



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch and Breakfast Programs

FROM: Paul F. Flinter, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: September 28, 2007

SUBJECT: Operational Memorandum # 30-07
Verification of Free and Reduced Meal Applications

By **November 15th** school districts must complete verification of a sample of their approved free and reduced price meal applications. The verification sample is obtained from meal applications on file as of the first operating day in October. The sample size is selected using the methods outlined in Sections I and II below. **Verification is restricted to the sample size.** For example, if you have selected a sample size of five households to verify, verify only five households. One hundred percent (100%) verification of all applications on file is not allowed.

Updated Verification forms may be downloaded on the following website:
<http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320644>. For more information pertaining to Verification, refer to the two enclosed tools to assist you in conducting this process: **Important Points to Remember** and the **Verification Check List**.

As an overview, there are three methods for selecting the verification sample, explained in Sections I and II below. General verification procedures/requirements are summarized in Section III.

Section I. Basic Sample Size Verification

If a school district's 2006-2007 Verification Summary Report indicated that they had a **non response rate** of 20% or more, the school district is required to do Basic Sample Size Verification. The **non-response rate** is defined as the percentage of approved household applications selected for verification for which verification information has not been obtained by the sponsor (e.g., the household failed to respond to the verification process.)

School districts must choose either 3,000 applications or three percent of all approved applications; whichever is less, as the basic sample size for verification. All applications selected for verification must be *error-prone*. Error-prone refers to those approved applications that listed household income within \$100 monthly or \$1200 annually of the free or reduced price eligibility guidelines for that household size. Error-prone does NOT include food stamp or Temporary Family Assistance (TFA) applications. If there are not enough error-prone applications to meet the required sample size, districts must randomly select additional

applications from *all* applications on hand, *including* food stamp/TFA applications, to fulfill the number requirement. *Please note that direct certification letters from the Department of Social Services, homeless/migrant/runaway certifications, and names that are supplied on an approved list from the Department of Social Services are **not** part of the Verification process.*

Section II. Alternate Sample Sizes

Districts may use the traditional random or focused methods of verification if the district meets either of the following conditions:

Condition #1

Any district where the non-response rate for the prior school year is less **than 20 percent**, or

Condition #2

Districts with more than 20,000 children approved by application (excluding direct certification students and homeless/migrant/runaway certifications) by October 1 that meet the following sub-condition:

- (a) The *non-response rate for school year 2006-07 is at least 10 percent below the verification non-response rate for school year 2005-06

Note: Any use of alternate methods would be subject to documented justification of conditions (percentage requirements and/or direct verification documents) during a CRE review or as requested from the state agency. For more information, contact the State Agency.

Once the above conditions are met, alternate sample size choices are the same options used in previous years outlined in the *Eligibility Guidance for School Meals* manual. The options are summarized below:

- Alternate 1 (Random): The minimum required sample size is 3 percent or 3,000, which ever is less, of all approved applications on file on October 1st. The applications must be selected at **random** without consideration of which are error-prone.

- Alternate 2 (Focused):

- 1) Verify 1 percent of *total approved applications*; if this percentage results in verifying more than 1000 applications, the SFA may limit verification to 1000 applications. The sample must be taken from error-prone applications, **plus**

- 2) Verify the lesser of .5 percent (half of 1 percent) or 500 applications with a case number (Food Stamp, TFA applications).

Section III. Regardless of the method used for Verification, the following applies:

- School sponsors now have the authority to decline to verify no more than 5% of the applications in the selected sample. This should be done with discretion and on a case-by-case basis. Factors such as household stability and communication difficulties are examples of reasons for not selecting a household for verification. Any application that was removed from the sample must be replaced with another approved application.
- School officials verifying income applications must allow households to provide documentation of income for **any point in time between the month prior to application and the time the household is required to provide documentation.** The current *Eligibility Guidance for School Meals* manual specifies that households that are selected for verification must document their income for the most recent month available. This is no longer in effect.
- School sponsors must provide all households selected for verification with a telephone number that they may call for assistance. The call must be **free** to all households in the school district. The school food authority may establish a toll-free number or allow the household to reverse the charges if any households in the school district are outside the local calling area. The school district may also provide different telephone numbers for each local calling area within the school district.
- **Confirmation Review** -sponsors must first review all of the selected applications to confirm that they were correctly approved. This is the “confirmation review and is **required**. The individual who conducts this review is called the “confirming official” and must be a different individual than the “determining official” who signed the application to establish the initial eligibility. Note: Schools have the option of conducting the confirmation review at the time of application as well. This would require that you do a confirmation review of all applications.

Documentation of the confirmation review must be kept on file by your district.

The requirement for a confirmation review may be waived if 1) the district uses an accurate technology-based automated system, and 2) the state agency gives approval after confirming that the automated system is accurate. To receive a waiver for the confirmation review, a letter explaining how your POS system ensures accuracy of the determination process must be submitted and approved by the Child Nutrition Programs.

- **Follow-up Official** -The “follow-up official” is the person who contacts a household that fails to respond to the initial Verification request. This person must make at least one attempt to obtain the required verification data from the selected household. The follow-up official may be the determining official, the confirming official or other appropriate staff member. The attempt may be made through the mail, by telephone, by e-mail or through personal contact. Please note that the school district must document in writing, on the actual application, each attempt to

contact the household for verification. *If the district is unable to verify the household's eligibility after at least one follow-up attempt, the household's benefits must be terminated through a notice of adverse action.*

The school sponsor may contract with a third party to assist with the required follow-up activity. Any third party is subject to confidentiality requirements based on current regulations.

Additionally, the follow-up attempt must be done early enough to allow verification to be completed by November 15th. Verification of an individual application is complete when a household's eligibility for the level of benefits for which it was approved is: a) confirmed; or b) changed to a higher level of benefit; or c) a letter of adverse action has been sent informing the household that benefits will be reduced; or d) a letter of adverse action has been sent informing the household that benefits will be terminated.

Questions about any of the information provided in this Memorandum may be directed to the following staff:

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Enclosures