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## 8. Verification of Eligibility

Source: Eligibility Manual for School Meals, USDA  
<https://www.fns.usda.gov/eligibility-manual-school-meals>

### Overview

Verification is confirmation of eligibility for free and reduced price school meals. Verification is only required when eligibility is determined through the application process, not through direct certification conducted with an Assistance Program or with agencies or officials who documented Other Source Categorical Eligibility (Migrant, Homeless, Runaway, Head Start).

Verification must include confirmation of either income eligibility; or that the child or any member of the household is receiving assistance under FA, FDPIR, or TAF; or that the child is Other Source Categorically Eligible.

Verification may also include confirmation of any other information required on the application, such as household size.

Verification efforts are not required:

- ◆ For children who have been certified under direct certification procedures, including children documented as eligible migrant, runaway, homeless children; foster children; and children enrolled in Head Start;
- ◆ For children in RCCIs, except for applications for any non-residential students attending the institution;
- ◆ In schools participating only in the SMP;
- ◆ In schools with non-pricing programs, which claim only the paid rate of reimbursement, where all children are served with no separate charge for food service and no special cash assistance is claimed; and
- ◆ In Sponsors where all schools participate in CEP or in Provisions 1, 2, 3, except in the base years in Provision 1, 2, or 3 schools in which applications are taken for all children in attendance.

### Key Verification Terms

Direct Verification	Use of records from public agencies to verify income or program participation.
Error Prone	Applications within \$100 per month of the applicable IEGs.
Random Sampling	Each application has an equal chance of being selected. A statistically valid random sample is not required. The Sponsor must determine a selection interval by dividing the number of applications by the required sample size.
Sample Pool	The total number of applications approved as of October 1.
Sample Size	The number of applications subject to verification; the minimum and maximum sample size is three percent total or 3,000 applications, whichever is less.

## Initial Verification

Each Sponsor must annually verify eligibility of children from a sample of household applications approved for free and reduced price benefits for that school year.

The Sponsor may begin verification activity once the application approval process for the current school year is underway and there are approved applications on file. To do so, the Sponsor may project the number of approved applications (sample pool) that it anticipates will be on file on October 1.

The projected number is based on prior years' experience. However, the final sample pool is the actual number of approved applications on file as of October 1. **The sample size must be based on the October 1 sample pool.** Any estimates must be compared with the actual number of applications on file on October 1, and the sample pool and sample size must be adjusted accordingly. If October 1 falls on a weekend, use the next operating day to establish the sample pool.

## Establishing the Sample Pool

The sample pool uses the total number of approved applications on file as of October 1 of the current school year.

The sample pool depends on the number of approved applications, paper or electronic, and is not based on the number of children eligible for free and reduced priced benefits.

If applications are submitted for “mixed households”, which include children who are eligible based on income and others based on Other Source Categorical Eligibility, these applications are subject to verification and are included in the sample pool.

## Establishing the Sample Size

Once the sample pool is determined by completing the Pre-Verification Worksheet in KN-CLAIM, the number of applications that must be verified will be displayed on the Post-Verification Worksheet. KN-CLAIM calculates the sample size, all fractions or decimals are rounded upward to the nearest whole number. At least one application must always be verified.

With the exception of verification for cause, Sponsors must not verify more than or less than the standard sample size or the alternate sample size (when used), and must not verify all (100%) of applications. Verification conducted “for cause” is done in addition to the required verification sample size.

## Verification Completion Deadlines

The Sponsor must complete the verification activities specified in this section no later than November 15 of each school year. However, the Sponsor may request an extension of the November 15 deadline, in writing, from the State agency. The State agency may approve, in writing, an extension up to December 15 of the current school year, due to natural disaster, civil disorder, strike, or other circumstances that prevent the Sponsor from the timely completion of verification activities. A request for an extension beyond December 15 must be submitted by the State agency to the USDA for approval.

## Verification for Cause

The Sponsor has an obligation to verify all questionable applications (“verification for cause”). 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 benefits, the application must be approved.

