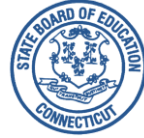




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch and School Breakfast Programs

FROM: John Frassinelli, Bureau Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: September 24, 2015

SUBJECT: Operational Memorandum #39-15

1. Verification Procedures
2. Verification Collection Report – Due December 15, 2015

1. Verification Procedures

By **November 15** of each year, local educational agencies (LEAs) must complete verification of a sample of their approved free and reduced-price meal applications. The verification sample is obtained from **new** meal applications on file as of the first operating day in October. LEAs must select the sample size using one of the methods outlined in the United States Department of Agriculture's (USDA) [Eligibility Manual for School Meals](#), dated July 2015.

Updated [verification forms](#) are available on the Connecticut State Department of Education's (CSDE) Verification Procedures Web page. Refer to the attached CSDE resources to assist you in completing this process:

- [Calendar for Completing Verification](#) (new);
- [Important Points for Completing Verification](#); and
- [Sample School District Verification Checklist](#).

2. Verification Collection Report

This report is due to the CSDE no later than **December 15, 2015**. The process for filing the Verification Collection Report has changed for school year 2015-16. More information will be forthcoming.

Questions may be directed to:

COUNTY ASSIGNMENTS	CONSULTANT	E-MAIL AND PHONE
Fairfield County	Fionnuala Brown	fionnuala.brown@ct.gov 860-807-2129
Hartford County	Teri Dandeneau	teri.dandeneau@ct.gov 860-807-2079
Middlesex County Windham County	Susan Alston	susan.alston@ct.gov 860-807-2081
Litchfield County	Allison Calhoun-White	allison.calhoun-white@ct.gov 860-807-2008
New Haven County	Jackie Schipke	jackie.schipke@ct.gov 860-807-2123
New London County Tolland County	Monica Pacheco	monica.pacheco@ct.gov 860-807-2073

JF:tdd

Attachments: (3)

Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain in a binder for future reference. All CSDE operational memoranda are posted on the CSDE's [Operational Memoranda for School Nutrition Programs](#) Web page.

IMPORTANT POINTS FOR COMPLETING VERIFICATION



The U.S. Department of Agriculture (USDA) regulations require that sponsors of the National School Lunch Program (NSLP) and School Breakfast Program (SBP) 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*, revised July 2015.

This handout summarizes the important points that school food authorities (SFAs) must consider when completing verification. It should be reviewed by all personnel who conduct verification.

- Refer to the Connecticut State Department of Education's (CSDE) *Verification Calendar*. This new 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, i.e., Income, Temporary Family Assistance (TFA) and Supplemental Nutrition Assistance Program (SNAP) on file by October 1.
- Local education agencies (LEAs) are not allowed to conduct 100 percent verification at the time of application. Additionally, LEAs cannot verify more than the sample size that is required. For example, a LEA cannot select a few "extra" households to verify to be on the "safe side." A 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, a confirmation review must be done by someone other than the determining official, to ensure that the application was determined correctly. The confirmation review must be documented. Any LEA that conducts a confirmation 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.
- 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, they are not subject to verification.

IMPORTANT POINTS FOR COMPLETING VERIFICATION, continued

- Residential child care institutions (RCCI) with **day students** must have approved meal applications or direct certification information on file to claim these day students as free or reduced. Verification must be conducted in those 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 and must be kept 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: Students that are directly certified based on the direct certification list, homeless, runaways, foster children that are directly certified, and children enrolled in a federally funded Head Start Program.
- Do not collect social security information from the adults in the verified household.
- Go to USDA's [Foreign Language Translations](#) to find foreign language forms. LEAs must ensure that limited English proficiency households are provided adequate language assistance and understand the need to respond to the verification request.
- **Always round up** and make sure that the number of applications to be verified is correctly calculated. For example, if the sample size is 3.03, four applications must be selected for verification.
- Formal letters notifying households that they have been selected for verification must be sent and copies of these completed letters must be kept on file in the school district. Proper documentation is essential to demonstrate successful completion of the verification process. Keep copies of everything. **Verification cannot be conducted over the phone.** It must be done 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 Connecticut State Department of Education's (CSDE) sample letters of adverse action contain the fair hearing language (see [Adverse Action for Income Households](#) and [Adverse Action for SNAP/TFA Households](#)).
- 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 must be completed by **November 15**.

