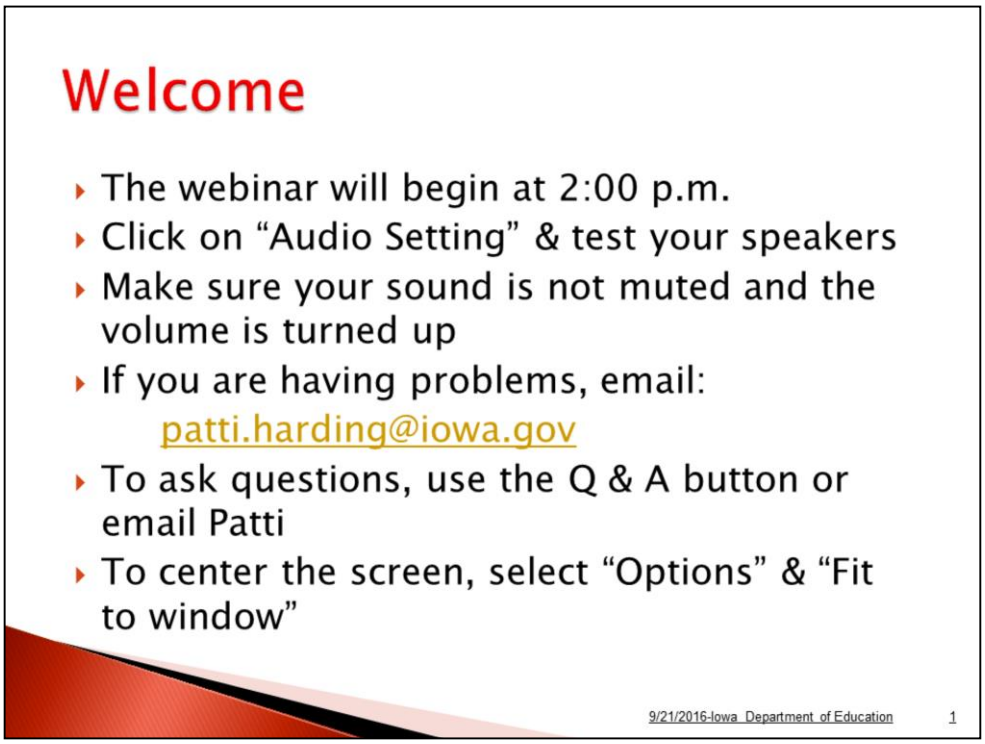

Welcome to the Verification Webinar for school year 2016-2017. My name is Deb Linderblood and I will be the presenter

for today's webinar. Patti Harding, our Administrative Assistant, will be assisting me today.

If you are having problems hearing, after you have tested your speakers and made sure that your sound is not muted and that

your sound is turned up, please email Patti at patti.harding@iowa.gov.

To ask questions, please use the Q&A button or email Patti. I will be answering questions partway through the webinar and at the end.

- This webinar will be recorded and posted at https://www.educateiowa.gov/pk-12/nutrition-programs/school-nutrition/income-eligibility-and-verification.
- Counts as Professional Standards training
- Certificate was emailed with the webinar link and will also be posted with the recording along with the power point notes pages
- Be sure the individual who does tracking of professional training knows you participated in this webinar

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This webinar is being recorded and will be posted at the link on this slide.

The webinar will count as part of your Professional Standards training. A certificate was email

with the webinar link and the certificate will also be posted with the recording along with the

Power point notes pages.

Please be sure that the individual who does the tracking of professional training knows that you participated

in this webinar.

Training Documentation

Professional Standards Training Documentation

September 20, 2016 Verification Webinar

Presenter: Deb Linderblood 515-281-5663 deb.linderblood@iowa.gov

Date: Tuesday, September 20, 2016 - 2:00 pm to 3:00 pm

Description:

- Purpose of verification
- Timeline
- Determining the sample pool and sample size
- Use of ICAVES
- Verification process
- Direct Verification
- Verification for cause
- Highlights of the Verification Report

USDA Professional Standards Areas:

Free and Reduced Price Meal Benefits (3100) – 1 HOUR

Participants will be able to:
3110 - Certify, process, and verify free and reduced price meal eligibility benefits in compliance with Federal regulations

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This slide shows what the training certificate looks like.

VERIFICATION TRAINING

September 20 & 27, 2016
Bureau of Nutrition and Health Services

Deb Linderblood, Consultant

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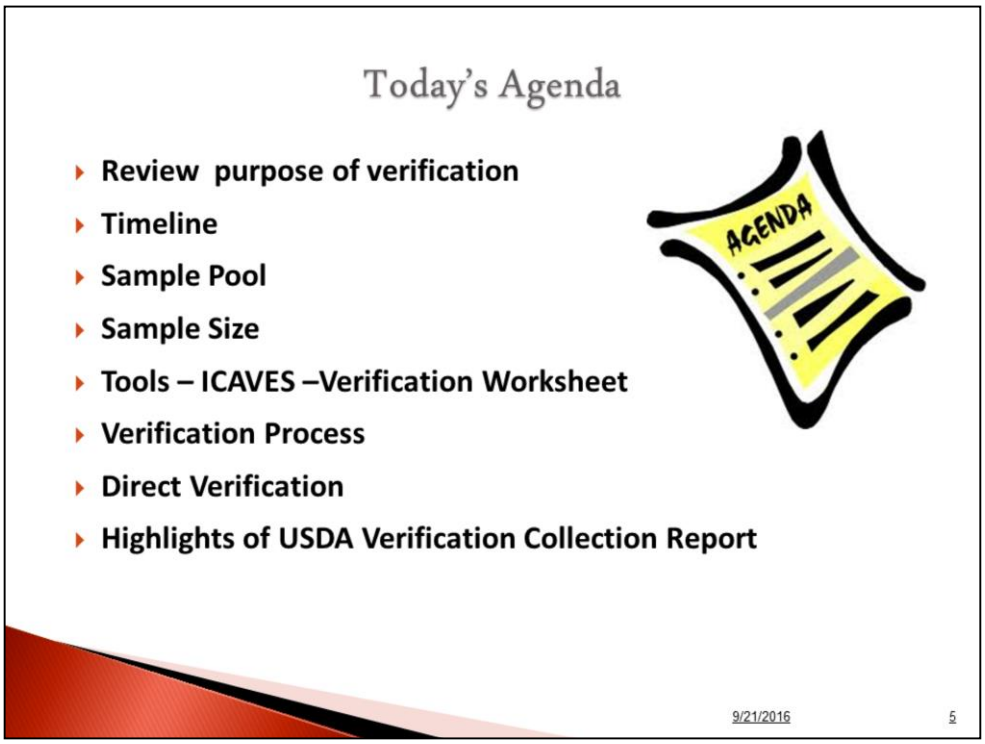
We will now begin the verification training.



Today's webinar will cover:
The Purpose of verification,

The Timeline for completing verification,

Define the Sample Pool,

Determine how to obtain your Sample Size,

Review the Tool ICAVES and how to use the Verification Worksheets,

Discuss the Verification Process,

Go over Direct Verification

And last we will go over Highlights of USDA Verification Collection Report

Purpose of Verification

- Verification is the confirmation of eligibility for free and reduced price school meals under the National School Lunch Program and the School Breakfast Program.

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The verification process confirms the integrity of the school meals programs. It is NOT designed to confirm the eligibility of every applicant and participant. Verification is only required when eligibility is determined through the application process, not through direct certification or with officials or agencies who documented Other Source Categorical Eligibility, which includes your homeless, runaway and migrant students.

Eligibility Manual for School Meals

Determining and Verifying Eligibility

School Year 2016-2017

https://www.educateiowa.gov/sites/files/ed/documents/2016%20Eligibility%20Manual%20for%20School%20Meals.pdf

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A great reference for you to use when completing the verification process is the 2016-2017 Eligibility Manual for

School Meals. Verification is covered in section 6. The link to access the manual is on this slide.

SFAs that must Complete Verification

- All public and non-public School Food Authorities (SFAs) participating in the National School Lunch Program and School Breakfast Program.
- All Residential Child Care Institutions (RCCIs) that have day students.

SFAs that must complete verification include: all public and non-public School Food Authorities (SFAs) participating in the National School Lunch Program and School Breakfast Program.

Also, RCCIs with day students must complete the verification process.

SFAs Exempt From Verification

- RCCIs *with "NO"* day students
- Schools/districts in Special Milk Programs only – No NSLP or SBP
- Schools with no free or reduced price eligible students

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The SFAs who are exempt from verification include:

RCCIs *with "NO"* day students

Schools/districts in the Special Milk Program only as they do not participate in the NSLP or SBP and also

schools with no free or reduced price eligible students.

For RCCIs with "No" day students and schools with no free or reduced price eligible students the **Verification Process is not required but the Verification Report must be completed.** USDA requires all SFAs participating in the School Breakfast Program and National School Lunch Program to complete the Verification Report even it no students were verified.

Also, School Food Authorities (SFA)s with split session kindergarten participating in Special Milk Programs may choose not to include these children in the verification pool.

SFAs Exempt from Verification

- SFAs 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.
- All entities are required to file the Verification Collection Report

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Also exempt from verification are SFAs where all schools participate in CEP or in Provisions 1, 2, or 3, except in the base years in Provision 1, 2, or 3 schools in which applications are taken for all children in attendance. SFAs with some, but not all schools selecting CEP must still conduct verification in the schools not electing CEP. Once again, these SFAs do need to complete the Verification Report.

Applications Subject to Verification

Verification is required when eligibility is determined through the **application** process

- **Applications based on income**
- **Applications with foster children listed**
- **Applications based on a FIP or Food Assistance case number written onto an application**

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As I stated previously, verification is required when eligibility is determined through the application process, which includes:

Applications based on income

Applications with Foster children listed

Applications based on FIP or a Food Assistance case number. This is when a case number is written onto an application.

Applications *NOT* Subject to Verification

- Carry-over applications
- Other Source Categorical Eligible- Children **documented** during the application process as eligible migrant, runaway, homeless children, foster children (on DC list) and children participating in Head Start/Even Start
- Applications approved after October 1

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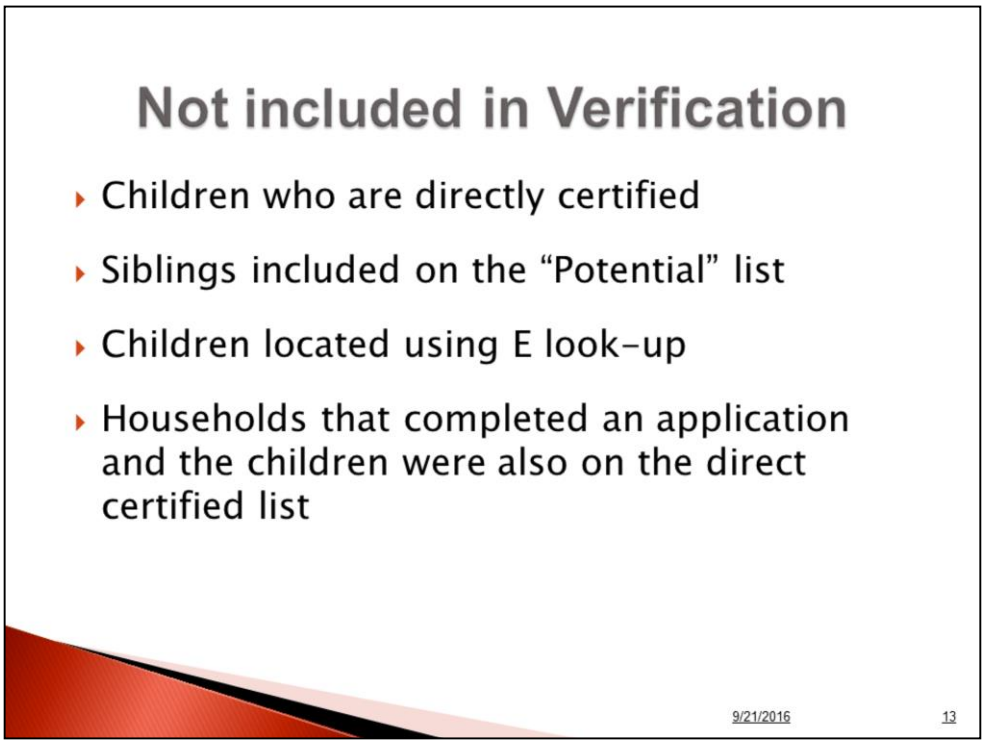
Applications which are not subject to verification include:

Carry-over applications

and

Children documented during the application process as eligible migrant, runaway, homeless children, foster children which are identified on the Direct Certification list and children participating in Head Start/Even Start. For example - if an application is completed by the school's Migrant coordinator or Homeless Liaison they are not included in the verification pool.

Applications approved after October 1 are also not subject to verification.



Also since verification is only completed when eligibility is determined via an application, children who are directly certified are NOT subject to verification. This includes siblings included on the "Potential" list and also children located using E look-up

Households that completed an application and the children were also on the direct certified list should not be verified. These applications should be removed and placed in a separate folder so that they are not counted in the number of applications. These households will need to be counted as Directly Certified when you complete the Verification Collection Report. SFAs should write Dced and the date on the application and file these applications in a folder labeled "became Dced."

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.

Are They Included in Verification?