Only after the determination of eligibility has been made can the Sponsor begin the verification process. Determining officials are strongly encouraged to contact the household during the certification process to clarify any information that is unclear or questionable, before certifying the application and proceeding with verification for cause. Once households have been requested to provide documentation for cause, the Sponsor must complete the verification process for these households.

USDA supports use of verification for cause where appropriate as a method for Sponsors to address integrity concerns. To verify an approved application for cause, the Sponsor must send the household a Notification of Selection. This notification letter may be sent with the Notice of eligibility. The Sponsor verifies applications for cause following the procedures in this Chapter. Any household that fails to submit requested verification information by the date specified by the Sponsor or that submits verification information that does not support the initial determination of eligibility must be sent a notice of adverse action.

## Questionable Applications and Information

Sponsors have an obligation to follow-up on questionable and incomplete information when reviewing applications submitted for free and reduced price meals or free milk. Prior to certifying children for benefits, the determining official should review the application for any discrepancies in the information provided.

If a discrepancy is found, the determining official should:

- ◆ Seek clarification about the information provided in order to make a determination in a timely manner;
- ◆ Deny the application with an explanation that incomplete information was provided; or
- ◆ Approve the application, and verify for cause.

## Verification for Cause for School District Employees

Sponsors can use verification for cause to review approved applications when known or available information indicates school district employees may have misrepresented their incomes on their applications.

Verification for cause must not be used to automatically verify the households of all school district employees whose children are certified for free or reduced price benefits. However, from among the list of children approved, the Sponsor could identify children of school district employees and use salary information available to the Sponsor to identify questionable applications and then conduct verification for cause on those questionable applications.

It is recommended that a Sponsor consult with legal counsel in establishing the parameters of verification for cause for school district employees. State agencies should assist in ensuring that Sponsors balance administrative requirements and integrity with access to free and reduced price benefits for eligible children.

USDA supports use of verification for cause where appropriate as a method for Sponsors to address integrity concerns. Sponsors and their legal counsel are strongly encouraged to consult with the State agency prior to undertaking verification for cause where concerns with employee misrepresentation of information on a household income eligibility application have been raised.

## Application Selection Procedures

### Available Sample Sizes

There are three sample sizes established for verification activities. The standard sample size must be used by Sponsors unless it qualifies to use one of the alternate sample sizes.

**Standard Sample Size** is the lesser of:

- ◆ Three percent (3%) of all applications approved by the Sponsor for the school year, as of October 1 of the school year, selected from error prone applications; or
- ◆ 3,000 error prone applications approved by the Sponsor for the school year, as of October 1 of the school year.

**Alternative Sample Sizes** that the Sponsor may qualify to use:

- ◆ Alternate One, where the sample size equals the lesser of:
  - Three percent of all applications approved by the Sponsor for the school year, as of October 1 of the school year, selected at random; or
  - 3,000 applications approved by the Sponsor for the school year, as of October 1 of the school year, selected at random.
- ◆ Alternate Two, where the sample size equals the lesser of the sum of:
  - Either
    - 1,000 of all applications approved by the Sponsor, as of October 1 of the school year, selected from error prone applications; or
    - One percent of all applications approved by the Sponsor, as of October 1 of the school year, selected from error prone applications;
  - PLUS the lesser of:
    - 500 applications approved by the Sponsor, as of October 1 of the school year, which provide case numbers in lieu of income information; or
    - One-half ( $\frac{1}{2}$ ) of one percent of applications approved by the Sponsor as of October 1 of the school year, that provide case numbers in lieu of income information.

### Completing the Sample Size

For sample sizes based on error prone applications, there may not be enough applications that meet this criterion. When this happens, the Sponsor must select, at random, additional approved applications to complete the required sample size.

In other situations, the number of error prone applications may exceed the required sample size. When this happens, the Sponsor must randomly select the required number of applications from all error prone applications.

## Qualifying to Use an Alternate Sample Size

There are two ways a Sponsor may annually qualify to use an alternate sample size based on lowered non-response rates. KN-CLAIM will determine if a Sponsor qualifies and displays options that can be used.