IMPORTANT POINTS FOR COMPLETING VERIFICATION, continued

- If verification cannot be completed by November 15, the school district's superintendent must send a letter to the CSDE requesting an extension and providing the reason for the request. Send the letter to: Linda Hubeny, Child Nutrition Programs Director, Connecticut State Department of Education, Bureau of Health/Nutrition, Family Services and Adult Education, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457. Please copy Teri Dandeneau on the letter. This request must be received by the CSDE no later than **November 1**.
- Prior to completing the verification process, review and complete the [Sample School District Verification Checklist](#).
- The [Verification Collection Report](#) (FNS 742) must be completed by all LEAs participating in the National School Lunch Program and School Breakfast Program including those that do not conduct the verification process, e.g., RCCIs. This form is due by **December 15**. The CSDE will be providing additional information to SFAs 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. It can be done 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 that were pulled for “verification for cause” on part VC-1 of the Verification Collection Report. For more information, refer to the USDA's [Eligibility Manual for School Meals](#).

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Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

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For more information, visit the CSDE's [Verification](#) Web page or contact the [school nutrition programs](#) staff in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457.

This handout is available at www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/verpoints.pdf.

CALENDAR FOR COMPLETING VERIFICATION

This calendar summarizes the tasks and completion dates required for Connecticut school nutrition programs to comply with the U.S. Department of Agriculture (USDA) verification requirements. The CSDE verification forms are updated annually in August/September and are available on the CSDE’s [Verification Procedures](#) Web page. Do **not** use outdated forms.

Check (☑) if completed	Target Completion Date	Task	Forms to Complete	Reminders
<input type="checkbox"/>	August 1 and ongoing	Review the USDA Eligibility Manual for School Meals .	Not applicable	Check to be sure you using the most current USDA manual (see Eligibility Manual for School Meals).
<input type="checkbox"/>	August 1 and ongoing	Verification for Cause may be conducted at any time during the school year and is not part of the formal verification process. Refer to Part 9D in the USDA Eligibility Manual for School Meals for further guidance.	Same forms as the formal Verification Process. Must be reported on the <i>Verification Collection Report (FNS 742)</i> .	The local education agency (LEA) has an obligation to verify all approved applications that may be questionable. However, such verification efforts cannot delay the approval of applications. If an application is complete and indicates that the child is eligible for free or reduced-price meal benefits, the application must be approved. The LEA can only begin the verification process after the determination of eligibility has been made.
<input type="checkbox"/>	August 15	Determine the type of verification that must be conducted.	<i>Alternate Two Sampling Worksheet</i> or <i>Alternate One Sampling Worksheet</i> or <i>Standard Sample Size Worksheet</i>	Refer to last year's Verification Collection Report and the USDA Eligibility Manual for School Meals . If 20 percent or more households failed to respond to the verification process in the previous school year, the district must do Standard Sample Size verification focusing on error prone applications. “Error prone” means applications within \$100 per month of the applicable Income Eligibility Guidelines.

CSDE VERIFICATION CALENDAR, continued

Check (☑) if completed	Target Completion Date	Task	Forms to Complete	Reminders
<input type="checkbox"/>	August 15	<p>Work with the determining official to decide how students will be tracked and entered into the system:</p> <ol style="list-style-type: none"> 1. Directly certified through the Supplemental Nutrition Assistance Program (SNAP); 2. Directly certified through other programs (e.g., TFA, foster, homeless, runaway, Head Start); 3. Applications that are categorically eligible for free meals based on a handwritten SNAP/TFA case number; 4. Free income applications; or 5. Reduced-price income applications. 	Not applicable	This will impact the completion of the <i>Verification Collection Report (FNS 742)</i> .
<input type="checkbox"/>	September 7	Review the CSDE's handout, <i>Important Points to Remember</i> .	Not applicable	Not applicable
<input type="checkbox"/>	September 7	Review the verification letters/forms and update as needed.	Verification letters/forms	Prototype forms are available on the CSDE's <i>Verification Procedures</i> Web page.
<input type="checkbox"/>	October 1	Print off the master list of all free and reduced-price eligible students as of October 1.	Not applicable	Not applicable
<input type="checkbox"/>	October 3	Select the required sample of applications to be verified. Prior to selecting the sample, determine the names that are directly certified or are not subject to verification, and separate out of the sample. Only newly approved applications are subject to the formal verification process.	<p><i>Alternate Two Sampling Worksheet</i> or <i>Alternate One Sampling Worksheet</i> or <i>Standard Sample Size Worksheet</i></p> <p>Also complete the <i>Verification Selection Worksheet</i> for each household that is selected.</p>	Review the USDA <i>Eligibility Manual for School Meals</i> for guidance.

