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School Food Service Directors/Managers

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SUBJECT: Income Verification

2023-2024 School Year Income Verification Procedures

School Food Authorities (SFAs) participating in the School Breakfast Program (SBP) and/or National School Lunch Program (NSLP) that conduct standard counting and claiming procedures are required to select and verify a sample of their approved free and reduced-price meal applications on file as of October 1st by November 15th of each year. **This process is called Income Verification.**

This guidance manual contains important information on how to conduct Income Verification and includes template letters that should be used to correspond with families.

List of SFAs Required to Conduct Income Verification

SFAs that are required to conduct income verification will appear on the attached list which also includes an indicator of the allowable sampling methods for each SFA.

2023-2024 School Year Important Information

Income Verification Sample Size: The sample size used to conduct income verification activities must be based on the number of approved applications on file as of October 1, 2023. For the 2023-2024 School Year, October 1 falls on a Sunday and therefore, SFAs should use the next operating day to establish their income verification sample pool.

Verification Collection Report

All SFAs **that conduct** income verification must complete and submit the Verification Collection Report on the Child Nutrition Management System (CNMS) by December 15, 2023. **SFAs operating the Community Eligibility Provision (CEP) or operating Provision 2 SFA-wide are not required to complete the Verification Collection Report.**

Additional Resources

[USDA Eligibility Manual for School Meals](#)

[USDA Verification Tool Kit](#)

[Income Verification & Verification Collection Report Snip-It](#)

If you have any questions regarding Income Verification, please contact your Child Nutrition Program representative at 518-473-8781.

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INTRODUCTION

Federal regulations require that all School Food Authorities (SFAs) participating in the School Breakfast Program (SBP) and/or National School Lunch Program (NSLP) conducting standard counting and claiming procedures select and verify a sample of their approved free and reduced-price meal applications on file as of October 1st by November 15th of each year. **This process is called Income Verification.**

Income Verification is the confirmation of eligibility for free and reduced-price meals under the NSLP and SBP. **Verification is only required when eligibility is determined through the application process, and is not required for eligibility determinations made through the direct certification process.**

Verification must include either confirmation of income eligibility or confirmation that the child or any member of the household is receiving assistance under Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian Reservations (FDPIR) or Temporary Assistance for Needy Families (TANF) or that a child is Other Source Categorically Eligible. Verification may also include confirmation of any other information required on the application, such as household size.

Income Verification requirements have become more stringent in order to improve the fiscal integrity of the child nutrition programs and the verification process. It is essential that verification efforts be completed on time, that changes in eligibility are implemented for all family members and that adequate records of your efforts are maintained. The selection of applications cannot target discrimination against anyone on the basis of race, color, national origin, age, sex, or disability.

Getting households to respond to verification requests can be challenging for SFA staff. If households do not respond, they lose their benefits regardless of their actual eligibility. In addition, the number of approved applications an SFA is required to verify is impacted by the number of responses they were able to obtain the previous year.

To assist SFAs with addressing these issues, USDA has developed a Verification Toolkit. The Toolkit contains a collection of resources that SFAs can use in their efforts to improve verification response rates and the overall efficiency of the process. These resources were developed by FNS but feature input from State and local officials from around the country. They were informed by two years of formal studies conducted by FNS and the Office of Evaluation Science's Social & Behavioral Sciences Team, as well as through a public contest and from informal conversations with program operators. To view the Toolkit, please visit <https://www.fns.usda.gov/school-meals/verification-toolkit>.

SFAs must report the results of the income verification process by completing and submitting the Verification Collection Report on the Child Nutrition Management System (CNMS) by December 15th.

HOW TO CONDUCT VERIFICATION

Start planning early! Allow yourself enough time to complete the verification process by the required deadline.

Verification efforts are not required for:

- Residential childcare institutions (RCCIs), except for RCCIs with day students, where eligible students must complete an application
- Schools in which all students are served without a separate charge for food services and the school claims only **paid** reimbursement
- Schools that do not have any free or reduced-price eligible students
- Schools participating in the Special Milk Program, even if they offer free milk
- Schools in non-base years of Provision 2. They must, however, conduct the Direct Certification Matching Process (DCMP) and report SNAP and Medicaid Direct Certification eligibility annually.
- Schools operating in the Community Eligibility Provision (CEP). They must, however, conduct DCMP and report SNAP and Medicaid Direct Certification eligibility annually.
- New SFAs who begin participation in a Child Nutrition Program after October 1 do not need to complete the verification process in their first year of operation **only**.

ESTABLISHING THE SAMPLE POOL

To establish the sample pool, SFAs must count the number of approved free and reduced applications on file for the entire SFA as of **October 1**. The sample pool depends on the number of approved applications, paper or electronic, and is not based on the number of children eligible for free and reduced priced benefits. **If October 1 falls on a weekend or a school break, use the next operating day to establish the sample pool.**

SFAs have the *option* to begin verification prior to October 1, once they begin the application approval process for the current school year. This option may ease the administrative burden for particularly large SFAs who receive several household income applications. However, the sample pool must still be based on the number of applications on file as of October 1. See page 6 for additional details.

Applications submitted for “mixed households,” which include children who are eligible based on income and others based on Other Source Categorical Eligibility, are subject to verification and must be included in the sample pool.

Applications with case numbers that are not certified through direct certification are subject to verification and should be included in the sample pool.

Verification must take place after an application has been approved.

Do NOT include:

- Households that are matched through the Direct Certification Matching Process (DCMP) for SNAP/Medicaid, and those students who have been identified as living in the same household as the certified student receiving SNAP/Medicaid benefits
- Certification letters for SNAP/TANF from the local assistance agencies
- Foster children who are identified by a list or letters from social services and voluntary placement agencies
- Migrant children who have been identified by the district's Migrant Education Program
- Runaway or homeless children who have been identified by the district's McKinney-Vento school district liaison
- Children participating in federally funded Head Start/Even Start

*When carrying over eligibility for the first 30 operating days for students whose free or reduced eligibility was determined in the previous school year, **do not count these applications in your verification pool and do not verify eligibility**. The carryover applications were subject to the verification process in the previous school year.

SELECTING YOUR SAMPLE SIZE

Using the sample pool, SFAs will calculate the required sample size (number of applications that must be verified) using one of the following methods:

- Error Prone (Standard) Sampling Method
- Random Sampling Method (Alternate 1)
- Focused Sampling Method (Alternate 2)

The Error Prone (Standard) Sampling Method must be used by an SFA unless it qualifies to use one of the alternate sampling methods. The SFAs approved to use an alternate sampling method are listed in Attachment H.

When determining the sample size, regardless of the verification method used, SFAs must **always round up to the nearest whole number**. For example, if your sample size is 3.18 you must verify 4 applications. You may not verify any more or any less than the required sample size allowed. Please note, at least one application must always be verified.

Error Prone (Standard) Sampling Method

New SFAs and SFAs that had less than 80 percent response rate to verification in the 2022-2023 school year **MUST** use the Error Prone (Standard) Sampling Method to conduct verification in the 2022-2023 school year. SFAs coming off Provision 2 or CEP must also use the error prone sampling method.

For **Error Prone (Standard) Sampling Method**, SFAs must verify the lesser of three percent (3%) or 3,000 of the approved applications on file as of **October 1**. The applications to be verified must be **selected randomly from applications that meet the definition of an Error Prone application**.

*Error prone applications are those with a reported income within \$24 per week, \$100

per month, or \$1,200 per year of the applicable Income Eligibility Guidelines.

If the SFA does not have enough error prone applications to produce a three percent (3%) sample, the SFA must use income applications and/or applications that report a SNAP/TANF/FDPIR number selected at random to meet the required sample size under the error prone sampling method.

SNAP/TANF/FDPIR applications will not be selected unless there are too few applications that meet the error prone criteria.

Note: When approving applications, SFAs should flag those that meet the error prone definition (see definition above) in order to facilitate this process.