- ◆ Lowered Non-Response Rate: Any Sponsor may use an alternate sample size for any school year when its non-response rate for the preceding school year is less than 20 percent. For example, for SY 2014-2015, the Sponsor could have elected to use one of the alternate sample sizes because in SY 2013-2014, the LEA's non-response rate was 18 percent.
- ◆ Improved Non-Response Rate: A Sponsor with more than 20,000 children approved by application as eligible, as of October 1 of the school year, may use an alternate sample size for any school year when its non-response rate for the preceding school year is at least 10 percent below the non-response rate for the second preceding school year.

## Post Selection Procedures

There are two procedures that the Sponsor completes prior to contacting the household to obtain documentation of eligibility. These are the required confirmation reviews and the optional replacement of certain applications.

Note: The confirming official cannot be the same person as the hearing official or the verifying official.

## Confirmation Reviews

Prior to any other verification activity, a confirming official, other than the official who made the initial eligibility determination (determining official), must review each approved application selected for verification to ensure that the initial determination was accurate.

This requirement is waived if the Sponsor uses a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination. The Sponsor must indicate the “technology-based solution” and request a waiver on the Pre-Verification Worksheet. KSDE will review and determine if the system qualifies for a waiver.

Further, any Sponsor that conducts a confirmation review of all applications at the time of certification is not required to conduct confirmation reviews prior to verification.

Depending on the outcome of each confirmation review, the Sponsor takes one of the following actions:

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<i>No Change in Status</i>	If the initial eligibility status was correct, the Sponsor verifies the application.
<i>Status Change From Reduced Price to Free</i>	The Sponsor: <ul style="list-style-type: none"> <li>◆ Makes the increased benefits available immediately;</li> <li>◆ Notifies the household of the change in benefits; and</li> <li>◆ Verifies the application.</li> </ul>
<i>Status Change From Free to Reduced Price</i>	The Sponsor: <ul style="list-style-type: none"> <li>◆ Does not change the child’s status; and</li> <li>◆ Verifies the application.</li> <li>◆ If the child’s free status is verified, the Sponsor does not notify the household. However, if the child’s status changes from free to either reduced price or paid, the household is sent a notice of adverse action.</li> </ul>
<i>Status Change From Free or Reduced Price to Paid</i>	The Sponsor: <ul style="list-style-type: none"> <li>◆ Immediately sends the household a notice of adverse action;</li> <li>◆ Does not verify the application;</li> <li>◆ Selects a similar application, such as another error-prone application, for verification; and</li> <li>◆ Follows the confirmation review procedures for the newly selected application.</li> </ul>

When a change in benefit level results from a confirmation review, send the household the appropriate notification letter (**Letter to Household about Benefit Decrease or Letter to Household about Benefit Increase** Form 8-N).

### Replacing Applications

After completing the confirmation reviews, the Sponsor may, on a case-by-case basis, replace up to five percent of applications selected. Applications may be replaced when the Sponsor believes that the household would be unable to satisfactorily respond to the verification request.

Any application removed must be replaced with another approved application selected on the same basis, that is, an error-prone application must be substituted for a withdrawn error-prone application. The newly selected application must then have confirmation review.

In those Sponsors where five percent of total applications result in less than one, one application may still be replaced. All results of the five percent calculation are rounded up to the next whole number.

### Household Notification of Selection

Once the Sponsor has completed the post selection procedures, the Sponsor proceeds with household notification.

### Contacting the Household

When a household is selected for verification and is required by the Sponsor to submit documents or other forms of evidence to document eligibility, the household must be sent a letter informing them of their selection and of the types of information acceptable to the Sponsor (**Confirm Your Eligibility for Free/Reduced Price Meals**).

The letter must include the following:

- ◆ That the household was selected for verification;
- ◆ Use of Information Statement (note that the social security numbers for all household members is no longer required for verification);
- ◆ The types of acceptable information that may be provided to confirm current income, including pay stubs, award letters from assistance agencies for benefits such as social security or SSI, and support payment decrees from courts;
- ◆ That the household may provide proof that a child or any household member is receiving benefits under the Assistance Programs instead of providing income information or that a child is Other Source Categorically Eligible; that documentation of income or receipt of assistance may be provided from any point in time between the month prior to application and the time the household is required to provide income documentation;
- ◆ That information must be provided by a date specified by the Sponsor and that failure to do so will result in termination of benefits;
- ◆ Name of an determining official who can answer questions and provide assistance; and
- ◆ A no-cost to the household telephone number.

