# SNP Memo #2019-2020-16

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**COMMONWEALTH of VIRGINIA   
Department of Education**

DATE: September 27, 2019

TO: Directors, Supervisors, and Contact Persons Addressed

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

## SUBJECT: Verification of Household Eligibility for Free or Reduced Price Meals 2019-2020

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. Verification is not required when eligibility is determined through direct certification in accordance with program regulations at 7 CFR 245.6(b).

The USDA [Eligibility Guidance Manual](https://fns-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf) (July 18, 2017 edition), Section 6, provides detailed guidance and USDA requirements for the verification process. Please read the section for guidance and additional information. Requirements specific to Virginia, along with highlights of USDA guidance, are provided in this memo and will be reiterated in a Superintendent’s memo. Additional details on Virginia verification reporting requirements will be provided in a technical assistance memorandum from the Office of School Nutrition that will be sent directly to the SFA point of contact.

### 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.
* **November 15** - Deadline for all verification activities to be completed by the LEA.
* **December 15** - Deadline for LEAs to report data and results of verification in the School Nutrition Program Web-based (SNPWeb) software, 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 alternative sample size. Use of alternative sample sizes must be approved in advance by the VDOE-Office of School Nutrition. 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 applicable household size.

To determine and validate the correct sample size, the SFA must enter the required preliminary verification data in the SNPWeb Verification Collection Report on October 1. The required data to report is in Section 4, Questions 4-1, 4-2, and 4-3, Column A, *Students approved as free or reduced price eligible through a household application*, and 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 for verification meets the required standard sample size.** The remaining data in the report will be 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. If the verification sample calculated and pulled by the SFA is more or less than the number calculated in Question 5-5 of the SNPWeb report, the SFA must adjust the sample size pulled for verification to meet the requirements. Contact the Office of School Nutrition regional specialist assigned to your SFA with questions.

### Prototype Letter 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 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 must be maintained.

### 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 also include the name of a school official(s) to act as a point of contact for the household, either to directly assist them or to refer the caller to a specific person for help.

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

### Reapplication

Households that 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 documentation of household income sources. SFAs must track the household(s) terminated because of non-response to verification for the remainder of the school year.

### Verification Reporting

The SNPWeb Verification Collection Report is the data collection tool required for Virginia SFAs to report verification data and results. Detailed instructions for completing the SNPWeb Verification Collection Report will be provided to school nutrition points of contact in a separate technical assistance memorandum from the Office of School Nutrition Director.

If you have questions regarding verification, please contact the regional specialist assigned to your division or submit the question by email to [SNPPolicy@doe.virginia.gov](mailto:SNPPolicy@doe.virginia.gov).

SCC/bdb