Alternate Sampling Methods (Random Method & Focused Method)

SFAs that had an 80 percent (80%) or greater response rate in the 2022-2023 school year may choose to select an alternate option for verification. (Please see Attachment H, the list of schools with 80% or greater response rate based on 2022-2023 Income Verification, included in this memo). These schools may choose to use the Error Prone Sampling Method (explained above) or may choose one of the following sampling methods:

Random Sampling Method (Alternate 1)

SFAs must verify the lesser of three percent (3%) or 3,000 of the total number of approved applications on file as of October 1. The applications to be verified must be selected randomly. The random sample should include both income applications and categorically eligible applications for children receiving SNAP/TANF/FDPIR benefits whose names do not appear on the direct certification matching list.

Focused Sampling Method (Alternate 2)

SFAs must verify the lesser of one percent (1%) or 1,000 of the total number of approved applications selected from income applications nearest the income eligibility guidelines (error prone applications); PLUS the lesser of half percent ($\frac{1}{2}\%$) or 500 of approved applications which reported a SNAP/TANF/FDPIR case number on an application instead of income information.

Example:

The Focused Sampling Method could be accomplished as follows:

SFA with 900 approved applications which include 600 applications that reported a SNAP/TANF/FDPIR case number

1. Count **all** approved applications, including applications reporting a SNAP/TANF/FDPIR case number to determine the number required to fill the one percent of income sample size

$$.01 (1\%) \times 900 = 9$$

2. Separate applications into two groups:
 - Income Applications (non-SNAP/TANF/FDPIR)
 - Applications reporting a SNAP/TANF/FDPIR case number

3. From the income applications (non-SNAP/TANF/FDPIR) group, select the sample of households (9) from error prone applications. If you do not have enough error prone applications, select the remainder at random from the income applications.
4. From the applications with a SNAP/TANF/FDPIR case number, determine the number required to fill the .5 percent sample size

$$.005 (.5 \text{ percent}) \times 600 = 3$$
5. Choose the applications (3) from those that reported a SNAP/TANF/FDPIR case number.
6. Perform the confirmation review on all selected applications and continue with all steps of verification.

***Note: 12 applications were verified in this example (9 income and 3 SNAP/TANF/FDPIR)**

Beginning Verification Prior to October 1

The National School Lunch Act states that verification must be based on a school's sample size as of October 1 each school year. However, SFAs are now allowed to begin verification once they begin the application approval process for the current school year and have approved applications on file. This means SFAs are not required to wait until October 1 to initiate the verification process and may instead choose to begin conducting verification once they begin the application approval process for the current school year.

When beginning verification prior to October 1, SFAs must:

- Decide how often to sample applications (weekly, every other week, etc.)
- Include in each sample pool only applications approved since the last sample was selected
- Select either 3 percent or 1.5 percent of approved applications, as required by the sampling method, each time. Round *down* to the nearest whole number to prevent over sampling

On or around October 1:

- Sample the final set of applications, selecting only from the applications approved since the last sampling
- Calculate the number of applications selected for verification *to date* (including the October sample)
- Calculate 3% or 3,00 (or 1.5%, if applicable) of *all applications* approved as of October 1, rounding up to the next whole number
 - If the number of applications selected to date is less than 3%/1.5% number, fill the remainder of the sample by selecting randomly from error prone, categorically eligible, or all applications, *approved since the beginning of the school year* as required for the sampling method
 - If there are not enough applications of the required type, then sample randomly from all applications

Please note that all existing statutory and regulatory requirements continue to apply when using

this approach, but the timing and sampling process is tailored to accommodate the extended timeframe during which verification is being conducted.

CONFIRMATION REVIEW

Prior to conducting any verification activity, an individual other than the original reviewing official must review each approved application selected for verification to ensure that the initial determination was accurate. The confirmation review must be done by an individual other than the individual who made the initial eligibility determination. **A confirmation review is not required if the SFA uses a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination.**

If an SFA is using “eligibility determining” software, it is the SFA’s responsibility to ensure that the "eligibility determining" software conforms to USDA regulations.

Depending on the outcome of each confirmation review, the SFA must take one of the following actions:

No Change in Status

- Verifies the application

Status Change from Reduced Price to Free

- Make the increased benefits available immediately
- Notify the Household of change in benefits
- Verify the application

Status Change from Free to Reduced Price

- Do not change the child’s status
- Verify the application
- Notify the household of the correct eligibility status after verification is completed and, if required, sends the household a notice of adverse action.

Status Change from Free or Reduced Price to Paid

- Immediately send the household a notice of adverse action
- Do not verify the application
- Select a similar application (example- another error prone application) to verify
- Begin the verification process with the newly selected application. The second reviewing official must review the application.

REPLACING APPLICATIONS

The SFA may, on a case-by-case basis, replace up to five percent (5%) of the applications selected for verification. Applications may be replaced when the SFA believes that the household would be unable to satisfactorily respond to the verification request. The SFA must document why the application was replaced. Any application removed must be replaced with another approved

application selected on the same basis (i.e., an error prone application must be substituted for a withdrawn error prone application). The newly selected application must then have a confirmation review prior to being verified. In those SFAs where five percent of total applications result in less than one, one application may still be replaced. All results of the five percent calculation are rounded up to the next whole number.

When an application is selected for verification and, prior to hearing back from the household in question, that household is found on a direct certification list, the application does not have to be replaced in the verification sample pool. The application would be marked as a direct certification in the appropriate box in Section 3 of the verification collection report. SFAs should include these applications in Field 5-5 (Number of applications selected for verification) of the verification collection report and indicate the number of these applications that are being converted to direct certification in the remarks portion of the verification collection report.

NOTIFYING HOUSEHOLDS OF SELECTION

When a household is selected for verification, the SFA must provide the household with a letter or an email if the parent or guardian contact information is known informing a household of its selection and must provide a list of the documents or other forms of evidence the household must submit to the SFA. When the SFA uses agency records or direct verification to confirm eligibility, a letter informing the household of its selection for verification is not required, as verification is completed. Please see the “Direct Verification” section of this booklet for more information on direct verification.

It is recommended that SFAs use the NYSED prototype “Letter to Households-Notification of Selection for Verification of Eligibility” letter (Attachment A) as this prototype letter contains all required information.

The notification letter must include:

- An indication that the household was selected for verification
- If a child is receiving benefits based on income, a list of the types of acceptable information that may be provided to confirm current income:
 - Pay stubs;
 - Award letters from assistance agencies for benefits such as Social Security or SSI; or
 - Support payment decrees from courts;
- If a child is receiving benefits based on categorical eligibility, the household may provide proof that a child or any household member is receiving benefits under an Assistance Programs (SNAP/TANF/FDPIR) or that a child is Other Source Categorically Eligible instead of providing income information;
- A warning that information must be provided by a date specified by the SFA and that failure to do so will result in termination of benefits
- Notice that documentation of income or receipt of assistance may be provided from any point in time between the months prior to application and the time the

household is required to provide income documentation

- A modified Use of Information Statement as follows:

The Richard B. Russell National School Lunch Act requires the information requested in order to verify your children's eligibility for free or reduced-price meals. If you do not provide the information or provide incomplete information, your children may no longer receive free or reduced-price meals

- Name of an SFA official who can answer questions and provide assistance
- A toll-free number for parents to obtain assistance. This can be a local number within the district. It cannot be a long-distance call
- The full USDA Nondiscrimination Statement.

Note: You do not need to collect social security numbers of all adults in the household as part of the verification process. Ensure all notification letters are updated and do not request this information.

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.

VERIFICATION OF ELIGIBILITY

All applications selected for verification must be resolved. All families selected must provide information that verifies or confirms their eligibility, or the families must be notified formally in writing that their benefits will change. Changes in eligibility must be updated at the point of service for all family members in the SFA.

Correctly approved applications are effective for the entire school year. If a family selected for verification submits information that confirms either their income or receipt of SNAP/TANF/FDPIR benefits for the time period beginning the month before they applied through the time the application is verified, the child's eligibility remains in effect. You may not change their status to reduced or paid if the family substantiates they were eligible for the free benefits when they applied. This is true even if current income proves at the time of verification they are no longer eligible.