When the Sponsor uses agency records or direct verification to confirm eligibility, a letter informing the household of its selection for verification is not required, since the household will not have to provide documents.

For verification inquiries, the Sponsor must provide a telephone number that is available at no cost to the household. The Sponsor may establish a toll-free number or allow the household to reverse the charges if any household in that Sponsor are outside the local calling area. The Sponsor may also provide different telephone numbers for each local calling area within the Sponsor.

When notifying households of selection for verification, in addition to the notification letter, the following forms may be used:

- ◆ How to Prove Eligibility (Form 8-E)
- ◆ Household Members' Names (Form 8-F)
- ◆ Confirmation of Earnings (Form 8-G) – Use of this form is optional. Households may ask employers to complete this form when paycheck stubs are not available.

## Sources for Verification

### Written Evidence

Written evidence is the primary source of eligibility confirmation for all households, including TAF, FDPIR, Other Source Categorical Eligibility Programs, and foster child households. Written evidence is most often pay stubs from employers or award letters from welfare departments or other government agencies submitted to the verifying officials as confirmation of eligibility.

Income to be reported by households is gross earned income, which includes any money received on a recurring basis. Gross income means all money earned before income tax, Social Security, insurance premiums or other deductions are withheld.

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Acceptable written evidence for income eligible households contains the name of the household member, amount of income received, frequency received, and the date the income was received. For example, a pay stub with no dates would be insufficient.

Acceptable written evidence for children who are receiving benefits from an Assistance Program is an official letter or notice indicating that the child or any household member is receiving benefits from that program. For example, a notice of eligibility is sufficient.

For Other Source Categorical Eligibility Programs, acceptable written evidence is an official letter, notice, or list from the appropriate State agency, Social Service agency, or program office or coordinator, or court.

The verifying official should examine the document provided to ensure that the child for whom the application was made is part of a household currently participating in any of these programs noted above or is a foster child. Electronic Benefit Transfer (EBT) cards cannot be used to confirm eligibility in FA and therefore cannot be used for categorical eligibility purposes.

A household that does not have satisfactory documentation may request a signed, dated letter from these offices verifying that the child is part of a household currently receiving their benefits. A document from an Assistance Program that does not specify the certification period does not meet the documentation for verification. For example, the FA identification card is not acceptable because it usually does not have an expiration date.

Sponsors must use the Verification Worksheet (Form 8-K) to document each household's verification.

### Collateral Contacts

A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income participation in Assistance Programs or Other Source Categorical Eligibility Program sources. Collateral contacts include employers, social service agencies, migrant workers' agencies, and religious or civic organizations. The verifying official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.

The verifying official must give the household the opportunity to designate the collateral contact. However, the verifying official may select a collateral contact if the household fails to designate one or designates one who is unacceptable to the verifying official. In either case, no contact may be made without first notifying the household and obtaining its permission.

All collateral contacts may be written or oral and must be documented, dated, and initialed. The Sponsor will examine any written information provided by the collateral contact or evaluate any oral information. If the collateral contact is unwilling or unable to provide the requested information, the Sponsor must contact the household to complete the verification process.

### When a Household Provides Pay Stubs

If a weekly pay stub is representative of what the household normally receives each week, one pay stub is sufficient.

If the household submits a pay stub that includes overtime, the determining official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime.

### Unacceptable Documentation

Income tax forms are **NOT** considered acceptable proof of income except for households with irregular income (i.e. farmers, seasonal workers, self-employed persons, etc.). In these cases, tax forms may be used to project the amount of income the household expects to receive for the current year.

Documentation for Food Assistance/TAF/FDPIR households that does not specify the certification period is not adequate proof of participation. For example, the Food Assistance identification card is not acceptable because it does not have an expiration date.

### When a Household Indicates No Income

If a household is selected for verification, or the application is being verified for cause and the application indicates zero income, the Sponsor must request an explanation of how living expenses are met and may request additional written documentation or collateral contacts. For example, the collateral contact may be asked to document the duration and type of assistance that is provided to the household.