- Q. A household completes an application and reports both income and a Food Assistance case number. The children are **NOT** on the directly certified list. Is this application included in verification?
- A. Yes – since the application is based on a Food Assistance case number – the income reported is not considered
- Use Direct Verification/E look-up document eligibility

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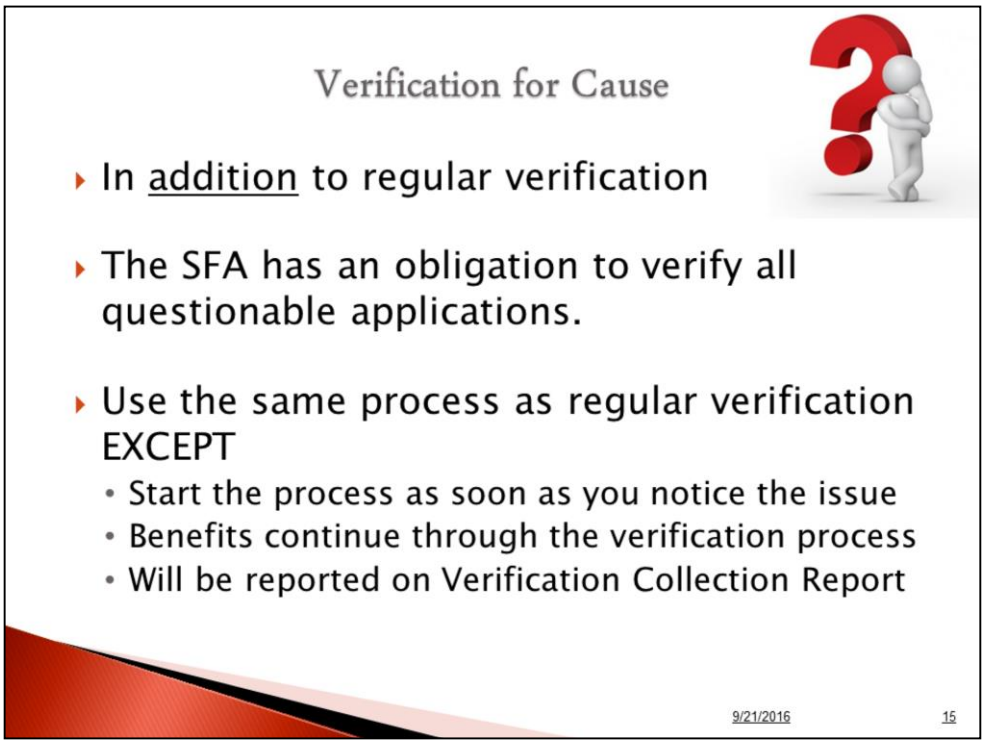
Q. A household completes an application and reports both income and a Food Assistance case number. The children are **NOT** on the directly certified list and were not found on Elookup. Is this application included in verification?

A. Yes – since the application is based on a Food Assistance case number – the income reported is not considered but since their eligibility is

determined using the case number on the application, this application would be subject to verification.

Households with some students who are FIP or Food Assistance eligible may have provided applications with income information. You should convert all the students and all these applications to FIP or Food Assistance applications prior to verification due to extension of benefits via FIP/Food Assistance case number.

Remember if you receive an application for any student(s) and then they are found or a member of that household is found on a DC list or on Elookup, please mark the application as DC and file it in a different place. These applications are not included in the verification process.



In addition, if prior to October 3rd you verify an application for cause, these applications would not be included when you do regular verification as they would have already been verified or may be in the process of being verified. Verification for Cause is done in addition to regular verification.

The SFA has an obligation to verify all questionable applications. Only after the determination of eligibility has been made can the SFA 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.

When verifying for cause, you will use the same process as regular verification EXCEPT you will

- Start the process as soon as you notice the issue (so you may have started the verification process for questionable applications in August or September)
- Benefits will continue through the verification process
- Applications verified for cause will be reported on the Verification Report as a separate line item so you will want to flag these or keep them in a separate folder or under a separate tab in a notebook.

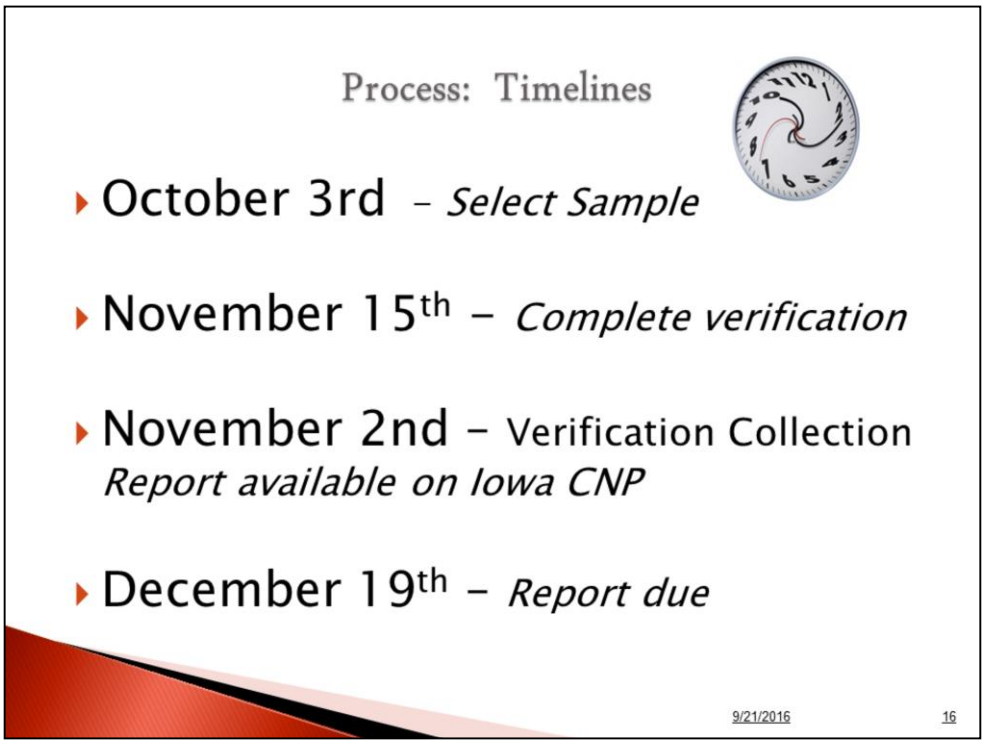
EXAMPLE 1:

Parents provide payroll stubs with an application that do not match what is on the application.

PROCEDURE:

You will approve the application at face value and also send a letter explaining that the household must submit verification of eligibility information for continued eligibility. Then proceed with the verification process.

If a household is selected for verification for cause, the verification process must be completed. Refer to pages 81 and 82 of the 2016 Eligibility Manual for additional information.



The dates for selection of the sample, for completion of the verification process and for completing the Verification Collection report are set by rule.

October 3rd is the date you will s*elect the sample of applications that will be verified. This is normally done on October 1st, but since it is a Saturday this year, you will use the next operating day to establish your sample pool and select your applications to be verified, which is October 3rd.*

November 15th - *Complete verification process*

November 2nd– Verification Collection *Report available on Iowa CNP*

December 19th– Verification Collection *Report due*

Be sure to add these dates to your calendar as these are important dates to remember.

Initial Verification

- Each SFA must annually verify eligibility of children from a sample of household applications approved for free and reduced price meal benefits.
- The SFA may begin verification activity once the application approval process begins however, the sample size must be based on applications on file October 3.

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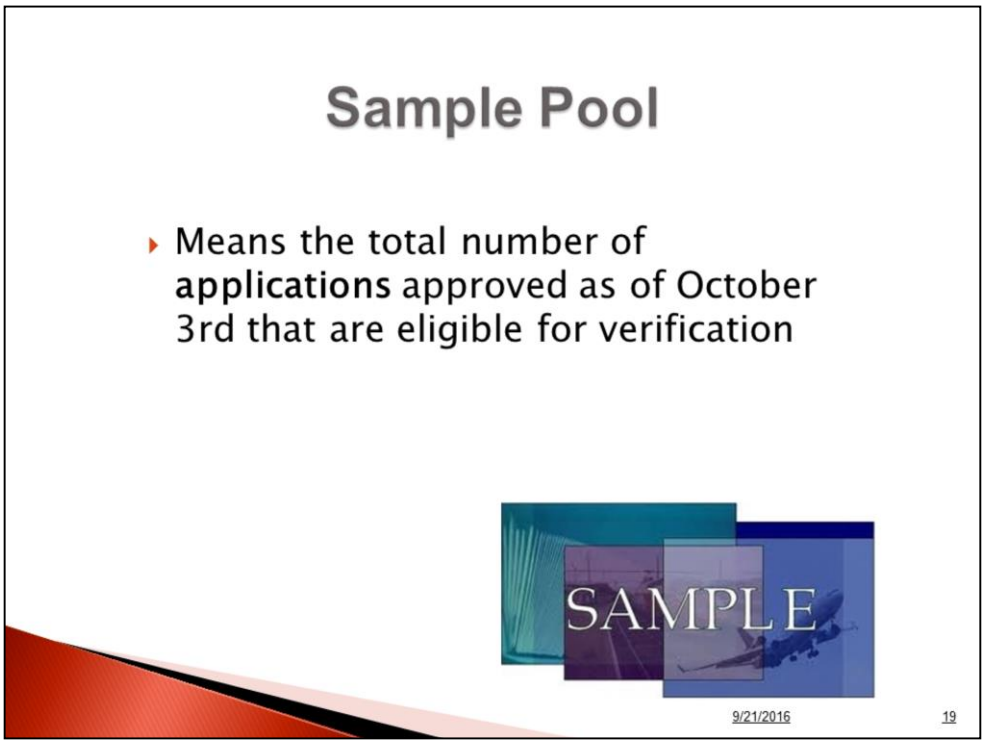
Each SFA must annually verify the eligibility of children from a sample of household applications approved for free and reduced price meal benefits for that school year.

You may begin verification activities once the application approval process is underway and there are approved applications on file. To do so, you may project the number of approved applications that you anticipate will be on file on October 3rd. The projected number is based on prior years' experience. However the final sample pool must be the actual number of approved applications on file as of October 3rd. Any estimates must be compared with the actual number of applications on file on October 3, and the sample pool and sample size must be adjusted accordingly. Thus, if you normally verify 4 applications you could select 2 or 3 now and begin the verification process. Then on October 3rd, you would determine the exact number that need to be verified and start the process with the additional selection.

Questions

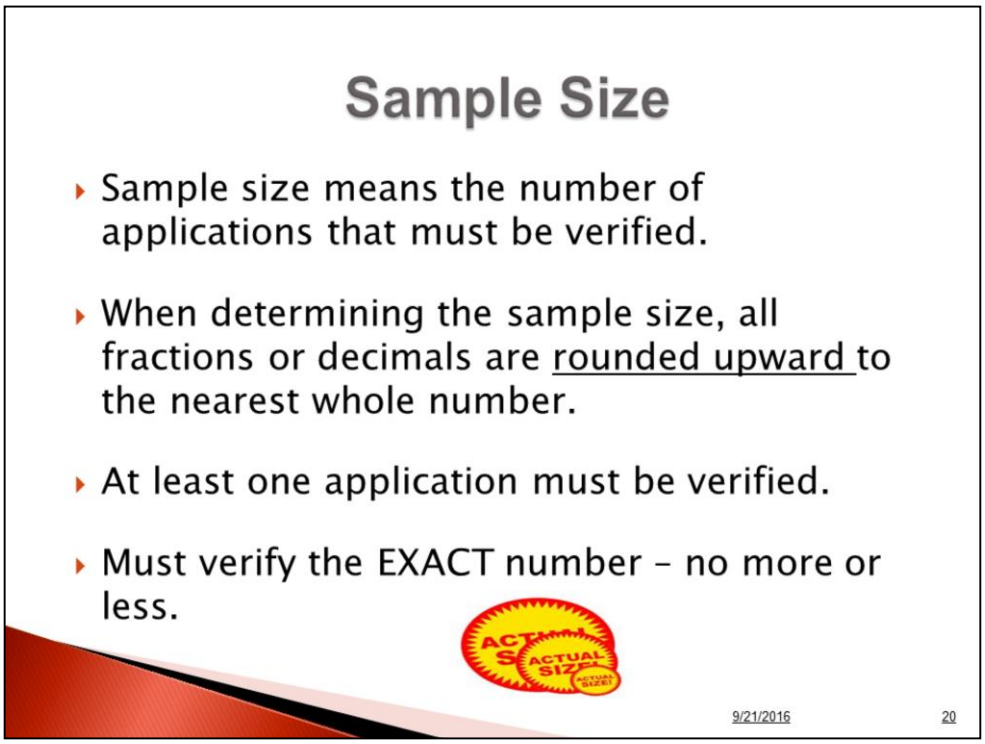


Sample pool means the total number of **applications** approved as of October 3rd that are eligible for verification.

The sample pool depends on the number of applications (paper or electronic) and is not based on the number of children eligible for free or reduced priced meals so

you will be counting the number of applications that were based on income, ones that have Foster children listed and applications with a case number written on

them.



Once the sample pool is determined the SFA calculates the sample size. Sample size means the number of applications that must be verified.

USDA's rules require that the sample size be **exact** no matter which method is used for selecting your sample size. It should be no more or no less.

Verifying a sample that is too large or too small will result in an invitation to attend more training next year.

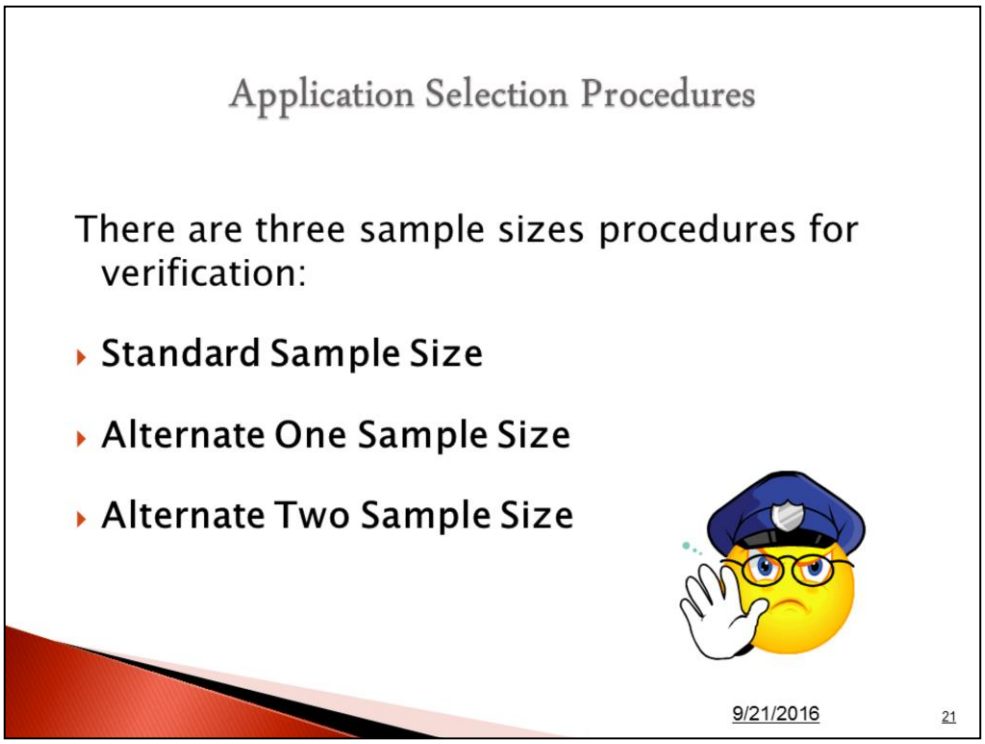
When determining the sample size, all fractions or decimals are rounded upward to the nearest whole number. Not rounding up is a frequent error we find during Administrative Reviews.

