

Verification Procedures for School Nutrition Programs



Connecticut State Department of Education
Bureau of Child Nutrition Program
August 2026

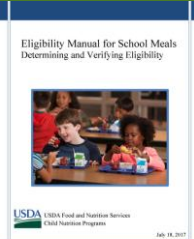
About This Training

- Reflects USDA regulations and requirements for Child Nutrition Programs
- Current as of date on title slide



Based on USDA's Eligibility Manual for School Meals

- Comprehensive resource
- Module does not cover all areas
- Verifying officials responsible for reviewing eligibility manual
- Latest version dated July 18, 2017



https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/freered/usda_eligibility_manual.pdf



Target Audience

- Staff responsible for conducting
 - Annual verification
 - Verification for cause



Applies to All School Nutrition Programs

- National School Lunch Program
- School Breakfast Program



Training Not Required for Schools That Do Not Process Applications

- Special Milk Program only schools
- Districts where all schools participate in Community Eligibility Provision (CEP)
- Residential child care institutions (RCCIs) that do not process free and reduced-price meal applications

Verification not required





Objectives

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Objective 1: Help local educational agencies (LEAs) successfully complete verification process

- Understand difference between formal verification and verification for cause
- Learn when to use each type of verification
- Determine how to select and notify households
- Identify follow-up steps for non-responsive households
- Understand how to determine if verification is complete



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Objective 2: Identify resources for guidance and training on verification

- Resources and websites listed in yellow bar



<https://portal.ct.gov/sde/nutrition/verification-procedures-for-school-nutrition-programs/verification-training>

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Topics on Verification

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Topics

- Terms to know
- Verification categories
- Direct Certification
- Verification types
- Reminders about verification
- Special circumstances
- Verification forms
- When households do not respond
- Final step: Communication with school food service staff
- Using verification software programs
- Confidentiality
- Records Retention
- FNS 742 Verification Summary Report
- Flagging LEAs for ameliorative action

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Introduction to Verification

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Verification

The confirmation of income each school year for a small percentage of households approved for free or reduced-price meals for the National School Lunch Program (NSLP) and School Breakfast Program (SBP)

- Must complete by November 15

Terms to Know

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When Formal Verification is Required

- LEAs that collect and process applications for school meals



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When Formal Verification is Not Required

- Alternate Provision Schools, e.g., Community Eligibility Provision (CEP)
- RCCIs
- Special Milk Program only schools



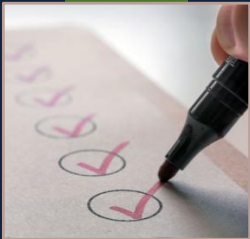
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Verification Selection

- Verification selection based on total number of newly approved applications on file by October 1



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Terms to Know

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Terms to Know: Administrative Authorities



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Local Educational Agency (LEA)

A public board of education or other public or private nonprofit authority within a state that maintains administrative control of public or private nonprofit elementary or secondary schools

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School Food Authority (SFA)

The governing body that is responsible for the administration of one or more schools and has the legal authority to operate one or more of the USDA's school nutrition programs

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Sponsor

A public, private nonprofit, or for-profit organization that is approved by the CSDE to operate a USDA Child Nutrition Program

Terms to Know

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Terms to Know: Nutrition Assistance Programs



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Community Eligibility Provision (CEP)

A special alternative provision that allows LEAs serving predominantly low-income students to offer free school meals to all students through the National School Lunch Program and School Breakfast Program

Terms to Know

- No household applications

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Temporary Family Assistance (TFA)

A federal program that provides cash assistance for basic and special needs, which are paid to recipients of Jobs First

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Supplemental Nutrition Assistance Program (SNAP)

A federal program that provides nutrition benefits to supplement the food budget of families with low income

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Connecticut Department of Social Services (DSS)

The state agency that oversees the Supplemental Nutrition Assistance Program (SNAP), Temporary Family Assistance (TFA), and Medicaid

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Terms to Know: Staff



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Determining Official (DO)

Person designated by LEA to review and approve free and reduced-price meal or free milk applications

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Verifying Official (VO)

Person designated by LEA to conduct the verification process for selected households

- Often same person as determining official

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Direct Certification Contact

Person designated by LEA to have access to the Connecticut State Department of Education's (CSDE) direct certification application webpage

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Hearing Officer

Person designated by LEA to conduct a fair hearing if a parent or guardian requests it

- Cannot be determining official or verifying official
- Cannot have any role in processing or verifying applications