### Direct Verification

Direct verification is using records from public agencies to verify income or program participation. Direct verification may be completed at the State or local level, or through a joint effort at both levels.

Sponsors are not required to conduct direct verification. However, any Sponsor that intends to conduct direct verification must contact the State agency for assistance with establishing a direct verification method. Direct verification may be used when the household application, certified based on case number, is subject to verification under the Sponsor's use of alternative sample size.

Sponsors may conduct direct verification activities with Assistance Programs, such as a local tribal office to confirm a household's receipt of FDPIR (use Forms 8-H and 8-I). Direct verification must be conducted prior to contacting the household for documentation. The public agency's records may document income for any point in time between the month prior to application and the time the household is required to provide income documentation.

If verification results in higher benefits for example a child who is moved from the reduced price to free category, the change is effective immediately and must be implemented no later than three operating days from the date verification was completed. Parents should be promptly notified through whatever channels the Sponsor uses to notify the household of approval for benefits.

## Names Submitted for Direct Verification

The Sponsor must only submit the names of school children certified for free or reduced price meal benefits listed on the application. These names are submitted to the agency administering an eligible program. The names of other household members – all adults, children who are not attending school, or children not approved for free or reduced price benefits – cannot be submitted for direct verification purposes.

## Direct Verification with Assistance Programs

If information obtained through direct verification of an application for free or reduced price meal benefits indicates a child is participating in one of these programs, no additional verification is required. The eligibility status of the child or children listed on the application is considered verified.

## Documentation Timeframe

The information used for direct verification must be the most recent information available which is defined as data which is no older than 180 days prior to the date of the free and reduced price application. To be consistent with policy established for “regular” verification, direct verification efforts may use information from any point in time between the month prior to application and the time the Sponsor conducts direct verification.

In other words, for direct verification, Sponsors and State agencies may use:

- ◆ The latest available information for one month, within the 180-day requirement; or
- ◆ Information for all months from the month prior to application through the month direct verification is conducted.

An example of this would be where the State agency or Sponsor used data for the month of September or, if available, for August through October.

## Incomplete or Inconsistent Information

If information provided by the public agency does not verify eligibility, the Sponsor must proceed with regular verification activities.

## Continuing the Verification Process

To continue the verification process subsequent to household notification, the Sponsor must either determine:

- ◆ If the household has submitted adequate information to complete its individual verification activity; or
- ◆ If follow-up with the household is needed.

## Follow-Up

The Sponsor must make at least one follow-up attempt to contact the household when the household does not adequately respond to the request for verification. The follow-up attempt may be in writing (including to the parent or guardian’s e-mail) or by telephone and the Sponsor must document that a contact was attempted. Sponsors must ensure the LEP households are

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provided adequate language assistance and understand the need to respond to the verification request.

- ◆ The Sponsor must inform the household that failure to provide adequate written evidence or to designate an adequate collateral contact will result in termination of benefits.
- ◆ The follow-up contact must attempt to obtain the missing written evidence or obtain collateral contact information.
- ◆ If the collateral contact is unwilling or unable to provide the requested information, the Sponsor must contact the household to complete the verification process.

The Sponsor must make a follow-up attempt when the household:

- ◆ Does not respond to the initial request for verification;
- ◆ Submits insufficient or obsolete written evidence;
- ◆ Does not designate collateral contacts; and
- ◆ Collateral contacts are unable or unwilling to provide the requested evidence.

If, after at least one follow-up attempt, the household responds and provides all needed evidence, verification is considered complete for this household:

- ◆ If there is no change in benefits; or
- ◆ When the household is notified that its benefits will be increased; or
- ◆ When notice of adverse action is sent.

If the household does not respond, verification is considered complete for this household when notice of adverse action is sent.

If, after at least one follow-up attempt, the Sponsor is unable to continue its verification activities because the household fails to provide adequate written evidence or knowledgeable collateral contacts, verification is considered complete for this household when the notice of adverse action is sent.

### When Verification is Considered Complete

The following demonstrates how a Sponsor determines whether or not the household adequately responded and whether follow-up is required.