So remember when rounding that: 3.4 rounds up to 4.

3.6 rounds up to 4

3.1 rounds up to 4

Also, at least one application must be verified.



We will now discuss the three selection procedures that possibly may be used to obtain your sample size for verification.

1. Standard Sample Size (this process is required to be used by the SFA unless you qualify to use one of the alternate sample sizes)
2. Alternate One Sample Size
3. Alternate Two Sample Size

Selection of Sample Size

The selection of the sample size process is based on the Non-Response Rate that is calculated from last year's Verification Report.

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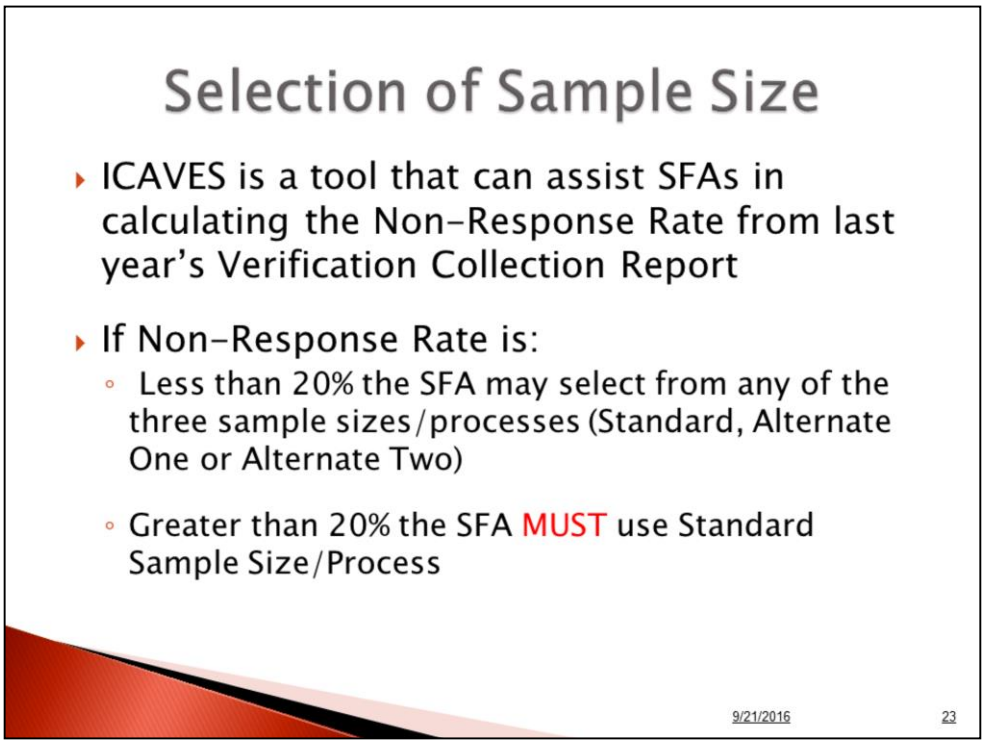
The selection of the sample size process – (Standard, Alternate One, or Alternate Two)

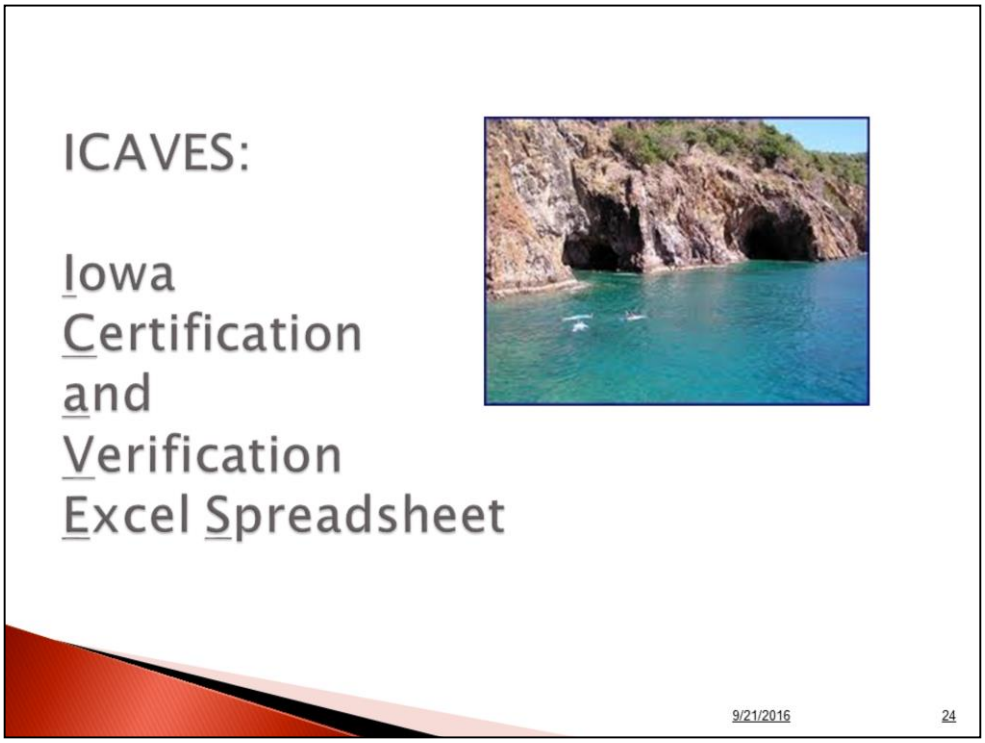
is based on the Non-Response Rate that is calculated using last year's Verification Report.



A tool the State Agency has that can assist SFAs in calculating their Non-Response Rate using last year's Verification Collection Report is an excel program

called ICAVES.

It is important to know your non-response rate because if the Non-Response Rate is less than 20% the SFA may select from any of the three sample sizes/processes (Standard, Alternate One or Alternate Two). If the Non-Response rate is 20% or greater the SFA MUST use the Standard Sample Size/Process.



ICAVES stands for Iowa Certification and Verification Excel Spreadsheet.

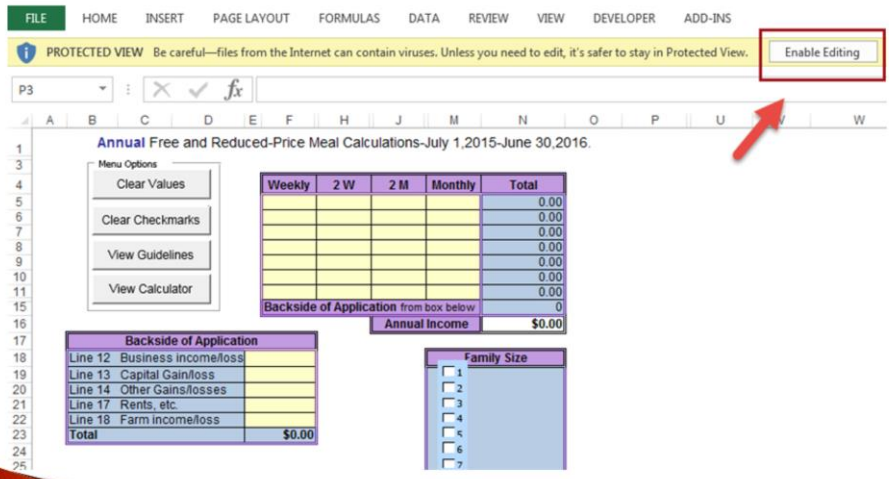
The first part of ICAVES is for the determination of benefit eligibility.

Verification is part of the same workbook

School Food Authority (SFA)s are not required to use ICAVES but it is available as a tool to assist you.

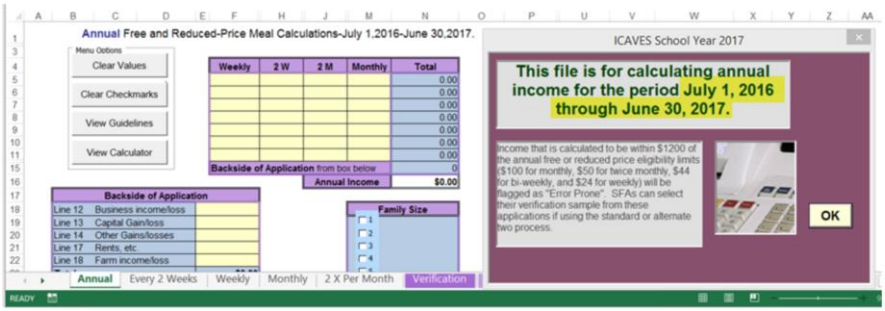
It is available on IowaCNP under download forms. It is form NSLP111.

ICAVES



When you first open ICAVES you may receive a Security Warning at the top of the worksheet. You will need to select the “Enable Editing” button.

ICAVES



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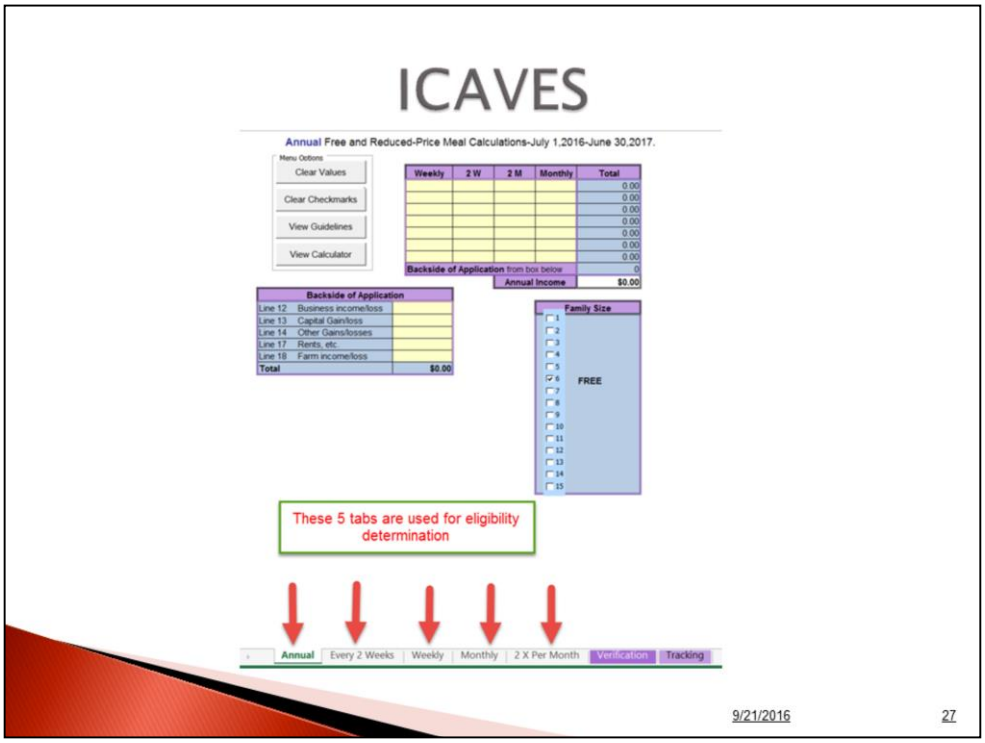
ICAVES is good for one year and expires on June 30th of each year. A new ICAVES is put onto IowaCNP each year. A popup will appear when you open ICAVES telling you the dates the ICAVES is for. Click ok to get rid of the pop-up.



The first 5 tabs are used for eligibility determination.

For verification you will use the last two tabs of the excel worksheets. These tabs are in purple.