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Term to Know: Days



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Operating Days

Days on which reimbursable meals or free milk are provided

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Calendar Days

Number of days represented on the calendar

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Working Days

Days when school is open and teachers or school administration are on site, but the reimbursable meal or free milk service is not operating

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School Year (SY)

The period from July 1 through June 30

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Term to Know: Verification Process



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Terms to Know

Household (HH)

A group of related or nonrelated individuals who are living as one economic unit

- “Family” has same definition (7 CFR Part 245.2)

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Terms to Know

Economic Unit

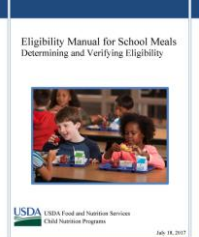
A group of related or unrelated individuals who are not residents of an institution or boarding house but who are living as one economic unit, and whose members share housing, significant income, and expenses

- Individuals residing in same house/apartment
- More than one economic unit may reside together
- Separate economic units in same residence characterized by prorating expenses and by economic independence

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More Information About Economic Units

- USDA’s Eligibility Manual for School Meals



https://portal.ct.gov/-/media/sde/nutrition/nsfp/forms/freered/usda_eligibility_manual.pdf

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Terms to Know

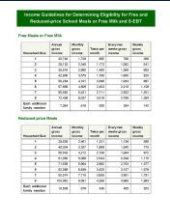
Income Eligibility Guidelines (IEG)

USDA guidelines that determine eligibility of participants for free and reduced-price meals or free milk in the school nutrition programs, free meals in the SFSP, and eligibility for S-EBT

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Where to Find IEG

- Income Guidelines for Determining Eligibility for Free and Reduced-price School Meals or Free Milk and S-EBT



<https://portal.ct.gov/sde/nutrition/income-guidelines-for-child-nutrition-programs/income-guidelines-for-school-nutrition-programs>

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Error Prone

Applications within \$100 per month or \$1,200 per year of the USDA's current IEG

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Random Sampling

A sampling process used to select applications for verification where each application has an equal chance of being selected

- Does not require statistically valid sample
- LEA must determine selection interval by dividing number of applications by required sample size

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Sampling Pool

The total number of newly applications approved as of October 1

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Sample Size

The number of applications subject to verification

- Minimum and maximum sample size is 3% of total or 3,000 applications, whichever is less

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Direct Certification (DC)

The process of a determining a child's eligibility for free or reduced-price meals without the completion of an application

- Directly certified children not subject to verification

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Direct Verification

Use of records from public agencies to verify income or program participation

- Direct verification is different from DC
 - DC determines eligibility
 - Direct verification verifies eligibility

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Summer Electronic Benefit Transfer (S-EBT)

A nationwide program that began in summer 2024 and provides extra benefits like SNAP to families with children to help pay for food in the summer

- May determine eligibility for free or reduced-price meals

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More Information About Acronyms and Abbreviations

- CSDE Resource: Common Acronyms and Abbreviations for Determining Eligibility in the School Nutrition Programs and Summer Food Service Program



https://portal.ct.gov/-/media/sde/nutrition/nsfp/forms/freered/acronyms_abbreviations_determining_eligibility_snp_sfsp.pdf

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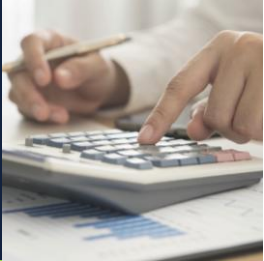


Verification Categories

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Two Different Verification Categories

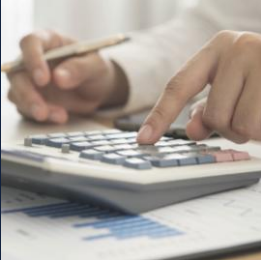
- Formal Verification Process
- Verification for Cause



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Category 1: Formal Verification Process

- Annual
- Based on newly approved applications
- Starts October 1
- Must complete by November 15



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Completed

All final letters regarding the verification process are issued to the selected households

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Category 2: Verification for Cause

- Conducted any time during SY
- DO works closely with VO
- Required for any questionable applications
- Cannot delay application approval
 - Start after eligibility determination



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Clarifying Information for Verification for Cause

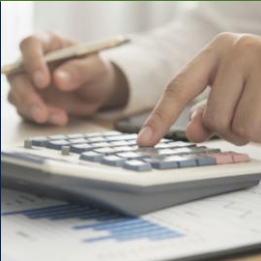
- DO contacts HH if any information unclear or questionable
 - Before approving application
 - Document in writing
- Only contact person who signed application