- ◆ The household submits either adequate written evidence or collateral contact corroboration of income or categorical eligibility: verification is considered complete for this household.
- ◆ The household submits either adequate written evidence or collateral contact corroboration of income which indicates that the children should receive either a greater or lesser level of benefits: verification is considered complete for this household when the notice of adverse action is sent or household is notified that its benefits will be increased or decreased.
- ◆ The household indicates, verbally or in writing, that it no longer wishes to receive free or reduced price benefits: verification is considered complete when the notice of adverse action is sent.
- ◆ The application provided case numbers and it is determined that no household member is receiving benefits from an Assistance Program: verification is considered complete when the notice of adverse action is sent.

### Notify Households of Changes in Benefits

After notification is sent to households and they have been asked to submit verification of eligibility, one of the following four outcomes will result:

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1. **Benefits Decrease:** The household complies with the request and provides information, but the evidence shows the household is eligible for a lower benefit level than was previously determined or the household indicates, verbally or in writing, that they no longer wish to receive benefits. Verification is considered complete when the household is sent the Letter to Household about Benefit Decrease, and is provided ten-calendar days written notice of the change in eligibility status. Benefits must be changed on the specified date.
2. **Benefits Increase:** The household complies with the request and provides information, but the evidence shows the household is eligible for a higher benefit level than was previously determined. Verification is considered complete when the household is sent the Letter to Household about Benefit Increase (Form 8-N) and increased benefits are provided immediately.
3. **Benefits Do Not Change:** The household complies with the request and provides information that confirms the eligibility determination previously made. Verification is considered complete. Sponsors may inform households by sending the Letter to Household about No Change in Benefits (Form 8-O).
4. **Household Does Not Respond or Submits Incomplete or Obsolete Information:** The sponsor must attempt to contact the household at least one additional time to request the missing information and notify them that failure to comply will result in termination of benefits. The sponsor may contract with a third party to assist with the required follow-up activity. Any third party is subject to the confidentiality requirements outlined in Chapter 6 of *Food Service Facts*.

The follow-up attempt(s) may be made through the mail, by telephone, by e-mail, or through personal contact. The sponsor must document on the Verification Worksheet (Form 8-K) any attempts and the results, if any. If the sponsor is unable to verify the household's eligibility status after the follow-up attempt(s), the household's benefits must be terminated through a Letter to Household about Benefit Decrease.

Verification is considered complete when the sponsor receives adequate information to determine eligibility and the household is sent the appropriate notification letter:

- ◆ Letter to Household about Benefit Decrease,
- ◆ Letter to Household about Benefit Increase (Form 8-N), or
- ◆ Letter to Household about No Change in Benefits (Form 8-O),

All households for which benefits are to be reduced or terminated must be given ten-calendar days advance written notice of the change. The first day of the notice period is the day the Letter to Household about Benefit Decrease is sent.

If the household does not appeal, the benefits must be reduced or terminated on the specified date. When household appeals a reduction of benefits within the ten-calendar days advance notice period, the sponsor must continue to provide the benefits for which the child was originally approved until a final determination is made. Ensure that meal program accountability is updated on the date indicated on the Letter to Household about Benefit Decrease and Letter to Household about Benefit Increase Form 8-N. Use the Notification to Attendance Center about Change in Eligibility Status Form 8-L to facilitate making eligibility changes.

## Report Results using KN-CLAIM's Post Verification Results

The sponsor must complete verification of the minimum required sample size by the verification completion deadline, November 15.

Form 8-Q, Part 1 Pre Verification Worksheet and Part 2 Post Verification Results, is intended to be used as a worksheet. The information on this form must be entered by the sponsor into KSDE's KN-CLAIM computer system by December 15 each year. The data is entered on the "Post Verification Results" screen which is very similar to Form 8-Q. KSDE may need to update the form and related computer screens frequently to respond to changing requirements from USDA. Be sure to use the form issued by KSDE for the current school year.

The Application for CNP Benefits is the official document from which eligibility is determined. Therefore, when the eligibility category changes the status change must be documented on the application and on rosters, databases and the medium of exchange used for meal accountability.