ICAVES

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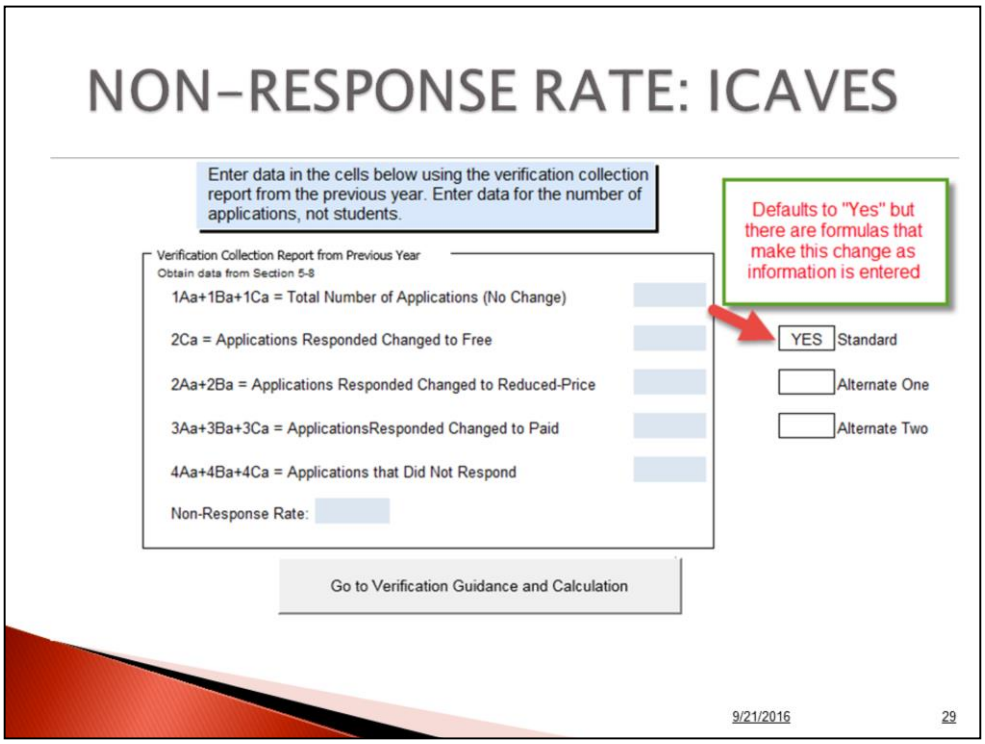
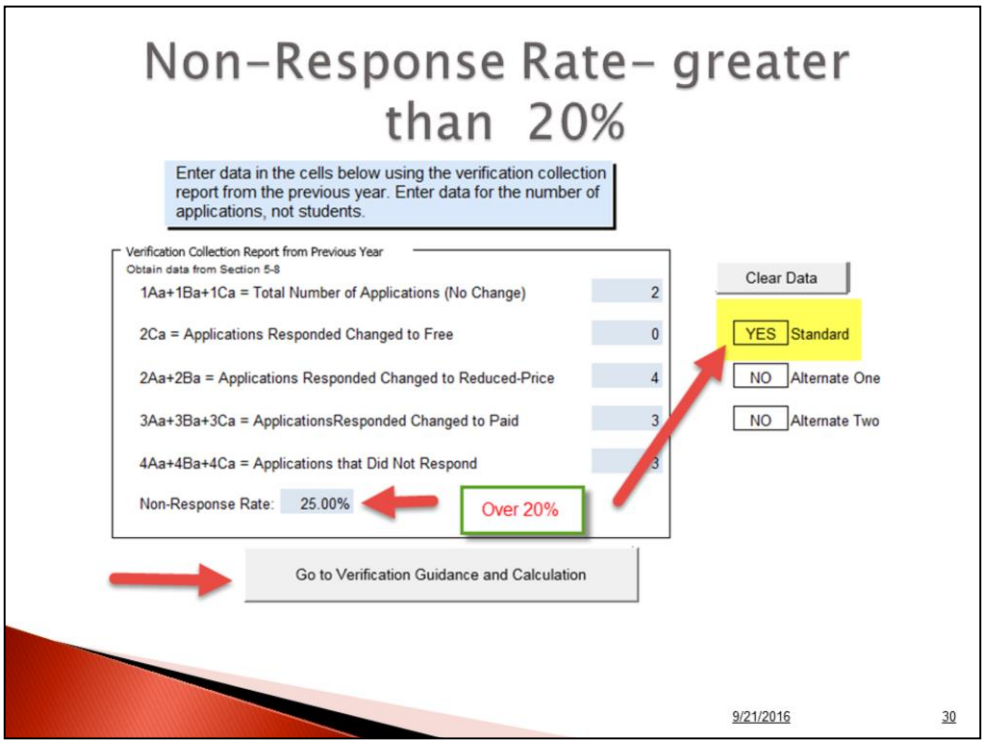
Simply click on the tab to take you to that worksheet.



This is the screen that you will enter the information from the previous year's Verification Report to determine your Non-Response Rate.

The data is obtained from Section 5-8 on the Verification Report where you entered the results of last year's verification. The "Standard" box is the Default so it will say "Yes" but it will change as the information is entered.

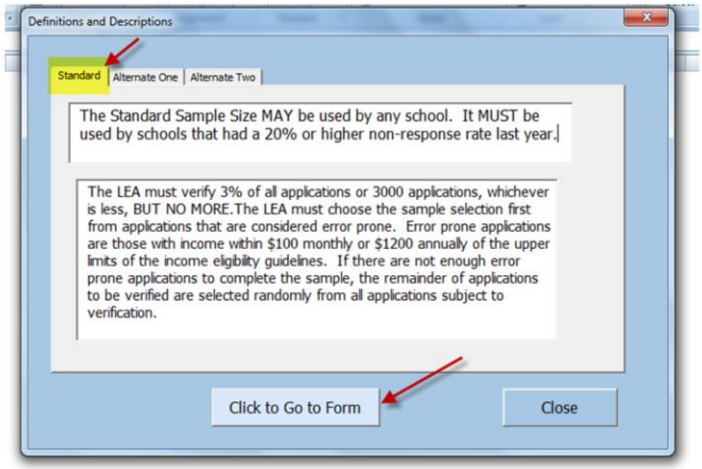
You will enter data for the number of applications, not students.



In this example, the Non-response rate is OVER 20% so the SFA must use the "Standard" sample size process as indicated with a YES. **Alternate One and Alternate Two are not an option and are indicated with a no.**

To go to the next step you will click on "Go to Verification Guidance and Calculations".

Standard Sample Size Standard



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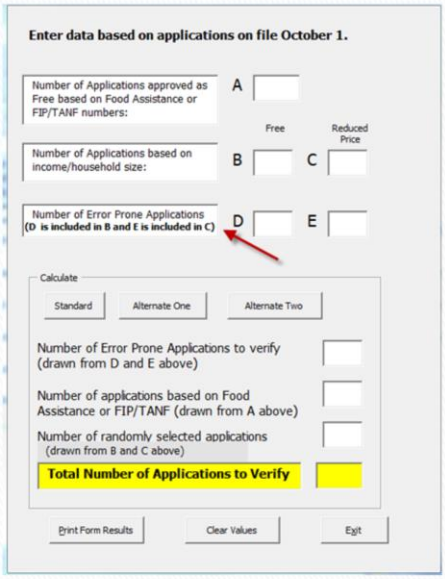
This will take you to the definitions and descriptions for the 3 sample size processes. We will be discussing these as we go through the presentation.

You will then click on “Go to form”.

Standard Sample Size



- Important:
- For B and C – report the total number of applications based on income
- For D and E – report the number of ERROR PRONE applications included in B and C

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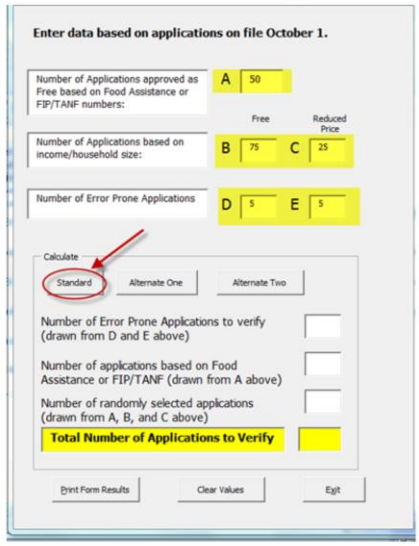
On this form you will enter the number of applications approved as free based on Food Assistance, FIP or TANF numbers in “A” This will be your applications with a case number written on the application form. You then enter the number of applications determined free based on income/household size in B. You will put the number of applications determined reduced price based on income/household size in C.

For D and E you report the number of error prone applications included in B and C. I will be explaining error prone applications in greater detail after I have gone through the use of ICAVES.

Standard Sample Size



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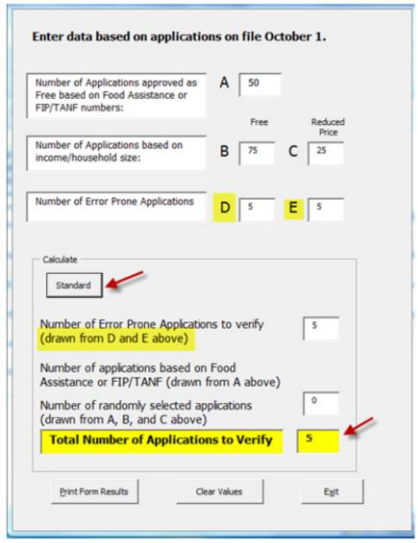
After the information is entered, you will “CLICK” on the “Standard” button if that is the sample size process you need to use as identified on the initial form you completed.

Standard Sample Size



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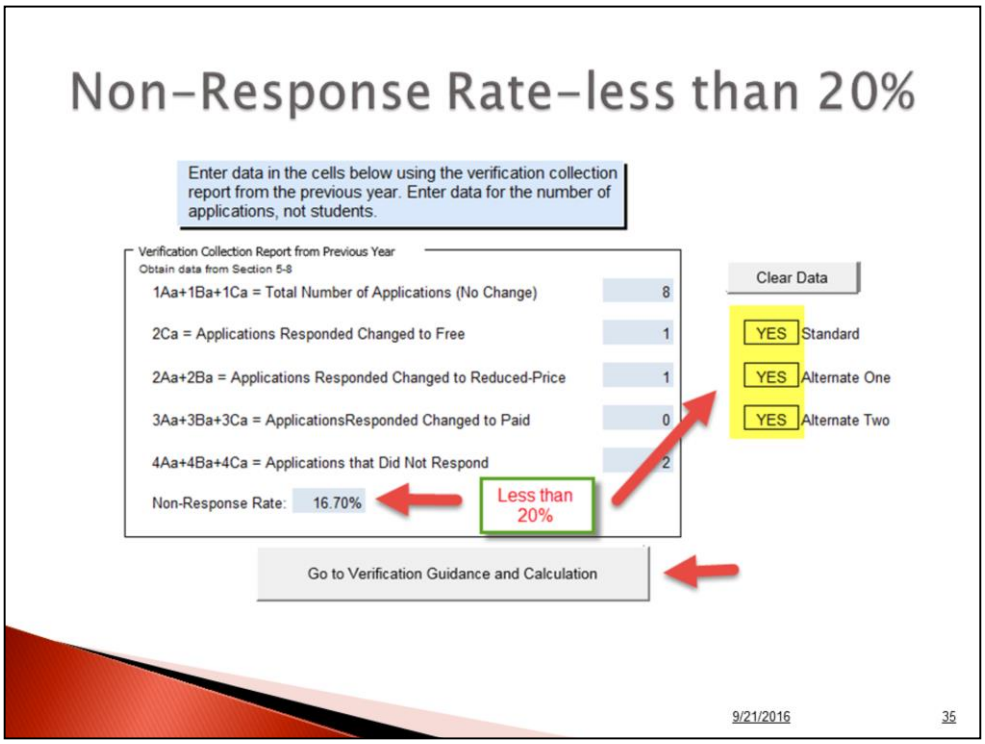
The worksheet then tells you how many applications must be verified and from what “type” of application.

Since Standard sample size is required in this case, the number of applications to verify will be “RANDOMLY” selected from “ERROR PRONE” applications. If you do not have enough error prone applications, the rest of the sample is taken randomly from all applications.

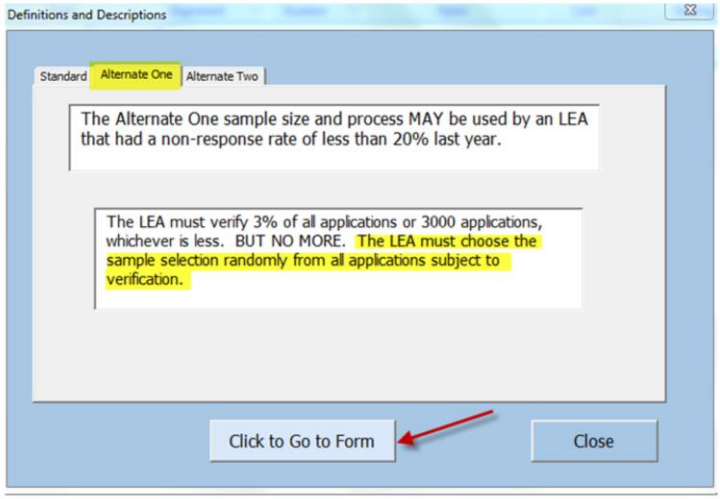
At the bottom of the form you can click on Print Form Results to keep a copy of your work.

In this example, the SFA had 10 error prone applications, so the sample will be drawn totally from these error prone applications.



We will now look at an example of when the Non-Response Rate is less than 20% and thus any of the three sample size processes may be used. Click on Go to Verification guidance and calculation.

Alternate One Sample Size



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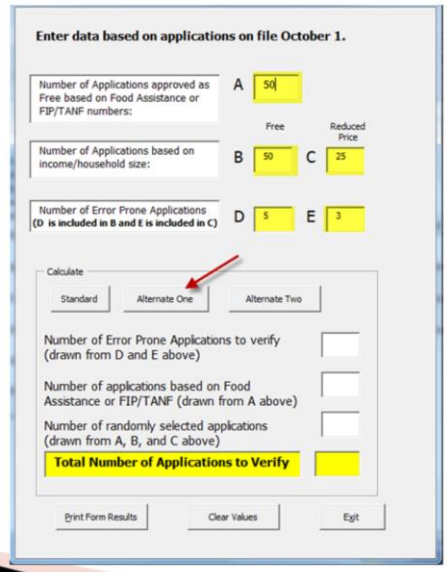
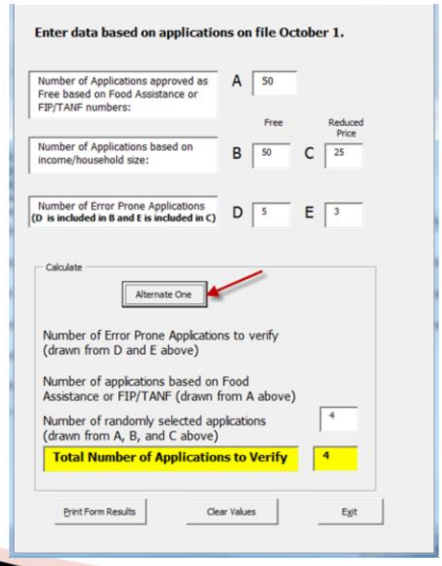
Once again descriptions of the sample size processes will appear. Click on Go to Form.

Alternate One Sample Size



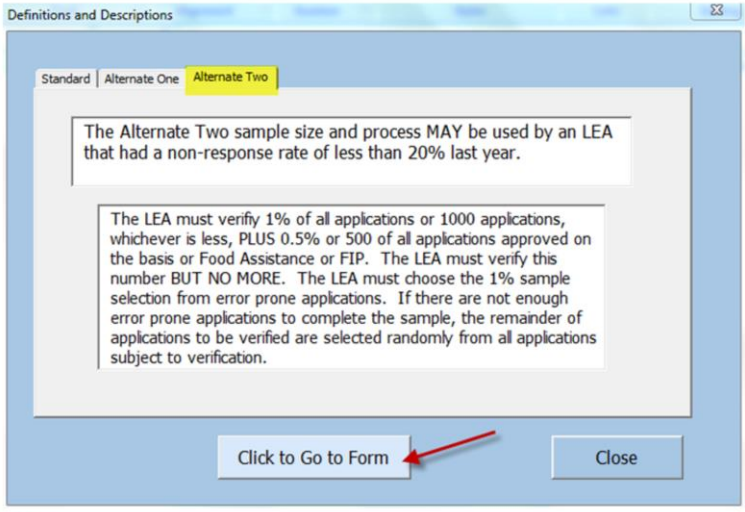
If you choose to use Alternate One Sample Size click on that button.