Written Evidence

Written evidence is the primary source of eligibility confirmation for all households, including TANF, FDPIR, Other Source Categorical Eligibility Programs, and foster child households. Written evidence most often includes pay stubs from employers or award letters from assistance agencies or other government agencies.

Acceptable Written Evidence	
Income Eligible	Contains: <ul style="list-style-type: none">• The name of the household member• Amount of income received• Frequency received• The date the income was received <p>*A pay stub with no dates would be <u>insufficient</u></p>
Categorically Eligible: Assistance Program	An official letter or notice indicating that the child or any household member is receiving benefits from that program, such as a notice of eligibility. *A document from an Assistance Program that does not specify the certification period does <u>not</u> meet the documentation for verification. *For example, the identification cards for SNAP or TANF would be <u>insufficient</u> unless it contains an expiration date.
Categorically Eligible: Other Source	An official letter, notice, or list from the appropriate State agency, social service agency, program office or coordinator, or court.

Note: Tax returns may be used to verify income of self-employed household members ONLY.

When a Household Provides Pay Stubs

Households may provide pay stubs with income from employment. If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient.

If the household submits a pay stub that includes overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime.

Indication of “No Income”

If a household is selected for verification, or the application is being verified for cause and the

application indicates zero income, the SFA must request an explanation of how living expenses are met and may request additional written documentation or collateral contacts. For example, the collateral contact may be asked to document the duration and type of assistance that is provided to the household.

Collateral Contacts

A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income level or participation in Assistance Programs or Other Source Categorical Eligibility Programs. Collateral contacts include employers, social service agencies, migrant workers' agencies, and religious or civic organizations. The verifying official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.

The verifying official must give the household the opportunity to designate the collateral contact. However, the verifying official may select a collateral contact if the household fails to designate one or designates one who is unacceptable to the verifying official. In either case, no contact may be made without first notifying the household and obtaining its permission. At the time of the notice, the household may consent to the contact or provide acceptable documentation in another form. If the household refuses to choose one of these options, the household's eligibility will be terminated in accordance with normal verification procedures. Households which dispute the validity of information acquired through collateral contacts or a system of records must be given the opportunity to provide other documentation.

All collateral contacts may be written or oral and must be documented, dated, and initialed. The SFA will examine any written information provided by the collateral contact or evaluate any oral information. If the collateral contact is unwilling or unable to provide the requested information, the SFA must contact the household to complete the verification process.

Foster Children

If a household application is selected for verification in which a foster child is listed as a family member, and State or local documentation certifying the foster child for free meal benefits has been provided to the school, then only the family income or SNAP/TANF/FDPIR case number must be verified for the other students listed on the application.

If the family application is the only form of certification for the foster child, then documentation verifying the foster child's status would be required. Documentation from a State or local foster agency or the court where the foster child received placement is acceptable for verification.

SNAP/TANF/FDPIR

Verification consists of confirming current receipt of SNAP (only for children not found in the direct certification matching process), TANF or FDPIR benefits for each child/household listed. If at least one member of the household confirms receipt of SNAP/TANF/FDPIR, the remainder of the children residing in the household shall remain eligible through confirmation of school enrollment records. Verification of eligibility for households that provided an Assistance Program case number on the application may be accomplished by submitting a list of names and Assistance Program case numbers to the local SNAP or assistance office for confirmation of certification of receipt of benefits from agency records or by directly verifying eligibility using the

Direct Certification Matching Process (DCMP) data. Please see the “Direct Verification” section of this booklet for more information.

It is essential to cooperatively discuss and work out a mutually effective and efficient means for handling requests for verification of current SNAP/TANF participation by school officials and school meal applicants with local SNAP/TANF agencies. Refer to Attachment B for requesting verification from local SNAP/TANF agencies. Please note local SNAP/TANF agencies may not be able to provide this service. The SFA is encouraged to first utilize the DCMP data prior to conducting direct verification with local SNAP/TANF agencies.

Note: EBT cards cannot be used to confirm eligibility in SNAP or TANF.

DIRECT VERIFICATION

Direct verification is a method that can be used to confirm eligibility for verification. Direct verification uses records from public agencies to verify assistance program participation which can help reduce the burden upon families and eliminate non-responders. Results of Direct Verification must be reported on the School Food Authority Verification Collection Report.

SFAs are not required to conduct direct verification but are encouraged to utilize this method. Direct verification was put in the federal law to make it easier for eligible families to retain benefits and is an excellent means to address the non-response rates of households selected for verification. It is not an opportunity to run a computer check for all children in your school. Direct verification should be used only to check students selected in your verification sample.

Direct verification must be conducted prior to contacting the household for documentation.

Direct verification can be used for the sample selected for verification via the error prone method, the random sample, or the focused sample. SFAs must have security measures to ensure the confidentiality of the information.

SFAs will conduct the direct verification process by using the Direct Certification Matching Process (DCMP) data. Direct certification electronic records will provide data for the current school year through October and will be available to authorized users of the New York State Student Identification System (NYSSIS).

To directly verify students using the direct certification matching system SFAs must:

- Have a username and password to access the SED Business Portal with entitlements to the NYSSIS system
- Search the direct certification data by last name or date of birth for a specific student that was selected for verification
- If the student is found on the list, the student is eligible for free meal benefits. Verification is considered complete and further documentation is not needed from the family to confirm eligibility.

- If the student is not found on the direct certification list, you must continue verification efforts. You must notify the family that they have been selected for verification and request documentation to confirm eligibility.
- Keep a record of directly verified students on file for 3 years plus the current year

Verification of eligibility for households that provided an Assistance Program case number on the application may also be accomplished by submitting a list of names and Assistance Program case numbers to the local SNAP or assistance office for confirmation of certification of receipt of benefits from agency records. Please see Attachment B for the prototype letter that may be used.

If information provided by the public agency does not verify eligibility or if you are not able to find the student through the direct certification matching data, the SFA must proceed with regular verification activities. The SFA must complete direct verification immediately following the October 1 verification sample selection, so that households not directly verified can be contacted for verification information in a timely manner.

If information obtained through this process verifies that the household is participating in an assistance program no additional verification is required. The eligibility status of the child or children listed on the application is considered verified and a letter informing the household of its selection for verification is not required.

When an application is selected for verification and, prior to hearing back from the household in question, that household is found on a direct certification list, the application does not have to be replaced in the verification sample pool. The application would be marked as a direct certification in the appropriate box in Section 3 of the verification collection report. SFAs should include these applications in Field 5-5 (Number of applications selected for verification) of the verification collection report and indicate the number of these applications that are being converted to direct certification in the remarks portion of the verification collection report.

VERIFICATION FOLLOW-UP

To continue the verification process subsequent to household notification, the SFA must either determine:

- If the household has submitted adequate information to complete its individual verification activity; or
- If follow-up with the household is needed

Following Up with Households

SFAs **must** make at least one attempt to contact the household when the household does not adequately respond to the request for verification. The required follow up can be done in writing (letter or e-mail), or by telephone or text message. The SFA must document that contact was attempted and ensure the LEP households are provided adequate language assistance and understand the need to respond to the verification request. Please see the “Non-Responders” section of this booklet for steps to take if a family does not respond to verification.

The SFA must make a follow-up attempt when the household:

- Does not respond to the initial request for verification
- Submits insufficient or obsolete written evidence
- Does not designate collateral contacts
- Collateral contacts are unable or unwilling to provide the requested evidence

When following up with households, the SFA:

- Must inform the household that failure to provide adequate written evidence or to designate an adequate collateral contact will result in termination of benefits
- Must attempt to obtain the missing written evidence or collateral contact information
- Must contact the household to complete the verification process, if the collateral contact is unwilling or unable to provide the requested information

SFAs are encouraged but not required to do additional follow-up attempts if a household fails to provide adequate documentation after the required follow-up. If the household does not respond or fails to provide adequate documentation after the required follow-up and, if applicable, additional follow-ups, verification is considered complete for the household when notice of adverse action is sent.