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Completing Verification Process

- After LEA requires HH documentation for cause, must complete verification process
- Use same verification procedures as formal verification process



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Direct Certification and Verification



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Students on DC/S-EBT List with These Codes Are Not Subject to Verification

- FS = SNAP
- AF = TFA
- OT = Other (foster child)
- FM = free Medicaid
- RM = reduced Medicaid

Not included in sample pool



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Two Codes for Eligible Students Based on S-EBT

- FE = free meals
- RE = reduced-price meals



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S-EBT Codes of FE and RE

- Eligibility for FE and RE does not extend to children in HH
- Students coded as FE or RE subject to verification process by S-EBT team
 - Not part of verification process
 - Not included in sample pool



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Other Source Categorical Eligibility

- Students who are “other source categorically eligible” are directly certified
 - Not subject to verification
 - Not included in sampling pool



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Other Source Categorical Eligibility Includes

1. Students in federally funded Head Start Program
2. Students confirmed as homeless or a runaway by homeless liaison

3. Students confirmed as being a foster child by
 - coding as OT on direct certification/S-EBT list **OR**
 - district’s foster care point of contact

Foster students approved based on application are not directly certified



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Verification Types



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Types of Verification

1. Standard Sample Size
2. Alternate 1
3. Alternate 2 (not conducted in CT)



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Standard Sample Size Verification

- Based on 3% of all newly approved applications on file October 1
- Selection of applications must be based on error-prone



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When Standard Sample Size Verification is Required

- District had non-response rate of 20% or more in prior SY
- Must review FNS 742 Verification Summary Report
- Connecticut Online Application and Claiming System for Child Nutrition Programs (CNP System)



<https://portal.ct.gov/sde/nutrition/cnp-system>
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FNS 742 Verification Summary Report

The annual report about the verification process that must be completed by all sponsors of the National School Lunch Program and School Breakfast Program

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Non-response Rate Example 1

3.4 Results of Verification by Original Benefit Type

For each original benefit type (A, B, & C), report the number of applications and students as of November 15th for each result category (1, 2, 3, & 4). Do NOT include students and applications already reported in 5-74 or 5-78 (direct verification applications and students).

Result Category	A. FREE Category Eligible		B. FREE Income		C. REDUCED PRICE Income	
	Applications	Students	Applications	Students	Applications	Students
1. Responded, NO CHANGE	0	0	0	0	0	0
2. Responded, Changed to REDUCED PRICE	0	0	0	0	0	0
3. Responded, Changed to Paid	0	0	0	0	0	0
4. NOT Responded, Changed to FREE	0	0	0	0	0	0

- 100% non-response rate
- Standard Sample Size required

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Non-response Rate Example 2

3.4 Results of Verification by Original Benefit Type

For each original benefit type (A, B, & C), report the number of applications and students as of November 15th for each result category (1, 2, 3, & 4). Do NOT include students and applications already reported in 5-74 or 5-78 (direct verification applications and students).

Result Category	A. FREE Category Eligible		B. FREE Income		C. REDUCED PRICE Income	
	Applications	Students	Applications	Students	Applications	Students
1. Responded, NO CHANGE	0	0	0	0	0	0
2. Responded, Changed to REDUCED PRICE	0	0	0	0	0	0
3. Responded, Changed to Paid	0	0	0	0	0	0
4. NOT Responded, Changed to FREE	0	0	0	0	0	0

- Column B application responded
- No eligibility change
- Column C application did not respond
- Eligibility change from reduced-price to paid

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Non-response Rate Example 2, continued

3.4 Results of Verification by Original Benefit Type

For each original benefit type (A, B, & C), report the number of applications and students as of November 15th for each result category (1, 2, 3, & 4). Do NOT include students and applications already reported in 5-74 or 5-78 (direct verification applications and students).

Result Category	A. FREE Category Eligible		B. FREE Income		C. REDUCED PRICE Income	
	Applications	Students	Applications	Students	Applications	Students
1. Responded, NO CHANGE	0	0	0	0	0	0
2. Responded, Changed to REDUCED PRICE	0	0	0	0	0	0
3. Responded, Changed to Paid	0	0	0	0	0	0
4. NOT Responded, Changed to FREE	0	0	0	0	0	0

- 50% non-response rate
- Standard Sample Size required

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No Error-prone Applications

- VO randomly selects 3% from newly approved applications on file as of October 1
- Document no error prone applications on file



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May Use Alternate 1 Verification