Alternate One Sample Size



This will then tell you the number of randomly selected applications you must verify.

Alternate Two Sample Size



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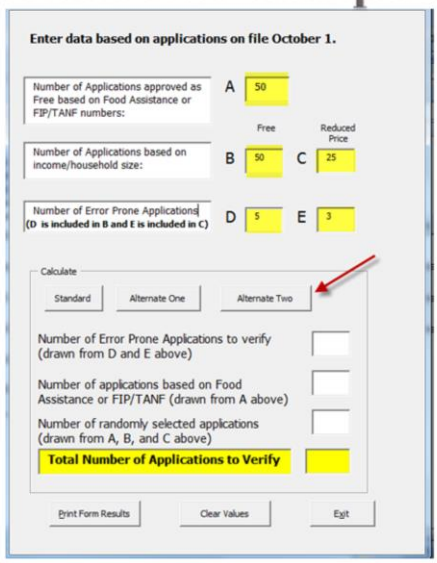
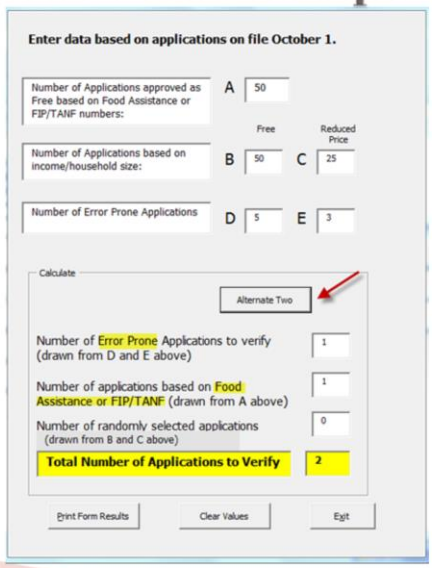
Choosing the Alternate Two tab will provide you with a description of the Alternate Two Sample Size Process. Click on Go to Form

Alternate Two Sample Size



You will then click on Alternate Two

Alternate Two Sample Size



This will then tell you the number of Error Prone Applications and the number of applications based on Food Assistance, FIP or TANF to verify .

ICAVES: Used to Identify Error Prone Applications

- Standard Sample Size and Alternate Two Sample Size draw from Error Prone applications.
- Error Prone means applications within $100 per month/$1200 annually of the Income Eligibility Guidelines.

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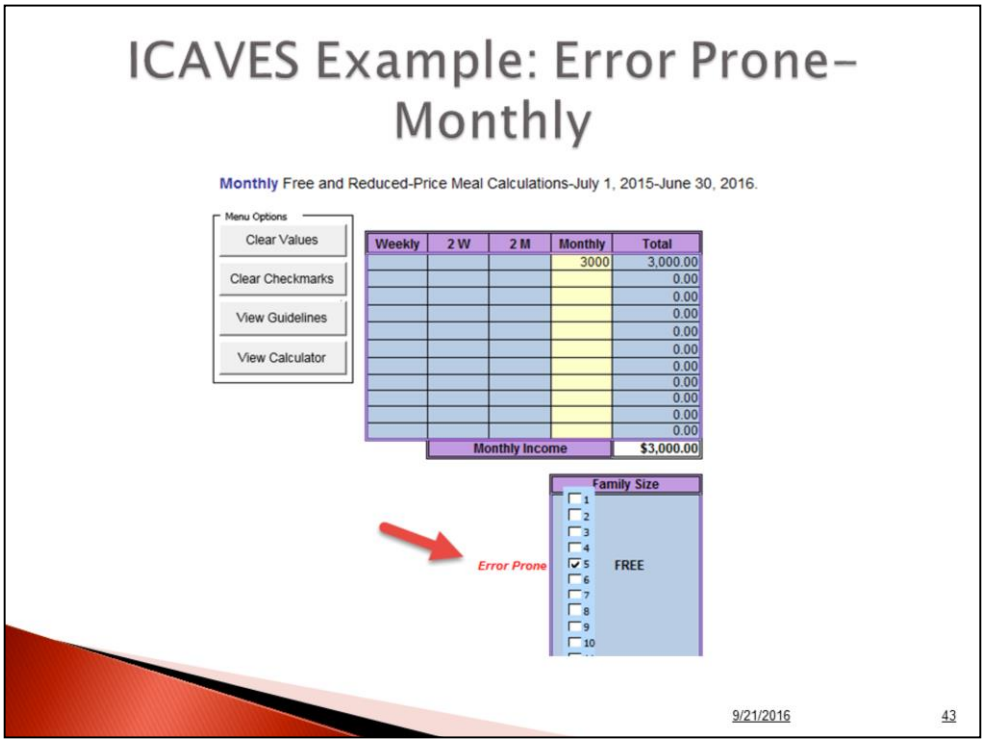
If you use the Standard Sample Size or Alternate Two Sample Size you will be selecting from Error Prone Applications.

Error Prone means that the application is within $100 per month or $1200 annually of the Income Eligibility Guidelines.



If you use ICAVES for determining income eligibility, error prone applications will appear in red so that you can easily identify these applications.

We recommend writing error prone on the application or flagging them in some manner so that you can find these applications when you are

completing verification.

Income Applications:
Error Prone Example 1

- Household of 5 reports monthly income of $3,000
- Upper limit for free benefits for household of 5 is $3,081
- $3,081– $3,000= $81
- Within $100 monthly

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An example of an error prone application would be:
A Household of 5 reports monthly income of $3,000

The upper limit for free benefits for a household of 5 is $3,081
$3,081- $3,000= $81
Within $100 monthly

Standard Sample Size

- Must be used by the SFA unless you qualify to use Alternate One or Alternate Two.
- 3% of all applications subject to verification.
- Selected from **error prone** applications
  - If not enough error prone applications, the rest of the sample is taken randomly from all applications.

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We will now take a look at how each sample size process is figured.

As we have discussed, the Standard Sample Size Process must be used by the SFA unless you qualify to use Alternate One or Alternate Two.

With a Standard Sample size, 3% of all applications are subject to verification.

You will select the applications from **error prone** applications

•If you do not have enough error prone applications, the rest of the sample is taken randomly from all applications.

Standard Sample Size- Example 1

200 applications subject to verification
5 are error prone

200 x .03= 6 (the exact sample size needed).

The SFA selects the 5 error prone applications and one other application selected randomly

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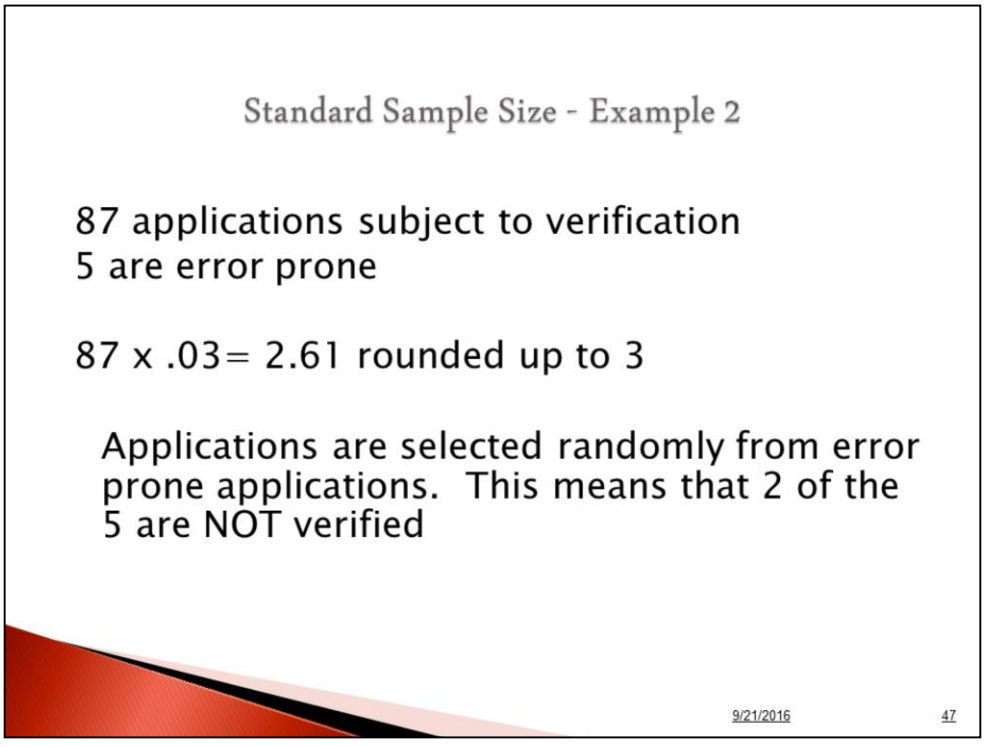
This is an example of how a School Food Authority (SFA) with only a few error prone applications would select an exact sample. 200 applications are subject to verification. 5 are error prone. 200 x .03 equals 6. The SFA selects the 5 error prone applications and the sixth application is drawn randomly from all applications. It may be a FIP or Food Assistance application or an income application that is not error prone.



In this example, the School Food Authority (SFA) will verify ONLY income applications and no FIP or Food Assistance applications as there are enough error prone applications to draw from.

87 applications are subject to verification

5 are error prone

87 x .03= 2.61 which is rounded up to 3

The 3 applications selected must be taken randomly from the error prone applications. This means that 2 of the error prone applications are not verified and no FIP or Food Assistance applications.

Alternate One Sample Size

- 3% of applications subject to verification.
- Drawn randomly without regard to income, FIP, Food Assistance, or error prone status.
- Only SFAs with a Non-Response Rate less than 20% may use Alternate One.

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When using the Alternate One Sample Size, 3% of the applications are subject to verification. The applications are drawn randomly without regard to income, FIP, Food Assistance or error prone status. Remember that only schools that experienced a **non-response rate less than 20% last year can use Alternate One.** Each application in the sample pool must have an equal chance of being selected for verification.

RANDOM!

- Random selection means that all applications have an equal chance of being chosen for verification.

Random selection means that all applications have an equal chance of being chosen for verification.

Alternate One - Example

- 87 applications subject to verification
- 87 x .03 = 2.61 rounded up to 3
- Draw randomly from ALL applications
  - The SFA must determine a selection interval by dividing the number of applications by the required sample size.
  - 87 ÷ 3=29 (interval is every 29th application)

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You will see on this slide that the School Food Authority (SFA) will verify the same NUMBER of applications as in the Standard Sample size but **all** applications in the sample pool have an equal chance of being selected for verification.

The SFA must determine a selection interval by dividing the number of applications by the required sample size.

To do this, divide the total number of applications from which the sample will be drawn by the number of applications to be drawn. For example, if 3 applications are to be drawn from a total pool of 87, divide 87 by 3 to get 29. Select one application randomly from among the first batch of 29 applications. Start counting through the remainder of the applications, with the first application AFTER the one you selected as number one. Choose the 29th application as the second application to be verified, and begin counting again with the next application as number one. The 29th application will be the third application to be verified.

Alternate Two Sample Size

(1%+0.5%)

- Draw 1% of all applications subject to verification – draw from Error Prone applications
- Draw one-half of one percent, (0.5%) of all applications approved with a Food Assistance or FIP case number
- Only SFAs with a Non-Response Rate less than 20% may use Alternate Two

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With Alternate Two Sample Size you will draw 1% of all applications subject to verification. These are drawn from Error Prone applications.

•You will then draw one-half of one percent, (0.5%) of all applications approved with a Food Assistance or FIP case number.

With this method you must sort the applications into error prone and those with a case number and then make the selection.

Alternate Two Sample Size:
1% + 0.5% Example

- 87 applications
  - 54 based on income including 6 error prone
  - 33 based on FIP or Food Assistance
- 1% based on all applications:
  - 87 x .01 = 0.87 or 1.
  - Draw from the 6 ERROR PRONE applications
- 0.5% based on FIP/Food Assistance
  - 33 x .005 = 0.165 or 1.
  - Draw randomly from 33 FIP/Food Assistance applications.

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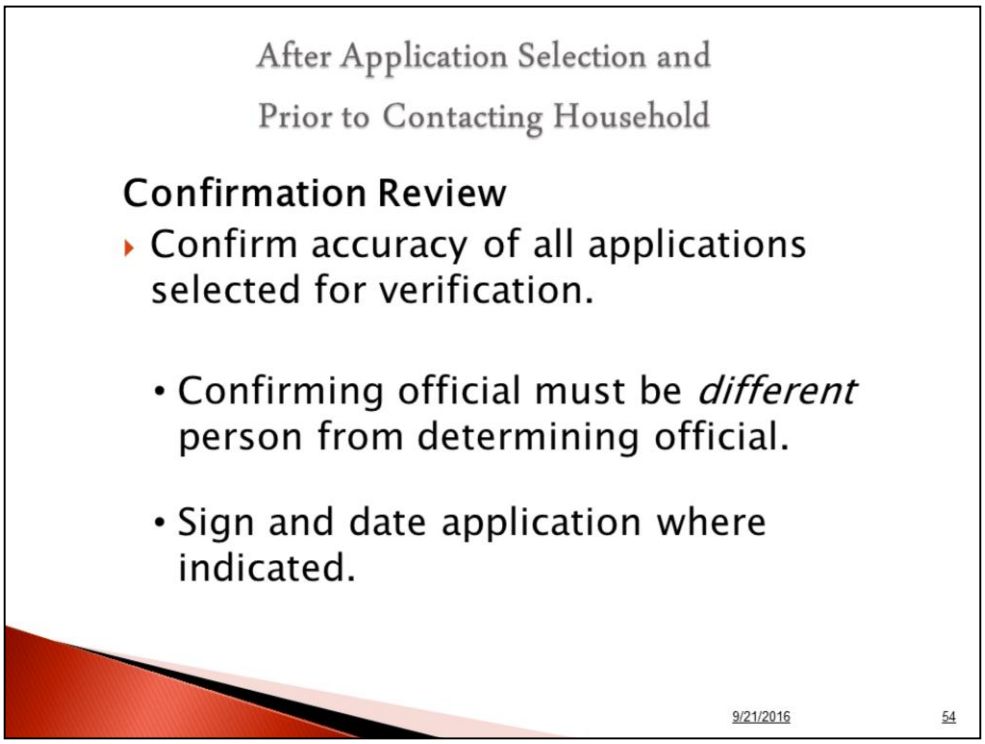
In this example, the School Food Authority (SFA) calculates the number of applications, which is 87. Notice that the sample size is calculated on the WHOLE pool of applications for the 1% and only on the total number of FIP/Food Assistance applications for the half-percent .5% (.005)

- 1% based on all applications:
  - 87 x .01 = 0.87 or 1.
  - Draw from the 6 ERROR PRONE applications

- 0.5% based on FIP/Food Assistance
  - 33 x .005 = 0.165 or 1.
  - Draw randomly from the 33 FIP/Food Assistance applications.