RESULTS OF VERIFICATION

If, after at least one follow-up attempt, the household responds and provides all needed evidence, verification is considered complete for this household.

The SFA would complete verification by:

- Informing the household that there is no change in benefits;
- Notifying the household that its benefits will be increased; or
- Sending notice of adverse action

It is recommended that SFAs use the NYSED prototype letters of verification results (Attachments C, D & E) as these prototype letters contain all required information.

- If verification results in higher benefits (e.g., a child who is moved from reduced price to free category), the change is effective immediately and must be implemented no later than 3 operating days.
- All households for whom benefits are to be reduced or terminated as a result of verification must be given 10 calendar days advance written notice of the change.

Note: If a family's benefits are reduced as a result of verification (e.g., because they failed to respond or did not submit sufficient information to substantiate their income) and during the school year the family re-applies, the SFA **must** verify the new application prior to the family being approved for benefits. If the family refuses to provide the required information, free or reduced-price benefits must be denied.

NON-RESPONDERS

Any household which fails to submit requested verification documentation by the date specified by the SFA or submits verification information which does not support the initial determination of eligibility, must be sent a notice that benefits will be reduced or terminated in 10 calendar days. Please see Attachment C for the prototype “Letter of Verification Results and Change in Eligibility.”

SFAs must take the following actions if the household fails to cooperate with verification efforts:

- SFAs **must** follow up with families who do not respond to initial verification efforts with at least one attempt in writing (including to a parent or guardian’s email) or by telephone or text message. All attempts must be documented and ensure that LEP households are provided adequate language assistance and understand the need to respond to the verification request. Additional follow up after this is encouraged but not required.
 - SFAs may contract with a third party to make additional attempts to follow up with non-responders.
- Prior to actual reduction in benefits or termination of benefits, 10 calendar days advance written notification must be provided to the household.
 - The first day of the 10-calendar day advance notification must be the day the notice is sent to the household.
- The notice must advise the household of a change in benefits, reason for the change, the right to appeal and that an appeal must be filed within the 10 calendar days advance notice period to ensure continued benefits while awaiting a hearing and decision, how and when the appeal must be filed, and that the household may re-apply for meal benefits.
 - If the household provides information that confirms their eligibility within the 10 calendar days, the family must continue to receive benefits.
 - If there is no response, benefits must be terminated on day 11
- Reductions or changes in benefits must be extended to all children in the household who were originally determined to be eligible by information that no longer supports the benefit level.
- Households that appeal the reduction or termination of benefits within the 10-calendar day notice must continue to receive benefits until the decision of the hearing official is made.

WHEN VERIFICATION IS CONSIDERED COMPLETE

The following demonstrates how an SFA determines whether or not the household adequately responded and whether follow-up is required.

- The household submits either adequate written evidence or collateral contact corroboration of income or categorical eligibility:
 - Verification is considered complete for this household;

- The household submits either adequate written evidence or collateral contact corroboration of income which indicates that the child(ren) should receive either a greater or lesser level of benefits:
 - Verification is considered complete for this household when the notice of adverse action is sent or household is notified that its benefits will be increased or decreased;
- The household indicates, verbally or in writing, that it no longer wishes to receive free or reduced-price benefits:
 - Verification is considered complete when the notice of adverse action is sent;
- The application provides case numbers and it is determined that no household member is receiving benefits from an Assistance Program:
 - Verification is considered complete when the notice of adverse action is sent.
- The household does not respond or fails to provide adequate documentation after the required follow up or the household refuses to cooperate with verification efforts.
 - Verification is considered complete when the notice of adverse action is sent.

VERIFICATION RECORDKEEPING

The SFA **must** retain all documents submitted by the household or duplicates of those documents, including all relevant correspondence between the SFA and households. You may document and/or note information directly on the application when contacting families for further information. A separate sheet of paper can also be attached. If the documents cannot be kept, the verifying official **must** make a written record of the documents submitted. Copies of all relevant correspondence between the households selected for verification and the school must be maintained with program records for three years plus the current year.

For each application verified, SFAs must maintain records documenting:

- The source of information used to verify the application
 - Documentation may include a wage stub or documentation from employer or collateral contacts
- Any changes in eligibility as a result of verification, including:
 - the changes
 - the reason for the changes
 - date the changes were made
 - records of follow-up attempts and results

Program regulations also require SFAs to maintain a description of their verification activities.

This includes:

- the total number of applications on file as of October 1
- a summary of the verification efforts, including the selection process
- the percentage and number of applications that have been verified
- the SFA must also be able to demonstrate compliance with the confirmation review requirement and provision of a no-cost telephone number for assistance in the verification process

VERIFICATION FOR CAUSE

The procedures discussed above refer to the required verification process. Applications that are verified “for cause” are in addition to the annually required verification process. SFAs have an obligation to verify all questionable applications (verification “for cause”). SFAs must verify any questionable application including, on a case-by-case basis, verifying any application for cause when the SFA is aware of additional income or persons in the household.

Only after the determination of eligibility has been made can the SFA 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 SFA must complete the verification process for these households.

It is important to note that the restriction on sample size does not apply to a State’s ability to conduct application verification activities connected to its general oversight responsibilities. For cause may include, but is not limited to, situations where school officials have knowledge of household circumstances that would cause them to verify the information on the application.

SFAs should follow the verification procedures outlined above when verifying an application “for cause”.

If the household fails to submit requested verification information by the date specified by the SFA or submits verification information that does not support the initial determination of eligibility, the household must be sent a notice of adverse action to terminate the free or reduced meal benefits.

The number of applications verified "for cause" and the results of verifying those applications must be reported on the Verification Collection Report (Question VC1). The applications “verified for cause” do not contribute toward your required sample size for the annual verification requirement. Please read the Verification Collection Report Instructions carefully.

Verification for Cause of School District Employees

Verification for cause must not be used to automatically verify the households of all SFA employees whose children are certified for free or reduced-price meals. However, from among the list of children approved for free or reduced-price meals, an SFA could identify children of SFA employees and use SFA salary information available to them to identify questionable applications and then conduct verifications for cause on those questionable applications.

SFAs can use verification for cause to review approved applications for free or reduced-price meals when known or available information indicates SFA employees may have misrepresented the income on their applications to receive free or reduced-price meals for their children. USDA recommends that an SFA consult with legal counsel in establishing the parameters of verification for cause for school district employees.

VERIFICATION COLLECTION REPORT (ATTACHMENT G)

Note: Please be sure to carefully read the Verification Collection Report Instructions to ensure the report is completed accurately.

SFAs must report all data elements requested on the Verification Collection Report (Attachment G) in the Child Nutrition Management System (CNMS) by December 15th.

SED is required to analyze, summarize, and submit the results to USDA.

The required data will enable State agencies and USDA to better understand certification errors and to improve oversight activities. This will help to ensure that free and reduced-price subsidized meals are provided only to eligible children. State agencies must provide more rigorous oversight activities to SFAs whose verification activities result in a high termination rate.

Failure to submit a completed Verification Collection Report by the required deadline, December 15, will result in your Child Nutrition Programs being placed on reimbursement hold.

Only USDA required elements are requested on the Verification Collection Report (Attachment G). Be sure you review it carefully to capture the required information that documents your SFAs efforts. Carefully follow the directions for completing the form.

Requests to extend the November 15th verification deadline must be submitted in writing to your Child Nutrition Program Representative at the State Education Department. All such requests must document extenuating circumstances beyond the SFAs control and should be received by the Child Nutrition Program office by October 15th.

A step-by-step tutorial on how to complete the Verification Collection Report is posted on the Child Nutrition Knowledge Center website. SFAs are strongly encouraged to review the tutorial when completing their report.

VERIFICATION QUESTIONS AND ANSWERS

1. **Q. What if an application is selected for verification, but the household transfers out of the SFA before the information can be verified?**

A. Verification is considered complete when a household's eligibility for the level of benefits for which it was approved is either confirmed or the household is sent a letter of change in eligibility. If a household selected for verification transfers out of the SFA before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application must be selected.