- If less than 20% non-response rate on prior year's FNS 742 Verification Summary Report
- VO must randomly select 3% of total newly approved applications on file as of October 1
- May also choose Standard Sample size

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When to Use Alternate 1 Verification

- Refer to Section 5-8 on FNS 742 Verification Summary Report
- Response rate must be less than 20%

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Example of When to Use Alternate 1 Verification

- One application selected
- HH responded
- Zero non-response rate

May use either alternate 1 or standard sample size

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Reminders About Both Types of Verification

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Reminders About Both Types of Verification

- Cannot verify more than sample size
- Must always round up

Example

- 3% of sample pool is .33
- Round up to 1 and verify 1 application

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Confirmation Review

- Must be completed for all applications selected for verification
- Must be conducted by someone other than person who made original determination
- Must occur before notifying household were selected for verification

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If Errors Found During Confirmation Review

- Refer to page 104 of USDA's Eligibility Manual for School Meals



https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/freered/usda_eligibility_manual.pdf

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Special Circumstances



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Circumstance 1: No Applications on File by October 1

- May occur due to LEA's robust direct certification system
- Must still complete FNS 742 Verification Summary Report
- Notify CSDE school nutrition team member no applications were on file



<https://portal.ct.gov/-/media/sde/nutrition/cnstaff/countyassign.pdf>

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Circumstance 2: Applications with Zero Income

- Should be part of sample pool on October 1
- If application selected
 - LEA must request written explanation of how HH meets living expenses
 - LEA may request additional written documentation or collateral contacts



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Circumstance 3: Verification Extension Request

- Serious reason that LEA cannot meet November 15 deadline
 - Natural disaster
 - Civil disorder
 - Strike
 - Other circumstances



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Requesting an Extension for Circumstance 3

- Superintendent must submit written request explaining reason for extension
 - Email allowed
- CSDE must receive by close of business on November 1



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CSDE Approval of Extension for Circumstance 3

- CSDE may provide written approval of extension for serious reasons up to December 15 of current SY



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Verification Forms



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Recommendation

- One folder per HH to contain all verification documents



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Verification Selection Worksheet

- Tells verification story for selected HH
- One form for each selected HH
- Complete all sections



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Alternate One Verification Sampling Worksheet

- 3% of all newly approved applications on file as of October 1
- Applications randomly selected
- Always round up



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Standard Sample Size Verification Sampling Worksheet

- 3% of all newly approved error-prone applications on file as of October 1
- Applications randomly selected
- Always round up



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Sample Household Letter to Verify Family Eligibility

- Use after selecting applications
 - Informs HH they have been selected for verification
 - Reviews acceptable sources of income and documentation
- Complete applicable highlighted sections



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Sample Household Letter to Verify Family Eligibility
Second Notice

- Must send to HH that do not respond by original date
- Adhere to dates indicated
- Follow up if HH fails to respond to second notice



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Sample Letter of Verification Results and Adverse Action for Income Households

- Must send to HH that did not respond to second notice
 - Must include fair hearing language
- Must give HH 10 calendar days from date on letter before changing benefits
- Eligibility change impacts all children enrolled in LEA



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HH with Increase in Benefits

Example: Reduced-price to Free

- Must notify HH of eligibility change using Sample Letter of Verification Results and Adverse Action for Income Households
 - Must include fair hearing language
- Effective immediately
 - Implement no later than 3 operating days from date verification completed



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Required Fair Hearing Language for Change in Benefits

- Must include in all verification notification letters
 - Right to appeal
 - Who to contact
 - Deadline



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Appeal within 10 Calendar Day Advance Notice Period

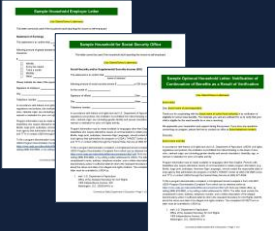
- LEA must continue to provide original eligibility benefits until final determination
- Refer to pages 57-59 in USDA's Eligibility Manual for School Meals



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Additional Verification Forms

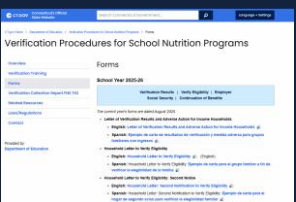
- Household Employer Letter
- Household Letter for Social Security Office
- Household Letter Notification of Continuation of Benefits as a Result of Verification



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Where to Find Verification Forms

