# SNP Memo #2020-2021-40


**COMMONWEALTH of VIRGINIA
Department of Education**

DATE: January 15, 2021

TO: Directors, Supervisors, and Contact Persons Addressed

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

## SUBJECT: Verification of Household Eligibility and Reporting for the 2020-2021 School Year

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 and reporting during the COVID-19 pandemic. Federal guidance provided in SP04-2021 extended the deadline for LEAs to complete verification during pandemic operation to February 28, 2021; the reporting deadline was extended to March 15, 2021. All other dates, deadlines, and requirements for verification remain unchanged.

Federal regulations 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. All LEAs that collected and approved meal applications must conduct verification. LEAs using the Community Eligibility Provision (CEP) or other special provisions in a non-base year for lunch do not collect meal applications or conduct verification. All SFAs must complete the required data in the School Nutrition Program Web-based (SNPWeb) Verification Collection Report (report), regardless of whether or not they were required to conduct verification.

The USDA [Eligibility Guidance Manual](https://fns-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf), Section 6, provides detailed guidance and USDA requirements for the verification process. Requirements specific to Virginia, along with highlights of USDA guidance, are provided in this memo. Details on Virginia verification reporting requirements are provided at the end of this memo. SFAs should refer to the Verification training video in the [Virginia Department of Education, Office of School Nutrition Programs (VDOE-SNP) Rise.com e-learning platform](https://vdoe-school-nutrition.rise.com/) as well as the [December 10, 2020 webinar slides and recording](https://doe-virginia-gov.zoom.us/rec/play/8JzGstW-8h-ibRz2F7B5a7nEt_nTIbv8J3iZdMFCFWeR5pDgmV7fNyjCFBGvIQYA7qGgoWZvSK0_1by2.hGM5j8dyS5kJbjCE) for additional guidance and technical assistance.

### Annual Timelines

* **October 1** - The total number of approved free and reduced-price applications on file as of October 1 (excluding previous year’s applications carried over into the current year) must be used to calculate the required standard verification sample size and reported in SNPWeb.
* **October 31** - The total membership and number of eligible students are reported as of this date in SNPWeb.
* November 15 extended to **February 28, 2021** - Deadline for completion of all verification activities by the LEA.
* December 15 extended to **March 15, 2021** - Deadline for LEAs to report data and results of verification in the SNPWeb Verification Collection Report.

### Sample Size and Method to Calculate

The standard sample size for verification must be used unless the SFA qualifies to use an alternate sample size. Use of alternate sample sizes must be approved in advance by 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. Error-prone applications are those with reported total household income within $100 per month or $1,200 per year of the income eligibility guideline limits for free or reduced-price meals for the household size.

To determine and validate the correct sample size, the SFA must enter the required preliminary verification data in the SNPWeb report. The required data to report is in Section 4, Questions 4-1, 4-2, and 4-3, Column A, and Section 5, Question 5-3. The required sample size will populate in Question 5-5, *Number of applications selected for Verification sample*. **This data entry should be done immediately to determine if the number of applications selected for verification by the SFA meets the required standard sample size.** The remaining data in the report is entered by the SFA after the verification process is completed.

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.

### 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*.

### 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 eligibility determination. An individual, other than the one who made the initial eligibility determination, must conduct the confirmation review prior to household notification of their selection for verification. Documentation of the confirmation review and any resulting changes in eligibility status is required.

### 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 toll-free or local 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 must be made by mail, telephone, or personal contact. 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. A prototype letter is available in SNPWeb.

### 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 a means-tested assistance program at the time of reapplication. Any household terminated due to non-response to verification that reapplies in the same school year must submit documentation of household income sources at the time of reapplication. SFAs must track the household(s) terminated because of non-response to verification for the remainder of that school year.

### Verification Reporting

The SNPWeb Verification Collection Report is the data collection tool required for Virginia SFAs to report verification data and results. **All SFAs participating in the National School Lunch Program, whether or not the SFA is required to conduct verification, are required to complete certain information in the SNPWeb Verification Collection Report.** **The extended deadline for completing this report is March 15, 2021.**

The report will be locked on March 16 and SFAs will have to contact the assigned SNP regional specialist for assistance. SFAs using a free and reduced eligibility software package may produce a verification summary or FNS-742. The FNS-742 will contain the data needed for completing the report. Attachment A to this memorandum is a detailed checklist for completing the SNPWeb Verification Collection Report.

The verification report should use data that is consistent with other SFA reporting for the number of students and the number of applications. The number of students used in the report must be as of October 31 and consistent with the number of students reported in the October claim. The number of applications used in the report must be as of October 1 and the same number of approved applications used to determine the verification sample.

The Medicaid Demonstration Study has concluded. No additional reporting of students directly certified by Medicaid is required this year. Your past cooperation with the study is appreciated.

If you have questions regarding verification, please contact the regional specialist assigned to your division or Lynne A. Fellin, SNP Technical Assistance Specialist, by email at lynne.fellin@doe.virginia.gov.

SCC/LAF/cc

### Attachment

 A. 2020 SFA Verification Collection Report Checklist