2. **Q. How is overtime income counted for the purpose of verification?**

A. The school official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, it should

not be used in calculating regular income.

3. **Q. Am I verifying eligibility at the time of application or current eligibility?**

A. Verification is intended to establish eligibility for any point in time between the months prior to application and the time the household is required to provide income documentation. However, if the family income decreases making them eligible for increased benefits, then the school should verify current income.

4. **Q. If a household is paid weekly and submits a pay stub for a week, must I go back and ask for pay stubs for a whole month?**

A. No. If the weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient.

5. **Q. Must the SFA select the sample size to verify from each school within the SFA or from the SFA as a whole?**

A. SFAs are required to select and verify a sample of their approved free and reduced-price applications SFA wide. The SFA as a whole **must** meet the required sample size requirement. This does not mean that each school has to verify the required number of applications.

6. **Q. If my sample size is 4.2 applications, do I verify 4 or 5?**

A. Decimals must always be **rounded up** to the next whole number. Therefore, you must verify 5 applications.

7. **Q. Do we have to maintain the actual documentation from verification or just the results of verification?**

A. You are required to maintain a description of your verification efforts including the selection process, the total number of applications on file as of **October 1**, and the number of applications that were/will be verified by November 15th. For each application verified, the SFA must keep records of the source of information used to verify the application such as wage stubs or names and titles of collateral contacts. In addition, the applications selected must be readily retrievable by school, and the SFA must document correspondence between the selected households and the school. The verification official must retain the documents, a photocopy, or annotations that indicate which documents were submitted by the household and the date of submission. You must also keep a record of any change in eligibility as a result of verification procedures, the reason for the change, and the date the change was made. Please also see the "Recordkeeping" section of this manual and the "USDA Eligibility Manual for School Meals" for additional information on record keeping requirements.

8. **Q. When a notice of adverse action has been sent to a household, may I claim reimbursement for that child during the period covered by the notice?**

A. Yes. The household must be given 10 calendar days advance written notice that a change is being made in the child's eligibility status. During that time, the child must continue to receive free or reduced-price meal benefits and the SFA may

continue to claim reimbursement for free or reduced-price meals served to the child during this period.

9. **Q. If an SFA chooses to select more than 3 percent or the minimum number of required households to verify, and some of those households fail to respond, has the SFA completed the verification requirement as long as 3 percent or the minimum number of required households respond?**

A. No. First, the SFA cannot select any more or any less applications than the 3% sample size determined based on the method of verification performed. Second, all households selected for verification must either respond or have benefits terminated after appropriate notification.

10. **Q. If an application contains three sources of income, how many should be verified?**

A. All three sources of income must be verified. All sources originally noted by the family at the time of application must be verified.

11. **Q. What if the SFA forgets to do verification?**

A. Verification is an annual requirement. We will contact an SFA that has not submitted the Verification Collection Report (Attachment G) by the required deadline of December 15th each year. If income verification is not completed, the SFA jeopardizes its State and federal reimbursement for free and reduced meals served after November 15th of that school year.

12. **Q. When should an application be verified "for cause"?**

A. If an SFA is informed, even anonymously, that an applicant may not be eligible, the SFA must follow up on the allegation using the verification process. The SFA has an obligation to verify all questionable applications (applications that are reported to be fraudulent or suspicious). Verification that is done for cause is in addition to the sample required for either error prone/random/focused sampling. Verification must take place after the application was approved on the face value of the application.

13. **Q. What information must be submitted online to the Child Nutrition Program office by December 15th?**

A. All information reported on the Verification Collection Report (Attachment G) must be reported on the on-line form on the Child Nutrition Management System (CNMS). All other verification documentation, along with a copy of the verification worksheet, must be kept on file for three years plus the current year. SFAs in Provision 2 must retain all verification information from the base year for three years plus the current year after the end of the cycle.

14. **Q. If a foster child is listed on a family's application as a household member and that household happens to be selected for verification, does the school need anything extra for verification?**

A. It depends on the situation. If a household is chosen for verification and the

foster child included on the application was identified by a State or local foster agency, then no additional verification is needed for the foster child. However, to verify the other children in the household, the family must provide verification documentation to confirm eligibility.

If the foster child is not identified by a State or local foster agency, then documentation verifying the foster child's status would be required. Additionally, to verify other children in the household, the family must provide verification documentation to confirm eligibility.

15. **Q. What documentation must be provided for a foster child listed on a household application that is selected to be verified?**

A. Documentation from a State or local foster care agency or the court where the foster child received placement is acceptable for verification. Direct contact from the foster care agency or court (for example, a list of foster children sent to the SFA) is also acceptable documentation for verification.

16. **Q. What should I do if a family was approved for free meals based on a SNAP number but sends in a paystub for verification that makes them ineligible?**

A. The SFA should first conduct direct verification to confirm the family's eligibility for SNAP. If the SFA cannot verify eligibility through direct verification, they should contact the family to determine if they can document their SNAP eligibility for the month prior to submitting their application. If they can document their eligibility at that time, the free benefits must continue, and verification is complete. If the required SNAP documentation is not provided, the income stub must be used to determine their eligibility.

17. **Q. What if I receive an application for a child and then receive the child's name on a list from either the Migrant Education Program Coordinator or Homeless Liaison?**

A. The list from the Migrant Education Program Coordinator and Homeless Liaison supersedes the application. The application should be discarded and should not be included in determining the number of applications on file. The child should not be selected for verification.

ATTACHMENTS

**It is recommended that Attachment A be sent to all households selected for verification.
The other attachments are available to be used as needed.**

Attachment A page 1 of 4- “Letter to Households- Notification of Selection for Verification of Eligibility”

Attachment A page 2 of 4- USDA Nondiscrimination Statement

Attachment A page 3 of 4- “Adult Household Members”

Attachment A page 4 of 4- “Verification Information for Free and Reduced Price Meals”

Attachment B page 1 of 2- “Letter to the SNAP/TANF/FDPIR Office from the SFA”

Attachment B page 2 of 2- “Verification Form- SNAP/TANF/FDPIR Office from the SFA”

Attachment C page 1 of 2- “Letter of Verification Results and Change in Eligibility”

Attachment C page 2 of 2- USDA Nondiscrimination Statement

Attachment D page 1 of 2- “Letter of Change in Eligibility for SNAP/TANF/FDPIR Households”

Attachment D page 2 of 2- USDA Nondiscrimination Statement

Attachment E- “Notification of Continuation of Benefits as a Result of Verification”

Attachment F- “Verification Summary/Recordkeeping”

Attachment G- “School Food Authority (SFA) Verification Collection Report”

**LETTER TO HOUSEHOLDS-
NOTIFICATION OF SELECTION FOR VERIFICATION OF ELIGIBILITY**

Important: You must respond to this letter

Dear: _____

Date: _____

Schools participating in the federal meal programs are required each year to select a sample of applications to ensure that only eligible children receive free or reduced-price benefits. This process is called Verification.

Your child's application has been selected as part of this review. As part of this process, you must send information to _____ (official's name) at _____ (address) or contact _____ (official's name) by _____ (date).

You must send the name of each adult household member on the enclosed sheet and papers that show your household's current income. If your income is now higher, but you can document your income for the month prior to or at the time of application, your eligibility status for the year will not change.

We have enclosed information that shows the documentation that you may use to verify your household's income. If possible, do not send original papers. Original documents will be sent back to you only at your request.

If your child is receiving free meals based on participation in an Assistance Program (SNAP/TANF/FDPIR), provide proof that your child or any household member is receiving benefits under an Assistance Program instead of providing income information.

The Richard B. Russell National School Lunch Act requires the information requested to verify your children's eligibility for free or reduced-price meals. If you do not provide the information or provide incomplete information your children may no longer receive free or reduced-price meals.