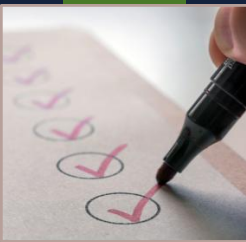
- CSDE Webpage: Verification Procedures for School Nutrition Programs



<https://portal.ct.gov/sde/nutrition/verification-procedures-for-school-nutrition-programs/forms>

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When Households Do Not Respond to Verification



- HH terminated and reapplies in same SY
- Must submit income or proof of participation in SNAP or TFA at time of application
- Not considered new applications
- VO must complete verification process

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When Households Do Not Respond to Verification



- HH terminated and reapplies in same SY
- Must submit income or proof of participation in SNAP or TFA at time of application
- Not considered new applications
- VO must complete verification process

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Final Step: Communication with School Nutrition Programs



- VO must notify food service of all students with change in benefits
- Ensures student receives correct benefit during breakfast or lunch
- Must be documented

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Communication with School Nutrition Programs



- VO must notify food service of all students with change in benefits
- Ensures student receives correct benefit during breakfast or lunch
- Must be documented

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Verification Software Programs

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Using Verification Software Programs

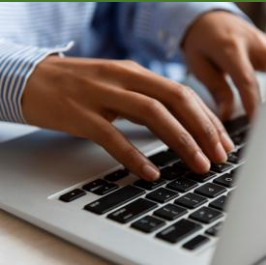
- VO must understand how software program operates



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Requirements for Verification Software Programs

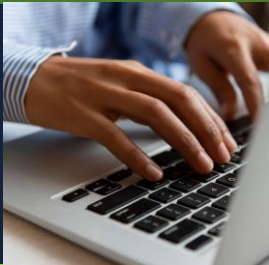
- Ensure software correctly determines
 - total applications as of October 1
 - sample pool
 - sample size
- Ensure software program's verification forms use required USDA language



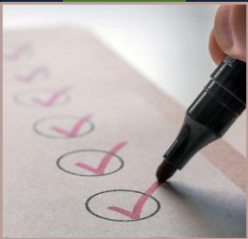
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Must Have Communication Systems in Place

- Consult with software company regarding questions about their verification program



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Confidentiality

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Ensuring Confidentiality

- VO must ensure that all aspects of verification process do not overtly identify free or reduced-price child



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Overt Identification

Any action that may result in a child being recognized as eligible to receive free or reduced-price meals or free milk

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Confidentiality Procedures

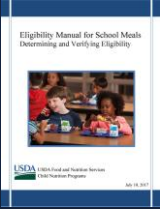
- VO must implement procedures to ensure verification information is kept confidential



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More Information About Confidentiality

- USDA Eligibility Manual for School Meals
 - Section 5: Confidentiality and Disclosure



https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/freered_usda_eligibility_manual.pdf

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Training on Confidentiality Requirements

- CSDE Training Program: Determining Eligibility in the School Nutrition Programs
 - Module 5: Confidentiality and Disclosure



<https://portal.ct.gov/sde/nutrition/eligibility-for-free-and-reduced-price-meals-and-free-milk-in-school-nutrition-programs/determining-eligibility-training>

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Records Retention

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Records Retention Regulations

- 7 CFR 210.23(c) of NSLP regulations
- 7 CFR 220.7(e)(13) of SBP regulations



[https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210#p-210.23\(c\)](https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210#p-210.23(c))
[https://www.ecfr.gov/current/title-7/part-220#p-220.7\(e\)\(13\)](https://www.ecfr.gov/current/title-7/part-220#p-220.7(e)(13))

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Records Retention Timeframe

All Records to Support Claim

▪ 3 years after submission date of final claim for fiscal year

Records with Unresolved Audit Findings

▪ Beyond 3 years, as long as required to resolve audit issues



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Records Retention for Special Provision Schools

Example: Community Eligibility Provision (CEP)

▪ Must keep all data to support base year or Identified Student Percentage (ISP) data



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Local Records Retention Requirements

▪ Check with board of education/town to determine if records retention requirements are more stringent



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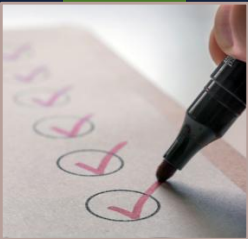
More Information About Records Retention

▪ CSDE Resource: Records Retention Requirements for the School Nutrition Programs



https://portal.ct.gov/-/media/sde/nutrition/nslp/adminrev/records_retention_snp.pdf

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FNS 742 Verification Summary Report