CSDE VERIFICATION CALENDAR, continued

Check (☑) if completed	Target Completion Date	Task	Forms to Complete	Reminders
<input type="checkbox"/>	October 6	Conduct a confirmation review.	Section on the Verification Selection Worksheet	Must be conducted prior to notifying the households and must be done by someone other than the determining official.
<input type="checkbox"/>	October 7	Notify the selected households.	<i>Household Notification of Selection</i> letter and applicable attachments. Print off the appropriate forms including the <i>Verification Selection Worksheet</i> .	Reminder: If the district uses the letters that are automatically generated by their software company, the district must review the letters to ensure that they comply with any updated language in the USDA Eligibility Manual for School Meals and the CSDE CNP prototype letters. Keep copies of all correspondence, letters and other documentation.
<input type="checkbox"/>	Prior to October 23	Issue a second notice to those households that have not responded to the verification process.	“Second Household Notification of Selection” section on the <i>Verification Selection Worksheet</i> .	A second notice is required if the household failed to respond. This follow-up attempt must be documented.
<input type="checkbox"/>	Prior to November 10	Review the data and supporting documentation that the households submitted. Send letters of adverse action as needed.	<i>Adverse Action for Income Households</i> or <i>Adverse Action for SNAP/TFA Households</i> or <i>Notification of Continuation of Benefits</i>	All households for whom benefits are to be reduced or terminated must be given 10 calendar days’ written advance notice of the change. The first day of the advance notice period is the day the notice is sent. The notice of adverse action may be sent via the postal service or to the email address of a parent/guardian. The LEA cannot notify the household of adverse action by phone. Keep copies of all correspondence, letters and other documentation.
<input type="checkbox"/>	November 15	Notify the school food service program of any changes in eligibility status and the date the changes go into effect.	Finish and sign-off on the <i>Verification Selection Worksheet</i> for each household that was selected for verification.	Keep documentation to demonstrate that the change went into effect.
<input type="checkbox"/>	November 15 <i>Must be completed by November 15</i>	Complete the verification process.	Verification Checklist	“ Complete ” means that all letters of changes in determinations have been issued to the households and the food service operations have been notified of the changes and the date that the changes go into effect.

CSDE VERIFICATION CALENDAR, continued

Check (☑) if completed	Target Completion Date	Task	Forms to Complete	Reminders
<input type="checkbox"/>	December 15 <i>Must be completed by December 15</i>	Complete and submit the <i>Verification Collection Report</i> (FNS 742) to the CSDE.	<i>Verification Collection Report</i> (FNS 742)	Make note of the type of verification the district will need to do next year based on the nonresponse rate.



For information on the USDA school nutrition programs, visit the CSDE's [School Nutrition Programs](#) Web page or contact the [school nutrition programs](#) staff in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457.

This document is available at www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/vercal.pdf.

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SAMPLE SCHOOL DISTRICT VERIFICATION CHECKLIST

Local Education Agency (LEA): _____ Date: _____

1. Type of verification conducted:

Standard Sample Size Alternate One Alternate Two

2. Did the district/institution follow the U.S. Department of Agriculture's (USDA) [Eligibility Manual for School Meals](#) and appropriate Connecticut State Department of Education (CSDE) [operational memoranda](#) to ensure that the verification sample was chosen correctly? Yes No
If "NO" explain:

3. Did anyone from the district/institution attend training on verification conducted by the CSDE during the past year? Yes No
If "NO" explain:

4. Was more than the required sample size verified? Yes No
If "YES" explain:

5. Were the state agency (CSDE) sample verification forms used? Yes No
If "NO" explain:

6. Was the verification process completed by November 15? Yes No
If "NO" explain:

7. Was a confirmation review conducted by a person other than the determining official? Yes No
If "NO" explain:

8. Were households with foster children verified correctly? Yes No
If "NO" explain:

9. Were the notifications of changes in eligibility to families sent in a timely manner? Yes No
If "NO" explain:

SAMPLE SCHOOL DISTRICT VERIFICATION CHECKLIST, continued

10. Were applications that did not need to be verified replaced by similar applications to meet the required number to be verified? Yes No
If "NO" explain:
11. Was the option to decline to verify no more than 5 percent of applications in the selected sample utilized by the district? Yes No
If "YES" explain:
12. Check this box if all calls within the district are local calls:
13. Was there a second attempt to obtain the family information for verification? If unable to verify the eligibility, after a reasonable period was a notice of adverse action sent to the families? Yes No
 Not applicable
If "NO" explain:
14. If there was a benefit change due to verification, was it properly applied in the lunchroom (ticket, roster and/or other system)? Yes No
 Not applicable
If "NO" explain:
15. Were any households selected for Verification for Cause? Yes No
 Not applicable
If "YES" explain:

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This worksheet is available in PDF at www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/verification/verbeck.pdf and Word at www.sde.ct.gov/sde/lib/sde/word_docs/deps/nutrition/verification/verbeck.doc.