If you do not have any information or documents, you can list the name of someone who is not a member of your household who we can contact to confirm your household's income. Write that person's name, address, and daytime telephone number below:

Contact Name

Daytime telephone #

Address

If you have any questions, or if you need any help, please call _____ (name) at (toll free phone number). If you do not hear from us by _____ (date) free or reduced price meals will continue without change. Thank you for your cooperation in this matter.

Sincerely,

Attachment A (page 2 of 4)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
program.intake@usda.gov

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ADULT HOUSEHOLD MEMBERS

If you do not supply documentation showing that you now receive Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR) for your child, you must send in the names of each household member 21 years of age or older and documentation verifying the current household income.

Please complete the following form and submit with the requested documentation for verification of income.

<u>Names of adult household members</u>	<u>Submitted Documents</u>
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____

VERIFICATION INFORMATION FOR FREE AND REDUCED PRICE MEALS

Provide information or documents which show your household's current income, or income for the month prior to when you applied for program benefits for the 2023-2024 school year. If you receive income from more than one source, you must provide documentation for each source. Examples of types of documents are listed below. You may also provide a letter(s) from your income source(s) stating the amount and frequency of income received and who received it.

The papers you send in must show: (1) the amount of the income received, (2) the name of the person who received it, (3) the date the income was received, and (4) how often the income is received.

To show the amount of money your household received last month, send copies of the following:

- ◆ **Earnings/wages/salary for each job:** Current paycheck stub that shows how often it is received; current pay envelope that shows how often it is received; letter from employer stating gross wages and how often they are paid; business or farming papers, such as ledger or tax books
- ◆ **Social security/pensions/retirement:** Social security retirement benefit letter; statement of benefits received; pension award notice
- ◆ **Unemployment compensation/disability or worker's compensation:** Notice of eligibility from State employment security office; check stub; letter from worker's compensation
- ◆ **Assistance Program participation (SNAP/TANF/FDPIR):** Benefit letter from assistance agency or documentation available through the mybenefits.ny.gov website
- ◆ **Child support/alimony:** Court decree; agreement; copies of checks received
- ◆ **All other income:** If you have other forms of income (such as rental income) send information or papers that show the amount of income received, how often it is received, and the date received
- ◆ **No income:** If you have no income, send a brief note explaining how you provide food, clothing and housing for your household, and when you expect to receive income

If you have any questions, or need help in deciding the kind of information to provide, please call (official's name) _____ at _____ (toll free phone number).

LETTER TO THE SNAP/TANF/FDPIR OFFICE FROM THE LOCAL EDUCATION AGENCY

Dear:

Date

The receipt of Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) program or Food Distribution Program on Indian Reservations (FDPIR) automatically qualifies children for free school meals. The regulations for SNAP, TANF and FDPIR permit SNAP, TANF, and FDPIR offices to release eligibility information to administrators of the National School Lunch and School Breakfast Programs to ensure that only eligible children receive free meal benefits.

Enclosed is a listing of approved free meal applicants who have been selected for verification and who have indicated that the child for whom application was made now receives SNAP, TANF, and/or FDPIR benefits. On the enclosed listing, please indicate whether these household members are participating in SNAP, TANF, or FDPIR or were eligible in August 2023. This information will be used only to confirm the approved applicant's eligibility for free meal benefits.

Please return this listing by (date) . A self-addressed return envelope is also enclosed for your convenience. If you have any questions, or need additional information, please contact (official's name) at (phone number).

Sincerely,

Signature

 (Address) (Telephone Number)

Enclosure (Verification Form-SNAP/TANF/FDPIR Recipients)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
program.intake@usda.gov

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VERIFICATION FORM - SNAP/TANF/FDPIR RECIPIENTS
(Multiple Applicants)

Child's Name Last Name, First Name	SNAP/TANF/FDPIR Case #	Participate Aug 2023 or Currently Yes No

Signature of SNAP/TANF/FDPIR Official	Date
Address	
Telephone Number	

LETTER OF VERIFICATION RESULTS AND CHANGE IN ELIGIBILITY

Child/Children's Name: _____

School: _____

Date: _____

Dear: _____

We have completed verification of your child/children's eligibility for school meal benefits. Starting on (10 calendar days from the date sent) your child/children's eligibility for meal benefits will be:

_____ Changed from free to reduced price because your income is over the allowable amount. Your child will still receive meals at no charge.

_____ Stopped for the following reason(s):

- Your income is over the allowable amount for free or reduced-price meals.
- You did not provide proof of current eligibility or eligibility for the month prior to when you applied for benefits.

_____ Changed from reduced price to free immediately because your income is within the free meal eligibility limits. Your child/children will receive meals at no charge.

If you are not eligible for benefits now, but have a decrease in household income, become unemployed, or have an increase in the size of your household, you may fill out an application at that time to reapply for benefits. You will be asked to provide documentation of your household income before your application can be approved.

If your benefits have been reduced or denied based on current income and you can supply documentation that confirms the information on the application for the month prior to when you applied, your benefits will remain the same for this school year.

If you do not agree with the decision, you may discuss it with (verifying official). You also have the right to a fair hearing. If you request a hearing by (10 calendar days), your child/children will continue to receive free or reduced price meals until the decision of the hearing official is made. You may request a fair hearing by calling or writing the following official:

Name: _____

Address: _____

Sincerely,

Attachment C (page 2 of 2)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
program.intake@usda.gov

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LETTER OF CHANGE IN ELIGIBILITY FOR SNAP/TANF/FDPIR HOUSEHOLDS

Date:

Dear: _____

Available records show that at this time your household is not receiving assistance through Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) or is not participating in the Food Distribution Program on Indian Reservations (FDPIR).

To continue benefits for your child/children you must submit documentation that you received SNAP/TANF/FDPIR benefits when you submitted your application **OR**

1. Complete a new application with income information,
2. Write the name of each adult household member on the attached sheet of paper (include Attachment A, page 2), and
3. Submit papers that show your household's current income.

Your child's/children's free school meal benefits will be stopped on (insert the date 10 days from the above date) unless we receive this information. Any continued free or reduced-price meals will depend on your current household income or the receipt of information confirming receipt of SNAP/TANF/FDPIR at the time the application was submitted.

If you do not agree with the decision, you may discuss it with _____ (verification official). You also have the right to a fair hearing. If you request a hearing by (date 10 calendar days from date sent), your child/children will continue to receive free or reduced-price meals until the decision of the hearing official is made. You may request a fair hearing by calling or writing the following hearing official:

Name:

Address:

If you are not eligible for benefits now, but your household circumstances change, you may fill out an application at that time and reapply for benefits. Your eligibility will be verified at the time of reapplication as noted above.

Sincerely,

Attachment D (page 2 of 2)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

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To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

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U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
program.intake@usda.gov

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**NOTIFICATION OF CONTINUATION OF BENEFITS
AS A RESULT OF VERIFICATION**

Date:

Dear _____:

Thank you for cooperating with the (name of local education agency) in its verification of eligibility for school meal benefits. The materials you have sent are sufficient for us to verify your eligibility for meal benefits.

We appreciate your cooperation and support during this process. If you have any questions concerning our program, please do not hesitate to contact our office.

Sincerely,

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
program.intake@usda.gov

This institution is an equal opportunity provider.

VERIFICATION SUMMARY/RECORDKEEPING

Date Selected: _____

Selection Method:

Response Due: _____

☐ Error Prone

☐ Random

Second Notice Sent: _____

☐ Focused

Date Reduction/Termination Notice Sent: _____

SNAP/TANF/FDPIR Household Confirmed:

Income Household:

☐ SNAP/TANF/FDPIR Office

☐ Direct Verification

Income/Frequency: \$ _____

☐ Wage Stubs

☐ Written Documents

☐ Collateral Contacts

☐ Agency Records

☐ Other: _____

Not Confirmed:

☐ Eligibility not confirmed

Verification Result: Attach another sheet if more space is needed.