Questions



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

You may confirm all applications, but you MUST confirm applications selected for verification The confirming official signs and dates the application where indicated at the bottom of the page.

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

If the initial eligibility status was correct, the SFA verifies the application.

If the eligibility status changes, see page 85 of the Eligibility manual for the steps to take.

After Application Selection

Prior to Contacting Household

REPLACING HOUSEHOLDS APPLICATIONS

- Household applications <u>may</u> be replaced after confirmation if the SFA believes the household would not be able to respond to verification (FRAIL)
  - limit: 5% of the verification sample.
- Households that move away during the process <u>must</u> be replaced by a similar household
  - Income replaces income, error prone replaces error prone, etc.

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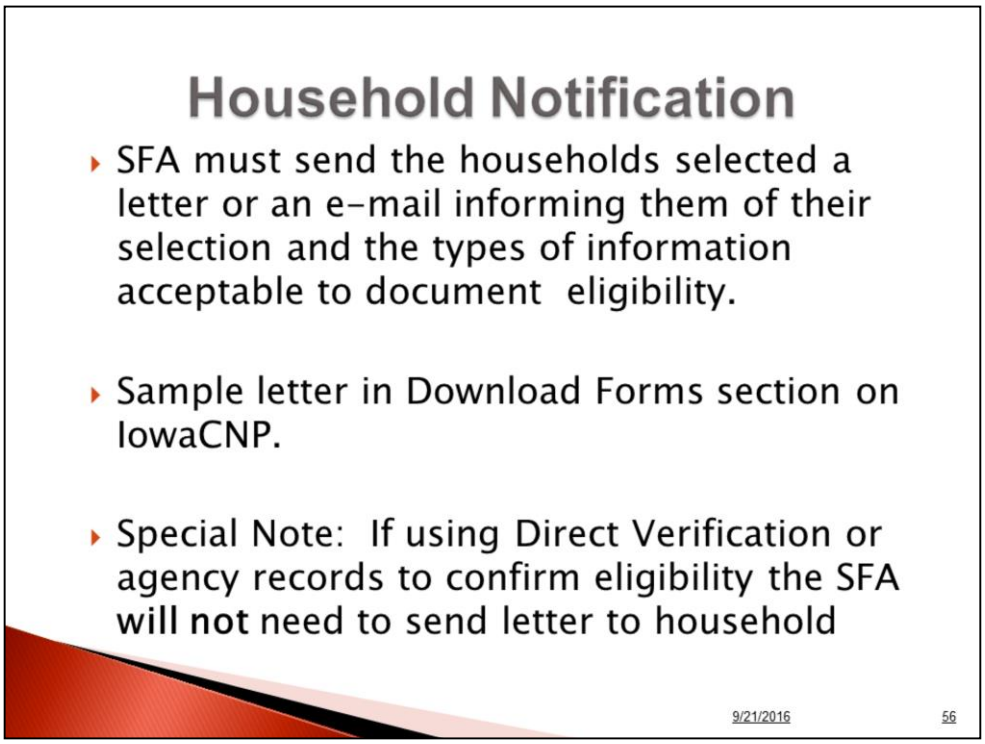
After completing the confirmation reviews, the SFA may, on a case-by-case basis, replace up to five percent of applications selected. Applications may be replaced when the SFA believes that the household would be unable to satisfactorily respond to the verification request.

- If 5% is less than 1, the SFA may replace 1 application.
- All results of the five percent calculation are rounded up to the next whole number.

How the School Food Authority (SFA) decides that a household would not be able to respond to verification should be documented. Examples of reasons a household would not be able to respond might include a recent catastrophic illness or accident, a household fire, recent immigration, limited ability to read or understand English.

Households that move away must be replaced. When you are replacing applications, income replaces income, error prone replaces error prone, etc. You will need to work closely with the admissions and attendance staff to stay on top of this issue.

The newly selected application must then have a confirmation review.



When a household is selected for verification and is required by the SFA to submit documents or other forms of evidence to document eligibility, the SFA must send the households a letter or e-mail informing them of their selection and the types of information acceptable to document eligibility.

Special Note: If you were able to use Direct Verification or agency records to confirm eligibility, you **will not** need to send a letter to the household since the household will not have to provide documents if they were found to be on the direct certification list, potential list or on e-lookup. I will discuss direct verification more in a few minutes.

We Must Check Your Application

Prototype III 08/16

WE MUST CHECK YOUR APPLICATION

You must send the information we need, or contact [name] by [date], or your children will stop getting free or reduced price meals.

School: _____ Date: _____

Dear _____:

We are checking your Free and Reduced Price School Meals Application because you were selected for verification. Federal rules require that we do this to make sure only eligible children get free or reduced price meals. You must send us information to prove that **[name(s) of child(ren)] [is/are]** eligible.

If possible, send copies, not original papers. If you do send originals, they will be sent back to you only if you ask.

1. If you were receiving Food Assistance or FIP benefits when you applied for free or reduced price meals, or at any time since then, send us a copy of one of these:

- Notice of Decision that shows dates of eligibility.
- Letter from Food Assistance or Welfare Office that says you have gotten Food Assistance or FIP.
- Do not send your EBT card.

2. If you get this letter for a homeless, migrant, Head Start or runaway child, please **contact [school, homeless liaison, or runaway, head start or migrant coordinator]** for help.

3. If the child is a Foster Child, send us written documentation that verifies the child is the legal responsibility of the agency or court or provide the name and contact information for a person at the agency or court who can verify that the child is a foster child.

4. If no one in your household receives FIP or Food Assistance benefits, send this page along with papers that show the amount of money your household gets from each source of income. The papers you send must show the name of the person who received the income, the date it was received, how much was received, and how often it was received. Please submit papers that show your income at the time that you applied for benefits. If you do not have this information, you may submit papers to confirm current income from the time of application up to the time of verification. **Send information to: [address].**

Acceptable papers include:

Jobs: Paycheck stub or pay envelope that shows the amount and how often pay is received; letter from employer stating gross wages and how often they are paid; or, if you work for yourself, business or farming papers, such as ledger or tax books.

Social Security, Pensions, or Retirement: Social Security retirement benefit letter, statement of benefits received, or pension award notice.

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This slide shows the top part of the letter that should be sent to households who are selected for verification.

The State Agency's prototype letter can be found on IowaCNP under applications and then download forms. It is form number

NSLP382. The yellow highlights show some of the areas that you need to put in your school specific

information. There is also a Spanish version and it is form NSLP325. We encourage you to use this

prototype but if you develop a letter of your own see pages 86 and 87 of the Eligibility manual for what

is required to be in the letter.

Household Notification

Required for verification inquiries:

- The SFA must provide a telephone number that is available at no cost to the household.
- It may be a toll-free number or allow the household to reverse the charges if any households are outside the local calling area.

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For verification inquiries or questions the household may have, the SFA must provide a telephone number that is available at no cost to the household in the letter. The SFA may establish a toll-free number or allow the household to reverse the charges if any households in your SFA are outside the local calling area.

Types of Documentation Written Evidence

- For income eligible households
  - Pay stubs – households members names, amount of income, frequency, date received
- For Food Assistance or FIP households

  Official letter or notice
  - Notice of Decision – must show expiration date
- Other Source Categorical Eligibility Programs
  - An official letter, notice or list from the appropriate agency

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Once the household is made aware that they have been selected for verification the SFA should begin to receive documents.

Written evidence is the primary source of eligibility confirmation that you will receive. Written evidence is most often pay stubs from employers or award letters from welfare department or other government agencies. Pay stubs must have the household members names, amount of income, frequency, & date received. 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 of decision indicating that the child or any household member is receiving benefits from that program. The Notice of Decision must show an expiration date.

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 court. You would need this sort of documentation for Foster Children who do not appear on the direct certification list.

Types of Documentation Collateral Contacts

- Is a person outside of the household who is knowledgeable about the household's circumstances.
- Can give confirmation of a household's income, participation in Assistance Programs or Other Source Categorical Eligibility Program sources.
- Must give household the opportunity to designate the collateral contact.

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Another type of documentation is a collateral contact. 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.

See page 88 of the Eligibility Manual for more information on Collateral Contacts.

When a Household Indicates No Income

- If an application indicates zero income, the SFA must request an explanation of how living expenses are met
- May request additional written documentation or collateral contacts

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If a household is selected for verification, or the application is being verified for cause and the application indicates zero income, the SFA 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

Uses records from public agencies to verify income and/or program participation

- Use E Look-Up as much as possible
- Avoid calling DHS if possible
- Request information from the household ONLY if Direct Verification does not work
- Not required to notify the household if their status stays the same

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As I mentioned earlier, if you can directly verify a household, then you do not need to contact them.

Direct verification is using records from public agencies to verify income or participation. Direct verification can be a significant time-saver for School Food Authority (SFA)s if the household can be directly verified. We recommend that you use E lookup as much as possible to verify applications selected for verification.

All Public, Non-Public and RCCI's have E-Lookup.

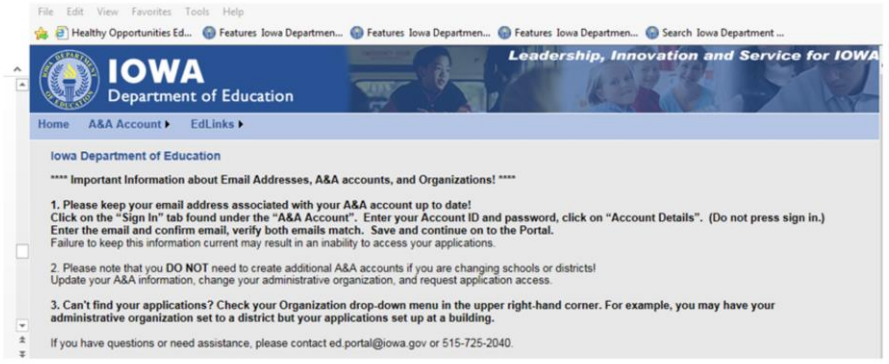
Direct verification, using ELookUp, would be used to confirm that the household is eligible. If no student in the household can be directly verified using ELookUp then the household MUST be given an opportunity to demonstrate eligibility based on their own records.

If you are able to directly certify the household and their status stays the same you are not required to notify the household that they were selected for verification. You have verified their free status and thus have completed the process.

If verification results in higher benefits, for example a student is moved from reduced price to free, the change is effective immediately and must be implemented no later than 3 operating days

from the date verification was completed and the household should be notified of the increased benefits.

Iowa Education Portal



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E-lookup is accessed via the Iowa Education Portal. Once you have logged onto this web site, choose A&A Account and then click on sign-in.

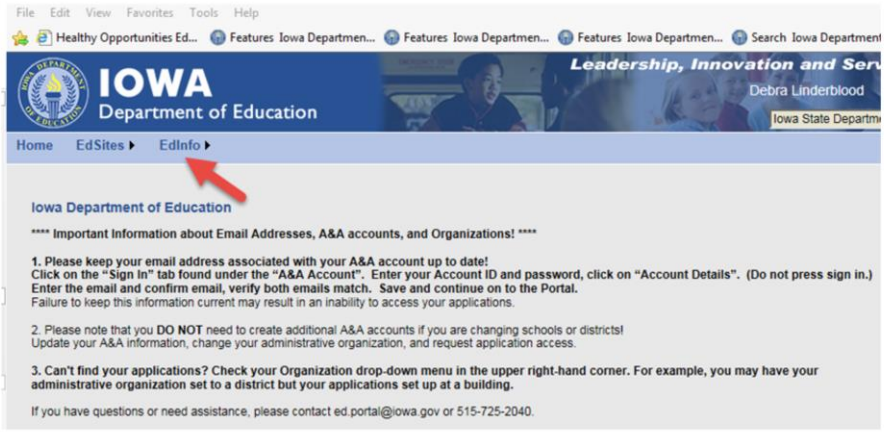
If you do not have access to the portal you will need to complete a Direct Certification access request form

which can be found on IowaCNP under download form. It is form NSLP0002. There are instructions with the form informing you how to submit the form.

Iowa Education Portal

Put in your account Id and your password. You will then click on Sign In.

Iowa Education Portal



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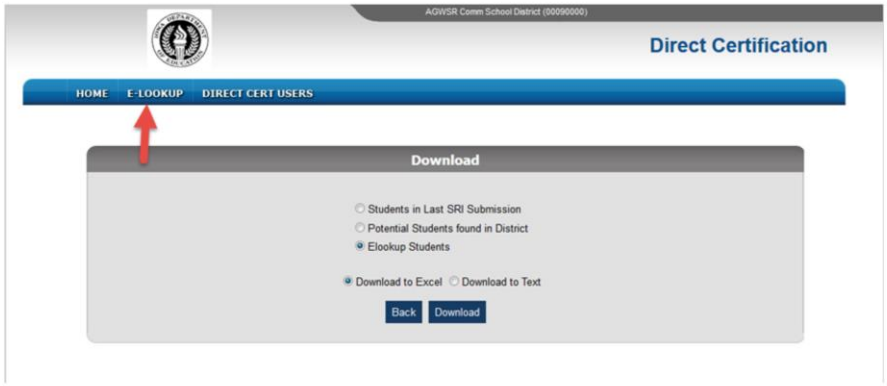
Next you will then click on EdInfo which will bring up Student Level Applications and then Direct Certification. Click on Direct Certification.