## Record Keeping

The sponsor must keep the following documentation on file to demonstrate compliance with the verification requirements:

1. Copies of all documents submitted by the verified households, or by collateral contacts, or by agencies completing direct verification
2. Documentation of all relevant correspondence/contact between the households and the sponsor
3. Copies of the applications selected for verification
4. The completed Pre Verification Worksheet (Form 8-K) for each household verified.
5. Post Verification Results (Form 8-Q) – It is not necessary to retain a written copy of this worksheet once the data has been entered in the KN-CLAIM computer system.

## Verification for Cause

An application may be verified at any time during the school year after it has been approved and the household has been notified. The sponsor has an obligation to verify any application that contains questionable information. However, any verification that is done "for cause" is **in addition** to the required sample. Only the minimum required number of applications must be verified by the deadline, November 15.

**Foster Child’s Application**

**Q** *What kind of written evidence is required for verification of a foster child’s application?*

**A** If the foster child’s name cannot be found on KSDE’s Direct Certification website, ask the foster family and/or the placement agency for a copy of written communication in which the status of the child and the financial arrangement is stated.



**Verification Documentation Dates**

**Q** *Am I to verify eligibility at the time of application or at the time of verification?*

**A** Households must be allowed to provide documentation of income for any point in time between the month prior to application and the time of verification.



**Income from Overtime**

**Q** *How is overtime income counted for verification purposes?*

**A** The verifying official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income (i.e. without overtime). Looking at “year to date” totals on paycheck stubs may help determine if overtime income is sporadic or regular. The household may provide additional check stubs to reflect frequency of overtime income.



**Income from Multiple Sources**

**Q** *If a household reports income from several sources (i.e., salary, child support and self-employment) must they provide evidence for each source of income?*

**A** Yes. Verification of all income sources is required. In general, anything considered as income for the initial application process is also considered as income for verification purposes, and documentation for such income is required. There should also be documentation of the loss of an income source, such as a lost job.

**Weekly Income**

**Q** *If a household is paid weekly and submits a pay stub for a week, must I go back and ask for pay stubs for a whole month?*

**A** Pay stubs for a whole month are not required.



**Household Moves**

**Q** *What if an application is selected for verification, but the household transfers out of the school or district before the information can be verified?*

**A** If a household selected for verification transfers out of the school or district before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application must be selected.



**Benefits During Notification Period**

**Q** *When a Notification to Household of Benefit Decrease (Form 8-M) letter has been sent, can I claim reimbursement for reduced price or free meals served to the child during the ten-day period before the benefit is decreased?*

**A** Yes. During this ten-day period, the child continues to be eligible for reduced price or free Child Nutrition Program benefits and the sponsor may continue to claim reimbursement for these meals.



**Seasonal Worker**

**Q** *Is a seasonal worker, such as a teacher's aid or school cook, eligible for reduced price or free meal benefits based on income during the summer months when the person was not working?*

**A** A seasonal employee has regular income for most months of the year. To determine "current monthly income", divide the annual income by 12 months. Although the individual may not have received a check in July or August, zero income should not be reported for these months. Instead, the household should be asked to provide documentation of its annual income.

## Benefits During Appeal of Verification Results

Households have the right to a fair hearing concerning the reduction of meal benefits due to verification activities. When a household appeals a reduction of benefits within the ten-calendar day advance notice period, the sponsor must continue to provide the benefits for which the child was originally approved until a final determination is made.

When a household does not appeal a reduction of benefits during the ten-calendar day advance notice period, the actual reduction of benefits **must** take place immediately after the ten-calendar day advance notice period.

## Hearing Procedure

The hearing procedure outlined in the Program Agreement, Section 1, must be followed. The designated hearing official must be an individual who is not involved with the approval or verification process. The decision of the hearing official must be based on the income documentation provided by the household and the current Income Eligibility Guidelines. Following the hearing, the household should be notified in writing within five days of the decision using the Letter to Household Following Hearing (Form 8-P).

## Households that Reapply for Program Benefits

A household that is terminated for failing to respond to verification efforts may reapply for Child Nutrition Program benefits in the same school year. However, at the time of reapplication they **MUST** provide either income documentation or proof of participation in FA, TAF, or FDPiR. The sponsor must verify the households' eligibility prior to approval.