☐ No Change ☐ Reduced to Free ☐ Free to Reduced ☐ Ineligible

Family members affected and date change is made: _____

Name/Date

_____	_____	_____
Name/Date	Name/Date	Name/Date

Reason for Change:

☐ High Income

☐ SNAP/TANF/FDPIR Eligibility Not Confirmed

☐ Refused to Cooperate

☐ Other

☐ N/A

Comments:

Signature of Verifying Official: _____

Date: _____

Department of Agriculture, Food and Nutrition Service School Food Authority (SFA) Verification Collection Report			
State agencies must report the information on this form ANNUALLY for each SFA with schools operating the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP). All SFAs, including SFAs with all schools exempt from verification requirements, must complete applicable sections.			
According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB number for this collection is 0584-0026. The time required to complete this information collection is 45 minutes per response, including the time to review instructions, search existing data resources, gather the data needed and complete and review the information collection.			
This form is provided as worksheet, this data should be reported in the Child Nutrition Management System (CNMS). If you do not access to the CNMS, you contact your Child Nutrition Representative at 518-473-8781. Paper forms will only be accepted by SFAs without CNMS access via fax at 518-473-0018.			
SFA Name:		LEA Code:	School Year:
Section 1	Total Schools, Residential Child Care Institutions (RCCIs) and Enrolled Students	**All SFAs must report Section 1**	
		1-1: Total schools (Do not include RCCIs):	
		1-2: Total RCCIs (Do not include schools counted in 1-1):	
		1-2a: RCCIs with day students (Report ONLY day students in 1-2aB):	
		1-2b: RCCIs with NO day students:	
Section 2	SFAs with schools operating alternate provisions	**ONLY SFAs with alternate provisions must report Section 2**	
		2-1: Operating Provision 2/3 in a BASE year for NSLP and SBP:	
		2-2: Operating Provision 2/3 in a NON BASE year for NSLP and SBP:	
		2-2a: Provision 2/3 students reported as FREE in a NON BASE year:	
		2-2b: Provision 2/3 students reported as REDUCED PRICE in a NON BASE year:	
		2-3: Operating the Community Eligibility Option:	
		2-4: Operating other alternatives for NSLP and SBP:	
Section 3	Students approved as FREE eligible NOT subject to verification	**ALL SFAs must report Section 3 or check box 3-1 if applicable**	
		3-1: <input type="checkbox"/> Check the box only if all schools and/or RCCIs in the SFA were not required to perform direct certification with SNAP (i.e. NON BASE year Provision 2/3 for all schools)	
		3-2: Students directly certified through Supplemental Nutrition Assistance Program (SNAP): Do <u>not</u> include students certified with SNAP through the letter method.	
		3-3: Students directly certified through other programs: Include those directly certified through Temporary Assistance for Needy Families (TANF), Food Distribution Program on Indian Reservations (FDPRI), or Medicaid (if applicable); those documented as homeless, migrant, runaway, foster, Head Start, Pre-K Even Start, or non-applicant but approved by local officials. DO NOT include SNAP students already reported in 3-2.	
		3-4: Students certified categorically FREE eligible through SNAP letter method: Include students certified for free meals through the family providing a letter from the SNAP agency.	
Section 4	Students approved as FREE or REDUCED PRICE eligible through a household application	**ALL SFAs collecting applications must report Section 4**	
		4-1: Approved as categorically FREE Eligible: Based on those providing documentation (e.g. a case number for SNAP, TANF, FDPRI on an application)	
		4-2: Approved as FREE eligible: Based on household size and income information	
		4-3: Approved as REDUCED PRICE eligible: Based on household size and income information	
T-1: Total FREE Eligible Students Reported:		T-2: Total REDUCED PRICE Eligible Students Reported:	

ALL SFAs must report Section 5 or check box 5-1 if applicable 5-1: <input type="checkbox"/> Check the box if ALL schools and/or RCCIs are exempt from verification (see instructions for list of exemptions). If 5-1 is checked, no further reporting in Section 5 is required.											
5-2: Was verification performed and completed? <input type="checkbox"/> Yes, completed by November 15th <input type="checkbox"/> Yes, completed after November 15th <input type="checkbox"/> No, verification was NOT performed or the process was not completed.					5-3: Type of Verification process used: 1. <input type="checkbox"/> Standard (Lesser of 3% or 3,000 error-prone) 2. <input type="checkbox"/> Alternate one [Random] (Lesser of 3% or 3,000 selected randomly) 3. <input type="checkbox"/> Alternate two [Focused] (Lesser of 1% or 1,000 error prone applications PLUS lesser of one-half of one percent or 500 applications with SNAP/TANF/FDPIR case numbers)						
If 1 or 3 is checked in 5-3, report 5-4. If 2 is checked in 5-3, enter "N/A" in 5-4.			5-4: Total ERROR PRONE applications: <i>Report all applications as of October 1st considered error prone</i>		5-5: Number of applications selected for verification sample:						
ALL SFAs must report 5-7 or check box 5-6 if applicable 5-6: <input type="checkbox"/> Check the box if direct verification was not conducted in the SFA, (i.e. not one of the schools and/or RCCIs in the SFA performed direct verification). If 5-6 is checked, skip 5-7.								A. Number of Applications		B. Number of Students	
Report if FREE and/or REDUCED PRICE eligibility is confirmed through direct verification with SNAP/TANF/FDPIR/MEDICAID as of November 15th						5-7: Confirmed through direct verification:					
5-8: Results of Verification by Original Benefit Type For each original benefit type (A, B, & C), report the number of applications and students as of November 15th for each result category (1, 2, 3, & 4). Do NOT include students and applications already reported in 5-7A or 5-7B.											
A. FREE-Categorically Eligible <i>Certified as FREE based on SNAP/TANF/FDPIR documentation (e.g. case number) on application</i>				B. FREE-Income <i>Certified as FREE based on income/household size application</i>				C. REDUCED PRICE-Income <i>Certified as REDUCED PRICE based on income/household size application</i>			
Result Category	a. Applications	b. Students		Result Category	a. Applications	b. Students		Result Category	a. Applications	b. Students	
1. Responded, NO CHANGE:				1. Responded, NO CHANGE:				1. Responded, NO CHANGE:			
2. Responded, Changed to REDUCED PRICE:				2. Responded, Changed to REDUCED PRICE:				2. Responded, Changed to FREE:			
3. Responded, Changed to PAID:				3. Responded, Changed to PAID:				3. Responded, Changed to PAID:			
4. NOT Responded, Changed to PAID:				4. NOT Responded, Changed to PAID:				4. NOT Responded, Changed to PAID:			
VC-1: Total questionable applications verified for cause (Enter "N/A" if not applicable): Report the number of applications as of November 15th verified for cause <u>in addition</u> to the verification requirement.											

Additional Instructions for Reporting the FNS-742

For additional guidance on verification requirements and procedures, refer to the Eligibility Manual (<http://www.fns.usda.gov/cnd/guidance/EligMan.pdf>).

Enter SFA name and LEA code for each SFA with schools and/or RCCs operating the NSLP and/or SBP.

Select if the SFA overall is a public or a private/nonprofit entity and enter the school year for which the report is completed. Include schools and/or RCCs and the enrolled students **only once** if operating both NSLP and SBP.

Section 1

All SFAs with schools or RCCs operating the NSLP and/or SBP must complete this section regardless if all schools are exempt from verification. Report schools or institutions operating the NSLP and/or SBP and students with access to the NSLP and/or SBP as of the **last operating day in October**.

1-1A & B: TOTAL number of schools (not including RCCs) operating the NSLP and/or SBP and the TOTAL number of enrolled students with access to the NSLP and/or SBP.

1-2A & B: TOTAL number of RCCs operating the NSLP and/or SBP and the TOTAL number of enrolled students with access to the NSLP and/or SBP in RCCs.

1-2aA & 1-2aB: Of the RCCs reported in 1-2A; enter the number of RCCs with DAY students and ONLY the DAY students with access to the NSLP and/or SBP in RCCs (**day students are those students NOT institutionalized and eligibility is determined individually by application or direct certification as applicable**).

1-2bA & 1-2bB: Of the RCCs reported in 1-2A; enter the number of RCCs with NO day students and the TOTAL number of institutionalized students.