E-Lookup Process

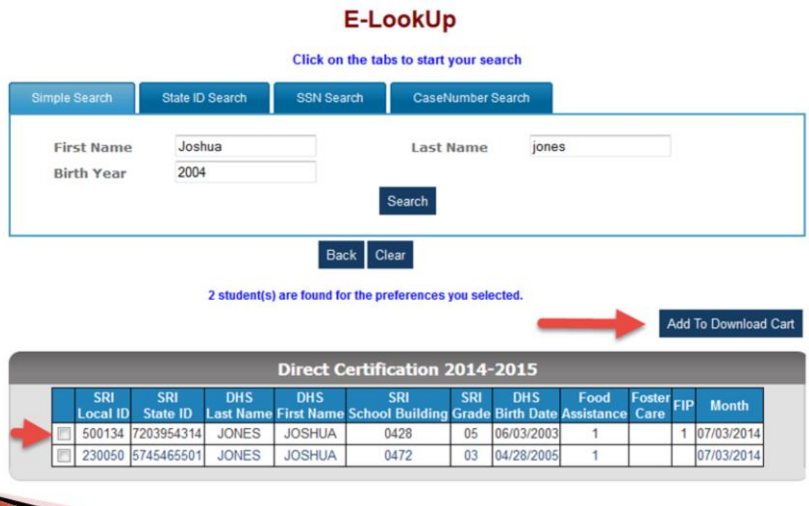


To use E-lookup, click on E-Lookup at the top of the page.

E-Lookup Process

You will have the option to search for a student using a simple search, State ID search, SSN Search or Case Number search. Click on the tab to choose the method you want to use.

E-Lookup Screen



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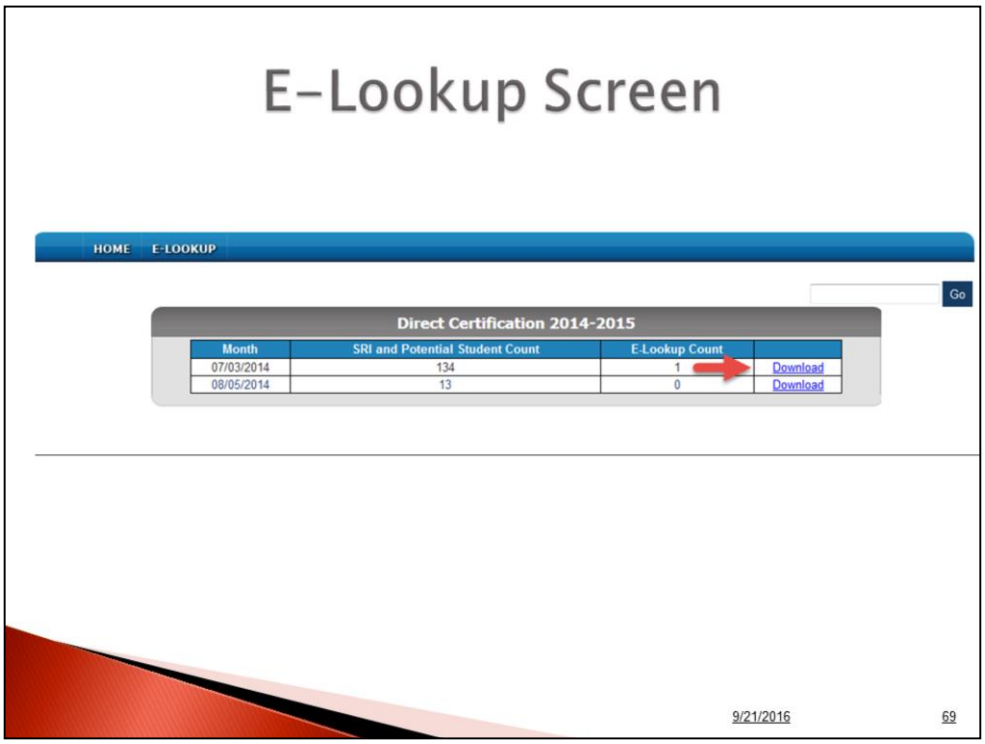
When searching, you may have more than one choice of students to choose from. For example in this sample search we have the choice of two Joshua Jones. One with a birth date of 6/3/2003 and the other on 4/28/2005. In the box on the left side of the spreadsheet you will select the student that is yours and then click on “Add To Download Cart.”



Last you will download and print your spreadsheet and keep it on file. When ever you use E-Lookup

it is important that you select the student and download to cart and then keep a copy of the spreadsheet.

The spreadsheet is your documentation that this student is directly certified and also will have a number

1 in the columns labeled Food Assistance, FIP or Foster Care which you will need when completing the

Verification Report.

Continuing the Verification Process

- SFA must determine:
  - If the household has submitted adequate information to complete its individual verification
  - If follow-up with the household is needed

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To continue the verification process after household notification, the SFA 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 Attempt

- The SFA must make a follow-up attempt when the household
  - Does not respond to the initial request
  - Submits insufficient or obsolete written evidence
  - Does not designate collateral contacts
  - Collateral contacts are unable or unwilling to provide the requested evidence

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The SFA 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

Collateral contacts are unable or unwilling to provide the requested evidence

Follow-Up

- The SFA must inform the household that failure to provide 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 information, the SFA must contact the household to complete the verification process.

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When following up with households, the SFA must inform the household that failure to provide 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.

And if the collateral contact is unwilling or unable to provide information, the SFA must contact the household to complete the verification process.

Non-Responding Households

- May be in writing, email or telephone
  Multiple follow-up calls are *not* required.
- SFA must document that a contact was attempted.
- Set reasonable deadlines for returning material to demonstrate eligibility.
- Keep in mind the **November 15** deadline!!

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For the follow-up attempt, any type of contact is OK: a letter, phone call, email, or personal visit. When setting due dates for verification materials to be sent in, keep in mind that you must make this one follow-up contact if a household misses the deadline. Build into your timeline enough time to make the call and for households to get back to you.

You should document that a follow-up contact was made by signing and dating the bottom of the application where it says “Follow-up Signature.”

You are **not** required to follow up several times however SFAs are encouraged to do additional follow-up attempts if a household fails to provide adequate documentation after the required follow-up.

You are not required OR ALLOWED to replace a household that does not respond with another household. Just document that you contacted them and report them as non-responsive.

If the household does not respond by the due date, you must send a notice of termination dated NO LATER THAN November 15, which starts the 10 calendar

day appeal period.

Notice of Adverse Action

- Provide 10 calendar days written advance notice if benefits are reduced or terminated, to allow for an appeal (must be written).
- Make changes to reduce price benefits within 10 operating days AFTER the advanced notice/appeal period ends.
- Make changes to improve benefits within 3 operating days. Fewer is better.

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If verification results in benefits being reduced or terminated, you must provide 10 calendar days written advance notice. Be aware that the appeal period is in CALENDAR days and the period during which you must make the changes is in OPERATING days. The 10 calendar day appeal period cannot be shortened by the School Food Authority (SFA). If the household appeals, the benefits continue until the appeal is heard and the notice is sent to the household. At that point, the changes may be made within the timelines specified.

A reduction in benefits includes:

1. a household goes from free to reduced or paid
2. a household goes from reduced to paid

There is a sample notice called “Verification results letter to households” on download forms of Iowa CNP. It is form NSLP232 and the Spanish version is NSLP233

Improved benefits include only a move from reduced to free. You should make changes to improve benefits within 3 operating days. Doing this in fewer days is even better.

Appeal Notice Example

- **November 4:** verification info moves family from free to reduced, and you send letter that day (first day of advance notice)
- **November 13:** close of the advance notice/appeal period (10th calendar day of advance notice)
- **November 14:** benefits changed to reduced (you are efficient!)
- **November 29:** benefits must be changed no later than this day (10th operating day after the closing of the 10 calendar day advance notice)

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Look at your calendar to review this example. In this example, the School Food Authority (SFA) is closed for Thanksgiving on Thursday and Friday but is operating on all other weekdays. You may keep a student on free until November 29th, or change as early as November 17th. This is your choice but consider the household's situation.

When is Verification Complete?

Depends on the results of the verification.

- If household submits documentation that indicates children should receive either greater or lesser level of benefits
  - Verification is complete for this household when the notice of adverse action is sent or household is notified that its benefits will be increased or decreased.

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So, when is verification complete?

It depends on the results of the verification.

If a household submits documentation that indicates children should receive either greater or lesser level of benefits, then verification is complete for this household when the notice of adverse action is sent regarding a decrease in benefits or the household is notified that its benefits will be increased.

When is Verification Complete?

- If household submits either adequate written evidence or collateral contact evidence of income or categorical eligibility then
  - Verification is considered complete
- If household indicates that it no longer wishes to receive benefits
  - Verification is considered complete when the notice of adverse action is sent

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If the household submits either adequate written evidence or collateral contact evidence of income or

categorical eligibility then verification is considered complete the day you receive the information.

If the household indicates that it no longer wishes to receive benefits then verification is considered complete when the notice of adverse action is sent.

When is Verification Complete?

- 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.

If the application provided a case number and it is determined that no household member is receiving benefits from an Assistance Program, then verification is considered complete when the notice of adverse action is sent.

Chart to Track Applications

TRACKING APPLICATIONS SELECTED FOR VERIFICATION

Fill in Columns A through J for all applications selected for verification.

	Column A	Column B			Column C	Column D	Column E	Column F	Column G	Column H	Column I				Column J
No.	Family Name	Number of Students in Household at Initial Benefit Level			Date Information Confirmed	Surname of Adult Signing Application	First Name of Adult Signing Application	Date Household Notified of Verification Selection	Date Household Provided Verification Information	Date Household Contacted for Follow-Up	Verified Benefit Level				Date Household Notified of Outcome
		Free (Income)	Free (FA/FIP)	Reduced Price							Free	Red.	Paid	No Response	
1															
2															
3															
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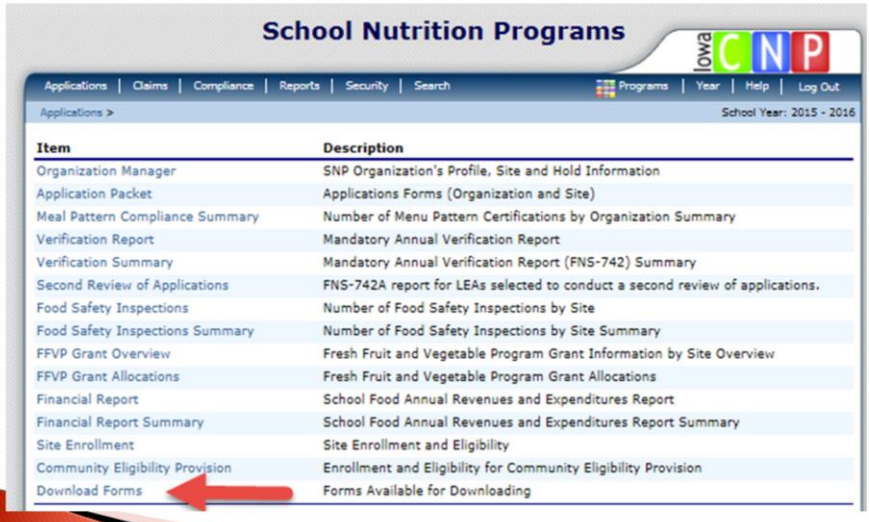
The last tab in ICAVES is a spreadsheet which may be used to track applications selected for verification.

This tool may be helpful for documenting your verification process.

WHERE TO FIND FORMS



Item	Description
Organization Manager	SNP Organization's Profile, Site and Hold Information
Application Packet	Applications Forms (Organization and Site)
Meal Pattern Compliance Summary	Number of Menu Pattern Certifications by Organization Summary
Verification Report	Mandatory Annual Verification Report
Verification Summary	Mandatory Annual Verification Report (FNS-742) Summary
Second Review of Applications	FNS-742A report for LEAs selected to conduct a second review of applications.
Food Safety Inspections	Number of Food Safety Inspections by Site
Food Safety Inspections Summary	Number of Food Safety Inspections by Site Summary
FFVP Grant Overview	Fresh Fruit and Vegetable Program Grant Information by Site Overview
FFVP Grant Allocations	Fresh Fruit and Vegetable Program Grant Allocations
Financial Report	School Food Annual Revenues and Expenditures Report
Financial Report Summary	School Food Annual Revenues and Expenditures Report Summary
Site Enrollment	Site Enrollment and Eligibility
Community Eligibility Provision	Enrollment and Eligibility for Community Eligibility Provision
Download Forms	Forms Available for Downloading

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The forms needed for verification can be found on Iowa CNP. Once you log in go to Applications and then to download forms.

VERIFICATION FORMS

NSLP320	Spanish verification Results Letter (Prototype VI)
NSLP325	Spanish-Verification Selection Letter (Prototype III)
NSLP360	Storage Facility Review Form
NSLP370	Team Nutrition Enrollment Form - Updated
NSLP380	Verification Collection Report Instructions
NSLP381	Verification Results Letter to Households (Prototype VI) - Updated
NSLP382	Verification Selection Letter to Households (Prototype III) - Updated

Forms you will find include:

-Verification Results Letter (Spanish and English)

-Verification Selection Letter (Spanish and English)

You will also find Instructions for completing the Verification Collection Report.

Errors in Verification Observed

- Income information submitted requires change in benefit status, but no change was made.
- Income tax form submitted to prove wage income.
- All income is not verified. Example:
  - John and Mary both report income on the application.
  - Only John's pay stubs are submitted.

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Your verification process and documents will be a part of your Administrative Review. Depending on when your consultant comes for your review we may look at last years documents or if the review is after November 15th we will look at the current years documents. If errors are found they may result in fiscal action.