## Reminders

- ◆ Verification must take place **after** the application has been approved and the household has been notified of benefits, even when the sponsor requires households to submit documentation of eligibility or the household provides documentation with the application.
- ◆ Round all decimals upward when determining the required sample size of applications to be verified.
- ◆ Each household application counts as only one application, regardless of the number of students included on the application.
- ◆ Sponsors must verify at least as many applications as calculated in the KN-CLAIM Post Verification Worksheet but may verify no more, unless an application is verified “for cause”. Selection must not discriminate against anyone on the basis of race, color, national origin, age, sex or disability.
- ◆ An application may be verified “for cause” at any time during the school year after it has been approved. Only the minimum required number of applications must be verified by the November 15 deadline.

- ◆ The sponsor must complete the verification process for all households that have been notified of their selection for verification and have been asked to submit verification information.
- ◆ If the household does not respond to a request for verification information, the sponsor is required to make at least one additional attempt to obtain the verification information from the household. The method and results of the contact should be documented and copies of all correspondence with the household kept on file.
- ◆ A household that does not respond is given another opportunity to respond when the Letter to Household about Benefit Decrease letter is sent.
- ◆ If a household selected for verification transfers out of the sponsor's program before the information can be verified, verification cannot be completed. To meet verification requirements, a new application **must** be selected.
- ◆ If verification results in an increase in benefits (i.e. a child is changed from reduced price to free meal benefits), this change is effective immediately, but no later than three operating days. Parents/guardians should be notified of the change in benefits as quickly as possible. See Letter to Household about Benefit Increase (Form 8-N).

### Verification Forms and Letters

Use the letters and forms provided in *Food Service Facts* to ensure that all required information has been included. Keep copies of all correspondence with households on file for review or audit.

### Meeting the Verification Deadline

Verification is an annual requirement. The verification completion deadline is November 15. This deadline is the same whether it falls on a weekday or weekend.

The minimum sample size of applications to verify is based on the total number of approved applications on the "verification count date", October 1. The verification official is not required to wait until the count date to begin. Sponsors are encouraged to begin as early as possible. Do not wait for a reminder from KSDE to begin the verification process.

To prevent overlooking the verification count date and deadline, KSDE recommends that sponsors:

- ◆ Mark October 1 (application count date), October 31 (student count date), and November 15 (verification completion deadline) on the school calendar of events or a calendar noting other important dates and deadlines.
- ◆ Ensure that more than one person is aware of the completion deadline and of the verification requirements and/or assign an alternate verification official. This will help to ensure timely completion of verification even if one of the assigned staff is unavailable.
- ◆ Develop a written verification plan that includes the methods to be used and the time frames by which each step must be accomplished. The basic plan can be used year after year and can be given to new personnel to help them complete the process more easily in their first year of responsibility for verification.
- ◆ Allow sufficient time for the Indian tribal office to verify household eligibility. Thirty days is the minimum a sponsor should allow when using direct verification.

If verification cannot be completed by the deadline, a written request for an extension of the verification deadline is required. The request must be submitted to Child Nutrition & Wellness, KSDE and must be approved in writing prior to November 15.

### USDA Verification Toolkit

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

To assist sponsors with increasing verification response rate, FNS has developed a Verification Toolkit. The toolkit contains a collection of resources that Sponsors can use in their efforts to improve verification response rates and the overall efficiency of the process. These resources were developed by FNS but feature input from State and local officials from around the country. They were informed by two years of formal studies conducted by FNS and the Office of Evaluation Science's Social & Behavioral Sciences Team, as well as through a public contest and from informal conversations with program operators.

Resources include:

- ◆ [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](#) (for more information, see policy memo [SP42-2017](#)). To customize a verification timeline for yourself, [use this file as a starting point](#).
- ◆ [Redesigned Verification Notification Letter](#) (rich text, with images)
- ◆ [Redesigned Verification Notification Letter](#) (plain text, without images)
- ◆ [Flyer for Households – Submit Verification Documents with Your Smartphone!](#)
- ◆ [Sources of Income for School Meal Eligibility](#)