NOTE: The sum of the students reported in 1-2aB and 1-2bB will NOT equal the total in 1-2B.

Section 2

All SFAs with some or all schools and/or RCCs operating under an alternative provision must complete this section. For RCCs operating an alternate provision, include both day and residential students. Report students with access to the NSLP and/or SBP as of the **last operating day in October**. 2-1 through 2-4 should be reported only if the school operates alternate provisions for BOTH programs resulting in no collection of applications for the school. Schools operating Provision 2/3 for only one program and collecting household applications for the other program should report applicable provision data in 2-5.

2-1A & B: BASE year is when certification procedures are conducted.

2-2A & B: NON BASE year is when no certification procedures are conducted.

2-2aB, 2-2bB: Multiply the most recent base year FREE percentage by the enrollment reported in 2-2B to determine 2-2aB. Multiply the base year REDUCED PRICE percentage by the enrollment reported in 2-2B to determine 2-2bB.

2-3A & B: Number of schools operating the Community Eligibility Option and the number of enrolled students in the schools with access to the NSLP and/or SBP.

2-4A & B: Other alternatives include Provision 1 and universal meal service through census data or socioeconomic surveys.

2-5A & B: Enter the number of schools and/or RCCs and students enrolled operating an alternate provision for **ONLY SBP or ONLY NSLP**. Include schools/RCCs operating in both a base year and non base year.

Section 3

All SFAs must complete this section. If all schools and/or RCCs in the SFA were not required to perform direct certification with SNAP, then check box 3-1. Direct certification is the process by which the student is certified eligible based on documentation received directly from the applicable program (e.g. SNAP or TANF agency). This process eliminates the need for the household to submit an application. Report students approved FREE eligible as of the **last operating day in October**.

3-2B: Include students **directly certified** with SNAP. If a student is directly certified with SNAP as well as with another program (e.g. TANF/eligible homeless), include the student in this SNAP count (3-2B). Also include in this count any student in the SFA deemed eligible based on extended categorical eligibility via an eligible student in the primary household who has been directly certified with SNAP. DO NOT include SNAP letter method certifications in this SNAP count, report these in 3-4B below. (SNAP letter method certifications are when the family submits a letter from the SNAP agency to document receipt of SNAP benefits. This is no longer considered to be direct certification.)

3-3B: Include students directly certified through programs other than SNAP. Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household directly certified with TANF or FDIPIR. DO NOT include SNAP students already reported in 3-2 or to be reported in 3-4 as certified categorically through SNAP letter method.

3-4B: Include ONLY students certified as categorically FREE eligible based on a letter submitted by family from the SNAP agency. Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household certified as FREE categorically eligible with the letter method with SNAP.

Section 4

All SFAs with schools and/or RCCs collecting individual household applications must report this section, including schools and/or RCCs in a Provision 2/3 base year. Report number of **applications (A)** approved as of **October 1st**. Report number of **students (B)** as of the **last operating day in October**.

4-1A & B: Number of **applications** approved FREE eligible based on documentation submitted on an application (i.e. case number for SNAP, TANF, or FDIPIR on an application) on file as of **October 1st** and the number of **students as of the last operating day in October** approved FREE eligible based on documentation submitted on an application (i.e. case number for SNAP, TANF, or FDIPIR on an application). *Include students in the SFA deemed eligible due to extended categorical eligibility via an eligible student in the primary household categorically FREE eligible with SNAP, TANF, or FDIPIR.*

4-2A & B: Number of **applications** approved FREE eligible based on income information submitted by the household on file as of **October 1st** and the number of **students as of the last operating day in October** approved FREE eligible based on income information submitted by the household.

4-3A & B: Number of **applications** approved REDUCED PRICE eligible based on income information submitted by the household on file as of **October 1st** and the number of **students as of last operating day in October** approved REDUCED PRICE eligible based on income information submitted by the household.

T-1: Enter the total number of students reported as FREE eligible.
(3-2B) + (3-3B) + (3-4B) + (4-1B) + (4-2B) + (2-2aB, if applicable)

T-2: Enter the total number of students reported as REDUCED PRICE eligible.
(4-3B) + (2-2bB, if applicable)

If **ALL** schools and/or RCCIs in the SFA are exempt from verification activities, check box **5-1** and no further reporting is required in Section 5. Verification activities are NOT required for:

- schools/RCCIs in which all children have been certified under direct certification procedures including children documented as eligible foster, migrant, runaway or homeless children;
- RCCIs which do not have day students;
- schools electing the Community Eligibility Option;
- schools/RCCIs in which FNS has approved universal meal service through census data or using socioeconomic surveys; e.g., special cash assistance claims based on economic statistics regarding per capita income (Puerto Rico and the Virgin Islands);
- schools participating only in the Special Milk Program;
- schools in which all children are served with no separate charge for food service and no special cash assistance is claimed, (i.e., non-pricing programs claiming only the paid rate of reimbursement);
- all schools are Provision 2/3 schools in a non base year;
- schools which do not have any free or reduced price eligible students;
- other FNS determined exemptions on a case-by-case basis.

5-2: Indicate whether verification was performed and completed by the deadline of November 15th. If verification was completed after the deadline, report the remainder of Section 5 as applicable.

5-3: If verification was completed, check the type of verification process used to comply with the requirements of 7 CFR 245.6a. Please note the qualification requirements in 7 CFR 245.6a(d) must be met to use the two alternate sample sizes.

- **Standard:** Verify 3% or 3,000 of approved applications, whichever is less, selected from error-prone applications on file as of **October 1st**. If there are not enough error-prone applications, LEAs must select at random additional applications to complete sample size.
- **Alternate one:** Verify 3% or 3,000, whichever is less, of all randomly selected approved applications on file as of **October 1st**.
- **Alternate two:** Verify the lesser of 1% or 1,000 approved applications as of **October 1st** selected from error prone applications PLUS the lesser of one-half of one percent or 500 applications approved as of **October 1st** that provided a case number in lieu of income.

5-4: Error-prone applications are household applications approved as of **October 1st** indicating monthly income within \$100 of the monthly limit or annual income within \$1,200 of the annual limit of the applicable income eligibility guidelines.

5-5: Enter the total number of applications initially selected for the verification process as indicated in 5-3.

5-6: Check if direct verification was not conducted in the SFA (not one school in the SFA conducted direct verification). Direct verification is using records from public agencies to verify income and/or program participation.

5-7A & B: Only report applications and students if FREE and/or REDUCED PRICE eligibility is confirmed through direct verification. Report applications and students not directly verified in the appropriate category in **5-8**.

5-8: For the purposes of this report verification is complete:

- for households whose eligibility does not change as of the date of the confirmation of eligibility by a reviewing official;
- for households which do not appeal a change in eligibility as of the first operating day following the last date for filing an appeal in response to a notice of change in eligibility;
- for households which appeal a change in eligibility as of the first operating day following a decision by the hearing official.

Responded: The household provided sufficient documentation. This includes verbal or written notification that the household declines benefits.

NOT Responded: The household did not provide sufficient documentation or the household did not provide a response.

A1, B1, & C1: Number of applications with no change and the number of students on these applications.

A2 & B2: Number of applications changed to REDUCED PRICE based on sufficient documentation provided by the household and the number of students on the applications.

C2: Number of applications changed to FREE based on sufficient documentation provided by the household and the number of students on the applications.

A3, B3, & C3: Number of applications for which the eligibility was changed to PAID based on sufficient documentation by the household and the number of students on the applications.

A4, B4, & C4: Number of applications for which the eligibility was changed to PAID because documentation necessary to complete the verification process was NOT provided and the number of students on the applications.

The number of applications reported in 5-8 should include both the results of verification from verification process and the results from any applications verified for cause reported in VC-1.

VC-1: If applicable in at least one school and/or RCCI, report all applications verified for cause outside of the verification process (7 CFR 245.6a) as of November 15th. Applications verified for cause are NOT considered part of the required sample size.

Include the results of verification for cause by original benefit type in the appropriate category in 5-8.