eligible for free or reduced price benefits, the application must be approved.

Only after the determination of eligibility has been made can the LEA begin the verification process. Determining officials are strongly encouraged to contact the household during the certification process to clarify any information that is unclear or questionable, before certifying the application and proceeding with verification for cause. Once households have been requested to provide documentation for cause, the LEA must complete the verification process for these households.

To verify an approved application for cause, the LEA must send the household a Notification of Selection. This notification letter may be sent with the Notice of eligibility. Please refer to the

Eligibility Manual for School Meals for verification procedures. Any household that fails to submit requested verification information by the date specified by the LEA or that submits verification information that does not support the initial determination of eligibility must be sent a notice of adverse action.

LEAs have an obligation to follow-up on questionable and incomplete information when reviewing applications submitted for free and reduced price meals or free milk. Prior to certifying children for benefits, the determining official should review the application for any discrepancies in the information provided.

If a discrepancy is found, the determining official should:

- Seek clarification about the information provided in order to make a determination in a timely manner;
- Deny the application with an explanation that incomplete information was provided; or
- Approve the application, and verify for cause.

### **Why is Verification important?**

Verification is a United States Department of Agriculture (USDA) requirement used to validate that the information provided on a sampling of applications is true and correct.

### **Resources**

Additional resources may be available for this topic. Please check the Idaho School Nutrition Reference Guide website for copies of manuals, user guides, and helpful links to relevant subject matter.