# SNP Memo #2022-2023-27


**COMMONWEALTH of VIRGINIA
Department of Education**

DATE: September 30, 2022

TO: School Nutrition Directors, Supervisors, and Contact Persons (Addressed)

FROM: Sandra C. Curwood, PhD, RDN, Sandy

## SUBJECT: Verification of Household Eligibility for Free or Reduced-Price Meals

The purpose of this memorandum is to provide guidance to local education agencies (LEAs) and school food authorities (SFAs) on the annual requirements for verification.

Regulations found at 7 CFR 245.6a(c)(1) require LEAs to verify a sample of applications approved for free and reduced-price meals each school year. Per regulations at 7 CFR 245.6a(c)(2), verification is not required when the LEA does not collect applications due to operating a special provision, such as the Community Eligibility Provision (CEP). However, **all SFAs** operating traditional or special provision schools and **all** Residential Child Care Institutions (RCCIs) **are required to submit certain information in the annual Verification Collection Report**.

The U.S. Department of Agriculture (USDA) [Eligibility Guidance Manual](https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf), 2017 edition, Section 6, *Verification*, provides detailed guidance for verification. Highlights from the USDA guidance, along with specific Virginia procedures, are provided in this memorandum. The complete verification guidance should be reviewed. Visit the Virginia Department of Education, Office of School Nutrition Programs (VDOE-SNP) [Training & Resources webpage](https://doe.virginia.gov/support/nutrition/training/index.shtml) to learn more about the RISE.com e-learning platform and how to access the e-learning video, *Verification of School Meal Applications.*

### Annual Timelines

* **October 1:** The **total number of approved** free and reduced-price applications **on file as of October 1** (excluding previous year’s carry over applications) must be **used to calculate the required standard verification sample size**.
	+ This year, October 1 falls on a weekend and LEAs must **use the next school day, October 3**, to calculate the sample size.
* **November 15:** Deadline for **all verification activities to be completed** by the LEA.
* **December 15:** Deadline for **all SFAs to report required data and the results of verification, if required**, in the SNPWeb Verification Collection Report.

### Sample Size and Method to Validate Sample Size Calculation

The standard sample size must be used unless the SFA qualified to use an alternative sample size and received advance approval from the VDOE-SNP. The standard sample size is three percent of all approved applications on file as of October 1, or 3,000 applications, whichever is less. SFAs are required to draw the standard sample from error-prone applications with total household income within $100 per month or $1,200 per year of the income eligibility guidelines.

To calculate and validate the correct standard sample size, the SFA must enter the required preliminary verification data in the SNPWeb Verification Collection Report on or around October 1. The required data to report is:

* Section 4, Questions 4-1, 4-2, and 4-3, Column A, *Students approved as free or reduced-price eligible through a household application*
* Section 5, Question 5-3, *Type of Verification process used*.
* The required sample size will populate in Question 5-5, *Number of applications selected for Verification sample*.
* **This data entry should be completed by the SFA on or immediately after October 1 to determine if the number of applications selected meets the requirement.**

The SFA is prohibited from verifying more or less than the required standard sample of applications, with the exception of those applications verified for cause. Applications verified for cause are reported in a separate section of the report and are not included in the required sample.

### Required Prototype Letters and Forms

Prototype letters and forms for verification, including the required Racial/Ethnic Data Report, are posted in SNPWeb in the *Applications* menu under *Download Forms*. SFAs must use these VDOE prototypes unless customized verification letters and forms have been approved as part of the annual SFA application Packet in SNPWeb.

### Confirmation Review of the Verification Sample

Prior to conducting verification, SFAs are required to conduct a confirmation review of all applications selected for verification. The purpose of the review is to check the accuracy of the initial free or reduced-price eligibility determination. An individual, other than the one who made the initial eligibility determination, must conduct the confirmation review prior to notifying households of their selection for verification. Documentation of the confirmation review and any resulting changes in eligibility status must be maintained by the SFA.

### Household Notification and Follow-up

Households selected for verification must be informed, in writing, of their selection and must be provided a list of the documents the household must submit. Households must be given a no cost local or toll-free telephone number to call for assistance. The notification letter must include the name of a school official(s) to act as a point of contact for the household, either to directly assist them or to refer the caller to a specific person for help.

A second follow-up is required for households that fail to respond to the initial request for verification information. At least one follow-up attempt, through mail, by telephone, or personal contact must be made. Written documentation of the required second notification, including all follow-up attempts and the results, must be maintained. If the household’s eligibility status cannot be verified after the follow-up attempt(s), the household’s benefits must be terminated through a notice of adverse action letter.

### Reapplication

Households that reapply for benefits after termination due to non-response to verification are required to submit income documentation or proof of participation in an assistance program at the time of reapplication. All households terminated as a result of non-response to verification that reapply at any time during the same school year must submit the required documentation with their new application. SFAs must track the household(s) terminated because of non-response to verification for the remainder of the school year in which the termination occurred.

### Verification Reporting

The SNPWeb Verification Collection Report is the data collection tool required for all Virginia SFAs to report certain data and for SFAs required to conduct verification to report results. Detailed instructions for completing the SNPWeb Verification Collection Report are in Attachment A to this memo.

If you have questions regarding verification, please contact the SNP regional specialist assigned to your SFA or contact Lynne Fellin, SNP Technical Advisor to the State Director, by email at Lynne.Fellin@doe.virginia.gov.

SCC/LAF/rd

### Attachment:

1. School Food Authority Verification Report Checklist