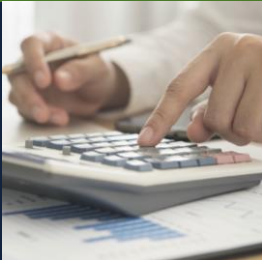
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Completing the FNS 742 Verification Summary Report

▪ Must be completed by all NSLP/SBP sponsors

▪ Includes districts not required to complete verification

- RCCIs without day students
- CEP school districts
- Private schools



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Due Date for FNS 742 Verification Summary Report

- December 1
- Completed in CNP System



<https://portal.ct.gov/sde/nutrition/cnp-system>

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Step-by-step Instructions for FNS 742

- CSDE Resource:
Completing the Verification Collection Report (FNS 742)



https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/verification/completing_verification_collection_report.pdf

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Ameliorative Action for Verification

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Ameliorative Action

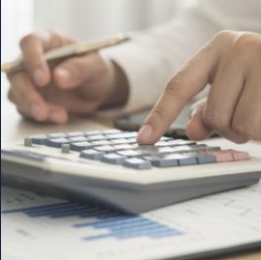
The high change rate in a child's eligibility due to a reduction in free or reduced-price benefits

Terms to Know

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USDA Requires State Agency Monitoring

- High change rates in a student's eligibility due to verification



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High Change Rate

Changes in eligibility status where there was a reduction in benefits to a household

Examples

- Free to reduced-price
- Free to denied
- Reduced-price to denied

Terms to Know

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Flagging LEAs with High Change Rate for Ameliorative Action

Two Criteria

1. 50% or more of verified applications resulted in reduction in eligibility

2. Had to verify more than 5 applications



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Flagged LEAs

▪ Notified by email prior to beginning of SY

▪ Asked to review verification processes to ensure they are completed in compliance with federal regulations



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Resources

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USDA Webpage: Verification Toolkit

▪ Strategies to Improve Response Rates in the Verification Process

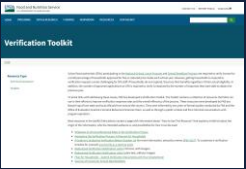
▪ Navigating the Verification Process: A Diagram for Households

▪ A Guide to Conducting Verification Before October 1st

▪ Redesigned Verification Notification Letter

▪ Flyer for Households – Submit Verification Documents with Your Smartphone

▪ Sources of Income for School Meal Eligibility



<https://www.fns.usda.gov/cn/verification-toolkit>

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USDA Webinar: Basics of Rolling Verification

▪ Outlines options for starting verification prior to October 1

▪ Highlights verification resources



<https://www.fns.usda.gov/resource/webinar-verification-toolkit-and-beginning-verification-october-1>

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CSDE Resource: Calendar for Completing Verification

▪ Tasks and completion dates required to comply with USDA's verification requirements

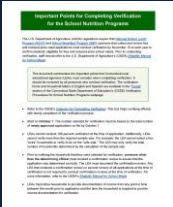


https://portal.ct.gov/-/media/sde/nutrition/nsfp/forms/verification/calendar_completing_verification.pdf

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CSDE Resource: Important Points for Completing Verification

- What LEAs must consider
- Review prior to starting verification

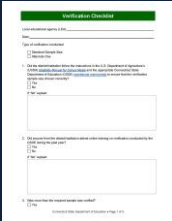


https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/verification/important_points_completing_verification.pdf

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CSDE Resource: Verification Checklist

- Assists VO in ensuring verification was completed accurately and thoroughly



https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/verification/sample_verification_checklist.pdf

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CSDE Resource: Guidance for Notifying Parents of a Child's Eligibility for Free or Reduced-price Meals

- Summarizes what LEAs must consider when notifying parents
- Should be reviewed by all personnel who conduct verification

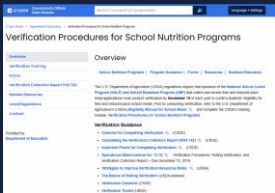


https://portal.ct.gov/-/media/sde/nutrition/nsip/forms/verification/important_points_completing_verification.pdf

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More Verification Information and Resources

- CSDE Webpage: Verification Procedures for School Nutrition Programs



<https://portal.ct.gov/sde/nutrition/verification-procedures-for-school-nutrition-program>

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Questions? Contact School Nutrition Programs Staff

- CSDE Resource: County Assignments for School Nutrition Programs





<https://portal.ct.gov/-/media/sde/nutrition/cnstaff/countyassign.pdf>

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Thanks for participating!



<https://portal.ct.gov/sde/nutrition/verification-procedures-for-school-nutrition-programs>

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1. mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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