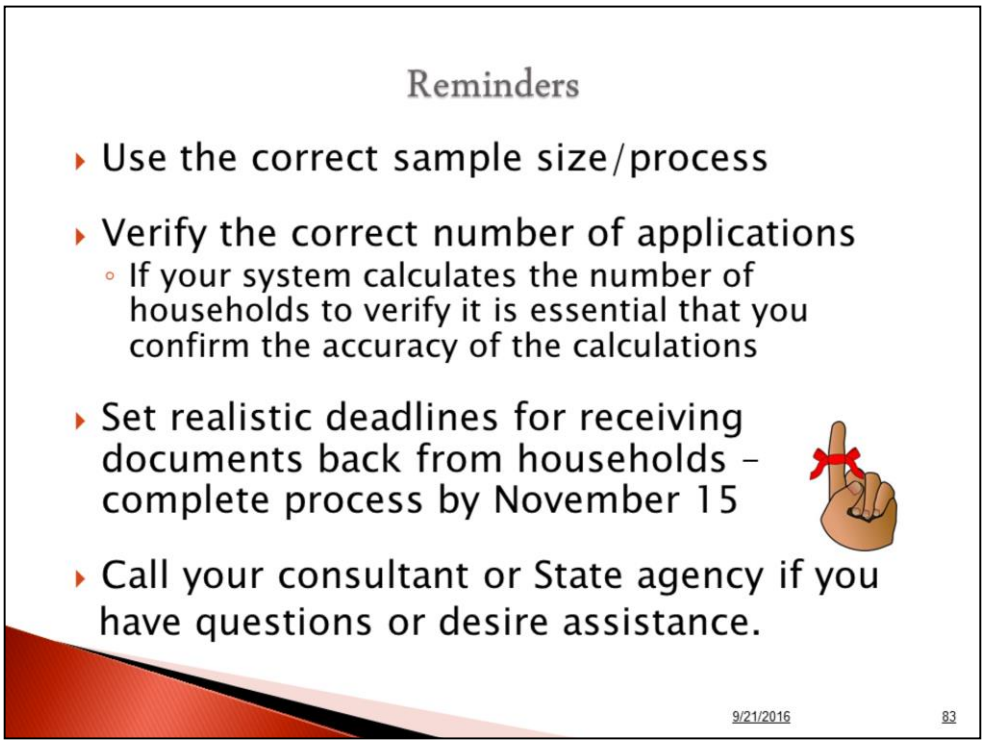
The types of errors we often find are:

1. The income information submitted requires change in benefit status, but no change was made.

2. Income tax form submitted to prove wage income.

3. All income is not verified. Example:
   - John and Mary both report income on the application.
   - Only John's pay stubs are submitted.

In addition to fiscal action, you may receive an invitation to training next year as part of corrective action.



This is a short list of reminders to help you keep on track to complete verification correctly and on time.

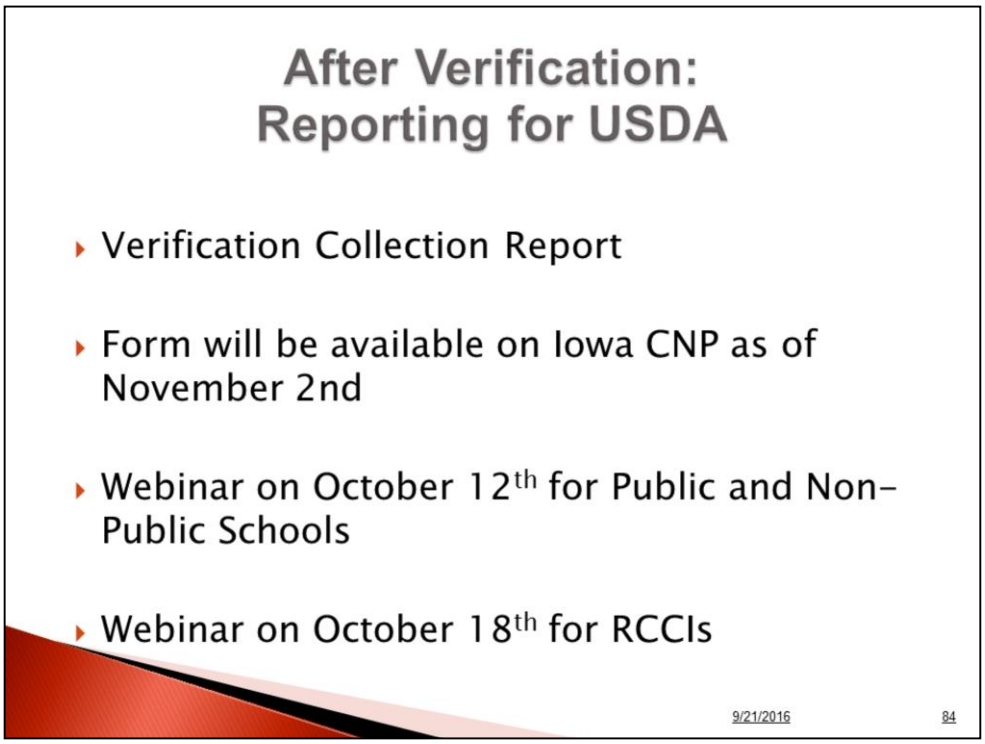
Use the correct sample size/process

Verify the correct number of applications

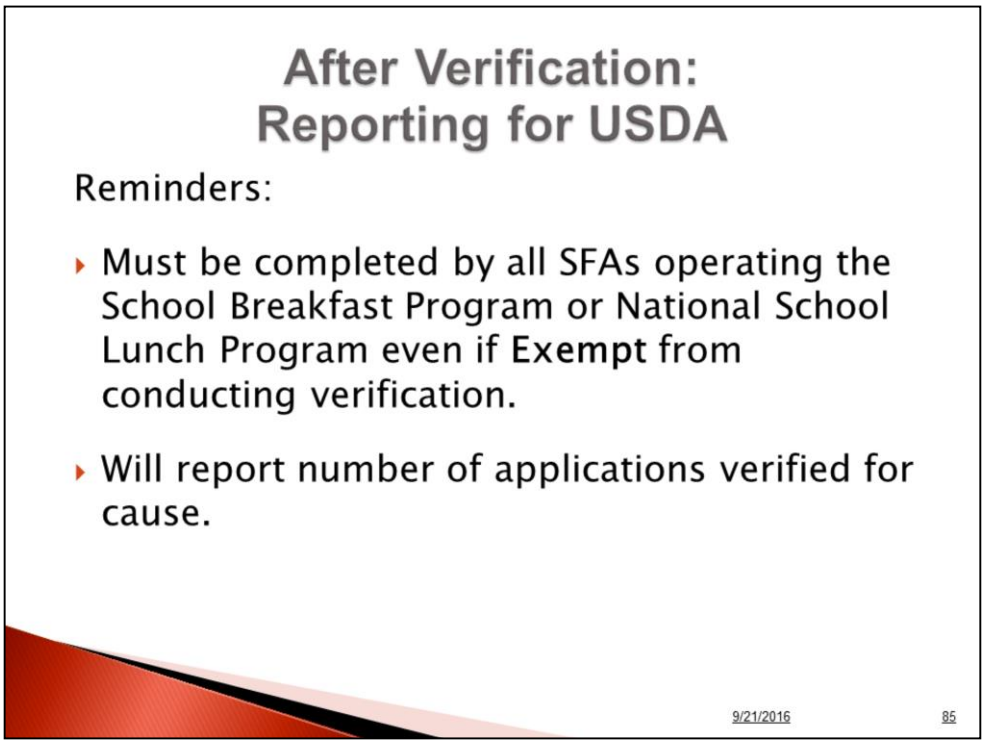
If your system calculates the number of households to verify it essential that you confirm the accuracy of the calculations.

Set realistic deadlines for receiving documents back from households. You need to complete the process by November 15

Call your consultant or State agency if you have questions or need assistance.

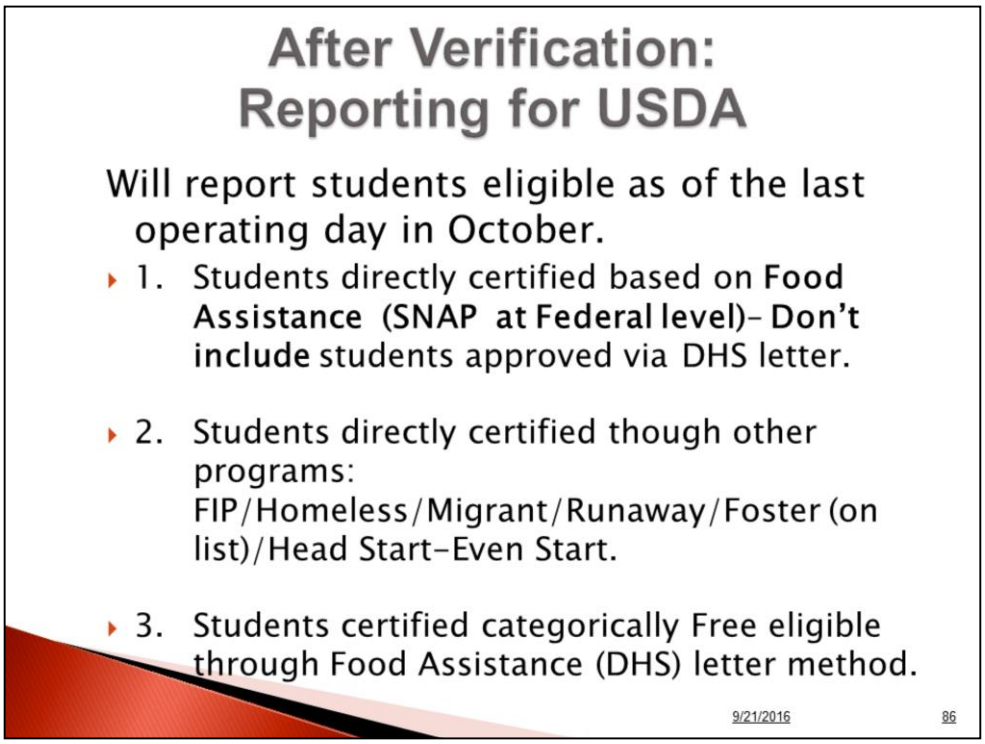


Following your verification process, you will need to complete the Verification Collection Report. This form will be available on Iowa CNP on Nov 2nd. I will be presenting a webinar on October 12th for Public and Non-public schools and on October 18th for RCCIs to go over the steps in completing this form. Completing the report by the December 19th due date helps us out a lot as then we do not have to call you and remind you that it must be completed.



The Verification Collection Report must be completed by all SFAs operating the School Breakfast Program or National School Lunch Program even if you are **Exempt** from conducting verification.

Also remember that you will need to report the number of applications verified for cause.

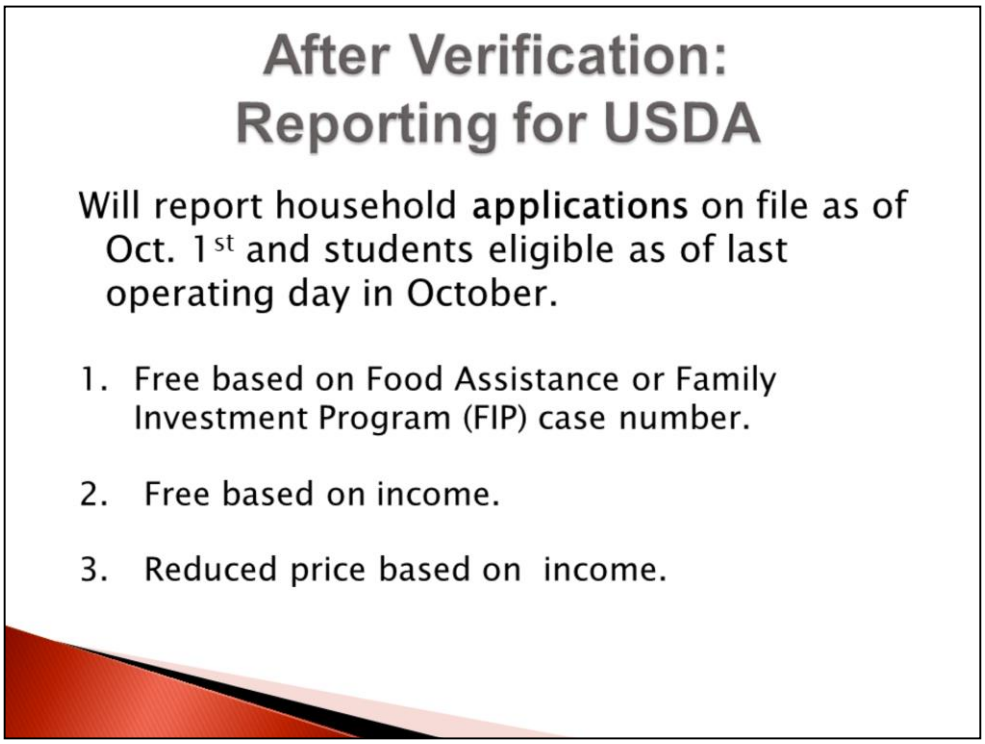


On the Verification Report you will report students eligible as of the last operating day in October for:

1. Students directly certified based on **Food Assistance (SNAP at Federal level)**– **Don't include** students approved via DHS letter with students who are directly certified.

2. Students directly certified though other programs: FIP/Homeless/Migrant/Runaway/Foster children on the Direct Certification list and Head Start-Even Start children.

3. Students certified categorically Free eligible through Food Assistance (DHS) letter method.



You will also report the number of household **applications** on file as of Oct. 1st and students eligible via an application as of last operating day in October for:

1. Free based on Food Assistance or Family Investment Program (FIP) case number written on an application.

2. Free based on income.

3. Reduced price based on income.

For Additional Assistance

- Bureau of Nutrition Programs
  - Main telephone number: 515-281-5356
- Consultant
  - Deb Linderblood: 515-281-5663
  - deb.linderblood@iowa.gov
- Administrative Consultant
  - Patti Harding: 515-281-4754
  - patti.harding@iowa.gov

If you have questions you may contact me or your area consultant.

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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;

(2) Fax: (202) 690-7442; or

(3) Email: program.intake@usda.gov.
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Questions?

Thanks For ALL You Do!!