

USDA Administrative Review: Verification

Off-Site Questions

200.	<p>Obtain a copy of the SFA's most recently submitted FNS-742 (Verification Collection Report)</p> <p>Did the SFA choose the correct verification sample size?</p> <p>Did the SFA verify the correct number of applications based on their verification sample size?</p> <p>Was the most recent report timely and accurate?</p> <p>If no, is this a recurring problem?</p> <p>Tips: The verification collection report must be submitted on time without errors by February 1st. The report must show an accurate picture of applications as of October 1, student count as of October 31 and the correct number of verified applications.</p> <p>*Verification is not required at CEP schools or schools in a Provision 2 non-base year.*</p> <p>Resources:</p> <p>Verification Collection Report Training: https://www.cde.state.co.us/nutrition/incomeverificationwebinareseptotm</p>
201.	<p>Who serves as the SFA's verifying official? (Name and/or position title):</p> <p>Tips: The verifying official must have some knowledge of the certification and benefit issuance process. They are responsible for conducting verification and reviewing submitted income documentation. This person can be the same as the determining official, but cannot be the same as the hearing official.</p>
202.	<p>Who serves as the confirming official? (Name and/or position title or software used is acceptable):</p> <p>Tips: Applications selected for verification must have the initial determination reviewed by a staff member whom did not make the initial eligibility determination. The confirming official must ensure the initial eligibility was determined correctly prior to proceeding any verification activities.</p>
203.	<p>Describe the SFA's verification process (including SFA's verification for cause process).</p> <p>Tips: Describe the SFA's annual verification process in detail. For example:</p> <p><i>All the applications are gathered and counted. The 3% sample size is determined. The error-prone applications are used first for the verification sample size. Then, the remainder of the applications are randomly chosen until the sample size is fulfilled. A confirmation review is done on all the verification applications. Then verification notification packets are sent to selected households. If there is no response by the deadline date a follow-up call is made. The information submitted by the chosen families is reviewed and the verification results is sent to the households. The Verification Collection Report is submitted to School Nutrition.</i></p> <p>Resources:</p>

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	<p>Eligibility Manual: https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf.</p> <p>School meal eligibility webpage: https://www.cde.state.co.us/nutrition/determine-program-eligibility</p>
204.	<p>Does the SFA use an electronic system to identify error-prone applications? If yes, explain in the comments what software the SFA uses?</p> <p>Tips: Work with the system vendor for accuracy of identifying error-prone applications.</p> <p>Resources:</p> <p>Error-prone chart: https://www.cde.state.co.us/nutrition/verificationerrorpronechart</p>

On-Site Questions

207.	<p>Do the verified applications on file match the number reported on the most recent FNS-742 as reviewed in Question 200 of the <i>Off-site Assessment Tool</i>?</p> <p>Tips: The number of applications the SFA has on-site must match what is reported in the FNS-742 (VCR).</p>
208.	<p>When a confirmation review was conducted,</p> <ol style="list-style-type: none"> Is documentation demonstrating that a confirmation review took place on file at the SFA? Did the SFA follow the required procedures if the confirmation review did not validate the original determination? <p>Tips: Documentation of the confirmation review, or confirmation review waiver, must be maintained. Best practice is to document this on the verification tracker.</p>
209.	<p>Based on the review of verified applications:</p> <ol style="list-style-type: none"> Were the applications subject to verification properly selected in accordance with the sample size option used (e.g., error prone)? If the SFA chose to replace applications selected for verification, was it done correctly and limited to 5% of the applications selected? Were all applications selected for review verified correctly? <p>If NO to a, b, or c, explain.</p> <p>Tips: There are three different sample size options. Most SFA's use the standard 3% sample size selected from error-prone applications. Alternate sample size 1 and 2 are only for qualifying SFA's. School Nutrition notifies those SFAs that qualify and an assurance is required to use an alternate sample size.</p>

