

Important Points for Completing Verification for the School Nutrition Programs

The U.S. Department of Agriculture (USDA) regulations require that [National School Lunch Program \(NSLP\)](#) and [School Breakfast Program \(SBP\)](#) sponsors that collect and review free and reduced-price meal applications must conduct verification by November 15 of each year to confirm students' eligibility for free and reduced-price school meals. Prior to conducting verification, staff should refer to the U.S. Department of Agriculture's (USDA) [Eligibility Manual for School Meals](#).

This document summarizes the important points that Connecticut local educational agencies (LEAs) must consider when completing verification. It should be reviewed by all personnel who conduct verification. The verification forms and household letters in English and Spanish are available in the "[Forms](#)" section of the Connecticut State Department of Education's (CSDE) Verification Procedures for School Nutrition Programs webpage.

- Refer to the CSDE's [Calendar for Completing Verification](#). This tool helps verifying officials with timely completion of the verification process.
- Start on **October 1**. The number selected for verification must be based on the total number of **newly approved** applications on file by October 1.
- LEAs cannot conduct 100 percent verification at the time of application. Additionally, LEAs cannot verify more than the required sample size. For example, the LEA cannot select a few "extra" households to verify to be on the "safe side." The LEA may only verify the total number of households determined by the calculation of the sample size.
- Prior to notifying the household that they were selected for verification, **someone other than the determining official** must conduct a confirmation review to ensure that the application was determined correctly. The LEA must document the confirmation review. Any LEA that conducts a confirmation review (or second review) of **all** applications at the time of certification is not required to conduct confirmation reviews at the time of verification. For more information, refer to the USDA's [Eligibility Manual for School Meals](#).
- LEAs must allow households to provide documentation of income from any point in time between the month prior to application and the time the household is required to provide income documentation for verification.

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- If a household submits a paper application for a foster child and the foster child's name does not appear on the direct certification list, the foster child application is subject to verification if selected. For more information, refer to the USDA's [Eligibility Manual for School Meals](#).
- If a child's name appears on the direct certification list, the child is not subject to verification.
- Residential child care institutions (RCCI) with **day students** must have approved meal applications or direct certification information on file to claim day students as free or reduced. Verification must be conducted in RCCIs that claim day students as free or reduced based on the approval of an application.
- Complete a [Verification Selection Worksheet](#) for **each selected household**. This tracks the verification process. The LEA must keep this worksheet on file.
- The following categories are **not** subject to verification and **cannot** be included in the total number of applications when determining the verification sample size: 1) students who are directly certified based on the direct certification S-EBT list; 2) homeless; 3) runaways; 4) foster children that are directly certified (including those foster children provided on a list by the LEAs Foster Care Point of Contact); 5) children enrolled in a federally funded Head Start Program; and 6) children qualifying for free or reduced-price meals based on the Summer Electronic Benefit Transfer (S-EBT) program and are coded as FE or RE on the direct certification S-EBT list. Though not directly certified, households with students coded as FE or RE have submitted applications to the S-EBT team for review and approval and they were subject to the verification process. For more information regarding S-EBT refer to the CSDE's document, [Student Eligibility for Free or Reduced-price Meal Benefits Through the Summer Electronic Benefit Transfer \(S-EBT\) Program](#).
- Do not collect social security documentation from the adults in the verified household.
- Refer to USDA's [Translated Applications](#) to find foreign language forms. Click on the language of interest, for example, [Spanish](#). The translated verification forms are part of the *Prototype Household Letters for State and Local Agencies* and have the title "We Must Check Your Application" or "We Have Checked Your Application," in the applicable language. Refer to the English version of [Prototype Household Letters for State and Local Agencies](#) for guidance.

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- LEAs must ensure that limited English proficiency households are provided adequate language assistance and understand the need to respond to the verification request. Refer to the CSDE's resource, [Taglines and Providing Meaningful Access to the Child Nutrition Programs](#).
- **Always round up** and make sure to correctly calculate the number of applications to be verified. For example, if the sample size is 3.03, the LEA must select 4 applications for verification.
- The LEA must send formal letters notifying households of their selection for verification and must keep copies of completed letters on file. Proper documentation is essential to demonstrate successful completion of the verification process. Keep copies of everything.
- **LEAs cannot conduct verification over the phone.** LEAs must conduct verification in writing.
- Letters of notification must give **deadline dates** for a response from the parents/guardians. Never say "as soon as possible" or "immediately." Indicate the consequences of the parent/guardian's failure to respond, i.e., their children will no longer be eligible for free or reduced-price meal benefits if they do not respond by the date indicated.
- All final letters notifying the household of a reduction in benefits due to verification must include **fair hearing procedures**. The CSDE's sample letters of adverse action contain the fair hearing language. Refer to *Letter of Verification Results and Adverse Action for Income Households* under "[Verification Results](#)" in the "Forms" section of the CSDE's Verification Procedures for School Nutrition Programs webpage.
- If a student selected for verification transfers out of the system during the verification process, the LEA must select another household application to be verified. **Transfers and withdrawals should be determined at the time of the confirmation review.**
- Verification (including Rolling Verification) must be completed by **November 15** (refer to the USDA's webinar, [The Basics of Rolling Verification](#)).
- If the LEA cannot complete verification by November 15, the superintendent or governing authority must send an email to the CSDE requesting an extension and providing the reason for the request. Send the email to Bureau Chief, Shannon Yearwood, at shannon.yearwood@ct.gov. Please copy Teri Dandeneau (teri.dandeneau@ct.gov) on the email. The CSDE must receive this request by **November 1**.

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- Prior to completing the verification process, review and complete the CSDE's [Sample Verification Checklist](#).
- The Verification Collection Report (FNS 742) must be completed by all LEAs participating in the NSLP and SBP, including LEAs that do not conduct the verification process, e.g., RCCIs. LEAs must complete this form by **December 15**, using the [Connecticut Online Application and Claiming System for Child Nutrition Programs \(CNP System\)](#). The CSDE will provide additional information to LEAs on submitting the FNS 742.
- The LEA has an obligation to verify all questionable applications, which is known as "verification for cause." "Verification for cause" is **not** the same as the formal verification process. LEAs can complete "verification for cause" at any time throughout the school year. While it is not part of the formal verification process, the USDA requires that LEAs report all applications selected for "verification for cause" on part VC-1 of the FNS 742. For more information, refer to the USDA's [Eligibility Manual for School Meals](#).

For more information, visit the Connecticut State Department of Education's (CSDE) [Verification Procedures for School Nutrition Programs](#) webpage or contact the [school nutrition programs staff](#) at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/forms/verification/important_points_completing_verification.pdf.



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Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
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3. email: program.intake@usda.gov

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