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	<p>The SFA may, on a case-by-case basis, replace up to 5% of applications selected. Applications may be replaced when the SFA believes that the household would not be able to respond. Any application chosen to be replaced must be replaced with a similar type of application. For example, an error-prone application must be replaced with an error-prone application. The newly selected application must then have a confirmation review.</p> <p>All documentation must be viable and correct. SFA must document all steps of verification and send notification to families once verification is complete. Verification must be completed by November 15th.</p>
210.	<p>a. Did the SFA attempt to directly verify selected applications?</p> <p>b. If YES, were the requirements met?</p> <p>Tips: Direct verification involves using records from public agencies to verify household income or household participation in an eligible program, helping relieve families of additional paperwork and reducing the gap in meal benefits for eligible children resulting from non-response. Any SFA that intends to conduct direct verification must contact the State agency for assistance with establishing a direct verification method.</p>
211.	<p>Does the SFA's verification notification letter include all required information?</p> <p>Tips: The verification notification letter must include the following:</p> <ul style="list-style-type: none"> • That the household was selected for verification; • A modified Use of Information Statement as follows: <i>The Richard B. Russell National School Lunch Act requires the information requested in order to verify your children's eligibility for free or reduced price meals. If you do not provide the information or provide incomplete information, your children may no longer receive free or reduced price meals;</i> • The full USDA non-discrimination statement • 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 supplemental security income, 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 for 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 as specified by the SFA and that failure to do so will result in termination of benefits; • 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; • Name of an SFA official who can answer questions and provide assistance; and • A telephone number the household can call at no-cost for assistance. <ul style="list-style-type: none"> ○ The SFA may establish a toll-free number or allow the household to reverse the charges if any household in that LEA are outside the local calling area.

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	<ul style="list-style-type: none"> ○ The SFA may also provide different telephone numbers for each local calling area within the SFA <p>Resources:</p> <p>Eligibility Manual: https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf.</p> <p>School Nutrition verification notification template: https://www.cde.state.co.us/nutrition/verificationnotificationselectionverification</p>
212.	<p>Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?</p> <p>Tips: The SFA 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 (postal mail or email) or by telephone and the SFA must document that a contact was attempted.</p>
213.	<p>If applicable, did the SFA’s notice of adverse action contain all required information, including notification of appeal rights?</p> <p>Tips: All households in which benefits are to be reduced or terminated must be given 10 calendar days’ written advance notice of the change. The first day of the advance notice period is the day the notice is sent. The notice of adverse action may be sent via the postal service or to the e-mail address of the parent or guardian. The SFA cannot notify the household of adverse action by phone.</p> <p>The notice must advise the household of the following:</p> <ul style="list-style-type: none"> • Change in benefits; • Reasons for the change; • An appeal must be filed within the 10 calendar days advance notice period to ensure continued benefits while awaiting a hearing and decision; • Instructions on how to appeal; • The household may reapply for benefits at any time during the school year; <p>Resources:</p> <p>School Nutrition verification results letter: https://www.cde.state.co.us/nutrition/verificationletterofverificationresults</p>
214.	<p>If a student’s eligibility changed due to verification,</p> <ol style="list-style-type: none"> a. Did the SFA make updates to the eligibility status to benefit issuance list? b. Were benefits increased no later than 3 calendar days and decreased no later than 10 calendar days from the final decision? <p>Tips: If verification results in a change of status this must be changed in the benefit issuance system and the point of sale system. Within the point of sale system, eligibility must be updated</p>

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	no later than 3 operating days for an increase in benefits and no earlier than 10 operating days for a decrease in status.
215.	<p>a. Did the SFA complete verification by November 15?</p> <p>b. If not, did the SFA get SA approval for an extension until December 15?</p> <p>Tips: Verification is required to be completed by November 15th. Verification is considered complete when:</p> <ul style="list-style-type: none">• 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 the student(s) 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 household is directly certified.• 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.

Resources:

Eligibility Manual: https://fns-prod.azureedge.us/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf

School meal eligibility webpage: <https://www.cde.state.co.us/nutrition/determine-program-eligibility>